

# ADM Grievances and Resolutions Summary Table

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2018-011	8/23/2018	Deforestation	<p>Mighty Earth's <a href="#">Rapid Response Report 6</a></p> <p>Report alleges deforestation in 11 plantations in Indonesia and 1 plantation in Malaysia.</p>	Mighty Earth	<p>ADM has reached out to our direct suppliers to determine which, if any, source from these plantations.</p> <table border="1"> <thead> <tr> <th></th> <th>GAR</th> <th>Fuji</th> <th>Unimills</th> </tr> </thead> <tbody> <tr> <td>PT RJ</td> <td>Indirect – <a href="#">G33.b</a></td> <td></td> <td></td> </tr> <tr> <td>PT KPI</td> <td>Direct – <a href="#">G39</a></td> <td>Indirect</td> <td></td> </tr> <tr> <td>MT MIP</td> <td>Direct – <a href="#">G31</a></td> <td>Not currently sourcing as mill is not in operation</td> <td></td> </tr> <tr> <td>PT KDK</td> <td>Indirect – <a href="#">G33.e</a></td> <td>Investigating</td> <td>Indirect</td> </tr> <tr> <td>PT SP</td> <td></td> <td>Investigating</td> <td>Indirect</td> </tr> <tr> <td>PT SKR</td> <td></td> <td></td> <td>Indirect</td> </tr> </tbody> </table> <p>We are still awaiting feedback from Wilmar/Olenex, AAK, IOI, ICOF and Cargill.</p>		GAR	Fuji	Unimills	PT RJ	Indirect – <a href="#">G33.b</a>			PT KPI	Direct – <a href="#">G39</a>	Indirect		MT MIP	Direct – <a href="#">G31</a>	Not currently sourcing as mill is not in operation		PT KDK	Indirect – <a href="#">G33.e</a>	Investigating	Indirect	PT SP		Investigating	Indirect	PT SKR			Indirect		
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2018-010	7/16/2018	Deforestation	<p>Mighty Earth's <a href="#">Rapid Response Report 5</a></p> <p>Report alleges deforestation in 7 plantations in Indonesia.</p>	Mighty Earth	<p>Supplier outreach started on 31<sup>st</sup> July 2018. ADM received responses as follows:</p> <table border="1"> <thead> <tr> <th></th> <th>GAR</th> <th>Unimills</th> <th>Fuji</th> <th>Wilmar/Olenex</th> <th>Cargill</th> </tr> </thead> <tbody> <tr> <td>PT KPI</td> <td>Direct – <a href="#">G39</a></td> <td></td> <td>Indirect</td> <td></td> <td>Indirect</td> </tr> <tr> <td>PT RJ/HRJ</td> <td>Indirect – <a href="#">G33.b</a></td> <td></td> <td></td> <td></td> <td>Indirect</td> </tr> <tr> <td>PT PKP</td> <td></td> <td>Sources from parent company, but not listed plantation</td> <td></td> <td>In dialogue – <a href="#">N25</a></td> <td>Indirect</td> </tr> <tr> <td>PT KDK</td> <td>Indirect – <a href="#">G33.e</a></td> <td></td> <td></td> <td>PT KDK no longer owns the concession listed.</td> <td>Indirect</td> </tr> </tbody> </table> <p>We are still awaiting feedback from AAK and IOI.</p>		GAR	Unimills	Fuji	Wilmar/Olenex	Cargill	PT KPI	Direct – <a href="#">G39</a>		Indirect		Indirect	PT RJ/HRJ	Indirect – <a href="#">G33.b</a>				Indirect	PT PKP		Sources from parent company, but not listed plantation		In dialogue – <a href="#">N25</a>	Indirect	PT KDK	Indirect – <a href="#">G33.e</a>			PT KDK no longer owns the concession listed.	Indirect
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2018-009	6/25/2018	Deforestation Human Rights	Greenpeace <a href="#">Rogue Trader</a>  The publication outlines connections between Wilmar and Gama and links to deforestation and human rights violations.	Greenpeace	We have been in contact with our direct suppliers and have been informed by Wilmar that they are not sourcing from Gama and related companies mentioned in the report anymore with immediate effect. Developments to be followed closely on <a href="#">Wilmar Dashboard</a> and on the The Forest Trust (TFT) who gave a <a href="#">Public Briefing</a> regarding this issue on 29 <sup>th</sup> of June 2018.
2018-008	6/11/2018	Deforestation	Mighty Earth's <a href="#">Rapid Response Report 4</a>  The report is a follow-up which outlines continued deforestation in 5 concessions.	Mighty Earth	In response to Rapid Response Report 3, ADM let Mighty know that we reached out to our suppliers, and that at least one supplier continued to buy from GAMA group. In addition multiple suppliers are still in dialogue with ANJ.  In the fourth Mighty reports highlights that deforestation continued in following concessions: BLD Plantation Bhd, owned by KTS Holdings Sdn Bhd, PT Permata Putera Mandiri (Blok I), owned by Austindo Nusantara Jaya Agri (also featured in report), LPF/0039 Zedtee SB, a member of the Shin Yang group, linked to Sarawak Oil Palm Bhd, PT Agriprima Cipta Persada, linked to the GAMA Group (also featured in report 3) and PT Condong Garut, ownership/links unknown.  Given the continued clearance by both GAMA and ANJ, ADM has intensified dialog with suppliers. On 21 <sup>st</sup> June 2018 ADM reached out to all relevant direct suppliers to better understand how they manage critical suppliers in order to bring them back into compliance with ADM's NoDPE Policy and asking how ADM could support the efforts.
2018-007	5/15/2018	Deforestation Human Rights	<a href="#">Greenpeace Report Moment of Truth</a>  The publication covers palm oil producers involved in deforestation and/or human rights abuses.	Greenpeace	The publication covers various palm oil producers involved in deforestation and/or human rights abuses. ADM responded to Greenpeace that some of companies, connected to the Greenpeace list, are/were indirect suppliers of ADM.  On 21st June 2018 ADM reached-out to all relevant direct suppliers to better understand how they manage critical suppliers in order to bring them back into compliance with ADM's NoDPE Policy and asking how ADM could support the efforts.
2018-006	6/1/2018	Deforestation	<a href="#">Eyes on the Forest Report (EoF) Enough is Enough</a>  Report cites 22 palm oil mills receiving FFBS illegally from protected areas.	Eyes on the Forest	ADM does not directly purchase palm oil from the mills listed in the <a href="#">EoF report</a> ADM did not directly purchase palm oil from the 22 CPO mills mentioned in the <a href="#">EoF report</a> which received illegal FFB from protected areas.  On June 21, 2018 ADM reached-out to all relevant direct suppliers to better understand how they manage critical suppliers in order to

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2018-05	6/6/2018	Deforestation	<a href="#">RAN Report</a> <a href="#">Leuser Watch</a> PT Surya Panen Subur	Rainforest Action Network, PepsiCo.	<p>ADM did not directly sourced product from PT Surya Panen Subur II (PT SPS II). Immediately after ADM received the request we have engaged with all their direct suppliers in order to check with them if they are already engaged with PT SPS II and to understand how they work on bringing this supplier back into compliance's with ADM's NoDPE policy.</p> <p>Most of direct suppliers have engaged PT SPS II issue and also logged this on their corporate <a href="#">grievances lists</a> giving regular updates.</p> <p>Another supplier already had initiated engagement with PT Surya Panen Subur II (PT SPS II) when RAN released the report titled "The Last Place on Earth" in November 2014. PT SPS II has been transparent in updating customers regularly on their progress in addressing issues raised by RAN. Further, PT SPS II has implemented best management practices on peatland since 2014 and have committed to a moratorium in 2015.</p> <p>With reference to RAN's latest report, where it has mentioned the State Prosecutor's Office has convicted PT SPS II in using fire on land clearing, it has to be clarified that the high court has delivered their verdict that, PT SPS II was found <u>not guilty</u>.</p> <p>Besides that relevant ADM suppliers closely work with The Forest Trust (TFT) in order to ensure NoDPE compliance in the Leuser Ecosystem and to foster supply chain transformation.</p>
2018-004	5/2/2018	Deforestation	PAPUA OIL PALM PLANTATIONS UPDATE 2018 – The report identifies links between ADM's supply chain and specific concession plantations in Papua and West Papua, Indonesia.	Environmental Investigation Agency (EIA)	<p>ADM is already in contact with our direct suppliers. Based on the report shared by EIA, the dialog will be intensified.</p> <p>On 21st June ADM reached-out to all relevant direct suppliers to better understand how they manage critical suppliers in order to bring them back into compliance with ADM's NoDPE Policy and asking how ADM could support their efforts.</p>
2018-003	4/24/2018	Deforestation	<a href="#">Report</a> cites peat development in Salim region in Borneo.	Aid Environment, PepsiCo	<p>ADM indirectly sourced from following palm oil mills:</p> <ul style="list-style-type: none"> <li>• Riau Agrotama Plantation</li> <li>• Bontipermai Jayaraya mill</li> <li>• Simba, Sintang – PSC mill</li> <li>• Agro Sukses Lestari</li> <li>• Buana Hijau Abadi</li> <li>• PKS Sejahtera</li> <li>• Kalimantan Sanggar Pusaka</li> <li>• Belian</li> </ul>

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					<p>ADM is not aware that we source from additional mills that are located close to the plantations PT Duta Rendra Mulya (PT DRM) and PT Sawit Khatulistiwa Lestari (PT SKL), which are mentioned in the Aid Environment report. ADM initiated supplier dialog with all direct suppliers relevant in this case in order to find out if oil from the mentioned plantations is in our supply chain.</p> <p>One supplier, who is sourcing from the mills Sintang Agro Mandiri, Agro Sukses Lestari and Buana Hijau Abadi assured us that product from these oil mills is not relevant for ADM supply chains; however, they will check with the mentioned three mills if they do source from PT DRM and/or PT SKL. Another direct suppliers assured that they will add mentioned companies to their will be included in their “watch list” to ensure NoDPE compliance.</p>
2018-002	3/8/2018	Deforestation	<a href="#">Report</a> cites deforestation in seven concessions.	Mighty Earth	ADM reached out to suppliers relevant in this case in order to identify if any of them are sourcing from the listed concessions. Three of eight state that they neither directly nor indirectly source from mentioned plantations/oil mills. All other suppliers assure that they have active engagement with their suppliers, especially regarding Austindo Nusantara Jaya Agri (AJN) and the Salim and GAMA group in general. Most of them have suspended the GAMA group from their supply base. One supplier informed us that there is still supply from GAMA group, but not from the plantations listed in the Mighty report and generally not in the ADM relevant supply chains. Some are still in dialog with AJN, others already suspended AJN as supplier.
2018-001	2/8/2018	Human Rights	<a href="#">Report</a> cites human rights violations, fraud and corruption, and environmental pollution by Empresa Reforestadora de Palma de Petén SA (REPSA). <a href="#">Report</a> identifies REPSA as a company linked to tax fraud network.	Friends of the Earth, Nestle, TFT	<p>ADM sourced indirectly from REPSA.</p> <p>As of December 2017, all our suppliers report that they have suspended business with REPSA, therefore it has been removed from the ADM supply chain. Because global traceability scores and mill lists are reported on a rolling four quarter basis, REPSA will still appear in our supply chain map.</p>
2017-006	11/16/2017	Deforestation, Human Rights	Inquiry regarding allegations against Samling Group in Malaysia	Colgate, TFT, Greenpeace, NGO coalition	ADM sources indirectly from Samling through Wilmar. Reference <a href="#">Wilmar grievance log N32</a> .
2017-005	11/7/2017	Deforestation, Human Rights	Inquiry regarding allegations against Indofood Agri Resources	Cargill, Rainforest Action Network	ADM sources indirectly from Indofood through Wilmar. Reference <a href="#">Wilmar grievance log N16</a> .

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2017-004	11/7/2017	Deforestation, Human Rights	Report citing deforestation and human rights violations in Paraguay and Argentina.	Mighty Earth	<p>ADM reviewed the case studies listed in the report and below for reference. ADM has not carried out business operations with the companies/farms cited in the report.</p> <table border="1"> <thead> <tr> <th>Case Study</th> <th>Property</th> <th>GPS</th> </tr> </thead> <tbody> <tr> <td>1_Argentina</td> <td>La Ronda Grande</td> <td>-26.923466; -60.48937</td> </tr> <tr> <td>2_Argentina</td> <td>Javier and Elisa <i>Milan</i></td> <td>-26.528346; -60.32326</td> </tr> <tr> <td>3_Argentina</td> <td>Picoli (sell to Cooperativa Avellaneda)</td> <td>-26.4997; -60.40471</td> </tr> <tr> <td>4_Argentina</td> <td>Bartolo; La Elva</td> <td>-26.30439; -61.0037</td> </tr> <tr> <td>5_Argentina</td> <td>Las Rejas</td> <td>-25.651323; -61.496577</td> </tr> <tr> <td>6_Argentina</td> <td>Cuenca del Salado S.A. , owned by Las Rejas</td> <td>-25.742543; -61.297591</td> </tr> <tr> <td>7_Argentina</td> <td>Adriana Melissa Giongo</td> <td>-25.830787; -61.298771</td> </tr> <tr> <td>8_Argentina</td> <td>Los Tordos S.A.</td> <td>-25.745031; -61.398387</td> </tr> <tr> <td>9_Argentina</td> <td>Marco Rosich Farm</td> <td>-26.69994; -60.709912</td> </tr> <tr> <td>1_Paraguay</td> <td>Location unknown _ GPS coordinates match a location in Santa Rosa del Aguaray</td> <td>-23.877349; -56.255156</td> </tr> <tr> <td>4_Paraguay</td> <td>Y'apo Indigenous Community</td> <td>-24.1422222; -55.115</td> </tr> <tr> <td>5_Paraguay</td> <td>Nueva Esperanza Landfill</td> <td></td> </tr> </tbody> </table>	Case Study	Property	GPS	1_Argentina	La Ronda Grande	-26.923466; -60.48937	2_Argentina	Javier and Elisa <i>Milan</i>	-26.528346; -60.32326	3_Argentina	Picoli (sell to Cooperativa Avellaneda)	-26.4997; -60.40471	4_Argentina	Bartolo; La Elva	-26.30439; -61.0037	5_Argentina	Las Rejas	-25.651323; -61.496577	6_Argentina	Cuenca del Salado S.A. , owned by Las Rejas	-25.742543; -61.297591	7_Argentina	Adriana Melissa Giongo	-25.830787; -61.298771	8_Argentina	Los Tordos S.A.	-25.745031; -61.398387	9_Argentina	Marco Rosich Farm	-26.69994; -60.709912	1_Paraguay	Location unknown _ GPS coordinates match a location in Santa Rosa del Aguaray	-23.877349; -56.255156	4_Paraguay	Y'apo Indigenous Community	-24.1422222; -55.115	5_Paraguay	Nueva Esperanza Landfill	
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2017-003	8/17/2017	Deforestation, Human Rights	<a href="#">Report</a> published citing violation of Malaysian labor laws and development of peat in Indonesia post-moratorium by FELDA.	The Forest Trust (TFT), Colgate-Palmolive	ADM reviewed its supply chain and noted that it does not directly source PO or PKO from FELDA, but it does receive FELDA product from third party suppliers (Mewah and Unimills). These																																							

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					<p>suppliers do not source from the critical FELDA plantations mentioned in the report.</p> <p>ADM sources PKE directly from FELDA and has reached out and requested completion of an Engagement for Policy Implementation (EPI) form.</p> <p>ADM is also engaging with Mewah and Unimills to determine how they are responding to the issue with FELDA.</p> <p>In January 2018, FELDA directly responded to ADM's inquiry and provided information on how they intend to resolve the problems addressed in the referenced Greenpeace alert. They are also posting periodic updates via their <a href="#">sustainability dashboard</a>.</p> <p><b>Update:</b> On April 9, 2018, Felda Global Ventures' updated its NDPE policy to: "aim(s) to restore all its developed peat lands in line with our 2017 Sustainability Policy, without causing social conflict", among other pledges. Felda Global Ventures also stated that it had submitted a Peat Restoration Plan to Indonesia's Ministry of Environment and Forestry (KLHK) for the peatlands drained by its subsidiary PT Temila Agro Abadi.</p>
2017-002	2/24/2017	Deforestation	<a href="#">Report</a> published detailing how the meat and animal feed industries are causing deforestation in Brazil and Bolivia. <a href="#">Case studies</a> specifically named ADM as sourcing from deforested areas.	Mighty Earth	ADM met with Mighty Earth to discuss the farms in question - "Bolivia Case Study 2 – Papagayo Agropecuaria Celestina" and "Bolivia Case Study 3 – Menonitas 2". We provided information showing that ADM clearly does not source from Papagayo Agropecuaria Celestina, and regarding the Menonitas Colony, we acknowledged that we were sourcing indirectly through a 3 <sup>rd</sup> party from this co-op, but that it was impossible for us to know if the soybeans were coming from a recently deforested area. We engaged with the 3 <sup>rd</sup> party, explaining our No-Deforestation Policy requirements, asking them to exclude soy suppliers who had recently cleared land. After discussion with the supplier and a closer review of the location cited in the report, we were able to identify that the deforestation was occurring at an adjacent farm which is not owned by the Mennonites Colony, and thus, not part of ADM's supply chain. We reached out to Mighty Earth and explained this to them, and the updated <a href="#">follow-up report</a> reflects our findings.
2017-001	2/3/2017	Deforestation	<a href="#">Report</a> published citing deforestation in and around the Leuser ecosystem.	Rainforest Action Network	ADM sources indirectly from the mill in question through Wilmar. After discussion with Wilmar, we are satisfied with their handling of the issue. Reference <a href="#">Wilmar grievance log N31</a> .

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2016-003	10/19/2016	Deforestation, Human Rights	Written request for information related to sourcing palm oil from Abdi budi Mulia and Sarana Prima Multi Niaga mills (indirect suppliers in the ADM supply chain). Alleged working conditions and human rights violations published in a <a href="#">report</a> by Amnesty International.	Amnesty International	<p>ADM responded to Amnesty International's request for information. Engagement with Amnesty International followed and is ongoing.</p> <p>Independent third party assessments by Business for Social Responsibility (BSR), Roundtable on Sustainable Palm Oil (RSPO) and International Sustainability &amp; Carbon Certification (ISCC) were conducted. ADM is in continuous contact with its supplier Wilmar regarding the progress on corresponding action plans.</p>
2016-002	09/01/2016	Deforestation, Human Rights	<a href="#">Report</a> published alleging rainforest destruction, including through illegal burning and lack of Free, Prior and Informed Consent (FPIC) to new developments, by Korindo Group in Indonesia's Papua province.	Mighty Earth	<p>ADM sources indirectly from Korindo through Wilmar. After discussion with Wilmar, we are satisfied with their handling of the issue. Reference <a href="#">Wilmar grievance log N23</a>.</p> <p><b>Update</b> – As of January 2018, all our indirect suppliers report that they have terminated business with Korindo, therefore it has been removed from the ADM supply chain. Because global traceability scores and mill lists are reported on a rolling four quarter basis, Korindo will still appear in our supply chain map until the next update. ADM has not procured any palm from Korindo since Q4 2016.</p>
2016-001	8/5/2016	Deforestation	Multiple reports of deforestation and violation of RSPO principles at IOI.	Greenpeace, RSPO	<p>After failure to see improvement, ADM removed IOI from its supply chain in August 2016.</p> <p>Since July 2016, IOI has reported progress toward achieving key milestones for the implementation of commitments as identified by Greenpeace, Grassroots, Rainforest Action Network, Finnwatch and Forest Peoples' Programme. In August 2016, the Roundtable on Sustainable Palm Oil (RSPO) lifted the suspension of RSPO certification for the entire IOI Group. Since then, ADM recognizes that IOI has made good progress toward resolving the "<a href="#">Ketapang complaint case</a>" and has submitted an action plan to RSPO to resolve the "<a href="#">Pelita complaint case</a>". Based on these actions, ADM lifted its supply chain suspension of IOI in October 2017.</p>

