

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	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). 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.	Mighty Rapid Response Report 38 (February 2022) Mighty Rapid Response Report 40 (July 2022)	Resolved



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2	Agropalma	Allegations of	Indirect via	SDGI Liverpool	The Chain: Agropalma Faces Possible Legal,	The Chain:	Ongoing
		poor working	third party		Reputational Risks from Health and Safety	Agropalma	Monitoring &
		conditions	traders	SDGI	Violations, Conflict with Local Communities	Faces Possible	Engagement
		and conflicts		Zwijndrecht	Agropalma is in our supply chain indirectly via	Legal,	
		with local			third-party traders with relevant NDPE	Reputational	
		communities.			commitments.	Risks from	
						Health and	
					Our third-party trader has engaged with	Safety	
					Agropalma, who has clarified some points	Violations, Conflict with	
					mentioned in the article published by Chain	Local	
					Reaction Research, on March 22, which addressed a decision against the company, in a labor lawsuit,	Communities	
					and the recent occupation of land by Agropalma,	Global	
					on the banks of the Acará River, in Pará.	Witness -	
					On the first point, the aforementioned public civil	Brazil's	
					action filed in 2019, Agropalma responded that	biggest palm	
					this was based on facts that do not match the	oil producers	
					reality experienced by their employees and ended	Agropalma	
					up resulting in conviction. They added that the	and Brasil	
					decision is not final, and an appeal will be filed and	Biofuels	
					will be presented by the company, as it	accused of	
					understands that it has been complying with the	serious	
					determinations of labor legislation and providing	human rights	
					adequate conditions for the execution of the	violations	
					work, which is confirmed by several decisions of	against	
					the same Court, reiterating the dismissal of	communities	



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				compensation claims for inadequate working	in the Pará	
				conditions, filed in individual claims.	region	
				As for the recent occupation of land, Agropalma	https://www.r	
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				· · · · · · · · · · · · · · · · · · ·		
				the vicinity of its farms.		
				Agropalma has been present in Pará since 1982		
				and added that all of their lands were acquired in	plantations	
				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		
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				by iaw.		
	<u>-</u>	' Issues	ISSUES	Group Company Issues Buying Relationship Guthrie International's Global Supply	Group Company Issues Buying Relationship Global Supply Chain Compensation claims for inadequate working conditions, filed in individual claims. As for the recent occupation of land, Agropalma emphasizes that the relationship with communities is at the heart of their sustainability strategy. 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. 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	Group Company Issues Buying Relationship Relationship Chain Compensation claims for inadequate working conditions, filed in individual claims. As for the recent occupation of land, Agropalma emphasizes that the relationship with communities is at the heart of their sustainability strategy. Agropalma relierates 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. 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 comfirmation 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 cancellation of registrations, in addition to starting the process of land regularization, as determined



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					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.		
					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.		
					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		
					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		



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					third party to carry out an external assessment to		
					investigate the alleged land rights issues.		
					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. Our third-party trader has also disclosed		
					Agropalma has started to implement an action		
					plan which includes corrective measures to regain		
					RSPO certification. This action plan has already		
					been shared with the certifying bodies. Our trader		
					is also closely monitoring the implementation of		
					the action plan for the recovery of the certification		
					and for addressing other outstanding issues		
					In March 2025, our trader has received progress		
					report updates which explains key acheivements		
					made by Agropalma such as emplementations of		
					Social and Environmental Responsibility Program,		
					improving community engagement, and		
					addressing social and environmental gaps. To		
					sustain this progress, Agropalma will maintain		
					advanced human rights training, technical		
					assistance, and field monitoring throughout the		



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					year. Upcoming actions include ongoing training sessions, progress monitoring visits, and the integration of grievance updates into Agropalma's action plan.		
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 can do to ensure that these mills do not appear in future spot market purchases. 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	Uncovering the Supply Chain: Palm Oil from Colombia to the EU (by Aidenvironme nt & IUCN NL)	Resolved



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					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.		
4	Astra Internationa ITbk / Astra Agro Lestari	Reports of deforestation at PT Agincourt Resources Tbk (Astra Group's gold mining company) Various allegations of land grabbing, governance risks, and environmen	Direct purchases	PT Guthrie International Pulau Laut	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. However, we are open to discussions with stakeholders on how best to collaborate on deforestation events in the landscapes that we are connected to. 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. WALHI & FOE Report and Open Letter dated September 2022 AAL is currently a direct supplier to PT Guthrie International Pulau Laut in Indonesia, however, we are not sourcing from AAL Sulawesi – we are only	Mighty Earth - Rapid Response Report 33 (May 2021) Mighty Earth - Rapid Response Report 34 (June 2021) Mighty Earth - Rapid Response Report 36 (October 2021)	Ongoing Monitoring & Engagement



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		tal impacts at PT Agro Nusa Abadi (PT ANA), PT Lestari Tana Teladan (PT LTT), and PT Mamuang			sourcing from AAL Kalimantan. None of the implicated concessions highlighted in the report are in our supply from AAL. 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. Appointment of EcoNusantara as an Independent Third Party Progress Update (9th June 2023) Progress Update (23rd June 2023) Progress Update (27th October 2023) Publication of ENS Report (November 2023) Publication of Stakeholders' Responses to ENS Report Progress Update (4th April 2024)	WALHI & FOE Report and Open Letter from Civil Society Organization s dated September 2022	



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					Progress Update (4th November 2024)		
					Norway's Council of Ethics' (CofE's) Removal of AAL from Watchlist		
					AAL's 3-Year Action Plan as Follow up on Third Party Verification Report (1st Semester)		
5	Central Cipta Murdaya / Hardaya Plantations Group	Reports of deforestation in the following operations: - PT Hardaya Inti Plantations - PT Sebuku Inti Plantation	Direct purchases	PT Guthrie International Pulau Laut	PT Hardaya Inti Plantations The Hardaya Plantations Group came into our supply chain via third party traders with relevant NDPE policies. 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 until NDPE requirements can be addressed. PT Hardaya Inti Plantations entered our supply chain via a spot purchase in the 1st quarter 2018.	Greenpeace - Deforestation Case Studies (December 2017) Mighty Earth Rapid Response Report 41 (February 2023)	No Longer in Supply Chain



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6	Daabon Group	Alleged links to deforestation and human rights violations in Colombia	Indirect via third party traders	SDGI Zwijndrecht SDGI Liverpool	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. 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.	Uncovering the Supply Chain: Palm Oil from Colombia to the EU (by Aidenvironme nt & IUCN NL)	Resolved



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7	First Borneo	Reports of deforestation in the following operations: - PT Khatulistiwa Agro Abadi - PT Borneo International Anugerah	Indirect via third party traders	SDGI Langat	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. The Group has a mill named PT Arjuna Utama Sawit (PT AUS) located in Katingan, Central 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. 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.	Mighty Earth Rapid Response Report 40 (July 2022)	Resolved



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					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.		
8	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	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. Sumber Tani Agung, an indirect supplier to SDGI, is allegedly sourcging 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	Mighty Earth - Rapid Response Report 39 (May 2022)	No Longer in Supply Chain



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					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. Our third-party trader that is sourcing directly 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.		
					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.		



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					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. PT STA and other alleged supply links are no longer in our supply chain since January 2022.		
9	Musim Mas	Imposed HCV/HCS without FPIC by PT Sarana Esa Cita (formerly known as PT Agrowitama)	Direct purchases and indirect via third party traders	SDGI Liverpool SDGI Zwijndrecht	Allegations by Villagers of Mukti Rahaja Villagers of Mukti Rahaja has expressed their dissatisfaction, this incudes imposing HCV and HCS without FPIC among villagers, disregarding customary rights such as sacred sights, customary forest and land, impacting food security and livelihood. The community members filed a case against PT SEC in September 2023 to the local police on the allegation of land grabbing of 233.74 ha in Sabung Sanggau hamlet of Sabung village. In early October, the police released the results of the investigation through an official letter issued by the Head of Sambas Police office in West Kalimantan addressed directly to the complainant,	Lembaga Bentang Alam Hijau (LemBAH)	Resolved



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					which was received by Musim Mas in early November. The investigation included interrogation of witnesses, verification of land compensation documents and of legal permits of PT Agrowiratama and PT SEC, a joint field verification with Sambas Investment Agency and involvement of the Sambas Land Agency. From the evidence reviewed, the police have concluded that there is no violation of legal requirements by PT SEC. Musim Mas has considered this case as Resolved. Supply Chain Linkage Musim Mas is in our supply chain via third party trader and direct purchase through SDGI Europe		
10	Naturaceites	Allegations of land rights violations in Guatemala	Indirect via third party traders	SDGI Liverpool SDGI Zwijndrecht	Allegations by CIR 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 are believed to contaminate Lake Izabal and endanger the livelihoods of the	Investigation by the Romero Initiative (CIR) on Human Rights Abuses (June 2023)	Resolved



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					One of the companies being protested is NaturAceites. The Guatemalan government NaturAceites are also alleged to be behind violent police operations. The Guatemalan communities, where plantations and oil mills of NaturAceites are	Center for Constitutional and Human Rights (ECCHR) - https://www.	
					demonstrably located, is 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.	ecchr.eu/en/c ase/edeka- taeuscht- verbraucherin nen-mit- nachhaltigkeit	
					Supply Chain Linkage Naturaceites is in our supply chain to Europe 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	s-siegel/	
					engaged with Naturaceites regarding the allegations and they have assured us that the ongoing procurement is subject to regular reviews and compliance checks to ensure that NaturAceites adheres to relevant NDPE policies.		
					Our third party trader has also confirmed that Naturaceites is currently undergoing a		



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					comprehensive review of the actions (including studies and procedures) required to lift the suspension. Official Response from Naturaceites dated 5th June 2023 Official response from Naturaceites, published in March 2024 Official RSPO Response The Certification Body responsible for NaturAceites' 2023 audits lost its accreditation in August 2023, leading to NaturAceites' certificates being transferred to Control Union. Control Union since then has suspended both of NaturAceites' RSPO P&C certificates after audits in July-August 2024. NaturAceites has appealed the findings, and the suspension will last up to six months during the appeal. NaturAceites must resolve all Major Non-		
					Conformities to reinstate its certificates; otherwise, it risks termination and a new recertification process. Despite the suspension, NaturAceites can still trade RSPO Certified material from other certified members due to its active supply chain certificates. NaturAceites remains committed to transparency and		



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				Criain	compliance with RSPO standards regarding labor, environmental, and social practices. The RSPO is closely monitoring the situation to enhance its assurance processes and ensure sustainable oil palm production. The European Center for Constitutional and Human Rights (ECCHR), Foodwatch and Updated CIR Report The ECCHR and Foodwatch filed a complaint (https://www.ecchr.eu/en/case/edeka-taeuscht-verbraucherinnen-mit-nachhaltigkeits-siegel/) 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 (https://www.ci-romero.de/palmoel-report-2024/) on 19th February 2024, alleging NDPE non-conformances by Naturaceites. Naturaceites have published (https://naturaceites.com/sostenibilidad-naturaceites/) their internal investigation report and an official response to these allegations.		



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					Our supplier has stopped purchasing certified oils from NaturAceites as of March 2025. However, they may start repurchasing regular or certified oils rom NaturAceites in the future. SD Guthrie will monitor NaturAceites' RSPO status and its presence in our supply chain.		
11	Poligrow Colombia S.A.S.	Alleged links to deforestation and human rights violations in Colombia	Indirect via third party traders	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 can do to ensure that these mills do not appear in future spot market purchases. 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	Uncovering the Supply Chain: Palm Oil from Colombia to the EU (by Aidenvironme nt & IUCN NL)	Resolved



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					reports (dated between September 2022 and February 2023) did not find any non-compliances on the issues highlighted.		
12	PT Nia Yulided Bersaudara (PT NYB)	Clearing of lowland rainforests in the northeast of the Leuser Ecosystem	Indirect via third party traders	SDGI South Africa	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). 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. 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.	Leuser Watch Website RAN - Notorious Rainforest Destroyer Caught Taking Palm Oil To Global Market	Resolved



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13	PT Runding Putra Persada (PT RPP)	Reports of links to deforestation in the Leuser Ecosystem via 3rd party FFB Reports of peat forest clearing in the Rawa Singkil Wildlife Reserve via third party FFB	Indirect via third party traders	SDGI Langat	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. 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. 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 location of the illegal plantation was once covered in peat forests but was cleared and the waterlogged soils drained in the last five years. 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).	Leuser Watch Website RAN - Deforestation and Fires Continue to Destroy Precious Indonesian Rainforests April 2018 RAN - Carbon Bomb Scandals: Big Brands Driving Climate Disaster for Palm Oil (September 2022)	Resolved



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					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.		
					Land Agency (BPN) since 2017.		
					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.		
					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,		



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					which they have started sourcing since April 2022. 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. 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. 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 to deliver his commitment. Our third-party trader has received a written statement from CV BI and RPP regarding this commitment. 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-		



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					compliant with their policy and therefore cannot enter their supply chain. 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. 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.		
14	Rimbunan Hijau	Reports on deforestation and peat development in Sibu, Sarawak for Palmraya Pelita Spapa Oya Plantation Sdn Bhd	Indirect via third party traders	SDGI Langat SDGI South Africa	Mighty Earth has reported deforestation and peat development in Sibu, Sarawak for Palmraya Pelita Spapa Oya Plantation Sdn Bhd amounting to approximately 114 ha of clearing conducted from January 2023 to July 2024. According to our third party-traders, The land clearing mentioned did not involve Pelita Plantation Sdn Bhd and took place outside the official Pelita Project area. The Pelita Project is a joint venture in Sarawak,	Mighty Earth - Rapid Response Report 46 (October 2024)	Resolved



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					Malaysia, involving the private sector, Native Customary Rights (NCR) landowners, and the government. In this partnership, 60% of the shares are held by a private company, 30% by NCR landowners through land contribution, and 10% by the Sarawak Land Custody and Development Authority (LCDA). Pelita Holdings, a subsidiary of LCDA under the Ministry of Rural and Land Development, is responsible for managing NCR land for the project. These lands typically include areas used for farming, fruit cultivation, or regenerating forests, depending on their previous use. If NCR landowners choose not to participate in the project, their land is not developed and remains under their legal ownership. The deforestation referred to in the report occurred on land where the NCR landowners had not agreed to take part in the Pelita Spapa Oya Plantation project. As a result, no development was carried out by the company on that land.		



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					Supply Chain Linkage SD Guthrie International is not sourcing directly from Rimbunan Hijau . However, it is present in our supply chain via third party trader with relevant NDPE polocies. Based on the information provided, we consider this case resolved.		