

No	Group Company	Issues	Buying Relationship	Presence in SD Guthrie International's Global Supply Chain	Summary of Actions and Findings	Reported By	Case Status
1	AA Sawit / Jernih Kemboja	Alleged clearance of potential HCS forest	Indirect via third party traders	SDGI Pasir Gudang	<p>Mighty Earth (ME) has reported a total of ~25 ha of HCS forest clearance in the PTD 1815 concession. ME has also reported that between January 2020 and December 2021, there was a total of 636 ha of forest loss in the PTD 4882, PTD 4085, PTD 4963, PTD 4118, PTD 4177 and PTD 4121 concessions (only within the areas covered by the EIA). The Project Proponent is AA Sawit Sdn Bhd, whose shareholder also owns 100% of Jernih Kemboja (palm oil mill).</p> <p>Jernih Kemboja POM was in our supply chain indirectly (mainly CPKO purchases) via third-party traders with relevant NDPE policies and commitments. Upon investigation, several of our third-party traders stopped purchases from Jernih Kemboja POM. Consequently, supplies from Jernih Kemboja POM have not entered our supply chain since March 2023.</p>	Mighty Rapid Response Report 38 (February 2022) Mighty Rapid Response Report 40 (July 2022)	Resolved

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2	Agropalma	Allegations of poor working conditions and conflicts with local communities.	Indirect via third party traders	SDGI Liverpool SDGI Zwijndrecht	<p>The Chain: Agropalma Faces Possible Legal, Reputational Risks from Health and Safety Violations, Conflict with Local Communities</p> <p>Agropalma is in our supply chain indirectly via third-party traders with relevant NDPE commitments.</p> <p>Our third-party trader has engaged with Agropalma, who has clarified some points mentioned in the article published by Chain Reaction Research, on March 22, which addressed a decision against the company, in a labor lawsuit, and the recent occupation of land by Agropalma, on the banks of the Acará River, in Pará.</p> <p>On the first point, the aforementioned public civil action filed in 2019, Agropalma responded that this was based on facts that do not match the reality experienced by their employees and ended up resulting in conviction. They added that the decision is not final, and an appeal will be filed and will be presented by the company, as it understands that it has been complying with the determinations of labor legislation and providing adequate conditions for the execution of the work, which is confirmed by several decisions of the same Court, reiterating the dismissal of</p>	The Chain: Agropalma Faces Possible Legal, Reputational Risks from Health and Safety Violations, Conflict with Local Communities Global Witness - Brazil's biggest palm oil producers Agropalma and Brasil Biofuels accused of serious human rights violations against communities	No Longer in Supply Chain

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					<p>compensation claims for inadequate working conditions, filed in individual claims.</p> <p>As for the recent occupation of land, Agropalma emphasizes that the relationship with communities is at the heart of their sustainability strategy. They are pioneers in the palm family farming program, through which they have established partnerships with 240 family farmers and integrated producers. Agropalma reiterates that it has always had a very respectful relationship and has never removed any community from its lands or made threats to any community or neighbors living in the vicinity of its farms.</p> <p>Agropalma has been present in Pará since 1982 and added that all of their lands were acquired in good faith from their legitimate owners and possessors, including with the confirmation of documentation by the competent bodies at the time of acquisition. Unfortunately, decades after the purchase, notary flaws were found that compromised the legitimacy of the land documentation of some properties. As soon as Agropalma became aware of the problem, they contacted the competent bodies and asked for the</p>	<p>in the Pará region</p> <p>https://www.rescue.org/updates/11281/brazil-rspo-certification-suspended-for-agropalma-oil-palm-plantations</p>	

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					<p>cancellation of registrations, in addition to starting the process of land regularization, as determined by law.</p> <p>Unfortunately, on February 6th, a group of people entered a non-servitude area and declared that they were establishing housing in the place claiming ownership of the land. Agropalma took measures to prevent further invasions, at the same time as it sought its repossession through judicial channels but emphasized that it never used or allowed attitudes that implied physical violence against any person.</p> <p>The agreements established at the conciliation hearing, held on February 17, for the repossession of land, are being strictly complied with by Agropalma. The company has always believed in the institutional and peaceful resolution of conflicts and will continue to choose this path.</p> <p>Suspension of RSPO Certification We have continued our engagement with our third-party trader regarding the recent land grabbing allegations and RSPO suspension. Our third-party trader has shared that in February 2023, Agropalma's RSPO certification was</p>		

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					<p>temporarily suspended due to unresolved land rights issues. Agropalma has shared with our third-party trader that they are appealing the suspension. Our trader is currently working with a third party to carry out an external assessment to investigate the alleged land rights issues.</p> <p>In the meantime, our third-party trader continues to engage Agropalma to close the gaps in their agreed action plan. A key part of the engagement happens through our trader's Aggregator Refinery Transformation (ART) Program that is deployed in Brazil together with the Earthworm Foundation.</p> <p>Agropalma is no longer in our supply chain since December 2022.</p>		
3	Agropecuaria Santa Maria S.A.	Alleged links to deforestation and human rights violations in Colombia	Indirect via third party traders	SDGI Zwijndrecht SDGI Langat	Agropecuaria Santa Maria, Daabon Group, and Poligrow Colombia S.A.S are in our supply chain indirectly via spot market purchases through several third-party traders with relevant NDPE policies and commitments. It is worth noting that mills entering our supply chain via the spot market often only appear a handful of times during the year (usually as one mill in a long list of mills associated with a delivery). Unfortunately, there is very little leverage on these mills and little that we	Uncovering the Supply Chain: Palm Oil from Colombia to the EU (by Aidenvironment & IUCN NL)	Resolved

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					<p>can do to ensure that these mills do not appear in future spot market purchases.</p> <p>We have reviewed the allegations made against these companies. As highlighted in the report, the land clearings detected are either in the vicinity or within a 50-km radius around the respective mills. As RSPO-certified companies, they undergo annual sustainability certification audits by third-party auditors. Our desktop review of their latest RSPO reports (dated between September 2022 and February 2023) did not find any non-compliances on the issues highlighted.</p>		
4	Agro Sarimas Group	Reports of deforestation in PT Agro Sarimas	Indirect via third party traders	SDGI Langat	<p>Agro Sarimas Group came into our supply chain via a third-party trader with relevant NDPE policies and programmes.</p> <p>Upon investigation, our third-party trader confirmed that the land clearing was not conducted by PT Agro Sarimas as it happened outside their concession boundary. This has been verified against their concession maps.</p>	Mighty Rapid Response Report 22 (December 2019)	Resolved

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5	Amanah Saham Pahang (ASPA)	<p>Reports of deforestation in the following operations:</p> <ul style="list-style-type: none"> - Mentiga Corporation Bhd (area A) - Mentiga Corporation Bhd (area B) - Berabong estate 	Indirect via third party supplier	<p>SDGI Biodiesel</p> <p>SDGI Pasir Gudang</p>	<p>Amanah Saham Pahang (ASPA) enters our supply chain via a third party mill that sources FFB from ASPA. Our third-party supplier is engaging with ASPA, who have agreed to adopt an NDPE policy and have issued a moratorium on new clearing. ASPA have published an NDPE Policy, dated May 2020, on their website.</p>	Mighty Earth - Rapid Response Report 30 (August 2020)	Resolved
6	Anglo-Eastern Plantations	<p>Reports of deforestation and land conflicts in the following operations:</p> <ul style="list-style-type: none"> - PT Kahayan Agro Plantation (PT KAP) 	Indirect via third party traders	<p>SDGI Langat</p> <p>SDGI Zwijndrecht</p>	<p>PT Kahayan Agro Plantation (PT KAP) is not specifically in our supply chain, although other affiliated Anglo Eastern Plantation mills are. PT KAP came into our supply chain via third party traders with relevant NDPE policies and programmes.</p> <p>A review of PT KAP's HCV report has been conducted and they have also agreed to a moratorium on land clearing. HCS assessment has been commissioned for PT KAP and the report is being peer reviewed.</p>	<p>Mighty Earth - Rapid Response Report 1 (Nov 2017)</p> <p>Greenpeace - Deforestation Case Studies (Dec 2017)</p> <p>Mighty Earth - Rapid</p>	Resolved

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		Suspected of sourcing non-compliant material from PT Guntur Madu Agrotama (PT GMA)			<p>Confirmation was also received that PT KAP is not sourcing from PT Guntur Madu Agrotama (PT GMA). AEP have officially published their NDPE policy, dated June 2019, on their website.</p> <p>The HCSA peer review was completed in December 2019 but was disputed by Mighty Earth. PT KAP has agreed to continue the moratorium on new developments until the dispute is resolved.</p> <p>PT KAP has completed a ground-truthed review of the area under dispute, which was suggested by the HCSA Secretariat as a pathway to resolve the issue. The HCSA team are planning to visit the disputed site, however, have been unable to make the visit due to the covid-19 pandemic. The objective of the visit is to engage with local communities who are expecting the disputed area to be developed into smallholder plasma plantations. Local community consent will be key to the successful conservation of the disputed area.</p> <p>- HCSA peer review report is now available here: http://highcarbonstock.org/wp-content/uploads/2019/12/HCSA-Peer-Review-Report-PT-KAP-Final-Response-271119.pdf</p>	<p>Response Report 14 (Apr 2019) Mighty Earth - Rapid Response Report 15 (May 2019) Mighty Earth - Rapid Response Report 24 Jan 2020) Mighty Earth - Rapid Response Report 25 (Mar 2020)</p>	

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7	Asian Agri	Potential deforestation detected in: - PT Usaha Sawit Unggul	Indirect via third party traders	SDGI South Africa	PT Usaha Sawit Unggul is not specifically in our supply chain but affiliated Asian Agri mills are. Asian Agri came into our supply chain via third party traders with relevant NDPE policies. Third-party traders have investigated the deforestation report by Mighty Earth and confirmed that the clearing detected is not in the PT Usaha Sawit Unggul concession. This has been verified against their concession maps.	Mighty Earth - Rapid Response Report 17 (July 2019)	Resolved
8	Astra International Tbk / Astra Agro Lestari	Reports of deforestation at PT Agincourt Resources Tbk (Astra Group's gold mining company) Various allegations of	Direct purchases and indirect via third party traders	PT Guthrie International Pulau Laut SDGI Langat SDGI Zwijndrecht	Astra Agro Lestari (Astra Group's palm oil division) is in our supply chain indirectly via third party traders with relevant NDPE policies and commitments. This allegation is related to the gold mining industry and a commodity that we do not source. This is therefore not relevant to SD Guthrie Internationals' supply chain. We are however open to discussions with stakeholders on how best to collaborate on deforestation events in the landscapes that we are connected to.	Mighty Earth - Rapid Response Report 33 (May 2021) Mighty Earth - Rapid Response Report 34 (June 2021) Mighty Earth - Rapid	Ongoing Monitoring & Engagement

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		land grabbing, governance risks, and environmental impacts at PT Agro Nusa Abadi (PT ANA), PT Lestari Tana Teladan (PT LTT), and PT Mamuang			<p>As further land clearing continues being detected in this concession, we are engaging with Astra Agro Lestari to discuss how best to address the issue, given the lack of leverage we have due to the cross commodity nature of the case.</p> <p>WALHI & FoE Report and Open Letter dated September 2022</p> <p>AAL is currently a direct supplier to SDGI Rantau in Indonesia, however, we are not sourcing from AAL Sulawesi – we are only sourcing from AAL Kalimantan. None of the implicated concessions highlighted in the report are in our supply from AAL.</p> <p>Upon receiving the allegations, we immediately reached out to AAL for further investigation. AAL has been very open to engagement, and we are currently in the initial stages of discussion. Our current engagement is focusing on obtaining further documentation from AAL to verify their responses to the allegations.</p> <p>We are currently reviewing AAL’s response to the allegations, as well as their commitment and plans to engage an independent third-party to verify the</p>	<p>Response Report 36 (October 2021)</p> <p>WALHI & FoE Report and Open Letter from Civil Society Organizations dated September 2022</p>	

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					<p>allegations and the steps they have taken to address them.</p> <p><u>Appointment of EcoNusantara as an Independent Third Party</u> On 31st March 2023, AAL appointed EcoNusantara (ENS) as an independent third-party to review the allegations. The assessment is scheduled to start in April 2023 and is planned to be completed in six months.</p> <p><u>Progress Update (9th June 2023)</u> ENS began the on-the-ground process in Sulawesi on 22nd May 2023 with two days of fact-finding in Palu. WALHI has rejected the notion of further investigation into this issue. While AAL respects WALHI's position, ENS had planned to communicate with WALHI at a pre-arranged kick off meeting on 25th May 2023 for consultation. However, Walhi was later unable to join this meeting.</p> <p>Nevertheless, field visits have been planned to commence on 26th May 2023 to affected communities within the sites of PT Lestari Tani Teladan, PT Agro Nusa Abadi, and PT Mamuang, followed by needs assessments in Toviora village.</p>		

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					<p><u>Progress Update (23rd June 2023)</u> The second phase of on-the-ground interviews across all three plantations began on 20th June 2023. These take a twin track approach - for those where data has been logged and where individuals have come forward, the purpose will be to confirm these findings from phase one with the communities themselves and the local government.</p> <p>The second approach is to attempt to engage again with the individuals and communities who have yet been interviewed in phase one.</p> <p><u>Progress Update (27th October 2023)</u> ENS's independent verification report has been finalized and will be shared with key shareholders by end of October 2023.</p> <p><u>Publication of ENS Report (November 2023)</u> AAL published the full independent verification report by ENS on their website.</p> <p><u>Publication of Stakeholders' Responses to ENS Report</u></p>		

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					<p>ENS received detailed responses from key stakeholders on their verification report. ENS, together with AAL, published their comments on the headline issues raised to continue the process of complete transparency.</p> <p><u>Progress Update (4th April 2024)</u> AAL announced that they will soon be establishing an action plan to follow up on the ENS verification report. Currently, the Action Plan is in the review stage by the Robertsbridge team to ensure all recommendations made by ENS have been addressed.</p> <p><u>Norway's Council of Ethics' (CofE's) Removal of AAL from Watchlist</u> Norway's CofE has recommended to cease the observation on AAL on the basis that there is no longer an unacceptable risk of serious environmental damage relating to the development and operation of oil palm plantations.</p>		

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9	Bakrie Group	Reports of deforestation in the following operations: - PT Menthobi Mitra Lestari	Indirect via third party traders	SDGI Langat SDGI Zwijndrecht	<p>PT Menthobi Mitra Lestari is not specifically in our supply chain, although other affiliated Bakrie Group operations are. Bakrie Group came into our supply chain via third party traders with relevant NDPE policies.</p> <p>Upon investigation of the deforestation report by Mighty Earth, it was verified that the clearing detected was not located in PT Menthobi Mitra Lestari's concession.</p> <p>PT Bakrie Sumatera Plantations Tbk has now issued a public statement to the effect that 'PT Menthobi Mitra Lestari is no longer a part of PT Bakrie Sumatera Plantations Tbk or Bakrie Group since 2017. Therefore, the case is now resolved as confirmed with Mighty Earth.</p> <p>https://www.bakriesumatera.com/files/Pernyataan Perusahaan BSP 31012020.pdf</p>	Mighty Earth - Rapid Response Report 16 (June 2019)	Resolved

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10	Borneo Pacific Group	<p>Reports of deforestation in the following operations:</p> <ul style="list-style-type: none"> - PT Arjuna Utama Sawit 	Indirect via third party traders	SDGI Zwijndrecht	<p>Supply from Borneo Pacific Group came through a 3rdparty trader with NDPE commitments and an active supplier management programme. We have started engagements to investigate the allegations, however, were informed that our third-party trader is no longer sourcing from them.</p> <p>PT Arjuna Utama Sawit (PT AUS) has followed a re-entry engagement program led by one of our third-party traders in 2020. Summary of progress during engagement process include the following:</p> <ul style="list-style-type: none"> - PT AUS has a SWO in place, issued on 25 May 2020. - PT AUS has updated their Sustainability Policy, incorporated with NDPE elements. - PT AUS is in the process of implementing integrated HCV-HCS assessment. Future new development will be based on the results and recommendation of the assessment. - PT AUS has committed to do remediation for past non-compliance peat development, which area will be based on the HCV-HCS assessment result and recommendations. 	Mighty Earth - Rapid Response Report 23 (January 2020)	Ongoing Monitoring & Engagement

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					<p>Based on the evidence submitted for PT AUS commitment and progress relevant with re-entry criteria, several third-party traders have decided to repurchase from PT AUS. However, PT AUS has not entered SDGI's supply chain to date.</p> <p>We will continue to monitor PT AUS's progress.</p>		
11	Bumi Gading Prima	<p>Reports of deforestation in the following operations:</p> <ul style="list-style-type: none"> - PT Bumi Agro 	Indirect via third party traders	SDGI South Africa	<p>PT Bumi Agro is not specifically in our supply chain, but other affiliated mills are. Bumi Gading Prima came into our supply chain via a third-party trader with relevant NDPE commitments.</p> <p>We have initiated engagement with our third-party trader to investigate this allegation.</p> <p>Bumi Gading Prima is no longer in our supply chain since January 2021.</p>	Mighty Earth - Rapid Response Report 33 (May 2021)	No Longer in Supply Chain

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12	Bumitama / Lim Hariyanto Family	<p>Reports of deforestation , peat clearance and fires, in the following operations:</p> <ul style="list-style-type: none"> - PT Andalan Sukses Makmur (PT ASMR) - PT Bumitama Gunajaya Abadi (PT BGA) - PT Damai Agro Sejahtera (PT DAS) 	Indirect via third party traders	<p>SDGI Zwijndrecht</p> <p>SDGI Langat</p>	<p>PT Bumitama Gunajaya Abadi supply came through a third-party trader. Third party traders and Bumitama have relevant NDPE policies. Bumitama is also reporting regularly on progress of issues raised:</p> <ul style="list-style-type: none"> - PT ASMR issues have been closed - PT BGA issues are closely monitored via RSPO complaints facility - PT DAS clarification available at: http://www.bumitama-agri.com/asset/upload/storage/report/News%20elea%20se%20-%20PT%20DAS%20clarification.pdf <p>Further direct engagement with Bumitama confirmed that the areas located under the concession of PT Damai Agro Sejahtera (DAS) were not cleared but impacted by forest fires during the peak of the dry season in September 2019. While the change in vegetation colour from the satellite imagery may seem as a result of land-clearing, the ground-truthing check identified varied extent of damage, from apparently un-impacted to scorched and burned vegetation.</p> <p>Bumitama’s response regarding land clearing in PT Andalan Sukses Makmur (as reported in Mighty</p>	<p>Friends of the Earth - Up in Smoke Report (December 2015)</p> <p>Forest Hints - Article (April 2017)</p> <p>Mighty Earth Rapid Response Report #22 (December 2019)</p>	Resolved

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					<p>Earth Rapid Response Report No. 23) is that ground checking in PT ASMR and hotspot reports revealed that this is not a result of land clearing, but a fire scar from forest fires that occurred in the area in September 2019.</p> <p>These areas are owned by the local community and thus enclaved from the management of the company. They were set-aside for conservation based on the rapid HCS assessment and peat delineation study conducted in April 2014 (refer to Bumitama's 12 September 2014 Announcement: https://ir.bumitama-agri.com/static-files/5ce66171-9006-449f-9189-%20b206eca3e0c7) (January 15, 2020).</p>		
13	Bunga	Value Greenworld Sdn Bhd	Indirect via third party traders	SDGI Pasir Gudang SDGI Langat	<p>Value Greenworld Sdn Bhd is not specifically in our supply chain. However, other mills owned by the parent company, Bunga Realty Sdn Bhd, are indirectly in our supply chain via third-party traders with relevant NDPE policies and commitments.</p> <p>Our third-party trader immediately initiated engagement with Bunga Group when allegations of deforestation at Value Greenworld was brought</p>	Mighty Earth Rapid Response Report 32 (Jan 2021)	Resolved

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					<p>to their attention in January 2021. They were informed by Bunga Group that they acquired Value Greenworld in late 2016, where the purchase agreement categorised the land as 'shrubs' and suitable for immediate planting. Due to this, Bunga Group proceeded with land clearing without conducting any HCV-HCS assessments.</p> <p>An immediate moratorium was imposed by Bunga Group on the Value Greenworld concession and all other plantations under Bunga Group in December 2020 when the non-compliance to NDPE was first brought to their attention. Since then, Bunga Group has released their Sustainable Palm Oil Policy in January 2021.</p> <p>Based on the concession maps shared by Bunga Group, our third-party trader confirmed that the deforestation has indeed happened inside their concession area. As there was no HCS/HCV assessment conducted prior to land clearing, our third-party trader deemed this land clearing as non-compliant to their NDPE policy. Our third-party trader stopped purchases from this supplier in March 2021</p> <p>As of July 2021, Bunga Group has met all the</p>		

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					<p>requirements stipulated in our third-party trader's re- entry criteria. This includes their commitment to the development of a Recovery Plan for Non-Compliant Land Clearing to the NDPE policy at group level, for activity that has taken place from January 2016 onwards. Based on the detailed review of documentation, reports and a letter of commitment from Bunga Group, our third-party trader lifted the suspension of Bunga Group in July 2021.</p> <p>Bunga Group is no longer in our supply chain since January 2022.</p>		
14	Central Cipta Murdaya / Hardaya Plantations Group	<p>Reports of deforestation in the following operations:</p> <ul style="list-style-type: none"> - PT Hardaya Inti Plantations - PT Sebuku Inti Plantation 	Direct purchases	PT Guthrie International Pulau Laut	<p>PT Hardaya Inti Plantations</p> <p>The Hardaya Plantations Group came into our supply chain via third party traders with relevant NDPE policies.</p> <p>Hardaya Plantations has issued a moratorium on land clearing and are investigating assessments required for further development. They are also seeking support to strengthen capacity to manage NDPE requirements. The company is being monitored on a monthly basis by traders to ensure that they respect the moratorium on land clearing</p>	<p>Greenpeace - Deforestation Case Studies (December 2017)</p> <p>Mighty Earth Rapid Response Report 41 (February 2023)</p>	No Longer in Supply Chain

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					<p>until NDPE requirements can be addressed.</p> <p>PT Hardaya Inti Plantations entered our supply chain via a spot purchase in the 1st quarter 2018.</p> <p>PT Sebuku Inti Plantation Cipta Cakra Murdaya is a direct supplier to PT Guthrie International Pulau Laut.</p> <p>Satellite imagery shows that between December 2021 and November 2022, there was a total of ~32 ha of forest loss/clearance preparation in the PT Sebuku Inti Plantation concession.</p> <p>We have reached out to CCM to investigate this allegation. CCM has stopped land clearing as of 2 February 2023, upon receiving queries from buyers on the allegation.</p> <p>CCM is no longer in our supply chain since December 2022.</p>		

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15	Daabon Group	Alleged links to deforestation and human rights violations in Colombia	Indirect via third party traders	SDGI Zwijndrecht SDGI Liverpool	<p>Agropecuaria Santa Maria, Daabon Group, and Poligrow Colombia S.A.S are in our supply chain indirectly via spot market purchases through several third-party traders with relevant NDPE policies and commitments. It is worth noting that mills entering our supply chain via the spot market often only appear a handful of times during the year (usually as one mill in a long list of mills associated with a delivery). Unfortunately, there is very little leverage on these mills and little that we can do to ensure that these mills do not appear in future spot market purchases.</p> <p>We have reviewed the allegations made against these companies. As highlighted in the report, the land clearings detected are either in the vicinity or within a 50-km radius around the respective mills. As RSPO-certified companies, they undergo annual sustainability certification audits by third-party auditors. Our desktop review of their latest RSPO reports (dated between September 2022 and February 2023) did not find any non-compliances on the issues highlighted.</p> <p>Daabon is no longer in our supply chain since December 2022.</p>	Uncovering the Supply Chain: Palm Oil from Colombia to the EU (by Aidenvironment & IUCN NL)	Resolved

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16	Dhanista Surya Nusantara	<p>Reports of deforestation in the following operations:</p> <ul style="list-style-type: none"> - PT Sabhantara Rawi Sentosa 	Indirect via third party traders	SDGI Zwijndrecht	<p>PT Sabhantara Rawi Sentosa is not specifically in our supply chain, but other affiliated mills are. Dhanista Surya Nusantara came into our supply chain via third party traders with relevant NDPE policies.</p> <p>The third-party trader who engaged with Dhanista Surya Nusantara advised that the reported land clearing was not conducted by the company, as it happened outside their concession boundary. This has been verified against their concession maps.</p>	Mighty Earth - Rapid Response Report 21 (November 2019)	Resolved
17	Dharma Satya Nusantara (DSN)	<p>Reports of deforestation in the following operations:</p> <ul style="list-style-type: none"> - PT Putra Utama Lestari (area 1) and (area 2) - PT Kencana Alam Permai 	Indirect via third party traders	SDGI Langat	<p>PT Putra Utama Lestari</p> <p>PT Putra Utama Lestari is not specifically in our supply chain, however other mills affiliated to its parent company are. Supplies from Dharma Satya Nusantara are predominantly via a third-party trader who have NDPE policies and commitments. We have started engagements to investigate the allegations.</p> <p>The third-party trader who engaged with Dharma Satya Nusantara advised that the reported land clearing was not conducted by the company, it happened outside their concession boundary. This has been verified against their concession</p>	<p>Mighty Earth Rapid Response Report #20 (Oct 2019)</p> <p>Mighty Earth Rapid Response Report #37 (Dec 2021)</p>	Resolved

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					<p>maps.</p> <p>PT Kencana Alam Permai Satellite imagery shows that between May and Sept 2021 a total of 8.5 hectares of forest (HCS) was cleared in the PT Kencana Alam Permai concession.</p> <p>PT Kencana Alam Permai is not specifically in our supply chain, but other affiliated mills are indirectly in our supply chain via third-party traders with relevant NDPE policies & commitments. We have engaged with our third-party trader who have investigated this allegation and confirmed the following:</p> <p>DSN has confirmed that they have not carried out new land development since 2015. NDPE commitments have also been officially issued since March 2020 (DSN is a member of RSPO).</p> <p>DSN has confirmed that the land clearance at PT KAP was carried out by the local community for farming/paddy fields in the area that is not yet under PT KAP's control. While the said area is technically inside PT KAP's HGU, the community is still unwilling to sell the land to PT KAP as they</p>		

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					<p>need it for their daily livelihood.</p> <p>PT KAP's field investigation has verified that the clearing activities were conducted by five individuals in Desa Sungai Buluh. See photos and verification report here.</p> <p>PT KAP's team has also carried out a joint verification visit at the location with the head of the village (Desa Sungai Buluh) – as an independent observer – and it has been confirmed that the land clearance was conducted by the said five individuals (local community) as identified by PT KAP. See here.</p> <p>DSN understands that this land clearing by the community is aimed at fulfilling their daily needs/ livelihood. Therefore, DSN will continue engaging the community to seek a mutually-agreed resolution.</p>		
18	Double Dynasty Group	Reports of deforestation and land conflict in the	Indirect via third party traders	SDGI Zwijndrecht SDGI South Africa	Radiant Lagoon Sdn Bhd and Mutiara Pelita Genaan Plantation Sdn Bhd are not specifically in our supply chain, although a mill affiliated to the Double Dynasty Group is.	Mighty Earth - Rapid Response Report 13	Resolved

No	Group Company	Issues	Buying Relationship	Presence in SD Guthrie International's Global Supply Chain	Summary of Actions and Findings	Reported By	Case Status
		<p>following operations:</p> <ul style="list-style-type: none"> - Radiant Lagoon Sdn Bhd - Mutiara Pelita Genaan Plantation Sdn Bhd - DDB Bawan Plantation Sdn Bhd (Peat development and land conflict) 			<p>Status of engagement with Double Dynasty includes:</p> <ul style="list-style-type: none"> - agreement to a stop-work-order for all new developments in their oil palm operations pending the outcome of relevant High Conservation Value and High Carbon Stock Assessments. - commitment to secure the Free, Prior and Informed Consent (FPIC) of local communities before further expansion. - monthly monitoring of Double Dynasty's operations is in place to assess the implementation of these commitments. <p>Progress updates:</p> <ol style="list-style-type: none"> 1. Radiant Lagoon Sdn Bhd (ME Report #13) - DD has confirmed with local regulators on terminating their work in Radiant Lagoon. An environmental consultant has been appointed to carry out work to rehabilitate historical clearing. 2. Mutiara Pelita Genaan Plantation Sdn Bhd (ME Report #15) – DD confirmed that the alleged deforestation is not within Mutiara Pelita Genaan project boundary. 3. DDB Bawan Sdn Bhd (ME Report #21) - DD 	<p>(March 2019) Mighty Earth - Rapid Response Report 15 (May 2019) Mighty Earth - Rapid Response Report 21 (November 2019)</p>	

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					<p>confirmed that they have a stop work order on all land clearing on the sites at DDB Bawan (Block 13 Lot 34 and Lot 35) and have agreed to conduct soil investigation to confirm the site is peat or not peat. The final peat verification report dated September 2020 has been shared with us and confirms that the soil within the concession area is categorized as neither muck nor peat as classified and defined by RSPO Peatlands Working Group 2 (PLWG-2).</p> <p>Double Dynasty received the Final HCV Report for DDB Bawan from their ALS-licensed assessor in April 2021. They have submitted the report to us for further review.</p> <p>Our last direct purchase with DD was in December 2021.</p> <p>In July 2019, DD Group had met all the criteria stipulated in our third-party trader's re-entry criteria, including their commitment to the Development of Recovery Plan for Non-Compliant Land Clearing to NDPE policy at group level incurred from January 2016 onwards. Based on the detailed review of documentation, reports and letter of</p>		

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					<p>commitment from DD Group, our third-party trader had given due consideration of this progress and lifted the suspension of the DD Group in July 2019.</p> <p>In the meantime, our third-party trader continues actively guiding DD Group in the development of the recovery plan and monitoring DD Group's activities monthly through their Supplier Group Compliance Verification program.</p>		
19	Eagle High Plantation	Reports of peat clearing, deforestation in the following operations:	Direct purchases and indirect via third party traders	PT Guthrie International Pulau Laut SDGI Langat	<p>PT Arrtu Energy Resources PT Arrtu Energy Resources is not specifically in our supply chain, however other mills affiliated to Eagle High Plantation are. Supplies from Eagle High Plantation are via a third-party trader who have NDPE policies and commitments.</p> <p>Third-party trader reported that the area in</p>	Mighty Earth - Rapid Response Report 22 (December 2019) Mighty Earth - Rapid	Resolved

No	Group Company	Issues	Buying Relationship	Presence in SD Guthrie International's Global Supply Chain	Summary of Actions and Findings	Reported By	Case Status
		<ul style="list-style-type: none"> - PT Arrtu Energy Resources - PT Tandan Sawit Papua 			<p>question in PT Arrtu Energie Resources (AER) was caused by fire incidents triggered by extreme dry weather conditions in Indonesia. The fire outside PT AER's concession area has spread into their concession and caused the fire in PT AER during the dry period.</p> <p>PT Tandan Sawit Papua Our third party trader has investigated this allegation and confirmed that the land clearing detected was not conducted by PT TSP. Eagle High, their parent company, is a member of RSPO since 2008 and they have also published their NDPE policy since 2018. Their land development are therefore being guided by the RSPO P&C as well as NDPE policy requirements.</p> <p>PT TSP carried out a site visit to investigate the allegation and the report is available here. Based on the outcome of the investigation, it appeared that the land clearing was conducted by villagers in the area without PT TSP's consent. The community members claimed that they were unaware that the area belongs to PT TSP. PT TSP has therefore conducted socialisation and engagement with the local communities and</p>	Response Report 34 (June 2021)	

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					<p>managed to secure their commitment in stopping the illegal land clearance inside PT TSP.</p> <p>PT TSP has also engaged with local authorities, including Arso Timur District Government and Keerom Regency Government on the said issue, where the local authority has agreed to hold further meeting with the community leaders to provide clarity on the PT TSP boundary. In the meantime, PT TSP will put up signboard in the area to notify external parties on the ownership of PT TSP.</p>		
20	Felda Global Ventures (FGV)	<p>Reports of labour issues in their Malaysian operations.</p> <p>Reports of deforestation and peatland clearing in Kalimantan, Indonesia:</p>	Direct purchases and indirect via third party traders	<p>SDGI Bintulu</p> <p>SDGI Pasir Gudang</p> <p>SDGI Langat</p> <p>SDGI Zwijndrecht</p> <p>SDGI Carey Island</p>	<p>We have been engaging with FGV directly. Current updates on their progress on social and labour issues include:</p> <ul style="list-style-type: none"> - FGV adopted a Social Compliance & Human Rights action Plan in August 2017. - FGV is developing plans to address directives from the RSPO Complaints panel. <p>FGV has submitted an appeal against the Roundtable On Sustainable Palm Oil (RSPO) Complaints Panel's decision of 13 January 2020. Link to appeal: https://bit.ly/39LqIV7</p>	<p>Wall Street Journal - Article (July 2015)</p> <p>Greenpeace - Deforestation Case Studies (December 2017)</p> <p>Mighty Earth Rapid Response Report 9</p>	Ongoing Monitoring & Engagement

No	Group Company	Issues	Buying Relationship	Presence in SD Guthrie International's Global Supply Chain	Summary of Actions and Findings	Reported By	Case Status
		<ul style="list-style-type: none"> - PT Temila Agro Abadi - PT Citra Niaga Perkasa 		SDGI Port Klang	<p>Link to press release: https://bit.ly/2woqEgn</p> <p>While we are not supplied by FGV's Indonesian operations, we have been engaging with FGV directly on the cases in Kalimantan, Indonesia. Current updates on their progress on these cases include:</p> <ul style="list-style-type: none"> - FGV have a stop work order in place at PT Temila Agro Abadi, PT Citra Niaga Perkasa and Asian Plantation Limited. - HCS assessments have been commissioned and a peat restoration plan published. <p>FGV is also reporting publicly on progress. Regular updates can be found at: http://www.fgvholdings.com/sustainability/stakeholder-engagement/sustainability-updates/</p> <p>PT Temila Agro Abadi Since April 2017, FGV has stopped all new planting in Kalimantan concession area and as a result this has caused pressure to the local community to develop their land on their own. FGV has lodged a police report dated 21/08/2018 to ensure that the authorities have been made aware of these incidences. Similarly,</p>	(October 2018) Mighty Rapid Response Report #20 (Oct 2019)	

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					<p>they have also confirmed these incidences to the RSPO.</p> <p>PT Citra Niaga Perkasa FGV's internal investigation revealed that the land that was cleared belongs to the local community. The land clearing has been carried out by the landowner since June 2019 for paddy planting. FGV wishes to reiterate that the stop work order for FGV Kalimantan (PT Citra Niaga Perkasa and PT Termila Agro Abadi) remains to be in force since May 2017 and since then FGV Kalimantan has not carried out any land clearing except for maintenance of roads, drains and boundary trenches.</p> <p>Sept 24, 2020 - Associated Press reported on a set of allegations of forced labor and human trafficking on the palm oil plantations of FGV Holdings Berhad (FGV).</p> <p>Sept 30, 2020 – U.S. CBP’s Office of Trade directed the issuance of a Withhold Release Order (WRO) against palm oil and palm oil products made by FGV based on information that reasonably indicates the use of forced labor. The investigation also raised concerns that forced child labor is</p>		

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					<p>potentially being used in FGV’s palm oil production process.</p> <p>Nov 13, 2020 - Nov 2020 FGV Holdings Berhad (FGV) clarified that they are fully committed to respecting human rights and to upholding labour standards in line with their commitment to the Sustainable Development Goals (SDGs) and to the United Nations Guiding Principles on Business and Human Rights (UNGPs).</p> <p>FGV issued a press statement in response to the WRO issued by U.S. CBP https://www.fgvholdings.com/press_release/fgv-responds-to-cbp-issues-detention-order-on-palm-oil-produced-with-forced-labour-in-malaysia-dated-30-september-2020-by-united-states-customs-and-border-protection/?pagen=2</p> <p>FGV have identified an independent auditor and is finalising the appointment.</p> <p>FGV issued a 2nd press statement in response to the WRO issued by U.S. CBP https://www.fgvholdings.com/press_release/fgv-</p>		

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					<p>updates-its-steps-to-address-the-withhold-release- order-wro-issued-by-u-s-customs-and-border- protection-cbp/?pagen=1%5C</p> <p>FGV's press release dated 31 March 2021: FGV Continues to Enhance Labour Practices to Address the Withhold Release Order (WRO) issued by U.S. Customs and Border Protection (CBP): https://www.fgvholdings.com/press_release/fgv-continues-to-enhance-labour-practices-to-address-the-withhold-release-order-wro-issued-by-u-s- customs-and-border-protection-cbp/?pagen=1</p> <p>Updates on FGV's affiliation to the Fair Labor Association (FLA) including FLA's report on the progress of implementation of FGV's action plan on enhancing labour practices (1 April 2021): https://www.fgvholdings.com/wp-content/uploads/2021/04/FLA-Assessment-Report-on- the-Implementation-of-FGV%E2%80%99s-Action-Plan-to-Enhance-Labour.pdf</p> <p>FGV Sustainability Updates (1 July 2021)</p>		

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					<p>https://www.fgvholdings.com/wp-content/uploads/2021/07/FGV-Sustainability-Updates-1-July-2021.pdf</p> <p>FGV Press Release - 30 August 2021 FGV stated that it is in the process of finalizing the appointment of an independent auditing firm to assess its operations against the 11 ILO Indicators. The appointment is expected to be finalized in September 2021. FGV has also recently appointed a US-based legal firm to provide support in this process and in FGV's overall effort to address the WRO.</p> <p>FGV Press Release - 2 September 2021 FGV announced the establishment of its Board Sustainability Committee, whose main role is to assist FGV's Board in fulfilling its oversight responsibilities in relation to FGV Group's sustainability policies, strategies and initiatives. The Committee, which will meet at least four times a year, will also provide the appropriate platform for more focused deliberation on sustainability-related matters such as human rights, labour standards, health and safety, climate action, biodiversity, traceability and supply chain, as well as circular economy, among others.</p>		

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					<p>FGV Press Release - 20 October 2021 FGV has identified an independent auditor to carry out the audit work and is currently working with a US- based legal counsel to finalise the terms and conditions for the appointment. In ensuring that the scope and methodology of the audit meet the requirements and expectations of the CBP, FGV foresees a slight delay in the appointment and expects to formalise the appointment by November 2021.</p> <p>FGV Press Release - 16 November 2021 FGV has appointed ELEVATE as the independent auditing firm to conduct an assessment of FGV’s operations against the 11 International Labour Organization (ILO) Indicators of Forced Labour. The assessment is part of FGV’s efforts towards petitioning for the revocation of the WRO by the CBP. FGV is in discussions with their US-based legal counsel and Elevate on the audit design and plan, which is expected to begin in November 2021.</p> <p>Press Statement - 30 November 2021 https://www.theedgemarkets.com/article/site-</p>		

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					<p>assessments-forced-labour-allegations-begin-1h2022-says-fgv)</p> <p>FGV stated that the site assessments by ELEVATE is expected to commence in the first half of 2022. Based on the timeline set by ELEVATE, it will take about six months to undertake the reviews at some of the operations, and from there on, FGV will need to work on a remediation plan. Once FGV has completed and verified the necessary remediations, the group will submit a petition for the revocation of the Withhold Release Order (WRO) by the US CBP.</p> <p>Press Statement - 14 June 2022 FGV Holdings Berhad (FGV), the Malaysian Trade Union Congress (MTUC) and the International Labour Organization (ILO) Malaysia co-organised a workshop to promote greater awareness and understanding on the issue of forced labour and child labour among FGV’s plantation workers. The awareness session was a joint effort by FGV, MTUC and ILO Malaysia to support the global and national agenda against forced labour and child labour and to contribute to the implementation of Malaysia’s National Action Plan on Forced Labour (2021-2025) and the National Pledge against Child</p>		

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					<p>Labour. The interactive session, which was attended by migrant workers from Bangladesh, India and Indonesia, was conducted in the Bengali, Hindi and Malay languages for better comprehension, and focused on the 11 ILO Indicators of Forced Labour as well as measures to prevent and address child labour.</p> <p>Press Statement - 19 August 2022 FGV announced that based on the recently published Independent External Assessment (IEA) Report by the Fair Labor Association (FLA), no non-compliances are identified based on FLA's forced labour benchmarks and found no evidence of child labour at their operations. The report also recognises that progress has been made by FGV including its top management's commitment, policy alignment with international and national standards, and engagement with civil society organizations, especially at the headquarters level.</p> <p>FLA conducted the IEA between November 2021 and January 2022 and involved a review of both FGV's management systems and field-level operations and it was based on the FLA's Workplace Code of Conduct (WCOC), which is derived from international labour standards and</p>		

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					<p>internationally accepted good labor practices.</p> <p>FGV became a participating company of the FLA in 2019 and commits to implementing a long-term and comprehensive action plan to further strengthen various aspects of FGV's labour practices. This includes code alignment, recruitment process of migrant workers, capacity building and training modules on human rights of migrant workers, grievance mechanism as well a labour standard compliance monitoring system.</p> <p>FGV's affiliation to FLA is subjected to independent assessment, validation and reporting by the FLA. In addition to this IEA report, FLA had also published its first and second validation report in October 2020 and April 2021 respectively. FGV, in consultation with FLA, has developed a comprehensive corrective action plan (CAP) to address and resolve all findings arising from the IEA. Many of the action items have already been implemented and relevant resources are identified to close the remaining gaps.</p> <p>In keeping with the principle of transparency, FLA's IEA report together with FGV's CAP is published on FLA's website.</p>		

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					<p>Press Statement - 30 May 2023 & Media Report - 1 June 2023</p> <p>FGV has paid nearly RM30 million to approximately 20,000 workers on March 15 to compensate recruitment fees for current migrant workers, as part of the 1st phase, with subsequent phases scheduled for June and September 2023.</p> <p>Furthermore, FGV is tracing its former migrant workers who were recruited on or after June 27th, 2019, that have left the company and eligible for reimbursement of the recruitment fees they paid, reflecting its commitment to fair treatment and equitable compensation for all migrant workers to further align with FGV's Sustainability Framework on the respecting human rights' pillar.</p> <p>Upon verification of reimbursement of recruitment fees paid, FGV will submit a report to the US CBP, which will go towards the lifting of the Withhold Release Order by 3Q2023.</p> <p>Press Release (10 Jan 2024)</p> <p>FGV has allocated a total of RM112 million to</p>		

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					<p>reimburse recruitment fees to its migrant workers, including former migrant workers. The reimbursements to workers were made in three tranches that were paid in March, June, and September 2023 respectively. To date, a total of RM72.2 million has been reimbursed to 19,673 workers.</p> <p>LRQA, formerly known as ELEVATE, is expected to conduct its follow-up assessment in Q1 2024 to verify the implementation of FGV's overall remediation plan. With the outcome of the assessment, FGV will prepare a petition to the CBP to modify the WRO, which will be submitted by the end of Q2 2024.</p>		
21	First Borneo	<p>Reports of deforestation in the following operations:</p> <ul style="list-style-type: none"> - PT Khatulistiwa Agro Abadi 	Indirect via third party traders	SDGI Langat	<p>Satellite imagery shows that between January 2022 and June 2022 there was a total of ~600 ha of forest loss /clearance preparation in the PT Khatulistiwa Agro Abadi concession. Between November 2021 and June 2022 there was allegedly a total of ~87 ha of forest loss/clearance preparation in the PT Borneo International Anugerah concession.</p> <p>The Group has a mill named PT Arjuna Utama Sawit (PT AUS) located in Katingan, Central</p>	Mighty Earth Rapid Response Report 40 (July 2022)	Resolved

No	Group Company	Issues	Buying Relationship	Presence in SD Guthrie International's Global Supply Chain	Summary of Actions and Findings	Reported By	Case Status
		- PT Borneo International Anugerah			<p>Kalimantan. PT AUS is allegedly entering buyers' supply chain via purchases by Eagle High Plantations (EHP). EHP is in our supply chain indirectly via several third-party traders with relevant NDPE policies and commitments. We have reached out to our third-party traders for further investigation.</p> <p>Our third-party trader has engaged with EHP and confirmed that EHP has no longer sourced from PT AUS since 2018. PT AUS has been added into PT EHP's No Buy List since then. PT AUS still appears in PT EHP's annual report because of the remaining account receivables that have not been settled between the two parties.</p> <p>During our engagement, we understood that several third-party traders have been engaging with PT AUS on re-entry procedure for potential re-entry into their supply chains. PT AUS started entering our supply chain via several spot purchases from a third-party trader. However, upon their investigation, our third-party trader has deemed Borneo Pacific / Arjuna Sawit to not be compliant with their NDPE policies. PT AUS is no longer in our third-party trader's supply chain since October 2022.</p>		

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22	First Resources / PT Fangiono Agro Plantation (PT FAP) / Ciliandry Anky Abadi (CAA) Group	<p>Reports of deforestation in the following operations:</p> <ul style="list-style-type: none"> - PT Ketapang Agro Lestari - PT Citra Agro Abadi - PT Tirta Madu Sawit Jaya - PT Agrindo Green Lestari - PT 	Indirect via third party traders	SDGI Zwijndrecht	<p>First Resources / PT Fangiono Agro Plantation (PT FAP) came into our supply chain via third party traders with relevant NDPE commitments. Engagements by third-party trader with the following companies revealed the following:</p> <p>PT Ketapang Agro Lestari - HCS/HCV assessment has been duly conducted prior the land clearing. The land development was guided by the outcome of the HCV/HCS assessment. No HCV/HCS area has been cleared.</p> <p>PT Citra Agro Abadi – Requirements of NDPE Policy shared. CAA has also attended third-party trader’s three-day training workshop in Jakarta focussing on the implementation of NDPE Policy in July 2017. Third-party trader managed to secure commitment from CAA to adhere to NDPE policy and to halt further land clearing. However, our internal monitoring detected ongoing land clearing activities.</p>	<p>Greenpeace - Deforestation Case Studies (December 2017)</p> <p>Mighty Earth - Rapid Response Report 9 (October 2018)</p> <p>Mighty Rapid Response Report 21 (Nov 2019)</p> <p>Mighty Earth Rapid Response Report 22 (December 2019)</p>	Ongoing Monitoring & Engagement

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		Ketapang Hijau Lestari			<p>Third-party trader's last purchase from CAA was on March 2018.</p> <p>PT Tirta Madu Sawit Jaya - the reported land clearing was not conducted by the company as it happened outside their concession boundary.</p> <p>PT Ketapang Hijau Lestari - High Carbon Stock assessment at PT Ketapang Hijau Lestari was completed in 2017 by a registered organization with HCSA. Based on third-party trader's monitoring, there was no land clearing at HCS area identified. FAP Agri has also published their NDPE policy in October 2019.</p> <p>PT Agrindo Green Lestari (PT AGL) PT AGL and other mills belonging to Ciliandry Anky Abadi (CAA) group are not in our supply chain. We are being linked to the reported issues in CAA and PT AGL via allegations that CAA, PT Fangiono Agro Plantation and First Resources all belong to the same parent group company. Our third party trader, via whom PT Fangiono Agro Plantation and First Resources mills enter our supply chain, stopped buying from CAA in 2018.</p> <p>The alleged ownership linkage is currently under</p>	Mighty Earth Rapid Response Report 27 (May 2020)	

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					investigation by the RSPO Complaints Panel. Updates can be found here .		
23	GAMA/ GANDA Group/ KPN Corporation	<p>Reports of deforestation and peatland clearing in the following operations:</p> <ul style="list-style-type: none"> - PT Agrinusa Persada Mulia (PT APM) - PT Agriprima Cipta Persada (PT ACP) - PT Graha Agro Nusantara (PT GAN) - PT Sumatera Unggul Makmur (PT SUM) 	Indirect via third party traders	SDGI Zwijndrecht	<p>The operations with reports of deforestation and peatland clearing are not specifically in our supply chain. However, other affiliated GAMA/GANDA mills are. Third party traders have relevant NDPE policies and we have been actively monitoring their engagement. Current updates on their progress include:</p> <ul style="list-style-type: none"> - GAMA/GANDA Group were suspended in June 2018 by our third-party trader. In September 2018, GAMA/GANDA published a sustainability policy and in February 2019 a progress report on the implementation of this policy (http://gamaplantation.com/assets/gama-files/pressrelease/Feb2019final-Gama_Plantation_Report.pdf). This includes an outline of recovery plans to address historical clearing. <p>Following a review of progress made, the suspension on GAMA/GANDA was lifted by our third-party trader in March 2019. We continue to monitor the ongoing progress of their policy commitments.</p>	<p>Greenpeace - Deforestation Case Studies (December 2017)</p> <p>Mighty Earth - Rapid Response Report 3 (February 2018)</p> <p>Environmental Investigation Agency - Papua Oil Palm Risk Exposure Summary (May 2018)</p> <p>Mighty Earth - Rapid</p>	Resolved

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		- PT Putra Lirik Domas			<p>KPN Progress Report updates – October 2019</p> <ul style="list-style-type: none"> -1. The Stop Work Order (SWO) is adhered to and monitoring is in place. -2. A comprehensive NDPE policy is being implemented. -3. Concession maps are shared at the request of interested parties. -4. Recovery Plans and Remediation work is being implemented which also include various socio-economic activities for the community. -5. Implementation a traceability system to ensure the legality of externally purchased FFB -6. ISPO certifications is in progress. -7. A grievance procedure to manage grievances and concerns has been adopted. -8. A Time Bound Action Plan (60 month) is available on their website. <p>-Further details can be found in this link http://kpnplantation.com/assets/gama-files/pressrelease/2019_Oct_KPN_-_2nd_Progress_Report_-_01112019.pdf</p> <p>-Third-party trader’s engagement with Gama confirmed that Gama has imposed a moratorium on land clearing July 2018, no land clearing was carried out since then. The area in question are</p>	<p>Response Report 20 (October 2019)</p> <p>Mighty Earth - Rapid Response Report 28 (June 2020)</p> <p>Letter of Complaint dated May 2021 on alleged unsustainable practices in PT Putra Lirik Domas</p>	

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					<p>outside PT Agrinusa Persada Mulia’s HGU concession area. The land clearing was carried out by communities for farming and the construction of a road.</p> <p>PT Sumatera Unggul Makmur (PT SUM) - KPN clarified that the land in which the alleged clearing of 11 ha which took place at PT SUM is not owned and controlled by PT SUM. In fact, that site is in the midst of a Villages Boundary Dispute since 2011. The land dispute is between Village Tebas Sungai with Batu Makjage mediated by local District Head (Camat). http://kpnplantation.com/assets/gama-files/pressrelease/MightyEarth_ReportVol28-16June2020.pdf</p> <p>Letter of Complaint dated May 2021 on alleged unsustainable practices in PT Putra Lirik Domas, a subsidiary of KPN Corporation The Letter of Complaint highlighted alleged land conflict, human rights violations and environmental pollution in PT Putra Lirik Domas (PT PLD). We immediately initiated engagement with our third-party trader when the allegation was brought to our attention in June 2021. KPN</p>		

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					<p>has since published an initial response on the case, clarifying their investigation approach and action plans in resolving the issues highlighted.</p> <p>We were informed by our third-party trader that PT PLD initiated site verification on 4 June 2021 and identified that the community facilities are within their land use permit (HGU) of PT PLD, in which PT PLD will apply for a permit change of the area with Badan Pertanahan Nasional (BPN), the national land agency. On 2 July 2021, PT PLD engaged directly with LemBAH. On 14 October 2021, PT PLD met with LemBAH, AMAN Bengsibas and representatives of the local communities to discuss the allegations raised and steps towards resolution of the issues identified.</p> <p>In support of the investigation process, PT PLD has also established an internal task force to investigate the allegations. The task force has subsequently developed an action plan to guide PT PLD in implementing corrective measures. During the investigation process, PT PLD has transparently shared all relevant documentations with our third-party trader for review, including copies of SOPs for grievance handling, water test results, worker’s promotions and training</p>		

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					<p>program, improvement of their environment, health and safety (EHS) practices. In addition, they have also shared activities related to plasma programs and engagement with government related to HGU revision.</p> <p>Our third-party trader continues to engage with PT PLD and monitor the implementation of the remaining action plan, which is primarily related to the revision of the HGU.</p>		
24	Genting Plantations	<p>Reports of deforestation , peat clearance, illegal planting and land conflicts in the Following operations:</p> <ul style="list-style-type: none"> -PT Permata Sawit Mandiri -PT Citra Sawit Cemerlang 	Indirect via third party traders	<p>SDGI Zwijndrecht</p> <p>SDGI Liverpool</p> <p>SDGI Langat</p> <p>SDGI Pasir Gudang</p>	<p>The operations highlighted in reports are not specifically in our supply chain. However, other affiliated Genting Plantation mills are.</p> <p>Third party traders have relevant NDPE policies and we have been actively monitoring their engagement. Current updates on their progress include:</p> <ul style="list-style-type: none"> - In March 2017, Genting disposed their shareholding in PT Permata Sawit Mandiri (PT PSM). PT PSM had allegedly cleared HCS areas. PT PSM was purchased by Bintang Harapan Desa, but was subsequently sold on in November 2018. Genting Plantations Press Statement <p>https://goldenagri.com.sg/sustainability-</p>	<p>RSPO Complaints - Several (2013 -2018)</p> <p>Environmental Investigation Agency - Papua Oil Palm Risk Exposure Summary (May 2018)</p> <p>Mighty Earth - Rapid Response Report 14</p>	Resolved

No	Group Company	Issues	Buying Relationship	Presence in SD Guthrie International's Global Supply Chain	Summary of Actions and Findings	Reported By	Case Status
		<ul style="list-style-type: none"> -PT Dwie Warna Karya -PT Kapuas Maju Jaya -PT Susantri Permai -PT Varita Majutama 			<p>dashboard/files/file_docs/Hnqrqclarification_on_psm.pdf</p> <ul style="list-style-type: none"> - Potential HCS clearing detected on their PT Citra Sawit Cemerlang plantation in West Kalimantan in 2019. PT CSC commissioned a High Carbon Stock (HCS) assessment in 2016, which was completed in October 2017. The HCS assessment has now been submitted for peer review and a stop work order has been implemented, pending the completion of the peer review process. Monthly monitoring is in place to assess the implementation of the stop work order. - Genting started an HCS Study in PT CSC with AidEnvironment in Nov 2016. The field work stopped in May 2019. The alleged deforestation is not in the HCS area. Supplier has ceased clearing since May 2019. The final HCS assessment has been submitted to HCSA Secretariat at the end of May 2019. Peer review was completed in February 2020. See http://highcarbonstock.org/wp-content/uploads/2020/02/2.-HCSA-Peer-Review-Report-PT-CSC-final-130220.pdf - Cases on PT Dwie Warna, PT Kapuas Maju Jaya 	(April 2019) Mighty Earth - Rapid Response Report 15 (May 2019)	

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					<p>and PT Susantri Permai being monitored via the RSPO Complaints panel.</p> <p>PT Susantri Permai https://askrspo.force.com/Complaint/s/case/50090000028Es0zAAC/detail The complaint was officially closed on 20 Dec 2018.</p> <p>PT Dwie Warna, PT Kapuas Maju Jaya and PT Susantri Permai https://rspo.my.salesforce.com/sfc/p/#90000000YoJi/a/0o000000bsJo/HTROf1NSnR1X7teP4vaRatyWU.YwxpdLAXiRsjGksGg The complaint was officially closed in Dec 2018.</p> <p>Press Statement by Genting Plantations on PT Susantri Permai https://www.gentingplantations.com/wp-content/uploads/2016/10/2017-Statement-by-PT-SP.pdf</p>		
25	Global Palm Resources	Reports of deforestation in the	Indirect via third party traders	SDGI Langat	PT Prakarsa Tani Sejati (PT PTS) entered our supply chain via a spot purchase in the 1st quarter 2018.	Mighty Earth - Rapid Response Report 14	Resolved

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		<p>following operations:</p> <ul style="list-style-type: none"> - PT Prakarsa Tani Sejati 			<p>Out third party traders have relevant NDPE policies and their updates on engagements, include:</p> <ul style="list-style-type: none"> -Mighty Earth Rapid Response Report 14 alleged 62ha of deforestation by PT Prakarsa Tani Sejati (PT PTS) in West Kalimantan. -engagement with PT PTS in April 2019 and investigated the alleged deforestation. -the investigation concluded that the location of the clearing detected by Mighty Earth was not located in the PT PTS concession. This was clarified by the third- party trader at: http://bit.ly/2v4XRca. 	(April 2019)	
26	Goodhope	<p>Reports of deforestation in the following operations:</p> <ul style="list-style-type: none"> - PT Sumber Hasil Prima - PT RIM Capital 	Direct purchases and Indirect via third party traders	SDGI Langat	<p>The alleged land clearing occurred as a result of land fires on community-owned areas on 20th September 2019. The company has submitted a report to local authorities which concluded that the alleged land clearing occurred as a result of land fires on community-owned areas that occurred in the vicinity of PT RIM Capital. PT RIM Capital plans to support conservation of surrounding forest and mitigation of land fires through a number of initiatives which have been outlined.</p>	<p>Mighty Rapid Response Report 19 (Sep 2019) Mighty Rapid Response Report 22 (December 2019)</p>	Resolved

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27	Incasi Group	<p>Reports of deforestation and peat clearing in:</p> <ul style="list-style-type: none"> -PT Sumatera Jaya Agro Lestari -PT Arvena Sepakat -PT Makmur Agro Lestari <p>Report questioning the legality of FFB processed in PT Sumbar Andalas Kencana as the company is alleged to receive and process FFB</p>	Indirect via third party traders	<p>SDGI Zwijndrecht</p> <p>SDGI South Africa</p>	<p>The operations with reports of deforestation and peatland clearing are not specifically in our supply chain. However, other affiliated Incasi Group mills are and came into our supply chain via third party traders with relevant NDPE policies. Current updates on their progress include:</p> <ul style="list-style-type: none"> -Dialogue initiated with PT Sumatera Jaya Agro Lestari (SJAL) in August 2015. PT SJAL agreed to a stop work order from 1 September 2015, pending HCV and HCS assessments. -In October 2018, Mighty Earth published a report on land clearing activities at SJAL. It was discovered that SJAL had accidentally cleared the area. SJAL immediately ceased the land clearing and reiterated their commitment to a moratorium on clearing, pending HCV and HCS assessments. -SJAL is expected to submit a recovery/rehabilitation plan commensurate with the scale of their non-compliant development. Monthly monitoring is conducted by our third-party traders. -Investigation on reported clearing by PT Arvena Sepakat revealed that the land clearing was not conducted by Arvena Sepakat. The area was illegally encroached and cleared by communities 	<p>Mighty Earth - Rapid Response Report 10 (November 2018)</p> <p>Mighty Earth - Rapid Response Report 17 (July 2019)</p> <p>Mighty Earth - Rapid Response Report 23 (January 2020)</p> <p>https://magz.tempo.co/read/38492/fro-m-the-woods-to-market-goods</p>	No Longer in Supply Chain

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		harvested within protected forest areas.			<p>of Kelompok Sinaga. Police report has been lodged on the illegal encroachment.</p> <p>- PT Makmur Agro Lestari as reported by Mighty Earth Report 23, located in Central Kalimantan, is not owned by Incasi Group. Incasi Group owns a similarly named company PT Makmur Agro Lestari, which is located in West Kalimantan.</p> <p>PT Sumbar Andalas Kencana Tempo, Mongabay Indonesia, Betahita, and Auriga Nusantara collaborated on an investigation that questions the legality of FFB processed in PT Sumbar Andalas Kencana as the company is alleged to receive and process FFB grown and harvested within protected forest areas.</p> <p>Incasi Raya is indirectly in our supply chain through a handful of spot market purchases in SDGI Zwijndrecht via third party traders with relevant NDPE commitments. We are trying to engage with relevant stakeholders to investigate further in ascertaining whether the allegation is true, and if so, whether Incasi Raya has paid the necessary sanctions to resolve the legality issue.</p> <p>However, It is worth noting that mills entering</p>		

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					<p>our supply chain via the spot market often only appear a handful of times during the year (usually as one mill in a long list of mills associated with a delivery). We have very little leverage on these mills and are limited in our ability to investigate the allegations.</p> <p>Incasi Group is no longer in our supply chain since January 2022.</p>		
28	IOI	<p>Reports of deforestation, peat clearing, illegal road construction, labour issues and land conflicts in the following operations:</p> <ul style="list-style-type: none"> -IOI Pamol -IOI Pelita -PT 	Direct purchases and Indirect via third party traders	<p>SDGI Zwijndrecht</p> <p>SDGI Liverpool</p> <p>SDGI Carey Island</p> <p>SDGI Langat</p> <p>SDGI Pasir Gudang</p>	<p>IOI came into our supply chain via third party traders with relevant NDPE policies and we have been monitoring their engagement with IOI.</p> <p>-In April 2016, RSPO confirms that IOI RSPO certification is suspended. IOI announced in May 2016 that it is challenging the suspension.</p> <p>-In letters dated 14 Mar and 28 Apr 2016, the RSPO Complaints Panel stated the conditions for lifting IOI Group's RSPO certification suspension. IOI issued a statement claiming saying it has met CP conditions and is developing more robust sustainability policy. Consequently, on 6/6/16, IOI announced it would withdraw the legal challenge against the RSPO.</p> <p>-IOI Group's suspension from trading RSPO CSPO shall remain in place until IOI Group and</p>	Local communities - RSPO complaint (March 2010) AidEnvironment - RSPO complaint (April 2015) Finnwatch - Working Conditions at the IOI Group's Oil Palm Estates in Malaysia report	Resolved

No	Group Company	Issues	Buying Relationship	Presence in SD Guthrie International's Global Supply Chain	Summary of Actions and Findings	Reported By	Case Status
		<p>Kalimantan Prima Agro Mandiri (PT KPAM) -PT Sukses Karya Sawit -PT Berkat Nabati Sawit -PT Bumi Sawit Sejahtera -PT Sawit Nabati Agro</p> <p>Allegations on workers' rights - Finnwatch - Migrant Workers' Rights in Oil Palm Estates in Malaysia CASE: IOI Group, Mekassar</p>			<p>complainants jointly declare in writing to RSPO that aforementioned demands are adequately settled through fact-based negotiation, guided by RSPO's Impact Unit, overseen the RSPO Complaints Panel and subject to potential appeal through independent review by RSPO's Board of Governors. -The complaint was officially closed on 8 Oct 2018.</p> <p>IOI is also actively reporting on its sustainability issues. Current updates on the progress is available at: https://www.ioigroup.com/Content/S/S_Grievance_Update</p> <p>Finnwatch - Migrant Workers' Rights in Oil Palm Estates in Malaysia CASE: IOI Group, Mekassar Some of the issues highlighted in the report are workers' living conditions, possession of employment contracts, dissatisfaction regarding working hours and wages, and payment of recruitment fees. Following this, IOI immediately formed an internal investigation team to address the allegations.</p> <p>On 2 July 2021, IOI published a Statement in</p>	<p>(November 2016)</p> <p>Finnwatch - Migrant Workers' Rights in Oil Palm Estates in Malaysia CASE: IOI Group, Mekassar (June 2021)</p>	

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					<p>Response to Finnwatch’s Report addressing the allegations. In the Statement, IOI also reaffirmed commitment to its “No Recruitment Fees Policy” since 2017, highlighted its “Guideline for Minimum Wage & Leave Pay” and “Worker’s Work Verification Guideline”.</p> <p>IOI also mentioned that it will be undergoing an audit supervised by one of its key customers and assisted by a reputable international labour rights consulting firm on its plantation operating units to ascertain non-compliance with its labour policies or unsatisfactory working conditions.</p> <p>On 21 July 2021, IOI published an update on its first virtual Sustainability Consultation Forum. IOI engaged BSR (Business for Social Responsibility) to develop and facilitate the Forum, which was held in May 2021 and attended by IOI’s internal and external stakeholders. Discussions at the Forum were centred around efforts to address current labour challenges faced by IOI and the Malaysian palm oil sector, with a specific focus on Responsible Recruitment Practices and legalisation of undocumented workers. An Executive Summary of the Forum can be found here.</p>		

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					<p>On 22 November 2021, IOI updated us that the planned independent assessment was completed in October 2021. All forced labour indicators, including allegations raised by Finnwatch have been assessed. A draft interim report has also been shared with IOI. Additionally, in consultation with their Sustainability Advisory Panel (SAP), IOI is currently finalising an action plan based on key outcomes from the Sustainability Consultation Forum (SCF).</p> <p>On 13 January 2022, IOI published a further update on outcomes and action plans arising from the Sustainability Consultation Forum, which includes active engagement with relevant stakeholders to develop solutions for responsible recruitment practices. IOI is also participating in the National Action Plan on Forced Labour (NAPFL) 2021-2025 and setting up a working group to find the best approach to legalise undocumented workers in Sabah. Further details are available here.</p> <p>On 2 June 2023, the RSPO Complaints Panel concluded its investigation into the allegations and dismissed the case. For more information on</p>		

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					RSPO Complaints Panel's deliberation, please refer to the case tracker .		
29	Jalan Abesin Limited	Reports of deforestation in: - PT Sawit Sukses Sejati - PT Usaha Sawit Unggul	Indirect via third party traders	SDGI South Africa SDGI Zwijndrecht	<p>Satellite imagery shows that between April 2021 and March 2022, a total of ~340 hectares of forest (indicative HCS) was cleared in the PT Sawit Sukses Sejati (PT SSS) concessions, while a total of ~390 hectares of forest (indicative HCS) was cleared in the PT Usaha Sawit Unggul (PT USU) concession.</p> <p>Sumber Tani Agung, an indirect supplier to SDGI, is allegedly sourcing FFB from PT SSS. Additionally, three other companies allegedly associated with PT SSS (PT Teguhkarsa Wanalestari (PT TKWL), PT Asia Sawit Lestari (PT ASL), and PT Prima Mas Lestari (PT PML)) enter our supply chain indirectly via spot market purchases in SDGI Zwijndrecht. We have reached out to the respective third-party traders for further investigation on these allegations.</p> <p>Our third-party trader that is sourcing directly</p>	Mighty Earth - Rapid Response Report 39 (May 2022)	No Longer in Supply Chain

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					<p>from PT Sumber Tani Agung (PT STA) confirmed that PT SSS used to supply FFB to PT 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 was running into operational issues. When the allegation of deforestation in PT SSS was brought to PT STA's attention, PT STA had immediately shared the Rapid Response report 39 with PT SSS for investigation. In the meantime, PT STA has ceased sourcing from PT SSS.</p> <p>Additionally, another third-party trader sought clarification from PT TKWL as their direct supplier regarding the issue and the link between the company and PT SSS as well as PT USU. PT TKWL clarified that the company is not associated to PT SSS and PT USU. They also informed that they have never bought or received any FFBs from PT SSS and PT USU.</p> <p>Our third-party trader also reached out to PT ASL and PT PML for their feedback regarding the alleged link to PT SSS and PT USU. Both companies denied the allegation and informed that they are not associated to PT SSS or USU.</p>		

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					PT STA and other alleged supply links are no longer in our supply chain since January 2022.		
30	Jhonlin Group	<p>Reports of deforestation , peat clearing, land conflicts, labour issues and excessive use of force in the following operations:</p> <p>-PT Senabangun Aneka Pertiwi -PT Kurun Sumber Rezeki</p>	Direct purchases	<p>PT Guthrie International Pulau Laut</p> <p>SDGI Rantau KCP</p> <p>SDGI Port Klang</p>	<p>The operations highlighted in reports are not specifically in our supply chain, however other mills affiliated with the Jhonlin Group are.</p> <p>Following engagements with the Jhonlin Group, they have agreed to issue a stop work order in their oil palm concessions. We are now providing guidance on the High Conservation Value and High Carbon Stock assessments that need to be conducted before further development commences. At the moment, Jhonlin Group's oil palm plantations are also in different stages of Indonesian Sustainable Palm Oil (ISPO) certification.</p> <p>Monthly monitoring of progress is currently in place. Investigations into the clearing reported in PT Senabangun Aneka Pertiwi and PT Kurun Sumber Rezeki are also ongoing.</p> <p>Since June 2021, the Jhonlin Group are no longer in our supply chain.</p>	<p>Mighty Earth - Rapid Response Report 9 (October 2018)</p> <p>Mighty Earth - Rapid Response Report 11 (December 2018)</p> <p>Mighty Earth - Rapid Response Report 17 (July 2019)</p>	No Longer in Supply Chain

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31	Kalimantan Sawit Kusuma Group	<p>Reports of deforestation and peat clearing, in the following operations:</p> <ul style="list-style-type: none"> - PT Fajar Saudara Lestari 	Indirect via third party traders	SDGI Langat	<p>Kalimantan Sawit Kusuma came into our supply chain via third party traders with have relevant NDPE policies and procedures.</p> <p>Our third-party trader that engaged with Kalimantan Sawit Kusuma Group advised that the land clearing in question at Fajar Saudara Lestari (PT FSL) was caused by fire incidents triggered by extreme dry weather conditions in Indonesia. Fire outside PT FSL concession area has spread into their concession and cause the fire in PT FSL during the dry period.</p>	Mighty Earth - Rapid Response Report 22 (December 2019)	Resolved
32	Kencana Agri	<p>Potential deforestation in:</p> <ul style="list-style-type: none"> - PT Agro Sawit Mas Lestari 	Direct purchases and indirect via third party traders	<p>SDGI Rantau</p> <p>SDGI Langat</p> <p>SDGI Pasir Gudang</p>	<p>Kencana Agri Group came into our supply chain via third party traders with relevant NDPE policies. The operation highlighted is not specifically in our supply chain, however other mills affiliated with the Kencana Agri Group are.</p> <p>Upon investigation, the clearing reported by Mighty Earth at PT Agro Sawit Mas Lestari was confirmed to be located outside of their operations.</p>	Mighty Earth - Rapid Response Report 17 (July 2019)	Resolved

No	Group Company	Issues	Buying Relationship	Presence in SD Guthrie International's Global Supply Chain	Summary of Actions and Findings	Reported By	Case Status
33	Kirana Megatara Group	Potential deforestation detected. Reports of land prepared for clearing (stacking lines) in PT Putra Katingan Pratama.	Indirect via third party traders	SDGI Zwijndrecht SDGI South Africa	Kirana Megatara mills are not in our supply chain. Our link to Kirana Megatara is via TAP mills in our supply chain. We also do not source directly from TAP, but via a third-party trader. ME alleges that TAP companies (PT Etam Bersama Lestari and PT Dwi Lestari Jaya) are sourcing from Kirana Megatara. Our third-party trader has investigated and confirmed with TAP that they are not sourcing from Kirana Megatara.	Mighty Earth - Rapid Response Report 17 (July 2019)	Resolved
34	KLK Berhad	Reports of peat clearing in: - PT Menteng Jaya Sawit Perdana	Direct purchases and indirect via third party traders	SDGI Langat SDGI Pasir Gudang SDGI Liverpool SDGI Zwijndrecht	PT Menteng Jaya Sawit Perdana is not in our supplychain, however other KLK mills are. The clearing detected by Mighty Earth was in a Community Forest Plantation that was gazetted by the Indonesian authorities. This is an area that KLK has no control over. KLK's public response on this allegation is available on their website: https://www.klk.com.my/sustainability/market-place/grievance/	Mighty Earth - Rapid Response Report 18 (Aug 2019)	Resolved

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35	Matahari Kahuripan Lestari (Makin)	<p>Reports of deforestation in:</p> <ul style="list-style-type: none"> -PT Krida Dharma Kahuripan -PT Mekar Karya Kahuripan 	Indirect via third party traders	<p>SDGI Zwijndrecht</p> <p>SDGI Langat</p>	<p>PT Krida Dharma Kahuripan and PT Mekar Karya Kahuripan are not specifically in our supply chain, however other mills affiliated with Makin are. Makin came into our supply chain via third party traders with relevant NDPE policies. Update of engagement as follows:</p> <ul style="list-style-type: none"> -PT Krida Dharma Kahuripan clearing was not conducted by Makin. Makin returned the location permit for the concession to the local government in 2017. -Makin clarified that as a business, PT Mekar Karya Kahuripan was shut down in 2016. The clearing detected was not related to the Makin Group. 	<p>Mighty Earth - Rapid Response Report 5 (June 2018)</p> <p>Mighty Earth - Rapid Response Report 6 (July 2018)</p> <p>Mighty Earth - Rapid Response Report 11 (December 2018)</p> <p>Mighty Earth - Rapid Response Report 12 (January 2019)</p> <p>Mighty Earth - Rapid Response Report 17 (July 2019)</p>	Resolved

No	Group Company	Issues	Buying Relationship	Presence in SD Guthrie International's Global Supply Chain	Summary of Actions and Findings	Reported By	Case Status
36	Medco Group (new owner Capitol Group)	Reports of deforestation and land conflicts in PT Medco Papua Hijau Selaras.	Indirect via third party traders	SDGI Langat SDGI Zwijndrecht	<p>PT Medco Papua Hijau Selaras entered SD Oils supply chain via a third-party trader who have relevant NDPE policies.</p> <p>PT Medco Papua Hijau Selaras has been divested to another party called Capitol Group. Despite the divestment third-party has continued to engage with Medco Group.</p> <p>Third-party trader who engaged with Capitol Group informed that HCV/HCS has already been conducted by qualified assessor and finalised in February 2020. The company has clarified that their land clearing was guided by the outcome of the assessments. Field verification was earlier planned but only completed in June 2020 due to covid-19 restrictive movement order. Assessment report is in progress.</p> <p>Further investigation conducted by the third-party trader revealed that the land clearance was a result of pressure from the community to develop areas for plasma smallholders programme. Several field assessments have been conducted thereafter to determine the details or the affected areas and location. The full field details were finally completed in September 2020.</p>	<p>Environmental Investigation Agency - Papua Oil Palm Risk Exposure Summary (May 2018)</p> <p>Mighty Earth - Rapid Response Report 25 (March 2020) Mighty Earth - Rapid Response Report 29 (July 2020)</p>	Resolved

No	Group Company	Issues	Buying Relationship	Presence in SD Guthrie International's Global Supply Chain	Summary of Actions and Findings	Reported By	Case Status
					<p>PT MPHS has agreed to rehabilitate the pockets of land clearing that were identified in the HCV/HCS assessment reports. Engagement with the communities on alternative plasma plans are ongoing, as the communities want the area to be cleared for plasma. PT MPHS also committed to submit the HCV/HCS assessment reports to be peer reviewed while observing a strict moratorium on further land clearance, which has been put in place since September 2020. Management plans for HCV/HCS areas have also been prepared to ensure these areas are protected and to prevent similar incidences from reoccurring.</p> <p>Our third-party trader will continue to monitor and engage PT MPHS closely, while continuing to guide them through the peer review process as well as in developing a rehabilitation plan.</p>		
37	Musim Mas	Report of HCS forest clearing in PT Multipersada Gatramegah	Direct purchases and indirect via third party traders	SDGI Liverpool SDGI Zwijndrecht	<p>Satellite imagery shows that between May and July 2021 a total of 6.6 hectares of forest (HCS) was cleared in the PT Multipersada Gatramegah concession.</p> <p>Musim Mas is in our supply chain indirectly via third-party traders with relevant NDPE policies and commitments.</p>	Mighty Earth - Rapid Response Report 37 (Dec 2021)	Resolved

No	Group Company	Issues	Buying Relationship	Presence in SD Guthrie International's Global Supply Chain	Summary of Actions and Findings	Reported By	Case Status
					<p>Our third-party trader has engaged Musim Mas on the alleged clearing of a HCS area. Musim Mas had conducted HCV and HCS assessments in 2018, where the findings showed that the area in question is neither HCV nor HCS area. The October 2020 integrated HCV/HCSA Assessment conducted only covered PT Multipersada Gatramegah's extension area as the existing area had already been assessed in 2018. Accurate maps of areas outside of the extension can be referred to in the HCS Report of PT Multipersada Gatramegah in 2018 (Figure 21 - Final HCS Map).</p> <p>Based on the evidence provided by Musim Mas, our third-party trader concluded that the area in question is neither a HCV or HCS area.</p>		
38	Musirawas / Asam Jawa Group	<p>Reports of peat clearing in PT Sumur Pandanwangi</p> <p>Reports of deforestation in PT Uni Primacom.</p>	Indirect via third party traders	SDGI South Africa	<p>PT Uni Primacom</p> <p>Satellite imagery shows that between October 2020 and March 2021, a total of 52 hectares of forest were cleared in the PT Uni Primacom concession. Asam Jawa is in our supply chain indirectly via a third-party trader with relevant NDPE policies & commitments.</p> <p>We are engaging with our third-party trader to investigate this allegation.</p>	<p>Mighty Earth - Rapid Response Report 6 (July 2018)</p> <p>Mighty Earth - Rapid Response Report 10 (November 2018)</p>	No Longer in Supply Chain

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					Asam Jawa is no longer in our supply chain since January 2022.	Mighty Earth - Rapid Response Report 11 (December 2018) Mighty Earth - Rapid Response Report 33 (May 2021)	
39	Naturaceites	Allegations of land rights violations in Guatemala	Indirect via third party traders	SDGI Liverpool SDGI Zwijndrecht	<p>Allegations by CIR</p> <p>The Romero Initiative (CIR) highlighted allegations of human rights abuses on Naturaceites Palm operations in Guatemala. The Maya protest is directed against the expansion of oil palm plantations, as they see their land rights violated. In addition, the wastewater from the oil mills is believed to contaminate Lake Izabal and endanger the livelihoods of the communities.</p> <p>One of the companies being protested is Naturaceites. The Guatemalan government and Naturaceites are also alleged to be behind violent police operations. The Guatemalan communities, where plantations and oil mills of Naturaceites are</p>	Investigation by the Romero Initiative (CIR) on Human Rights Abuses (June 2023) European Center for Constitutional and Human Rights (ECCHR) -	Resolved

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					<p>demonstrably located, are fighting against a lack of (drinking) water. Naturaceites is accused of contaminating rivers with pesticides and draining water from indigenous communities to supply their plantations.</p> <p>Supply Chain Linkage Naturaceites is in our supply chain in SDGI Zwijndrecht and SDGI Liverpool indirectly via several spot market purchases through several third-party traders with relevant NDPE policies and commitments. We have reached out to our third-party traders, who have engaged with Naturaceites regarding the allegations.</p> <p>Official Response from Naturaceites dated 5th June 2023 1. The complaints considers past events that have already been processed by our Compliance and Grievance Mechanism, publicly available here to all stakeholders, by which NaturAceites conducted a due diligence to truly ensure respect for human rights.</p> <p>2. (a) Public Security Operations in Chapin Abajo Community NaturAceites strongly ratifies its non-involvement</p>	https://www.ecchr.eu/en/case/edekataeuscht-verbraucherinnen-mit-nachhaltigkeits-siegel/	

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					<p>or influence in this situation, as it was, according to publicly available information, a public security operation in order to recover firearms and ammunition illegally abducted from the police by a local group that operates in the area. Public statements of government officials could be consulted to clarify the reasons of the public security operations.</p> <p>2. (b) Human Rights Policy Enforcement An annual Due Diligence on Human Rights with correspondent programs to address proactively this assessment is made, followed up and publicly available.</p> <p>To this day, NaturAceites has positive and direct relationship with the democratically elected representatives of the communities mentioned in the publications, legally organized as the Community Development Councils (COCODES, in Spanish).</p> <p>Voluntary Principles on Security and Human Rights (VPSHR) are followed and enforced by the private security company resulting that, since 2017, the security agents and personnel do not use firearms or defensive equipment that could result in human</p>		

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					<p>loss.</p> <p>2. (c) Water Management and Responsible Use of Agrochemicals</p> <p>The geographical regions where NaturAceites develops its operations are not at high risk of water supply and, to this day, there is no mechanical irrigation systems in place in NaturAceites plantations. A biannual participative monitoring on the quality of water that passes through our plantation is conducted with representatives of communities, civil society and environmental organizations, in order to ensure that our operation does not impact the rivers and water quality. The results are publicly shared with local authorities and local stakeholders.</p> <p>Water Footprint Audits in 100% of our mills were conducted by third party civil society organization FUNCAGUA, resulting in the definition of targets for the reduction, efficiency, and responsible consumption of water, which we have progressively been reporting since 2018.</p> <p>Biological and an integrated pest control system has reduced systematically our use of agrochemicals by -74% in comparison with 2016,</p>		

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					<p>in compliance with internationally good agricultural practices.</p> <p>It is important to establish that there are no open environmental complaints against NaturAceites operations or cases under investigation by the national environmental authorities.</p> <p>2. (d) Supply Chain Publicly Available The list of mills, plantations and third-party suppliers is publicly available. We conduct systematic audits to all third-party suppliers in order to guarantee compliance with our Human Rights and Sustainability Policy and the Roundtable for Sustainable Palm Oil (RSPO) standard, for those certified suppliers.</p> <p>2. (e) Responsible Growth and New Plantations It is important to clarify that NaturAceites is not expanding the plantations on the mentioned areas and the younger plantations dates are from 2012. NaturAceites and its certified RSPO supply chain have publicly committed to respecting the New Planting Procedure established by the RSPO Standard.</p> <p>The European Center for Constitutional and</p>		

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					<p>Human Rights (ECCHR), Foodwatch and Updated CIR Report</p> <p>The ECCHR and Foodwatch filed a complaint in Oct 2023 under the German Supply Chain Act, highlighting several violations of labor and human rights standards by Naturaceites. The Christian Initiative Romero (CIR) also published an updated report on 19th February 2024, alleging NDPE non-conformances by Naturaceites. Naturaceites have published their internal investigation report and an official response to these allegations.</p>		
40	Nuridin Tampubolon Corporation (NT Corp)	Reports of deforestation in PT Bintang Sakti Lenggana	Indirect via third party traders	SDGI Langat	<p>PT Bintang Sakti Lenggana is not specifically in our supply chain. NT Corp came into our supply chain via a third-party trader with relevant NDPE policies. We have initiated engagement with them on this case.</p> <p>Third-party trader informed that preliminary investigation reveals that PT Bintang Sakti Lenggana is not under the management control of NT Corp. Following investigations, third-party trader confirmed that the area where clearing was detected, is not related to oil palm development.</p>	Mighty Earth - Rapid Response Report 19 (Sep 2019)	Resolved

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41	Peputra Group	Potential deforestation in: - PT Marita Makmur Jaya	Indirect via third party traders	SDGI Zwijndrecht SDGI Langat	<p>PT Marita Makmur Jaya is not specifically in our supply chain, however other potentially affiliated mills are.</p> <p>Peputra Group came into our supply chain via third party traders with relevant NDPE policies. We have initiated engagement with them on this case. They are currently investigating the links between PT Marita Makmur Jaya and the Peputra Group.</p> <p>Upon investigation, third-party trader informed that PT Marita Makmur Jaya is not under the management control of Peputra Group.</p>	Mighty Earth - Rapid Response Report 12 (January 2019)	Resolved
42	Perkebunan Nusantara (PTPN)	Reports of deforestation in: - PT Perkebunan Nusantara II Prafi	Indirect via third party traders	SDGI Zwijndrecht SDGI Langat	<p>Mighty Earth Rapid Response Report 15 alleges 18ha of forests cleared by PT Perkebunan II Prafi in West Papua. This operation is not specifically in our supply chain. However, a potentially affiliated company, PT Perkebunan Nusantara XIII (Pelahari), is in our supply chain via a third-party trader. Trader has relevant NDPE policies.</p> <p>Third-party trader advised that the results from their engagement and investigation reveals that PT Perkebunan Nusantara II Prafi has been divested since 2014.</p>	Mighty Earth - Rapid Response Report 15 (May 2019)	Resolved

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43	Poligrow Colombia S.A.S.	Alleged links to deforestation and human rights violations in Colombia	Indirect via third party traders	SDGI Langat	<p>Agropecuaria Santa Maria, Daabon Group, and Poligrow Colombia S.A.S are in our supply chain indirectly via spot market purchases through several third-party traders with relevant NDPE policies and commitments. It is worth noting that mills entering our supply chain via the spot market often only appear a handful of times during the year (usually as one mill in a long list of mills associated with a delivery). Unfortunately, there is very little leverage on these mills and little that we can do to ensure that these mills do not appear in future spot market purchases.</p> <p>We have reviewed the allegations made against these companies. As highlighted in the report, the land clearings detected are either in the vicinity or within a 50-km radius around the respective mills. As RSPO-certified companies, they undergo annual sustainability certification audits by third-party auditors. Our desktop review of their latest RSPO reports (dated between September 2022 and February 2023) did not find any non-compliances on the issues highlighted.</p>	Uncovering the Supply Chain: Palm Oil from Colombia to the EU (by Aidenvironment & IUCN NL)	Resolved

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44	Prosper / Tee family	Reports of deforestation and land conflicts in Bewani Oil Palm Plantations.	Direct purchases and indirect via third party traders	SDGI Langat SDGI Biodiesel SDGI Pasir Gudang SDGI Port Klang	<p>Bewani Oil Palm Plantations are not specifically in our supply chain, however other mills affiliated with Prosper/Tee family are.</p> <p>Third party traders have relevant NDPE policies and we have initiated engagement with them on this case. It has been advised that the minority shareholder in the Prosper Group with shareholding in the Bewani Oil Palm Plantation has divested from the project. There are no longer any links between the Prosper Group and the Bewani Oil Palm Plantation.</p> <p>The Prosper Group have also initiated steps for NDPE policies and implementation in their operations and third-party sourcing.</p> <p>In November 2019, Prosper on behalf of their shareholder director concerned has prepared a LUCA and has acknowledged liability for the historical landclearing in PNG. They have agreed to undertake conservation programme as a recovery plan.</p> <p>Prosper commissioned Global Environment Centre (GEC) to look into a Recovery Plan and have recently shared their proposed Recovery</p>	Greenpeace - Final Countdown Report (September 2018)	Resolved

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					<p>Plan. The first phase of the recovery plan aims to support protection and rehabilitation of an initial area of lowland and peat swamp forest in part of Bukit Belata (extension) Forest Reserve. The first step of the project is underway, where the work of satellite analysis has started.</p> <p>Progress of the Recovery Plan can be found here: https://prosper.com.my/Sustainability-Conservation-and-CSR.html</p> <p>We will continue to monitor Proper's progress through their quarterly sustainability progress reports.</p>		
45	PT Berlian Inti Mekar Rengat (BIMR)	Reports of deforestation and clearing in Tesso Nilo and Bukit Tigapuluh national parks	Indirect via third party traders	SDGI Zwijndrecht SDGI Langat	<p>PT BIMR came into our supply chain via third party traders with relevant NDPE policies and we have been actively monitoring their engagement. Current updates on their progress include:</p> <ul style="list-style-type: none"> -a verification report was conducted by CORE (Consortium of Resource Experts; ProForest and Daemeter) in 2016 and a time-bound action plan was developed. -Eyes on the Forest's Enough is Enough 2018 report states that PT Berlian Inti Mekar Rengat has not received illegal FFB from Tesso Nilo and Bukit Tigapuluh national parks since 2014. 	Eyes on the Forest - Enough is Enough Report (June 2018)	Resolved

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46	PT Ensem Lestari	Reports of links to deforestation in the Leuser Ecosystem via 3rd party FFB	Indirect via third party traders	SDGI South Africa	<p>PT Ensem Lestari came into our supply chain via third party traders with relevant NDPE policies and procedures.</p> <p>Engagement by our third-party trader revealed that PT Ensem Lestari have been working on their traceability and NDPE action plan through their direct suppliers. There have not been any new reports of land clearing since the 2018 report. PT Ensem Lestari is no longer in our supply chain since December 2022.</p>	Leuser Watch Website RAN - Deforestation and Fires Continue to Destroy Precious Indonesian Rainforests April 2018	Resolved
47	PT Inti Indosawit Subur Ukui 1 and 2 (PT IISU 1 and 2)	Reports of deforestation and clearing in Tesso Nilo and Bukit Tigapuluh national parks	Indirect via third party traders	SDGI Zwijndrecht SDGI Liverpool	<p>PT Inti Indosawit Subur Ukui 1 & 2 came into our supply chain via third party traders with relevant NDPE policies and procedures. Current updates on their progress include:</p> <ul style="list-style-type: none"> -PT Inti Indosawit Subur Ukui 1 & 2 acknowledge that a third party trader had supplied FFB sourced from the area concerned and suspended the trader in May 2018. -They have improved the Traceability Master Database of their entire third party supply chain which enables them to monitor the source of 	Eyes on the Forest - Enough is Enough Report (June 2018)	Resolved

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					<p>incoming supplies.</p> <p>-Suppliers are also required to sign a statement that commits FFB suppliers to source only from legal areas and to prevent the inclusion of illegal FFB in their supply to the mills belonging to PT Inti Indosawit Subur Ukui 1 & 2.</p> <p>See their response at: https://www.apicalgroup.com/sustainability/grievances/tntp-eof-2018/</p> <p>PT IISU is no longer in our supply chain since December 2022.</p>		
48	PT Makmur Andalan Sawit	Reports of deforestation and clearing in Tesso Nilo and Bukit Tigapuluh national parks	Indirect via third party traders	SDGI Zwijndrecht SDGI Langat	<p>PT Makmur Andalan Sawit came into our supply chain via third party traders with relevant NDPE policies and procedures. Current updates on their progress include:</p> <ul style="list-style-type: none"> -facilitating a verification visit by TFT, and agreement on an action plan in 2016. -agreement to participate in a traceability to plantation pilot project in 2017. -100% traceability to plantation for supplies is expected to be achieved by end July 2019. This will allow them to demonstrate that supplies do not originate from Tesso Nilo and Bukit Tigapuluh 	Eyes on the Forest - Enough is Enough Report (June 2018)	Resolved

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					<p>national parks.</p> <p>MAS confirms no illegal FFB was received, and monitoring is in place to block such FFB into their supply chain. They have joined WWF "HALT" programme and have since achieved 100% traceability to plantation.</p>		
49	PT Mitra Unggul Pusaka Segati (MUPS)	Reports of deforestation and clearing in Tesso Nilo and Bukit Tigapuluh national Parks	Indirect via third party traders	SDGI Zwijndrecht	<p>Eyes on the Forest's Enough is Enough 2018 report states that PT Mitra Unggul Pusaka Segati has not received illegal FFB from Tesso Nilo and Bukit Tigapuluh national parks since 2012.</p> <p>PT MUPS is no longer in our supply chain since December 2022.</p>	Eyes on the Forest - Enough is Enough Report (June 2018)	Resolved
50	PT Nafasindo	Allegations of community conflicts	Indirect via third party traders	SDGI Langat	<p>PT Nafasindo came into our supply chain via third party traders with relevant NDPE policies and procedures. We reached out to our third-party trader, who updated the following from their investigation:</p> <p>RAN allegation that PT Nafasindo has seized nearly 2000 hectares of community lands for palm oil development, despite active opposition from communities.</p>	Leuser Watch Website RAN - Community Struggles for Land Rights and Livelihoods in Singkil-Bengkung	Resolved

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					<p>Nafasindo explained that was due to wrong data issued by the provincial authority, BPN Kanwil Prop Aceh (Aceh Province Land Agency). The correct data is based on the measurements conducted by the national authority, BPN RI (National Land Agency). In the HGU with the correct measurement as per the National Land Agency, the area of 1,997.5 Ha has not been developed and it currently remains as forests, community plantations, community settlements as well as government offices/public facilities, etc.</p> <p>RAN allegations that in 2012, the Aceh National Land Agency demarcated a permanent boundary that was disputed by local communities who were excluded from the boundary delineation process. The boundary negotiated between the National Land Agency and the company was different from that recognized and agreed by the former governor.</p> <p>Nafasindo clarified that as ordered by the National Land Agency, the company filed a lawsuit against the Aceh Governor who had ordered the demarcation with the wrong measurement. The Indonesian National Land Agency (BPN RI) had also ordered Nafasindo to revise its HGU.</p>	<p>region November 2019</p>	

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					<p>RAN allegation that around 100 farmers have been arrested and, in some cases, detained by police and imprisoned and later relocated. Some villagers faced time in prison and after their release continued to fight to regain their rights. Nafasindo clarified that there were demonstrators who tried to occupy the HGU and mill area to demand the enforcement of the Aceh Governor's Letter (based on the wrong measurement) and police detained four people who were subsequently released after being questioned.</p> <p>RAN allegation that in 2016, PT. Nafasindo released 347.4 hectares (Ha) of disputed land to 22 villages. This negotiated outcome did not fully restore the rights of local communities to their customary lands, but it was agreed as a way to move forward and secure some level of economic stability for local communities. Nafasindo explained that in 2016, the company acting on the provincial and district governments' letter released 347 hectares of land that had been under its control control as part of the dispute resolution between the communities in 22 villages and the company.</p> <p>In light of the progress, our third-party trader has</p>		

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					considered this grievance closed.		
51	PT Nia Yulided Bersaudara (PT NYB)	Clearing of lowland rainforests in the north-east of the Leuser Ecosystem	Indirect via third party traders	SDGI South Africa	<p>RAN has reported that PT NYB is producing oil palm fruit on deforested lands. The oil palm fruit harvested is reportedly collected by a dealer called RAM UD Makmur Jaya and sold to a mill called PT. Bumi Sama Ganda (BSG).</p> <p>PT. NYB is allegedly responsible for nearly 2224 acres of rainforests destroyed for logging operations and the expansion of palm oil. The forest cover within the company's palm oil concession area has reportedly been reduced from 4873 hectares in 2016 to 2664 hectares in October 2022.</p> <p>RAN has reached out to SDGI enquiring on our linkage to PT Bumi Sama Ganda. We have investigated this supply link - PT BSG was previously in our supply chain in SDGI South Africa indirectly via a third-party trader, however, they had not been in our supply chain since December 2020.</p>	Leuser Watch Website RAN - Notorious Rainforest Destroyer Caught Taking Palm Oil To Global Market	Resolved

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52	PT Padasa Enam Utama	Report questioning the legality of FFB processed in Koto Kampar mill as the company's plantation area is said to be above convertible production forest (HPK) and protected forest area if attached to a forest area map (HL).	Indirect via third party traders	SDGI Zwijndrecht SDGI Langat	<p>Tempo, Mongabay Indonesia, Betahita, and Auriga Nusantara collaborated on an investigation that questions the legality of FFB processed in Koto Kampar mill as the company's plantation area is said to be above convertible production forest (HPK) and protected forest area if attached to a forest area map (HL). According to the findings of ground checks conducted on September 19-22, 2021, the oil palm plantations in the partnership area—in the HPK and HL areas—are managed by PT Padasa Enam Utama under the Primary Cooperative Credit for Members (KKPA) with the Tiga Koto Village Unit Cooperative.</p> <p>PT Padasa Enam Utama and Koto Kampar mill are indirectly in our supply chain through a handful of spot market purchases in SDGI Zwijndrecht via third party traders with relevant NDPE commitments. Our third-party trader's investigation confirmed that PT Padasa Enam Utama has taken the necessary steps to address the issue of legality and the legal process is still ongoing.</p> <p>It is worth noting that mills entering our supply chain via the spot market often only appear a</p>	https://magz.tempo.co/read/38492/from-the-woods-to-market-goods	Resolved

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					handful of times during the year (usually as one mill in a long list of mills associated with a delivery). We have very little leverage on these mills and are limited in our ability to investigate the allegations.		
53	PT Peputra Supra Jaya (PSJ)	Reports of deforestation and clearing in Tesso Nilo and Bukit Tigapuluh national parks	Indirect via third party traders	SDGI Zwijndrecht SDGI Langat	<p>PT PSJ came into our supply chain via third party traders with relevant NDPE policies and procedures. Key highlights include:</p> <ul style="list-style-type: none"> -verification visit by third party suppliers in 2016. -it was verified that the fire stated in EOF's report took place outside PSJ's concession. Despite this, PSJ agreed to enhance its fire prevention and management system. -agreed to a traceability to plantation pilot project at their mills in 2017. -PT Peputra Supra Jaya expected to achieve traceability to plantation for 100% of supplies by end July 2019. This will allow them to demonstrate that supplies do not originate from Tesso Nilo and Bukit Tigapuluh national parks. -Eyes on the Forest's Enough is Enough 2018 report states that PT Peputra Supra Jaya has not received illegal FFB from Tesso Nilo and Bukit Tigapuluh national parks since 2015. 	Eyes on the Forest - Enough is Enough Report (June 2018)	Resolved

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					Third-party trader who engaged with PT PSJ updated that PT PSJ has since achieved 100% traceability to plantation using the third-party trader's special development programme called Collaboration for Transformation (CFT).		
54	PT Runding Putra Persada (PT RPP)	<p>Reports of links to deforestation in the Leuser Ecosystem via 3rd party FFB</p> <p>Reports of peat forest clearing in the Rawa Singkil Wildlife Reserve via third party FFB</p>	Indirect via third party traders	SDGI Langat	<p>RAN - Deforestation and Fires Continue to Destroy Precious Indonesian Rainforests April 2018 PT RPP came into our supply chain via third party traders with relevant NDPE policies and procedures.</p> <p>Third-party trader conducted a field visit to verify the FFB supply from Loat Bangko and confirmed that the FFB was not supplied to PT Runding Putra Persada during the 2018 deforestation period.</p> <p>RAN - Carbon Bomb Scandals: Big Brands Driving Climate Disaster for Palm Oil Mr. Mahmudin allegedly operates an illegal plantation and an FFB collection facility in the village of Le Meudama. The GPS location shows that the plantation is located in the Rawa Singkil Wildlife Reserve. Satellite analysis shows that the</p>	<p>Leuser Watch Website RAN - Deforestation and Fires Continue to Destroy Precious Indonesian Rainforests April 2018</p> <p>RAN - Carbon Bomb Scandals: Big Brands Driving Climate Disaster for Palm Oil</p>	Resolved

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					<p>location of the illegal plantation was once covered in peat forests but was cleared and the waterlogged soils drained in the last five years.</p> <p>Mr. Mahmudin allegedly sold FFB using a palm oil broker called CV Buana Indah to a mill operated by PT Runding Putra Persada (PT RPP).</p> <p>PT RPP entered our supply chain indirectly via a third-party trader with relevant NDPE policies and commitments. Our third-party trader has reached out to PT RPP. Based upon PT RPP team's verification visit to Pak Mahmudin's farm, PT RPP confirmed that the said area was outside of RSWR boundary. PT RPP also stressed that Pak Mahmudin had obtained individual land ownership (SHM) certificates from the National Land Agency (BPN) since 2017.</p> <p>A series of meetings and engagements with PT RPP was carried out thereafter. Our third-party trader carried out a joint field verification with another trader 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 that Mr Mahmudin has a certificate of ownership (SHM) covering an area of 29 hectares.</p>	(September 2022)	

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					<p>However, he has further claimed ownership of an additional 4 hectares within RSWR which has not yet been allocated SHM. In addition, Mr Mahmudin's FFB collection point also lacks adequate traceability mechanism to map the FFB that are sourced from the local community farms around Mr Mahmudin's farm. It has been confirmed that CV BI is indeed PT RPP's supplier, which they have started sourcing since April 2022.</p> <p>The third-party traders shared the outcome of the investigation and discussed the action plan with RAN on 1 December 2022. The final field verification report has also been shared with RAN on 21 December 2022.</p> <p>Our third-party trader in collaboration with some other traders visited PT RPP, CV BI and Pak Mahmudin from 8th to 12th May 2023 to discuss progress and support them in fulfilling the agreed action plan.</p> <p>On 13th July 2023, our third-party trader GAR and several other traders had a meeting with PT RPP. Our third-party trader, PT RPP RPP, and CV BI have agreed to exclude Pak Mahmudin from their supply chains effective 13 July 2023 due to failure</p>		

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					<p>to deliver his commitment. Our third-party trader has received a written statement from CV BI and RPP regarding this commitment.</p> <p>On 21st July 2023, our third-party trader sent letters to supplier mills surrounding Pak Mahmudin's farm/ramp that they had deemed FFBs from Pak Mahmudin's farm/ramp non-compliant with their policy and therefore cannot enter their supply chain.</p> <p>Regarding traceability, our third-party trader's partner, Koltiva, has been mapping the CV BI supply base. They expect it to be completed by the end of Q3 2023 and will continue to provide the necessary support.</p> <p>On 19th December 2023, our third-party traders, together with several other direct buyers of PT RPP, made a joint statement that PT RPP has completed all the items in the agreed action plan satisfactorily, and hence the case is deemed closed.</p>		
55	PT Sawit Mas Nusantara (PT SMN)	Reports of deforestation and clearing in Tesso Nilo	Indirect via third party traders	SDGI Langat	PT SMN came into our supply chain via third party traders with relevant NDPE policies and procedures. Current updates on their progress include:	Eyes on the Forest - Enough is Enough	Resolved

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		and Bukit Tigapuluh national parks			<p>-PT SMN has denied allegations of deforestation in national parks.</p> <p>-Upon investigation insufficient evidence was found to substantiate the allegations.</p> <p>-It was confirmed that PT SMN's sources of FFB does not include concessions indicated by Eyes on the Forest.</p> <p>-100% traceability to plantation for supplies is expected to be achieved by end July 2019. This will allow them to demonstrate that supplies do not originate from Tesso Nilo and Bukit Tigapuluh national parks.</p> <p>Update February 2020: -PT SMN have achieved 100% traceability to plantations to prove they are not sourcing FFB from illegal sources.</p>	Report (June 2018)	
56	PT Surya Panen Subur II	Reports of deforestation and peat clearing in the Leuser Ecosystem.	Indirect via third party traders	SDGI Langat	<p>PT SPS II came into our supply chain via third party traders with relevant NDPE policies and procedures. Current updates on their progress include:</p> <p>-PT SPS II committed to a moratorium on peatland clearing in 2015 and have been implementing best</p>	Rainforest Action Network - Last Place on Earth Report (November 2014)	Resolved

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					<p>management practices for peatland plantations.</p> <p>-Our third party trader’s monitoring of PT SPS II’s operations has identified pockets of land clearing in their concession, which has been due to community encroachment. PT SPS II themselves have continued to maintain a moratorium on the area.</p> <p>-To deal with the illegal encroachment, PT SPS II has reported the following actions:</p> <ol style="list-style-type: none"> 1. Engagement with surroundings communities. 2. Reached out to Government Land Authority requesting for enforcement of PT SPS II’s land use right. 3. Conducted land Tenure Study/Participatory mapping. 4. Filed police reports on the ongoing illegal encroachment. 5. Transparently reported the encroachment/illegal occupation issues to the Governor of Aceh. <p>-On the 13th July 2018, officials from the Indonesia Ministry of Environment and Forestry (KLHK) conducted a field verification to SPS II, where the officials visited disputed area including area allegedly cleared by illegal encroachers.</p> <p>-On land conflicts, PT SPS II is working with TFT to seeking resolution with the local communities. A</p>		

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					<p>Collaboration For Transformation programme was launched in 2017 to address the land tenure issues between PT SPS II and the local communities. On the use of fire for land clearing, there have been a few mistakes:</p> <ol style="list-style-type: none"> 1. In 2016, PT SPS II were found not guilty by the Indonesian High Court for the allegation of use of fire for land clearing. 2. In June 2018, officers from PT SPS II were convicted for using fire to clear peatland (http://aceh.tribunnews.com/2018/06/26/jaksa-tahan-manajer-kebun-pt-sps) <p>Third party trader continues to support the progress made by PT SPS II but has decided to stop purchasing from them in June 2018. No longer in our supply chain.</p>		
57	QL Resources	Potential deforestation detected in PT Pipit Mutiara Indah.	Indirect via third party traders	<p>SDGI South Africa</p> <p>SDGI Carey Island</p> <p>SDGI Langat</p>	<p>QL Resources came into our supply chain via third party traders with relevant NDPE policies and procedures.</p> <p>Based on detailed review of documentation, reports and letter of commitment from QL Group, our third- party supplier lifted the suspension on</p>	Mighty Earth - Rapid Response Report 21 (Nov 2019) Mighty Rapid Response	Resolved

No	Group Company	Issues	Buying Relationship	Presence in SD Guthrie International's Global Supply Chain	Summary of Actions and Findings	Reported By	Case Status
		Reports of land prepared for clearing (stacking lines) in the PT Pipit Mutiara Indah concession.		SDGI Zwijndrecht	<p>QL Group in April 2020.</p> <p>QL Resources is no longer in our supply chain since December 2022.</p>	<p>Report 27 (May 2020)</p> <p>Mighty Rapid Response Report 28 (June 2020)</p>	
58	Rimbunan Hijau	Reports of deforestation and peat clearing in operations in Papua New Guinea and Sarawak, including:	Indirect via third party traders	<p>SDGI Zwijndrecht</p> <p>SDGI South Africa</p>	<p>Gilford Ltd, Rimbunan Hijau's operation in Papua New Guinea is not specifically in our supply chain. However, other affiliated mills from Rimbunan Hijau's Malaysian operations are indirectly in our supply chain via third-party traders with relevant NDPE policies and commitments.</p> <p>Third party traders have relevant NDPE policies, and we are initiating engagement with them on this case. Current report on progress includes:</p>	<p>Greenpeace - Final Countdown Report (September 2018)</p> <p>Mighty Earth - Rapid Response Report 12 (January</p>	Ongoing Monitoring & Engagement

No	Group Company	Issues	Buying Relationship	Presence in SD Guthrie International's Global Supply Chain	Summary of Actions and Findings	Reported By	Case Status
		<ul style="list-style-type: none"> -Erajaya Synergy Sdn Bhd -Jaya Tiasa, LPF/0024 -Poh Zhen Sdn Bhd -Rimbunan Sawit, -RH Plantation (Selangor Estate), RHPOM -Woodijaya Sdn Bhd -Timrest Sdn Bhd -PJP Pelita Lundu Plantation Sdn Bhd mill -LPF 0026 Report of environment 			<ul style="list-style-type: none"> -engagement with Rimbunan Hijau initiated in September 2018. -Gilford Ltd, Rimbunan Hijau's operations in Papua New Guinea, committed to adhering to an NDPE policy and shared relevant information for further investigation. -third party trader in the process of analysing the information provided and may verify with a field visit. -moratorium on further clearing is in place while engagement is ongoing. <p>Global Witness Report - Gilford Limited Our third-party trader immediately reached out to RH for clarification on the issues raised by GW and has been actively engaging with the company since. RH has rebutted the allegations and shared relevant documents to assist the investigation, which include:</p> <ul style="list-style-type: none"> -A field visit report by an independent consultant; -Evidence of engagements between RH and GW since 2017; -Landowner consent forms to ascertain FPIC and identify cultural sites that require protection; -Voluntarily written statements by a landowner, contents of which were further corroborated by a 	<ul style="list-style-type: none"> 2019) Mighty Earth - Rapid Response Report 17 (July 2019) Mighty Earth - Rapid Response Report 18 (Aug 2019) Mighty Earth - Rapid Response Report 19 (Sep 2019) Mighty Earth - Rapid Response Report 21 (Nov 2019) Mighty Earth - Rapid Response Report 29 (July 2020) Mighty Earth - 	

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		<p>al and social non-compliance incidents by Gilford Ltd, a subsidiary of Rimbunan Hijau</p>			<p>statement given by a local ward councilor; -Correspondence between Gilford Ltd and the Royal Papua New Guinea (PNG) Constabulary; -Board meeting minutes by landowner companies; and -A mediated agreement between Gilford Ltd and a landowner company issued by the PNG National Court.</p> <p>On the allegation of lack of FPIC, RH has reaffirmed that landowners’ consent (i.e. FPIC) is a legally stipulated requirement in PNG to obtain a Special Agricultural Business Lease (SABL), which they are in adherence to. Further to this, a voluntary statement by one of the landowners which was shared with our third-party trader has also indicated that FPIC was in order, prior to land development. With regards to the allegation of violence and harassment, RH has informed our trader that any reported police presence was sanctioned by the Royal PNG Constabulary and that no malpractice was proven, following investigations by high-level authorities, including the Ombudsman Commission.</p> <p>On the allegation of deforestation and environmental issues, RH has clarified that their</p>	<p>Rapid Response Report 34 (June 2021) Global Witness - The True Price of Palm Oil (October 2021)</p>	

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					<p>operational planning and execution are compliant with all legal requirements. In fact, such compliance was monitored by the PNG Forest Authority Project Supervisor onsite, to ensure protection of all culturally important sites, and other specific protected areas such as buffer zones along rivers and streams; village reserves; conservation zones for fauna and flora; as well as sites of historical importance such as old village sites and caves. Since project commencement, they have not received any specific complaints from any affected landowners, ward councillors, village court officials, or any government officials on environmental matters. In addition, it is also important to note that our third- party trader has engaged with Gilford Ltd since 2018 on their compliance to NDPE, where Gilford has committed to carrying out HCV-HCS assessments prior to any new land clearing. A moratorium on new land clearing has been imposed since 2018.</p> <p>On the matter of PPE provision, our third-party trader will be working closely with RH to ensure that their practices are fully aligned with their NDPE Policy. This includes improvements to their PPE Policy and socialisation of the policy to all</p>		

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					<p>levels of management and operations, with effective on-the-ground implementation.</p> <p>Our third-party trader is investigating the remaining issues related to worker PPE Provision and RH's safety and health practices, and we will continue our engagement with them to monitor the progress of this matter.</p> <p>Cases in Sarawak February 3, 2020 - Third-party trader's investigation and engagement with Rimbunan Hijau reveals the following updates:</p> <ul style="list-style-type: none"> • Erajaya Synergy Sdn Bhd - Land clearing was reported in several areas based on the RRR 18. While a small portion was cleared for non-palm planting related operation, most of the area was illegally cleared by local communities. • Jaya Tiasa Holdings Berhad - The land clearing is not related to oil palm development. • Poh Zhen Sdn Bhd - the reported land clearing is not related to oil palm development. • Simunjan Estate - Land clearing was not done by the company, it was illegal encroachment by surrounding communities. • RH Plantation (Selangor Estate) - The land 		

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					<p>clearing is not related to oil palm development.</p> <ul style="list-style-type: none"> • Woodijaya Sdn Bhd - The area in question is an NCR land, where the 4ha clearance was done by communities for the planting of pineapple. • Timrest Sdn Bhd - Land clearing was not conducted by the company, it happened outside their concession boundary. • PJP Pelita Lundu Plantation Sdn Bhd mill - The alleged clearing on Lot N17 was not carried out by the company. This particular area (LOT N17) is still owned by the local smallholders as it has not been surrendered yet. The land clearing is reported to be done by local smallholders. • Poh Zhen - The alleged clearing at Poh Zhen has been verified to be not related to oil palm. <p>LPF 0026 - Our third-party trader has verified this allegation and confirmed that the land clearing is not related to oil palm development.</p>		
59	Samling / Glenealy Plantations	Reports of deforestation in Myanmar Stark	Direct purchases and indirect via third party traders	SDGI Langat SDGI Port Klang SDGI Biodiesel	Myanmar Stark Prestige Plantation specifically is not in our supply chain, however other mills affiliated with Samling / Glenealy Plantations are. Current updates on progress of their engagement with Samling / Glenealy include:	Greenpeace - Deforestation Case Studies (December 2017)	Resolved

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		<p>Prestige Plantation (MSPP), operations in Sarawak, Malaysia and in North Kalimantan, Indonesia.</p> <p>-Tunas Borneo Plantations</p> <p>-Syarikat Samling Timber Sdn Bhd</p> <p>-Samling Lana LPF 0006</p> <p>-Samling Jelalong LPF 0007</p> <p>-LPF 008 Marudi & Batu Belah</p>			<p>-they are not sourcing from their operations in Papua New Guinea or Myanmar. Supplies come from operations in Malaysia.</p> <p>-moratorium on new developments agreed to, pending relevant HCV and HCS assessments.</p> <p>-Dec 2017 MSPP commissioned Montrose Environmental which is also a registered assessor to carry out a HCV study and they are licensed to do so in Myanmar.</p> <p>-HCV report's recommendation was adhered to by MSPP until the asset was disposed towards the end 2018/early 2019 by the Group.</p> <p>Updates on deforestation in Kalimantan:</p> <p>-Reports of deforestation in Kalimantan, Indonesia by PT Tunas Borneo Plantation, is not associated with the Samling Group. The area highlighted is outside of the Samling Groups concession. Based on the information and photos evidence, the area is currently occupied by local communities which has conducted the land clearing. It was also noted that substantial land clearing was conducted by a mining company operating in the area.</p> <p>Updates on deforestation in Sarawak:</p>	<p>Environmental Investigation Agency - Papua Oil Palm Risk Exposure Summary (May 2018)</p> <p>Greenpeace - Final Countdown Report (September 2018)</p> <p>Mighty Earth - Rapid Response Report 11 (December 2018)</p> <p>Mighty Earth - Rapid Response Report 13 (March 2019)</p> <p>Mighty Earth - Rapid</p>	

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					<p>-Syarikat Samling Timber Sdn Bhd (LPF 0014) as highlighted by Mighty Earth's rapid response report 17 is for Industrial Tree Planting and that they have no oil palm estate in the stated location.</p> <p>-Samling Lana LPF 0006 and LPF 008 Marudi & Batu Belah as highlighted in Mighty Earth's rapid response reports 11, 13, 15, 16, and 17 were not related to oil palm plantations. Clearing detected were related to the harvesting of tree plantation species.</p> <p>-On reports of deforestation in Jelalong LPF 0007 concession, below are the findings:</p> <ul style="list-style-type: none"> •Samling Jelalong LPF 0007 Part 1 - Encroachment by communities and made police report made. •Samling Jelalong LPF 0007 Part 2 - photo evidences show the same area was again encroached by communities around Long Tisam. This was investigated and police report lodged. •Samling Jelalong LPF 0007 Part 3 - The deforested area is outside of Samling's concession. <p>•On the land clearing highlighted in Mighty Earth Report 24, direct engagement with Samling Group clarified that Marudi LPF is a reforestation area and no oil palm has been planted or will be</p>	<p>Response Report 15 (May 2019) Mighty Earth - Rapid Response Report 16 (June 2019) Mighty Earth - Rapid Response Report 17 (June 2019) Mighty Earth - Rapid Response Report 18 (Aug 2019) Mighty Earth - Rapid Response Report 24 (Jan 2020) Mighty Earth - Rapid Response Report 26</p>	

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					<p>planted within the LPF.</p> <ul style="list-style-type: none"> •Marudi LPF is certified under the Malaysian Timber Certification Scheme. •Within the area identified in ME Report 24, there are areas planted with rubber which is a project sponsored by the Government under RISDA for Long Panai local community. Other areas are for Reforestation under our Group's Licensed Planted Forest (LPF) area. •Glenealy Plantations are amenable to having an NDPE policy of which they are working with a consultant on this. •Glenealy Plantations have agreed to disclose their oil palm boundary maps provided an NDA from SD Oils is in place. <p>Due to specific requests by key customers to remove Glenealy Plantation mills from their supply chains, there will be no further direct purchases from Samling after April 2020, until concerns can be resolved.</p> <p>One of Glenealy Plantation's mills has entered SDGI's supply chain via several spot market transactions. It is worth noting that mills entering our supply chain via the spot market often only</p>	<p>(Apr 2020) Mighty Rapid Response Report 27 (May 2020)</p>	

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					<p>appear a handful of times during the year (usually as one mill in a long list of mills associated with a delivery). We have very little leverage on these mills and are limited in our ability to investigate the allegations.</p> <p>Engagement with Samling/Glenealy Plantations Sdn Bhd (GPSB) We re-initiated engagement with GPSB to clarify the progress that has been made since suspension by major customers in 2020. GPSB has undertaken various steps to demonstrate their commitment to sustainability since then:</p> <ul style="list-style-type: none"> • Published a Moratorium on new land development in 2020 • Published an NDPE Policy in 2020 • Published commitment to undertake integrated HCV-HCS assessments for future plantings • Undertook an independent HCS loss assessment • Established a HCS Recovery Site (Belaga HCS Recovery Site) • Published a HCS Recovery Plan <p>Ongoing deforestation monitoring analysis by our</p>		

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					<p>satellite monitoring partner has not identified any land clearing by the Group since the Moratorium. They highlighted several social issues raised against Samling in the past few years.</p> <p>While most of these issues had been addressed, the Strategic Lawsuits Against Public Participation (SLAPP) allegation remained outstanding as Samling continued to proceed with their defamation suit against SAVE Rivers. GPSB remained in open engagement with us and requested a few meetings to clarify our concerns on resuming trade with them. We have shared that from a sustainability perspective, the SLAPP allegation and ongoing defamation suit remained a concern to us and our stakeholders.</p> <p>On 18th September 2023, Samling/GPSB shared that they have reached an amicable resolution of the Suit with SAVE Rivers. We reached out to SAVE Rivers to seek their feedback should there be any outstanding concerns post-withdrawal of the lawsuit. To date, SAVE Rivers has not highlighted any pending issues to us.</p> <p>Based on our due diligence and engagements conducted, Samling/GPSB has addressed the</p>		

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					outstanding grievances against them and met our re-engagement requirements.		
60	Shin Yang Group / Sarawak Oil Palm	<p>Reports of deforestation /peat clearing in operations in Sarawak, Malaysia and the following operations:</p> <ul style="list-style-type: none"> -Dataran Linau Sdn Bhd -Shin Yang OP Planting Area (LPF/0018) -Dataran Seping Sdn Bhd (Adam Oil Palm 	Direct purchases	<p>SDGI South Africa</p> <p>SDGI Zwijndrecht</p>	<p>The highlighted mills are not specifically in our supply chain, however other mills affiliated with Shin Yang Group/SOP are. Third party traders have relevant NDPE policies and commitments. Current updates from their engagement with Sarawak Oil Palm (SOP) include:</p> <ul style="list-style-type: none"> -Acknowledgement that SOP had non-compliances in their operations between 2016 - 2017. -In 2018, SOP expressed commitment to NDPE and third party traders have been supporting them in their journey towards implementing a holistic action plan across their supply chain, which in phases will also look into their third party sourcing. -Priority is to ensure new clearings comply with NDPE commitments. -In March 2018, their Sepakau mill and supply base underwent an assessment by third party traders' consultants and in September 2018, an NDPE workshop was hosted for their team and third-party suppliers. -With reference to the Rapid Response Report #13 	<p>Mighty Earth - Rapid Response Report 4 (May 2018)</p> <p>Mighty Earth - Rapid Response Report 13 (March 2019)</p> <p>Mighty Earth - Rapid Response Report 15 (May 2019)</p> <p>Mighty Earth - Rapid Response Report 17 (July 2019)</p> <p>Mighty Earth - Rapid Response</p>	Resolved

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		<p>Estate) -Linau Sinar (Linau Mewah Group) - LPF 0019</p>			<p>that highlights 10ha of peat clearance in Belaga, Sarawak, our third-party trader is reviewing planning studies that indicate that the area is on mineral soil and not peat.</p> <p>-SOP has initiated engagement with their supplier on Rapid Response Report 17 that highlighted preparatory stacking activity.</p> <p>-On the SOP/Shin Yang cases, SOP has confirmed the following with evidence presented:</p> <p>-Clearing in Dataran Linau Sdn Bhd – third-party trader updated that site visit found that the clearing identified by Mighty Earth is not within Shin Yang’s operations. Shin Yang has also shared with SOP their concession maps and details were shared with the third-party trader.</p> <p>-Clearing in Dataran Seping (Rapid Response Report #20) were done by local communities intending to plant paddy. The management has met the community to prevent further encroachment into the concession area.</p> <p>-Peat development in Linau Sinar (Rapid Response Report #13) - Site visit was conducted and allegations that the clearing was on peat was found to be inaccurate. The EIA also states there is</p>	<p>Report 18 (Aug 2019) Mighty Earth - Rapid Response Report 20 (Oct 2019) Mighty Earth - Rapid Response Report 35 (Aug 2021)</p>	

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					<p>no peat in the concession.</p> <ul style="list-style-type: none"> •SOP advised Shin Yang to conduct a HCV assessment and this has been completed with preliminary report shared. •SOP will hold Shin Yang accountable to follow the HCV recommendations <p>LPF 0019: Reports of 423 ha of deforestation in LPF 0019, belonging to Shin Yang Group. Shin Yang Group is not specifically in our supply chain, but Sarawak Oil Palm is indirectly in our supply chain via a third-party trader.</p> <p>We have initiated engagements with our third-party trader and have been advised that the land clearing is not related to oil palm development. Based on our engagements with our third-party trader, as well as, SOPB, we have confirmed that the land clearing detected are not related to oil palm development.</p>		

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61	SD Guthrie Bhd	Alleged occurrence of deforestation within SD Guthrie's (SDG) boundary at SD Guthrie Bhd (Derawan, SOU 33) in Bintulu, Sarawak			<p>Pursuant to the report, our desktop verification on the coordinates (3.353, 113.39) showed that it falls outside of SDG's operational area; approximately 100 meters away from our Rajawali Estate boundary. This was followed by an on-site verification which further confirmed that the deforested area mentioned in the report directed to a neighbouring third party local agricultural company.</p> <p>Full press statement response as follow http://www.simedarbyplantation.com/media/press-releases/statement-response-rapid-response-palm-oil-report-19-mighty-earth 23 December 2019: The RSPO has now published the boundaries of SD Guthrie's concessions in Sarawak, which includes Derawan SOU 33 area. Following further engagement with Mighty Earth regarding the issue of the concession boundary, this matter has been resolved to Mighty Earth's satisfaction.</p>	Mighty Earth - Rapid Response Report #19 (September 2019)	Resolved
62	SD Guthrie Bhd	Complaints of social issues levelled			As of 25 June 2019, PT MAS has ceased to be a subsidiary of SD Guthrie as we have effectively disposed our interest in the company to PT Inti Nusa Sejahtera.	RSPO Complaints Panel (31 Oct 2012)	Resolved

No	Group Company	Issues	Buying Relationship	Presence in SD Guthrie International's Global Supply Chain	Summary of Actions and Findings	Reported By	Case Status
		against PT Mitra Austral Sejahtera II (PT MAS II) by Project Affected Community (PAC)			On 26 Jan 2024, The Appeals Panel's decision letter has been delivered to both parties. In line with Section 14.7.4 of the Complaints and Appeals Procedure 2017, the decision of the Appeals Panel is final and this Complaint is formally closed.		
63	Sin Tek Huat (STH Group)	Report of deforestation in: - PT Makmur Bersama Asia (PT MBA)	Indirect via third party traders	SDGI Zwijndrecht SDGI Langat	PT MBA is not specifically in our supply chain, however other mills affiliated with STH Group are. Supplies from STH Group are via third party traders who have NDPE policies and commitments. Engaging with third party trader on this case. Results of third-party trader's engagement with STH Group concluded that the reported deforestation is outside PT Makmur Bersama Asia concession boundary.	Mighty Rapid Response Report #20 (Oct 2019)	Resolved
64	SIPEF	Reports of deforestation in: PT Agro	Indirect via third party traders	SDGI Liverpool SDGI Zwijndrecht	PT Agro Muara Rupit is not specifically in our supply chain, however other mills affiliated with SIPEF are. Supplies from SIPEF came into our supply chain via third party traders who have NDPE policies and commitments.	Mighty Rapid Response Report 32 (Jan 2021)	Resolved

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		Muara Rupit		SDGI Langat	<p>SIPEF responded to the allegation (https://bit.ly/3o3gQ06), stating that the developmentdetcted by Mighty Earth has not undergone an Integrated HCV-HCS Assessment given it relates to a NPP of 2014 and it was not required at the time. A Land Use Risk Identification (LURI) was conducted by an independent assessor and accepted by the RSPO in April 2020. The LURI shows that all of the clearings identified by Mighty Earth are wholly within the area identified as “Low Risk”.</p> <p>SIPEF notes that from the evidence provided, none ofthe reported cleared areas overlap with either the HCV or any of the HCS areas. SIPEF also informed ourthird-party trader that the area cleared is covered by rubber vegetation.</p> <p>Status of the PT AMR peer review (area I & II) has beencompleted and the result is already available publicly at the HCSA website. See https://bit.ly/3IGld1A</p>		
65	Ta Ann / Sarawak Plantation Berhad	Reports of deforestation in: -Ladang	Indirect via third party traders	SDGI Zwijndrecht	<p>Ladang Selezu is not specifically in our supply chain, however other Ta Ann mills are.</p> <p>Third party suppliers have relevant NDPE policies and programmes. Updates on their engagement</p>	Mighty Earth - Rapid Response Report 15 (May 2019)	Ongoing Monitoring & Engagement

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		<p>Selezu Sdn Bhd - LPF 0010</p> <p>Reports of violence in:</p> <p>-Niah Palm Oil Mill</p>			<p>with Ta Ann include:</p> <ul style="list-style-type: none"> -commitment to adhere to NDPE policy obtained and concession maps shared for investigation. -Moratorium on clearing achieved. -Field verification scheduled for July 2019. <p>As part of the investigation, third-party trader's team has conducted a field assessment from 22-27 July to verify the allegation. The field assessment has verified that the deforestation happened outside Ladang Selezu's concession boundaries.</p> <p>Niah Palm Oil Mill:</p> <p>The incident occurred on 7 February 2021, involving, Neileson Digat Anak Regi, a former employee of Niah Palm Oil Mill (NPOM), Sarawak Plantation Berhad (SPB).</p> <p>Neilson is alleged to have entered staff quarters on 7 February 2021 after a verbal confrontation and despite being informed that no visitors were allowed on the premises due to COVID-19 lockdown. He was asked to leave by the company staff but is alleged to have physically assaulted a guard and engaged in a fight on his way out. Neileson was handed over to the police station</p>	<p>Mighty Earth - Rapid Response Report 35 (Aug 2021)</p>	

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					<p>and a report was filed against him. On the same day, he also lodged a police report claiming that he was beaten without reason, resulting in bodily pain.</p> <p>Following this incident, local community members and Nieleeson’s grandfather imprisoned and beat up company security guards at the main entrance of a SPB estate on 9 February 2021. The said guards proceeded to lodge a police report on 10 February. The police department, Polis Diraja Malaysia (PDRM) has issued a media release on the case. PDRM has also made several arrests and the cases are still under investigation.</p> <p>During the course of investigation, SPB has shared extensive supporting documents with our third-party trader, including a clear chronology of events, police reports, as well as internal memos, policies and SOPs. They have provided sufficient clarification on allegations highlighted in this case and have committed to developing procedures to enhance their commitment to non-violence at the workplace; this includes a SOP and Emergency Response Plan (ERP) for Security, with assistance from our third-party trader. SBP has also committed to actively socialise their SOP to</p>		

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					<p>relevant personnel in the organisation.</p> <p>LPF 0010: Since Q1 2021, Ta Ann Group only entered our supply chain via a single spot purchase transaction. Raw materials sourced from Ta Ann Group have not entered our supply chain since then.</p>		
66	Tasma Puja	Report questioning the legality of FFB processed in Batang Cenaku mill as the company's plantation area is said to overlap with forest areas.	Indirect via third party traders	SDGI Zwijndrecht	<p>Tempo, Mongabay Indonesia, Betahita, and Auriga Nusantara collaborated on an investigation that questions the legality of FFB processed in Batang Cenaku mill as the company's plantation area is said to overlap with forest areas. On site investigation for this research was conducted in August 2021. The report states that the permit map (Batang Cenaku) of PT Tasma Puja cuts the areas of convertible production forest (HPK) as well as limited production forest (HPT).</p> <p>Tasma Puja and Batang Cenaku mill are indirectly in our supply chain through a handful of spot market purchases in SDGI Zwijndrecht via third party traders with relevant NDPE commitments. Our third-party trader's investigation confirmed that Tasma Puja has taken the necessary steps to</p>	https://magz.tempo.co/read/38492/fro-m-the-woods-to-market-goods	Resolved

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					<p>address the issue of legality since a few years ago, pending further response from the government.</p> <p>It is worth noting that mills entering our supply chain via the spot market often only appear a handful of times during the year (usually as one mill in a long list of mills associated with a delivery). We have very little leverage on these mills and are limited in our ability to investigate the allegations.</p>		
67	Teladan Prima	<p>Reports of deforestation in:</p> <ul style="list-style-type: none"> - PT Tanjung Buyu Perkasa 	Direct purchases and indirect via third party traders	<p>SDGI Rantau</p> <p>SDGI Langat</p> <p>SDGI Pasir Gudang</p>	<p>Supplies from Teladan Prima came into our supply chain via third party traders who have NDPE policies and commitments. Engagement with Teladan Prima revealed that the alleged land clearing is not conducted by the company and happened outside their concession boundary. This has been verified from their concession maps.</p>	Mighty Earth - Rapid Response Report 26 (April 2020)	Resolved

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68	TH Plantations	<p>Reports of deforestation and peat clearing in:</p> <ul style="list-style-type: none"> -PT Persada Kencana Prima (PT PKP) -Hydroflow Sdn Bhd -Ladang Tabung Haji -TH Pelita Meludam Sdn Bhd -TH Pelita Simunjan Sdn Bhd -Mukim Tembeling (Yong Forest Reserve) Jerantut, Pahang 	Direct purchases and indirect via third party traders	<p>SDGI Langat</p> <p>SDGI Carey Island KCP</p> <p>SDGI Zwijndrecht</p> <p>SDGI Pasir Gudang</p> <p>SDGI Bintulu</p> <p>SDGI Port Klang</p>	<p>The highlighted operations are not specifically in our supply chain, however other mills affiliated with TH Plantations are. Current updates include:</p> <ul style="list-style-type: none"> -Moratorium on land clearing at PT Persada Kencana Prima (PT PKP) is in place. Agreement for HCV and HCS assessments before any development. -Advised on the presence of a logging company in the area with an overlapping claim on the concession (Hak Izin Lokasi), who have been responsible for most of the clearing (September 2017 - February 2018). -On the report issued by Chain Reaction Research dated 27th July 2018 alleging breach of moratorium in PT PKP, TH Plantations have clarified that activities were related to stacking work in areas previously cleared and overgrown. The restacking works were put on hold until this issue was clarified with stakeholders. This includes a field investigation by third party suppliers. -PT PKP hired an independent assessor to conduct assessment of the area of contention, together with third party supplier's team. The field assessment included mapping of the target area. A proposed rehabilitation plan will be established if new land was cleared. The field assessment was 	<p>Greenpeace - Deforestation Case Studies (December 2017)</p> <p>Chain Reaction Research Report (July 2018)</p> <p>Mighty Earth - Rapid Response Report 14 (April 2019)</p> <p>Mighty Earth - Rapid Response Report 15 (May 2019)</p> <p>Mighty Earth - Rapid Response Report 18 (Aug 2019)</p> <p>Chain</p>	Resolved

No	Group Company	Issues	Buying Relationship	Presence in SD Guthrie International's Global Supply Chain	Summary of Actions and Findings	Reported By	Case Status
					<p>carried out between 15 and 19 October 2018.</p> <p>-Monthly monitoring indicates that PT PKP continues to uphold their commitment to a moratorium.</p> <p>-Mighty Earth Rapid Response Reports 14 and 15 allege deforestation and peat clearing in two TH Plantation operations in Sarawak, Malaysia. Upon engagement, it was determined with documentary evidence that the clearing detected occurred outside of Hydroflow's concession boundary.</p> <p>-Mighty Earth Rapid Response Report 18 alleges peat clearing by TH Pelita Meludam in Sarawak.</p> <p>Engagement with TH Plantation revealed with map evidence indicates that the clearing occurred outside of their operations.</p> <p>-TH Plantation confirmed that land clearing at PT PKP had stopped since June 2019.</p> <p>-Ladang Tabung Haji is not specifically in our supply chain but a few affiliated mills are. The GPS coordinates for Ladang Tabung Haji pointed to a Ladang Sebauh an estate under the stable of Ladang Sawit Bintulu Sdn. Bhd., a joint venture company between TH Plantation and a local</p>	<p>Reaction Research Report (April 2020)</p>	

No	Group Company	Issues	Buying Relationship	Presence in SD Guthrie International's Global Supply Chain	Summary of Actions and Findings	Reported By	Case Status
					<p>based company. TH Plantations confirmed that Ladang Sebauh has been disposed to a third party since 2008 and therefore no longer part of TH Plantations.</p> <p>TH Plantation has confirmed that clearing activity covering 6 ha is outside TH Pelita Simunjan concession.</p> <p>Mukim Tembeling (Yong Forest Reserve) - In our engagement with THP, it was clarified that the company which owns the land which was cleared is Deru Semangat Sdn Bhd (DSSB), a joint venture company between Lembaga Tabung Haji and a member of the Pahang Royal family. Lembaga Tabung Haji (LTH) owns 55% in DSSB whilst THP does not own any shares in DSSB. THP merely acts as a management agent and does not have management control over the operation of DSSB. THP has conveyed its decision to terminate the Management Agreement to DSSB in 2019 and is in the process of finalising the termination of their Management Agreement with DSSB. Meanwhile THP have ceased all oil palm development in DSSB.</p> <p>THP has terminated the management agreement</p>		

No	Group Company	Issues	Buying Relationship	Presence in SD Guthrie International's Global Supply Chain	Summary of Actions and Findings	Reported By	Case Status
					<p>with DSSB, effective from 15th January 2021. THP is working with another third-party supplier to finalize THP Group's total liability area. The third-party supplier is also assisting THP in developing a recovery plan. Their first discussion took place on 26th February 2021.</p> <p>TH Plantation has committed to a NDPE policy which has been uploaded on their website http://www.thplantations.my/doc/THP_Sustainability%20Policy_v2.pdf</p> <p>THP has also established a Recovery Project in Johor in collaboration with Global Environment Centre (GEC).</p> <p>Please see progress update of the Recovery Plan as of December 2022 here.</p>		
69	Tradewinds	Potential deforestation detected by Trans Kenyalang	Direct purchases and indirect via third party traders	SDGI Langat SDGI Port Klang SDGI Bintulu	Third party traders have relevant NDPE commitments and programmes. Maps of the concession has been shared with third party traders for investigation. Identified clearing was found to be outside of the	Mighty Earth - Rapid Response Report 18 (Aug 2019)	Resolved

No	Group Company	Issues	Buying Relationship	Presence in SD Guthrie International's Global Supply Chain	Summary of Actions and Findings	Reported By	Case Status
		Sdn Bhd, in Sarawak, Malaysia		SDGI Pasir Gudang SDGI Carey Island KCP SDGI Zwijndrecht	Tradewinds concession.		
70	Triputra Agro Persada Group	Reports of deforestation in: -PT Dwiwira Lestari Jaya -PT Brahma Binabakti	Indirect via third party traders	SDGI Langat	<p>Triputra Agro Persada is indirectly in our supply chain via third party traders with relevant NDPE policies and commitments.</p> <p>PT Dwiwira Lestari Jaya HCV and HCS assessments conducted at PT Dwiwira Lestari Jaya in 2014 and 2016, show that the 56ha area highlighted in the Mighty Earth Rapid Response Report #12, was not located within their concession.</p> <p>PT Brahma Binabakti Our third-party trader has verified this allegation and confirmed that the land clearing happened outside of PT Brahma Binabakti's concession boundary. For more details, please refer to Triputra</p>	Mighty Earth - Rapid Response Report 12 (January 2019) Mighty Earth - Rapid Response Report 34 (June 2021)	Resolved

No	Group Company	Issues	Buying Relationship	Presence in SD Guthrie International's Global Supply Chain	Summary of Actions and Findings	Reported By	Case Status
					Agro Persada's official response here .		
71	TSH Resources Bhd	Reports of deforestation in PT Bulungan Citra Agro Persada.	Indirect via third party traders	SDGI Zwijndrecht SDGI Langat	<p>PT Bulungan Citra Agro Persada is not specifically in our supply chain, however other mills affiliated to its parent company are. Supplies from TSH Resources Bhd are predominantly via a third-party trader who have NDPE policies and commitments.</p> <p>TSH has commissioned Malaysian Environmental Consultants (MEC) to verify the allegation. It was concluded that the land use change was caused by fire spread into the concession from neighbouring area. As a RSPO member, TSH strictly adheres to no burn policy, and do not use fire for their land clearing activities.</p>	Mighty Rapid Response Report 21 (Nov 2019)	Resolved
72	Union Sampoerna Triputra Persada	Reports of deforestation in PT Harapan Hibrida Kalbar	Indirect via third party traders	SDGI Langat	<p>Supplies from Union Sampoerna Triputra Persada came into our supply chain via third party traders who have NDPE policies and commitments. Engagements with Union Sampoerna Triputra Persada clarified that the clearing detected was outside of PT Harapan Hibrida Kalbar concession.</p>	Mighty Earth -Rapid Response Report 23 (January 2020)	Resolved

No	Group Company	Issues	Buying Relationship	Presence in SD Guthrie International's Global Supply Chain	Summary of Actions and Findings	Reported By	Case Status
73	Widya Corporation	Reports of deforestation in PT Mulia Inti Perkasa	Indirect via third party traders	SDGI Langat	<p>PT Mulia Inti Perkasa is not specifically in our supply chain, however a mill affiliated to its parent company is. The supplies from Widya Corporation are via a third-party trader who have NDPE policies and commitments.</p> <p>We have started engagements to investigate the allegations.</p> <p>Third-party trader who engaged with MIP updated that MIP has conducted the necessary assessments which include HCS and HCV. The area identified in the report is outside the HCV/HCS area. MIP has agreed to submit their HCS report for peer review. They are in the process of discussing with their assessor to comply the same. Third-party trader confirmed that concession maps have been shared with them for verification that clearing detected is outside boundaries. It is also reported that MIP has ceased their land clearing activities.</p> <p>Our third-party trader continued to monitor PT MIP's activities and no deforestation within the identified HCS/HCV area had taken place since then. PT MIP has committed to a long-term moratorium of land clearing on PT MIP effective</p>	Mighty Earth - Rapid Response Report 25 (March 2020) Mighty Earth - Rapid Response Report 29 (July 2020)	Resolved

No	Group Company	Issues	Buying Relationship	Presence in SD Guthrie International's Global Supply Chain	Summary of Actions and Findings	Reported By	Case Status
					<p>March 2020.</p> <p>In September 2020, PT MIP submitted their HCV assessment to HCVRN for peer review.</p>		
74	Wings Group Indonesia / Kutuari Family Group	Reports of deforestation in PT Gawi Makmur Kalimantan	Indirect via third party traders	SDGI Zwijndrecht	<p>Wings Agro is in our supply chain indirectly via third party traders with relevant NDPE policies and commitments.</p> <p>Upon further investigation, we found that our third- party trader had erroneously grouped a different mill under the Wings Agro Group on their mill list. They have since then made necessary the correction to their mill list. This will also be reflected in SDGI's updated mill list.</p>	Mighty Earth - Rapid Response Report 34 (June 2021)	Resolved
75	Woodman Group	Reports of deforestation and peat clearing in Sarawak, Malaysia -- -(Baram estate, part of LPF/0004) -Adong and Liku estates	Indirect via third party traders	SDGI Zwijndrecht	Supplies from Woodman Group came into our supplychain via third party traders who have NDPE policies and commitments. Engagements with Woodman Group clarified that the clearing detected in the Baram, Adong and Liku concessions are not related to oil palm development.	Mighty Earth - Rapid Response Report 18 (Aug 2019)	Resolved

No	Group Company	Issues	Buying Relationship	Presence in SD Guthrie International's Global Supply Chain	Summary of Actions and Findings	Reported By	Case Status
		(part of LPF 0004)					
76	WTK	Reports of deforestation and peat clearing by Southwind Plantation, in Sarawak, Malaysia.	Indirect via third party traders	SDGI Zwijndrecht	Supplies from WTK came into our supply chain via third party traders who have NDPE policies and commitments. Engagement initiated on clearing detected in Rapid Response Report 17. Updates include: -Third-party trader who engaged with WTK concluded that WTK is not involved in the land clearing. -The land clearing happened either outside their concession boundary or within "Native Dispute Land". -A Police report has been lodged by WTK on the illegal clearing within the "Native Dispute Land" inside their boundary.	Mighty Earth - Rapid Response Report 17 (July 2019)	Resolved
77	Yayasan Pahang (YP)	Reports of peat clearing and stacking lines in the the YP Plantation Sdn Bhd	Indirect via third party traders	SDGI Biodiesel SDGI Pasir Gudang	Supplies from Yayasan Pahang came into our supply chain indirectly via a third-party trader with relevant NDPE policies and commitments. From our engagement with YP Plantation, YP Plantation is committed to sustainable production of oil palm. The Board of YP Plantation Sdn Bhd had on 17th August 2020	Mighty Earth - Rapid Response Report 30 (August 2020)	Resolved

No	Group Company	Issues	Buying Relationship	Presence in SD Guthrie International's Global Supply Chain	Summary of Actions and Findings	Reported By	Case Status
		concession in Bebar, Pahang, Malaysia.			<p>issued a stop work order and at the same time approved the implementation of a Group-wide NDPE policy.</p> <p>YP formally appointed the Global Environment Centre (GEC) in January 2021 to assist them in implementing their Recovery Project. On 23rd February 2021, GEC signed an MOU with the Pahang State Government to support conservation of forest and peatlands in Pahang, including the establishment of recovery projects in the Southeast Pahang Peatland Landscape (SEPPL).</p> <p>GEC has undertaken an assessment of the 790ha remaining area that had been cleared and verified that it is all severely degraded peatland having been repeatedly burnt over the past 25 years. The assessment showed that the area was dominated by alien invasive trees such as Acacia and is not ecologically viable to be rehabilitated. It also showed that abandoning it or converting to other crop types would likely enhance the greenhouse gas (GHG) emissions. It also determined that the Recovery Project would more than offset the potential emissions from this area. This assessment was reviewed and</p>		

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					<p>further confirmed by an international expert from Liverpool John Moores University, United Kingdom.</p> <p>Based on the detailed review of documentation, reports and the high commitment from Yayasan Pahang, our third-party trader has agreed to the lifting of the SWO for the remaining 790ha of cleared land in late October 2021.</p>		
78	Yayasan Pelajaran Johor (Johor State Government)	Reports of deforestation in the YPJ Plantations Sdn Bhd (Ladang SSI Sg Ara) concession, in Johor, Malaysia.	Indirect via third party traders	SDGI Pasir Gudang	<p>Supplies from YPJ Plantations came into our supply chain via third party traders with relevant NDDPE policies and commitments.</p> <p>Our third-party trader that engaged with YPJ Plantations have verified this case and updated the following:</p> <ul style="list-style-type: none"> -The total concession area of Sungai Ara is less than 90ha, whereby the entire concession was largely cleared prior to 2019. The remaining area of less than 5 ha which was developed in January 2019 is a combination of mixed scrub with pioneer species. -There was no further land clearing in Sungai Ara post January 2019. 	Mighty Earth -Rapid Response Report 32 (January 2021)	Resolved

No	Group Company	Issues	Buying Relationship	Presence in SD Guthrie International's Global Supply Chain	Summary of Actions and Findings	Reported By	Case Status
					<p>-Since the case was brought to YPJ's attention in January 2020, they have immediately developed an NDPE policy to guide future developments and demonstrate their commitment towards no deforestation.</p> <p>We will continue to monitor the progress at YPJ Plantation.</p>		
79	Yayasan Sabah / Innoprise Plantations Bhd	Reports of deforestation in Innoprise Plantations (Sabah, Malaysia)	Indirect via third party traders	SDGI South Africa SDGI Zwijndrecht	<p>Yayasan Sabah enters our supply chain indirectly through a handful of spot market purchases in SDGI Zwijndrecht via third-party traders with relevant NDPE policies and commitments.</p> <p>Our third-party trader has engaged with Innoprise Plantations to further investigate this allegation. During the investigation, Innoprise had shared comprehensive documentation for review:</p> <ul style="list-style-type: none"> -Detailed concession maps showing planting blocks, in shapefile format. -The Sabah Forestry Department (SFD) approved Annual Work Plans (this is a formal document required to be submitted to SFD annually and shows the planned work in relation to both their timber and oil palm operations) -Field visit report, including ground and drone 	Mighty Earth -Rapid Response Report 36 (October 2021)	Resolved

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					<p>photos of selected points to show condition on the ground.</p> <p>Our third-party trader's investigation has concluded that the land development was not related to their oil palm operation. Their activities were related to tree planting activities, mainly on Laran (Neolamarckia cadamba).</p>		
80	Yuwang	Reports of deforestation and peat clearing by Empresa Sdn Bhd, in Sarawak, Malaysia.	Indirect via third party traders	SDGI Langat	Supplies from Yuwang came into our supply chain via third party traders who have NDPE policies and commitments. Engagements with Yuwang clarified that the clearing detected was outside of their concession.	Mighty Earth - Rapid Response Report 17 (July 2019)	Resolved