

Group	Issues	Reported by	Relationship	Progress	Last Update
Anglo-Eastern Plantations	Reports of deforestation in the following concessions: - PT Kahayan Agro Plantation	Mighty Earth Rapid Response Report 1, 14, 15, 18, 19, 20, 24, 25, 27	Indirect with parent company via third party suppliers/traders.	ADM reached out to direct supplier for investigation. Our direct supplier informed us that their internal monitoring detected indications of land clearance in KAP concession (4 ha) from May to June 2019. Subsequently, Mighty Earth Rapid Response Report No.18 also mentioned 6 ha land clearing from June 15-July 15 2019 using GLAD Alert coverage. Our direct supplier informed AEP and they answered that they had stopped land clearing activities since the moratorium announcement at the end of May 2019. Our direct supplier checked the exact date of the indication of the land clearing and found AEP's statement was verified. HCSA assessment and peer review has been completed and verified. The HCSA Secretariat and AEP are in the process of discussing further actions. ADM will continue to monitor this process. A moratorium for the disputed area is in place as of May 5, 2020: https://bit.ly/35OrQ9Q	3-Jun-20
Asian Agri (RGE)	Reports of peat forest development, clearance prep/stacking line in the following concessions: -PT Usaha Sawit Unggul	Mighty Earth Rapid Response Report 17, 18, 20, 24, 26, 27	Indirect via third party suppliers/traders	ADM reached out to direct supplier for investigation. Our direct supplier confirmed that the concession is not involved in the land clearing, and it happened outside their concession. Please see link for details: https://www.apicalgroup.com/sustainability/grievances/asian-agri-2/	3-Jun-20
BBC Holdings Sdn Bhd	Reports of deforestation in the following concessions: - Alambumi Plantation Sdn Bhd	Mighty Earth Rapid Response Report 21, 26, 27	Indirect with parent company via third party suppliers/traders.	ADM adopts a no buy position on the company.	3-Jun-20
Brazil - Ten properties as listed in the report in the municipalities of Piauí, Bahia, Maranhão, Mato Grosso, Pará, and Tocantins	Reports of land clearing for soy and cattle	Mighty Earth Rapid Response Soy and Cattle Report 12		Under investigation	03-Jun-20
Brazil - Thirteen properties as listed in the report in the municipalities of Piauí, Bahia, Maranhão, and Tocantins		Mighty Earth Rapid Response Soy and Cattle Report 11		Under investigation	03-Jun-20
Bumitama Group	Reports of deforestation in the following concessions: - PT Damai Agro Sejahtera	Mighty Earth Rapid Response Report 22, 23, 26, 27	Indirect with parent company via third party suppliers/traders.	ADM reached out to direct supplier for investigation. Our direct supplier informed us that PT DAS patrols recorded illegal logging activity in the area prior to the incident. The illegal activity has been reported to the police. In addition, the area was also impacted by forest fires in the dry season of 2019. Bumitama has a NDPE and is an RSPO member. The official response can be found here: http://ir.bumitama-agri.com/static-files/f3999275-46d9-466b-b656-53d7dcfe985a	3-Jun-20
Capitol Group	Reports of deforestation and/or peatland development in the following concessions: - PT Medco Papua Hijau Selaras	Mighty Earth Rapid Response Report 25, 26, 27	Indirect via third party suppliers/traders	ADM reached out to direct supplier for investigation. Our direct supplier informed us that HCV/HCS has already been conducted by a qualified assessor, and the company has clarified that their land clearing was guided by the outcome of the assessments. ADM awaits further information on this case.	03-Jun-20

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CB Industrial Product Holding	Reports of deforestation in the following concessions: - PT Jaya Jadi Utama	Mighty Earth Rapid Response Report 15, 20, 23, 26, 27	Indirect via third party suppliers/traders	ADM adopts a no buy position on the company.	3-Jun-20
Dhanistha Surya Nusantara	Reports of deforestation in the following concessions: - PT Sabhantara Rawi Sentosa	Mighty Earth Rapid Response Report 21, 23, 26, 27	Indirect with parent company via third party suppliers/traders.	ADM reached out to direct supplier for investigation. Our direct supplier confirmed that area in question is outside of PT Sabhantara Rawi Sentosa's concession boundary.	3-Jun-20
Dharma Satya Nusantara (DSN Group)	Reports of deforestation in the following concessions: - PT Putra Utama Lestari (area 1)	Mighty Earth Rapid Response Report 20, 23, 27	Indirect with parent company via third party suppliers/traders.	ADM reached out to direct supplier for investigation. Our direct supplier informed us that all land clearing locations are outside PT PUL Kadastral map. RSPO has published revised boundaries of PT PUL. The issue regarding the concession boundaries has been resolved and accepted by Mighty Earth.	3-Jun-20
Dharma Satya Nusantara (DSN Group)	Reports of deforestation in the following concessions: - PT Putra Utama Lestari (area 2)	Mighty Earth Rapid Response Report 20, 23, 27	Indirect with parent company via third party suppliers/traders.	ADM reached out to direct supplier for investigation. Our direct supplier informed us that all land clearing locations are outside PT PUL Kadastral map. RSPO has published revised boundaries of PT PUL. The issue regarding the concession boundaries has been resolved and accepted by Mighty Earth.	3-Jun-20
Fangiono Agro Plantation	Reports of deforestation in the following concessions: - PT Tirta Madu Sawit Jaya	Mighty Earth Rapid Response Report 22, 24, 25, 27	Indirect with parent company via third party suppliers/traders.	ADM reached out to direct supplier for investigation. Our direct supplier confirmed that area in question is outside of PT Tirta Madu Sawit Jaya's concession boundary.	3-Jun-20
Genting Plantations Bhd	Reports of deforestation in the following concessions: - PT Citra Sawit Cemerlang	Mighty Earth Rapid Response Report 14, 15, 16, 17, 19, 23, 24, 27	Indirectly with parent company via third party suppliers/traders.	ADM reached out to direct supplier for investigation. Our direct supplier informed us that Genting commissioned Aidenvironment to conduct the HCS assessment since June 2016. A working map shapefile was submitted to PT CSC in October 2017 after the assessment. It was clarified that the land clearing happened outside the identified HCS area Aidenviroment will submit the final HCS report for peer review, and in the meantime Stop work order is currently in place at PT CSC. Please see the link below: http://bit.ly/2JK6m68 ADM is monitoring the progress through direct suppliers and public communications.	3-Jun-20
Global Enterprise Sdn Bhd	Reports of deforestation in the following concessions: - PT Bulunga Surya Pratama	Mighty Earth Rapid Response Report 21, 27	Indirect with parent company via third party suppliers/traders.	ADM reached out to direct supplier for investigation. Our direct supplier confirmed that area in question is outside of PT Bulunga Surya Pratama's concession boundary.	3-Jun-20
Indonusa Group	Reports of deforestation in the following concessions: - PT Internusa Jaya Sejahtera	Mighty Earth Rapid Response Report 7, 10, 11, 12, 15, 17, 20, 22, 23, 25, 27	Indirectly with parent company via third party suppliers/traders.	ADM adopts a no buy position on the company.	3-Jun-20

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Makin	Reports of peat forest development in the following concessions: -PT Mekar Karya Kahuripan	Mighty Earth Rapid Response Report 17, 21, 22, 23, 26, 27	Indirect with parent company via third party suppliers/traders.	ADM reached out to direct supplier for investigation. Our direct suppliers informed that Makin stated that PT Mekar Karya Kahuripan's business activity has been ceased/frozen since 15th September 2016. Through our direct supplier's ongoing engagement with PT MKK, proof was provided to ME in the form of Notary Acts. Therefore, this case is classified as closed.	3-Jun-20
Mulia Sawit Group	Reports of peat development, peat forest development, clearance prep/Stacking lines in the following concessions: - PT Persada Era Agro Kencana	Mighty Earth Rapid Response Report 9, 10, 11, 12, 15, 17, 18, 20, 22, 23, 24, 25, 27	Indirectly with parent company via third party suppliers/traders.	ADM adopts a no buy position on the company.	3-Jun-20
NPC Resource Bhd	Reports of deforestation and/or peatland development in the following concessions: - PT Sumber Alam Selaras	Mighty Earth Rapid Response Report 23, 25, 26, 27	Indirect with parent company via third party suppliers/traders.	ADM reached out to direct supplier for investigation. Our direct supplier informed us that PT SAS was affected by fires due to the extreme dry weather conditions in Indonesia. Parts of their current plantations were affected, as well as some conservation areas. Aidenvironment confirms that fires caused this land change, not deforestation. NPC Resources and PT SAS both have no open burning policies and will work on fire prevention methods. They also commit to carry out HCV/HCS assessment, no peat development and FPIC: https://www.npc.com.my/PublicStatement13Sep2018.pdf HCV and HCSA reports have been completed and peer reviewed. NPC is drafting an action plan based on findings and recommendations of the assessments.	03-Jun-20
Pinehill Pacific Bhd	Reports of deforestation in the following concessions: - PT Makmur Jaya Malindo	Mighty Earth Rapid Response Report 18, 19, 27	Indirect with parent company via third party suppliers/traders.	ADM reached out to direct supplier for investigation. We were informed that Pinehill Pacific Bhd has divested their Malaysian operations and they are no longer associated with PT MJM.	3-Jun-20
QL Resources Sdn Bhd	Reports of deforestation in the following concessions: - PT Pipit Mutiara Indah	Mighty Earth Rapid Response Report 21, 27	Indirect with parent company via third party suppliers/traders.	ADM reached out to direct supplier for investigation. Our direct supplier informed us PMI has provided written confirmation of a NDPE policy and shared their concession map for ongoing verification. The area in question was felled several years before the commitment, and PMI committed to immediate moratorium.	3-Jun-20
Rimbunan Hijau	Reports of peat development in the following concessions: - Woodijaya Sdn Bhd (Lot 197)	Mighty Earth Rapid Response Report 18, 26, 27	Indirectly with parent company via third party suppliers/traders.	We were informed that they are maintaining a moratorium as of 20 September 2018. They have shared concession maps and committed to NDPE.	3-Jun-20
Rimbunan Hijau	Reports of deforestation in the following concessions: - Timrest Sdn Bhd	Mighty Earth Rapid Response Report 21, 27	Indirect with parent company via third party suppliers/traders.	ADM reached out to direct supplier for investigation. Our direct supplier confirmed that area in question is outside of Timrest Sdn Bhd's concession boundary.	3-Jun-20

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Samling	Reports of deforestation in the following concessions: - LPF/0006 Samling Lana	Mighty Earth Rapid Response Report 15, 16, 18, 19, 20, 23, 25, 27	Indirect via third party suppliers/traders	ADM adopts a no buy position on the company.	3-Jun-20
Samling	Reports of deforestation in the following concessions: - LPF/0007 Samling Jelalong (OP)	Mighty Earth Rapid Response Report 14, 15, 16, 19, 20, 21, 23, 24, 25, 26, 27	Indirectly via third party suppliers/traders.	ADM adopts a no buy position on the company.	3-Jun-20
Samling	Reports of deforestation in the following concessions: - PT Tunas Borneo Plantations	Mighty Earth Rapid Response Report 18, 27	Indirectly via third party suppliers/traders.	Our direct supplier has stated that palm trees are not being planted in the concession. ADM adopts a no buy position on the company.	3-Jun-20
Samuel International Group	Reports of clearance prep/stacking lines in the following concessions: - PT Bina Sarana Sawit Utama	Mighty Earth Rapid Response Report 19, 20, 24, 26, 27	Indirectly via third party suppliers/traders.	ADM reached out to direct supplier for investigation. Our direct supplier informed us that based on their overlay map, the location of land clearing mentioned by Mighty Earth 19 was located more than 70 km away outside BSSU concession. Please see the below link: http://bit.ly/2kqcc1m	3-Jun-20
Shin Yang	Reports of deforestation and/or peatland development in the following concessions: - Dataran Linau OP (SY) (Lot 1 Block 14 Murum LD)	Mighty Earth Rapid Response Report 17, 18, 19, 20, 21, 23, 25, 27	Indirect with parent company via third party suppliers/traders.	ADM adopts a no buy position on the company.	3-Jun-20
Shin Yang group	Reports of deforestation in the following concessions: - Linau Sinar Sdn Bhd	Mighty Earth Rapid Response Report 13, 20, 21, 27	Indirect with parent company via third party suppliers/traders.	ADM adopts a no buy position on the company.	3-Jun-20
Shin Yang/Sarawak Oil Palms Bhd	Reports of deforestation in the following concessions: - Shin Yang OP Planting Area (LPF/0018)	Mighty Earth Rapid Response Report 18, 19, 20, 21, 25, 27	Indirect with parent company via third party suppliers/traders.	ADM adopts a no buy position on the company.	3-Jun-20
TH Plantations Bhd	Reports of deforestation and/or peatland development in the following concessions: - Hydroflow	Mighty Earth Rapid Response Report 14, 23, 27	Indirect with parent company via third party suppliers/traders.	ADM reached out to direct supplier for investigation. Our direct supplier informed us that the area in question is outside of Hdroflow's concession, which was verified by a third-party. In addition, a stop work order was put in place at for Hydroflow's operations since September 2018.	03-Jun-20
Unknown Group (PT MML formerly owned by PT Bakrie Sumatra Plantations Tbk)	Reports of deforestation in the following concessions: - PT Mentobi Mitra Lestari	Mighty Earth Rapid Response Report 16, 17, 20, 22, 27	Indirect with parent company via third party suppliers/traders.	ADM reached out to direct supplier for investigation. Our direct supplier informed us that Bakrie management confirmed that MML is no longer part of Bakrie Group since Nov 9 2017. MML is no longer mentioned in the list of subsidiaries in Bakrie Sumatera Plantation's 2018 Annual Report. After reviewing our internal control system, we found that there is no connection with the mill/concession identified in the report. Therefore, this case is not related to ADM and considered closed.	3-Jun-20

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Widya Corporation	Reports of deforestation, clearance prep/Stacking line in the following concessions: - PT Mulia Inti Perkasa	Mighty Earth Rapid Response Report 6, 15, 16, 20, 21, 22, 23, 24, 25, 26, 27	No direct or indirect connection between ADM and the parent company or mill.	ADM adopts a no buy position on the company.	3-Jun-20
Woodman Group	Reports of deforestation and peat development in the following concessions: - Baram Estate (Part of LPF/0004)	Mighty Earth Rapid Response Report 18, 21, 27	Indirect with parent company via third party suppliers/traders.	We were informed that the concession is not related to palm oil production and the area is not within Woodman's concession.	3-Jun-20
Woodman Group	Reports of peat development in the following concessions: -Adong estate, part of LPF 004	Mighty Earth Rapid Response Report 17, 18, 21, 27	Indirect with parent company via third party suppliers/traders.	ADM reached out to direct supplier for investigation. Our direct supplier confirmed that the operation / planting of the above are not related to palm oil production. Furthermore, those estates are not within Woodman's concession.	3-Jun-20
Astra Agro Lestari	Reports of land disputes and resistance by local citizens in the following concessions: - PT Mamuang (Passang Kayu)	Walhi	Indirect with parent company via third party suppliers/traders.	A field inspection was carried out by the National Land Agency (BPN), which showed that the land belongs to PT Mamuang. The company was proven be within its rights by the district and higher court. An agreement with other citizens was reached.	27-Apr-20
Austindo Nusantara Jaya Agri (ANJ Group)	Reports of deforestation in the following concessions: -PT Permata Putera Mandiri (Blok I)	Mighty Earth Rapid Response Report 3, 4, 6, 8, 10	Indirectly with parent company via third party suppliers/traders.	Austindo Nusantara Jaya Agri (ANJ Group) has implemented a group-wide moratorium on new land clearing not in line with NDPE: https://bit.ly/2xv9x9N ANJ has met many milestones on its sustainability efforts including: revamping its group-wide sustainability policy, sharing concession boundaries, its HCS clearance liability, the target recovery area, a framework for rehabilitation project, and a grievance mechanism. These details can be found under: https://anj-group.com/en/sustainability-approach-and-policies	27-Apr-20
Austindo Nusantara Jaya Agri (ANJ Group)	Reports of deforestation in the following concessions: -PT Putera Manunggal Perkasa	Mighty Earth Rapid Response Report 10, 11	Indirectly with parent company via third party suppliers/traders.	Austindo Nusantara Jaya Agri (ANJ Group) has implemented a group-wide moratorium on new land clearing not in line with NDPE: https://bit.ly/2xv9x9N ANJ has met many milestones on its sustainability efforts including: revamping its group-wide sustainability policy, sharing concession boundaries, its HCS clearance liability, the target recovery area, a framework for rehabilitation project, and a grievance mechanism. These details can be found under: https://anj-group.com/en/sustainability-approach-and-policies	27-Apr-20
Brazil - Fourteen properties as listed in the report in the municipalities of Amazonas, Bahia, Maranhão, Mato Grosso, Pará, and Tocantins	Reports of land clearing for soy and cattle	Mighty Earth Rapid Response Soy and Cattle Report 8	No direct connection between soy sourced by ADM and the areas of deforestation identified in this report.	The investigation concluded that there was no sourcing from the reported deforestation areas. We will closely monitor land use change in the properties listed to make sure they are in compliance with the local legislation and our No Deforestation Policy.	27-Apr-20

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Brazil - Nine properties as listed in the report in the municipalities of Bahia, Mato Grosso, and Tocantins	Reports of land clearing for soy and cattle	Mighty Earth Rapid Response Soy and Cattle Report 9	No direct connection between soy sourced by ADM and the areas of deforestation identified in this report.	The investigation concluded that there was no sourcing from the reported deforestation areas. We will closely monitor land use change in the properties listed to make sure they are in compliance with the local legislation and our No Deforestation Policy.	27-Apr-20
Brazil - Ten properties as listed in the report in the municipality of Mato Grosso	Reports of land clearing for soy and cattle	Mighty Earth Rapid Response Soy and Cattle Report 10	No direct connection between soy sourced by ADM and the areas of deforestation identified in this report.	The investigation concluded that there was no sourcing from the reported deforestation areas. We will closely monitor land use change in the properties listed to make sure they are in compliance with the local legislation and our No Deforestation Policy.	27-Apr-20
Group Olmeca	Reports of human rights violations - Reforestadora de Palma de Peten SA (REPSA)	RAN - Rainforest Action Network	No direct or indirect connection between ADM and the parent company or mill.	ADM adopts a no buy position on the company.	27-Apr-20
Kwantas Corporation	Reports of deforestation in the following concessions: - Kwantas Pelita Plantation (Balingian) Sdn Bhd	Mighty Earth Rapid Response Report 14, 17, 20, 26	Indirect with parent company via third party suppliers/traders.	We were informed that the land in questions is within the parameters of Kwantas Pelita Plantation (Balingian) Sdn Bhd (KPPSB) concession. However, this land does not belong to KPPSB as it has not been surrendered to KPPSB through the Native Customary Right (NCR) Land Aquisition project. The land is in privately owned and KPPSB has not been involved in any clearing activities.	27-Apr-20
Medco	Reports of deforestation and/or peatland development in the following concessions: - PT Energi Mitra Merauke	Mighty Earth Rapid Response Report 25	Indirect with parent company via third party suppliers/traders.	ADM reached out to direct supplier for investigation. Our direct supplier informed us that PT EMM is not part of the PT Medco Group and therefore not under their management.	27-Apr-20
Nurdin Tampubolon Corporation (NT Corp)	Reports of deforestation in the following concessions: - PT Bintang Sakti Lengana	Mighty Earth Rapid Response Report 19	Indirectly with parent company via third party suppliers/traders.	ADM reached out to direct supplier for investigation. Our direct supplier informed us that HCS/HCV assesments will be used using HCSA/ALS registered assesors followed by a peer review. Furthermore, a commitment to no development on HCS/HCV/peat is in place on a group-level.	27-Apr-20
Rimbunan Hijau	Reports of peat development, clearance prep/stacking line in the following concessions: -Poh Zhen Sdn Bhd	Mighty Earth Rapid Response Report 17, 19, 20, 26	Indirect with parent company via third party suppliers/traders.	ADM reached out to direct supplier for investigation. Our direct supplier confirmed that the operation / planting are not related to palm oil production.	27-Apr-20
Teladan Prima	Reports of deforestation and/or peatland development in the following concessions: - PT Tanjung Buyu Perkasa Plantation	Mighty Earth Rapid Response Report 26	Indirect with parent company via third party suppliers/traders.	ADM reached out to direct supplier for investigation. Our direct supplier informed us that a third-party carried out an assessment to verify that the deforestation was not committed by PT TBP: https://bit.ly/2RhlfyR The official concession boundary was shared with our direct supplier, who then verified the via overlay map that the alleged deforestation is outside of PT TBP's concession: https://bit.ly/2V5qqmF	27-Apr-20
TH Plantations Bhd (Tabung Haji)	Reports of peat development in the following concessions: - TH Pelata Meludam Sdn Bhd	Mighty Earth Rapid Response Report 18	Indirectly with parent company via third party suppliers/traders.	ADM reached out to direct supplier for investigation. Our direct supplier informed us that the land clearing was not conducted by TH Pelata Meludam Sdn Bhd. It happened outside of their concession.	27-Apr-20

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Tradewinds	Reports of peat forest development in the following concessions: - Trans Kenyaland Sdn Bhd	Mighty Earth Rapid Response Report 18, 19, 26	Indirectly with parent company via third party suppliers/traders.	ADM reached out to direct supplier for investigation. Our supplier informed us that the location of land clearing mentioned by Mighty Earth 18 was located outside their concession.	27-Apr-20
Agro Sarimas Group	Reports of deforestation in the following concessions: - PT Agro Sarimas Indonesia	Mighty Earth Rapid Response Report 22	Indirect with parent company via third party suppliers/traders.	ADM reached out to direct supplier for investigation. Our direct supplier confirmed that the concession is not involved in the land clearing, it was a fire incident, and it happened outside of their concession. Please see the below links: PT ASI's response: http://bit.ly/2PFatK7 Overlay map: http://bit.ly/2YCK8fE	20-Mar-20
Bumitama Group	Reports of deforestation and/or peatland development in the following concessions: - PT Andalan Sukses Makmur	Mighty Earth Rapid Response Report 23	Indirect with parent company via third party suppliers/traders.	ADM reached out to direct supplier for investigation. Our direct supplier informed us that these land changes were caused by forest fires due to dry season conditions. PT ASM responded to these fires as fast as possible with their fire-response personnel. The incidents were reported to local authorities as well as the RSPO. Bumitama's official statement: http://ir.bumitama-agri.com/static-files/5ce66171-9006-449f-9189-b206eca3e0c7	20-Mar-20
Double Dynasty Holdings Sdn Bhd	Reports of deforestation, clearance prep/Stacking line in the following concessions: - Mutiara Pelita Genaan Plantation Sdn Bhd	Mighty Earth Rapid Response Report 15, 16, 18, 19, 20, 25	No direct or indirect connection between ADM and the parent company or mill.	ADM adopts a no buy position on the company.	20-Mar-20
Gama	Reports of deforestation and/or peatland development in the following concessions: - PT Agro Lintas Nusantara	Mighty Earth Rapid Response Report 17, 18	Indirect with parent company via third party suppliers/traders.	PT Agro Lintas Nusantara previously had no identifiable connection to a Group. Upon researching this case, ADM was able to verify that PT ALN does not belong to Gama. Please see the below link: https://www.wilmar-international.com/wp-content/uploads/2018/09/100818-aide-announcement.pdf	20-Mar-20
Genting Plantations Bhd	Reports of deforestation in the following concessions: - PT Permata Sawit Mandiri	Mighty Earth Rapid Response Report 15, 17, 19, 20, 23	Indirect with parent company via third party suppliers/traders.	ADM reached out to direct supplier for investigation. Our direct supplier informed us that the concession PT Permata Sawit Mandiri doesn't belong to Genting Plantation Bhd since 2017 after it was divested to a non-related party. Genting Plantation's official statement can be found here: http://bit.ly/2wMjoaH ADM is monitoring that any product will be received from the concerned mill via another third party.	20-Mar-20
Goodhope	Reports of deforestation in the following concessions: - PT Rim Capital	Mighty Earth Rapid Response Report 22	Indirect with parent company via third party suppliers/traders.	ADM reached out to direct supplier for investigation. Our direct supplier informed us they have been in contact with PT Rim Capital, who takes the allegations very serious. PT Rim Capital confirms that one land clearing is outside of their concession and the other occurred during landfires on community-owned areas. This was found out after a team of village heads and community representatives investigated. Local authorities acknowledged the verification and report stating the company did not commit the fires. PT Rim Capital has a NDPE policy in place since May 2017. Please see the below links: Goodhope's official statement can be found here: http://bit.ly/2EhArF2 The field verification report can be found here: http://bit.ly/2LQfXym http://bit.ly/2PA2STW	20-Mar-20

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Incasi Raya	Reports of deforestation in the following concessions: - PT Avena Sepakat	Mighty Earth Rapid Response Report 17	Indirect with parent company via third party suppliers/traders.	ADM reached out to direct supplier for investigation. Our direct supplier informed us that it was not PT Arvena Sepakat, but the local communities of Kelompok Sinaga who illegally encroached the area. A police report was filed. An investigation was launched, and according to Musimmas, the local community has agreed to stop all activities in the PT Avena Sepakat concession.	20-Mar-20
Incasi Raya Group	Reports of deforestation and/or peatland development in the following concessions: - PT Makmur Agro Lestari	Mighty Earth Rapid Response Report 23	Indirect with parent company via third party suppliers/traders.	ADM reached out to direct supplier. Our direct supplier informed us that the concession does not belong to Incasi Raya. PT MAL is located in Kalimantan Barat while the location of the report is in central Kalimantan.	20-Mar-20
Kalimantan Sawit Kusama	Reports of deforestation in the following concessions: - PT Fajar Saudara Lestari	Mighty Earth Rapid Response Report 22	Indirect with parent company via third party suppliers/traders.	ADM reached out to direct supplier for investigation. Our direct supplier informed us that PT FSL was affected by the long dry season that caused a number of fire spots surrounding the concession. PT FSL has committed to a land clearing moratorium since July 2019. Please see the below links: No Development on HCS/HCV/Peat at group level since July 1, 2019: http://bit.ly/2EmiwNJ Kalimantan Sawit Kusama's official statement can be found here: http://bit.ly/2rHDIAu Spatial analysis for hotspots and wildfires here: http://bit.ly/36wRpeM	20-Mar-20
Kirana Megatara	Reports of clearance prep/stacking lines in the following concessions: - PT Putra Katingan Pratama	Mighty Earth Rapid Response Report 17	Indirectly with parent company via third party suppliers/traders.	Kirana Megatara is not in ADM's supply chain since they are not palm related. Our direct supplier informed us that they reached out to Triputra Agro Persada, who confirmed that Kirana Megatara is not a supplier to them.	20-Mar-20
KTS	Reports of deforestation and/or peatland development in the following concessions: - Wawasan Sedar Sdn Bhd	Mighty Earth Rapid Response Report 25	Indirect via third party suppliers/traders	ADM reached out to direct supplier for investigation. ADM is requesting information to our direct supplier to clarify the situation.	20-Mar-20
Makin	Reports of deforestation in the following concessions: - PT Cipta Karsa Kahuripan	Mighty Earth Rapid Response Report 21, 22	Indirect with parent company via third party suppliers/traders.	ADM reached out to direct supplier for investigation. We were informed that PT. CKK has never had a Location Permit (concession). Furthermore, from its inception until the time it was frozen, PT. CKK had never carried out land clearing or planting activities and hence PT. CKK has never owned or managed a plantation/estate. A notarized letter stating that the operation of the company had been frozen since 2016 can be requested with the Ketapang District Government.	20-Mar-20
PT Union Sampoerna Triputra Persada	Reports of deforestation and/or peatland development in the following concessions: - PT Harapan Hibrida Kalbar	Mighty Earth Rapid Response Report 23	Indirect with parent company via third party suppliers/traders.	ADM reached out to direct supplier for investigation. Our direct supplier informed us that the land clearing was not conducted by the company, and that the concession is outside of their boundary.	20-Mar-20

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Rimbunan Hijau	Reports of deforestation in the following concessions: - Rimbunan Sawit Sdn Bhd (Simunjan Estate)	Mighty Earth Rapid Response Report 21	Indirect with parent company via third party suppliers/traders.	ADM reached out to direct supplier for investigation. Our direct supplier informed us that the encroachment on the land was by local communities. ADM will continue to monitor the case.	20-Mar-20
Salim/IndoGunta	Reports of deforestation in the following concessions: - PT Rimbun Sawit Papua	Mighty Earth Rapid Response Report 3, 10, 13, 14, 16, 17, 18, 20, 23, 25	Indirectly via third party suppliers/traders.	ADM adopts a no buy position on the company.	20-Mar-20
Samling Group	Reports of deforestation, clearance prep./stacking line in the following concessions: - Samling Jelalong LPF 0007 (Parts 1 & 3)	Mighty Earth Rapid Response Report 15, 18, 19, 20, 23, 25	Indirect via third party suppliers/traders	ADM adopts a no buy position on the company.	20-Mar-20
Samling Group	Reports of deforestation in the following concessions: - LPF/008 Marudi & Batu Belah	Mighty Earth Rapid Response Report 13, 17, 19, 20, 21, 24, 25	Indirectly via third party suppliers/traders.	ADM adopts a no buy position on the company.	20-Mar-20
Tuan Junus Sutiono and Tuan Watson Dharma	Reports of deforestation and clearance prep./stacking lines in the following concessions: - PT Subur Karunia Raya	Mighty Earth Rapid Response Report 6, 9, 16, 25	No direct or indirect connection between ADM and the parent company or mill.	ADM adopts a no buy position on the company.	20-Mar-20
AlamBumi Group	Reports of deforestation in the following concessions: - AlamBumi Sdn Bhd	Mighty Earth Rapid Response Report 19	Indirectly with parent company via third party suppliers/traders.	ADM reached out to direct supplier for investigation. Our direct supplier confirmed that area in question does not belong to AlamBumi Sdn Bhd.	21-Jan-20
Borneo Pacific Group	Reports of deforestation and/or peatland development in the following concessions: - PT Arjuna Utama Sawit	Mighty Earth Rapid Response Report 23	Indirect with parent company via third party suppliers/traders.	ADM reached out to direct supplier for investigation. ADM is requesting information to our direct supplier to clarify the situation.	21-Jan-20
Brazil - Twelve properties as listed in the report in the municipalities of Bahia, Mato Grosso, Goiás, and Pará.	Reports of land clearing for soy and cattle	Mighty Earth Rapid Response Soy and Cattle Report 7	No direct connection between soy sourced by ADM and the areas of deforestation identified in this report.	The investigation concluded that there was no sourcing from the reported deforestation areas. We will closely monitor land use change in the properties listed to make sure they are in compliance with the local legislation and our No Deforestation Policy.	21-Jan-20
Bukit Berlian Plantation Group	Reports of deforestation and/or peatland development in the following concessions: - PT Ginang Fohu Plantation	Mighty Earth Rapid Response Report 17	Indirect with parent company via third party suppliers/traders.	ADM reached out to direct supplier for investigation. ADM is requesting information to our direct supplier to clarify the situation.	21-Jan-20
Double Dynasty Group	Reports of clearance prep./stacking lines in the following concessions: - Radiant Lagoon Sdn Bhd	Mighty Earth Rapid Response Report 13	No direct or indirect connection between ADM and the parent company or mill.	ADM adopts a no buy position on the company.	21-Jan-20

Group	Issues	Reported by	Relationship	Progress	Last Update
First Resources	Reports of deforestation in the following concessions: - PT Ketapang Agro Lestari	Mighty Earth Rapid Response Report 21	Indirect with parent company via third party suppliers/traders.	ADM reached out to direct supplier for investigation. Our direct supplier informed us that a HCS/HCV assessment had been conducted by PT KAL, and the land development was carried out based on the results. No HCS/HCV area was cleared.	21-Jan-20
GAMA Group	Reports of deforestation in the following concessions: -PT Agrinusa Persada Mulia	Mighty Earth Rapid Response Report 3, 20	Indirect with parent company via third party suppliers/traders.	The area in question are outside PT Agrinusa Persada Mulia's HGU concession area. The land clearing was carried out by communities for farming; and by PT. BPUP (Bangun Bina Utama Papua) for road construction.	21-Jan-20
Shin Yang Group / Sarawak Oil Palms Bhd	Reports of clearance prep/Stacking line in the following concessions: - Shin Yang LPF 0018	Mighty Earth Rapid Response Report 15	Indirectly with parent company via third party suppliers/traders.	ADM adopts a no buy position on the company.	21-Jan-20
Shin Yang/Sarawak Oil Palms Bhd	Reports of deforestation in the following concessions: - Dataran Seping Sdn Bhd (Adam Oil Palm Estate)	Mighty Earth Rapid Response Report 20, 21	Indirect with parent company via third party suppliers/traders.	ADM adopts a no buy position on the company.	21-Jan-20
STH Group (Sin Tek Huat)	Reports of deforestation in the following concessions: - PT Makmur Bersama Asia	Mighty Earth Rapid Response Report 20	Indirect with parent company via third party suppliers/traders.	ADM reached out to direct supplier for investigation. Our direct supplier confirmed that area in question is outside of PT Makmur Bersama Asia's concession boundary.	21-Jan-20
Teladan	Reports of deforestation in the following concessions: - PT Teladan Palma Perkasa	Mighty Earth Rapid Response Report 21	Indirect with parent company via third party suppliers/traders.	ADM reached out to direct supplier for investigation. Our direct supplier confirmed that area in question does not belong to the Teladan Group as their concession permit expired 2 years ago and no activities were ever undertaken.	21-Jan-20
TSH Resources Bhd	Reports of deforestation in the following concessions: - PT Bulungan Citra Agro Persada	Mighty Earth Rapid Response Report 21	Indirect with parent company via third party suppliers/traders.	ADM reached out to direct supplier for investigation. Our direct supplier informed us that TSH Resources Bhd adheres to their no burning policy as an RSPO member. TSH Resources commissioned Malaysian Environmental Consultants (MEC) which found that the clearing overlaps with recent massive local community land burning in Kalimantan Utara.	21-Jan-20
Eagle High Plantations Tbk	Reports of deforestation in the following concessions: - PT Arrtu Energie Resources	Mighty Earth Rapid Response Report 22	Indirect with parent company via third party suppliers/traders.	ADM reached out to direct supplier for investigation. Our direct supplier informed us that PT AER was affected by fires that came from outside of their concession due to extreme dry weather conditions in Indonesia. PT AER has no intention to open new areas for palm development due to its new planting moratorium since 2017. Eagle High Plantation informed that fire prevention and management measures are being implemented.	19-Dec-19
GAMA Group	Reports of deforestation in the following concessions: -PT Agriprima Cipta Persada	Mighty Earth Rapid Response Report 3, 4	Indirect with parent company via third party suppliers/traders.	Gama's bilingual NDPE policy was publicly launched on 18 September 2018 (http://gamaplantation.com/assets/gama-files/page/Gama_Plantation_Sustainability_Policy_-_18092018_Update1.pdf). The company provide information to stakeholders on their website about their progress on the implementation of their policy (http://gamaplantation.com/assets/gama-files/pressrelease/Feb2019final-Gama_Plantation_Report.pdf). Gama has worked with Aidenvironment and set up a Time Bound Plan. ADM is monitoring the progress through direct suppliers and public communications.	19-Dec-19
Indonusa	Reports of deforestation, clearance prep/Stacking line in the following concessions: - PT Internusa Jaya Sejahtera (Merauke) area 1	Mighty Earth Rapid Response Report 22	Indirect with parent company via third party suppliers/traders.	ADM adopts a no buy position on the company.	19-Dec-19

Group	Issues	Reported by	Relationship	Progress	Last Update
Indonusa	Reports of deforestation in the following concessions: - PT Internusa Jaya Sejahtera (Merauke) area 2	Mighty Earth Rapid Response Report 22	Indirect with parent company via third party suppliers/traders.	ADM adopts a no buy position on the company.	19-Dec-19
Mulia Sawit Agro Lestari (MSAL)	Reports of deforestation, clearance prep/Stacking line in the following concessions: - PT Persada Sejahtera Agro Makmur	Mighty Earth Rapid Response Report 22	Indirect with parent company via third party suppliers/traders.	ADM adopts a no buy position on the company.	19-Dec-19
Palma Serasih	Reports of deforestation in the following concessions: - PT Global Primatama Mandiri	Mighty Earth Rapid Response Report 13, 21	No direct or indirect connection between ADM and the parent company or mill.	ADM adopts a no buy position on the company.	19-Dec-19
Sampoerna Agro	Reports of deforestation in the following concessions: - PT Usaha Agro Indonesia	Mighty Earth Rapid Response Report 22	Indirect with parent company via third party suppliers/traders.	ADM reached out to direct supplier for investigation. Our direct supplier informed us that PT UAI was not involved in any deforestation activity, but that it the community's land that was burnt, which is in the concession. Sampoerna Agro has committed to No Deforestation and and No Peat Development	19-Dec-19
Brazil - Twelve properties as listed in the report in the municipalities of Acre, Bahia, Mato Grosso, and Pará.	Reports of land clearing for soy and cattle	Mighty Earth Rapid Response Soy and Cattle Report 6	No direct connection between soy sourced by ADM and the areas of deforestation identified in this report.	The investigation concluded that there was no sourcing from the reported deforestation areas. We will closely monitor land use change in the properties listed to make sure they are in compliance with the local legislation and our No Deforestation Policy.	30-Nov-19
CB Industrial Product Holding/ Jholin Group	Reports of deforestation in the following concessions: - PT Kurun Sumber Rezeki	Mighty Earth Rapid Response Report 17	No direct or indirect connection between ADM and the parent company or mill.	Our supplier began the engagement process with the company that has a joint venture with CBIP. There is no relationship between the company and PT Kurun Sumer Rezeki. CBIP has no management control over the joint venture companies	30-Nov-19
Dharma Sawit Nusantara Tbk (DSN Group)	Reports of deforestation in the following concessions: - PT Prima Sawit Andalan	Mighty Earth Rapid Response Report 17	Indirect with parent company via third party suppliers/traders.	ADM reached out to direct supplier for investigation. The land clearing was not conducted by DSN as they have a moratorium in place since 2015. The land was illegally encroached and cleared by communities from Dusun Tembaga and Desa Sungai Buluh, for the planting of paddy field . DSN has already reported the case to the local authorities and copies of the reports had also been shared with our direct supplier. ADM is monitoring the progress through direct suppliers and public communications.	30-Nov-19
Evershine Asset Corporation & Everbright Resources Corporation	Reports of deforestation, peat development, peat forest development, clearance prep/ Stracking lines in the following concessions: - PT Kapuasindo Palm Industry	Mighty Earth Rapid Response Report 5, 6, 12, 17, 20	Indirectly via third party suppliers/traders.	ADM adopts a no buy position on the company.	30-Nov-19

Group	Issues	Reported by	Relationship	Progress	Last Update
Felda Global Ventures	Reports of deforestation in the following concessions: - PT Citra Niaga Perkasa	Mighty Earth Rapid Response Report 20	Indirect with parent company via third party suppliers/traders.	ADM reached out to direct supplier for investigation. Our direct supplier informed us that the alleged deforestation area belongs to the local community who did not give consent to FGV for land development even though the land is within FGV's "Izin Lokasi" boundary. It is understood that the land clearing activities started since Jun'19 for paddy planting purpose. Both PT CNP and PT TAA operation in FGV Kalimantan involve only maintenance of road, drains and boundary trenches and water table.	30-Nov-19
Global Palm Resources	Reports of deforestation in the following concessions: - PT Prakarsa Tani Sejati	Mighty Earth Rapid Response Report 14	Indirect via third party suppliers/traders	Our direct suppliers confirmed and concluded that the location of land clearing in the Mighty Earth report was not in the concession of PT Prakarsa Tani Sejati (http://bit.ly/2v4XRca). The parent company implemented a NDPE Policy (http://www.gprholdings.com/environmental_policy.html). ADM is monitoring the progress through direct suppliers and public communications.	30-Nov-19
Golden Plantation Tbk	Reports of deforestation, peat forest development and clearance prep/stacking lines in the following concessions: - PT Mitra Jaya Agro Palm	Mighty Earth Rapid Response Report 21	Indirect via third party suppliers/traders.	ADM reached out to direct supplier for investigation. We were informed that the land clearing spots were located outside PT MJAP concession.	30-Nov-19
IJM Group	Reports of deforestation in the following concessions: - PT Prima Bahagia Permai	Mighty Earth Rapid Response Report 20	Indirect with parent company via third party suppliers/traders.	ADM reached out to direct supplier for investigation. Our direct supplier informed us that IJM has confirmed that the land clearing areas are NOT located within the PBP's concession boundary.	30-Nov-19
Jaya Tiasa Holding Berhad (Rimbunan Hijau Group)	Reports of deforestation in the following concessions: -LPF/0024	Mighty Earth Rapid Response Report 12	Indirect with parent company via third party suppliers/traders.	Rimbunan Hijau is in our supply chain indirectly and our trading partners have similar NDPE policies as ours. Please note the reported case in Report #12 on Haya Tiasa Holding Berhad (Rimbunan Hijau group) LPF /0024 concerns Licensed Planted Forests which are designated for timber plantation such as acacia and not related to palm oil.	30-Nov-19
KLK Bhd (Kuala Lumpur Kepong Bhd)	Reports of peat development in the following concessions: - PT Menteng Jaya Sawit Perdana	Mighty Earth Rapid Response Report 18, 19, 21	Indirect with parent company via third party suppliers/traders.	KLK Grievance List no.G06 shows that the alleged area is located within PT MJSP's permit area (Izin lokasi). It is however no longer within the management control of PT MJSP, as in Y2016 the area has been gazetted by Kementerian Lingkungan Hidup & Kehutanan ["KLHH"] as Community Forest Plantation [Hutan Tanaman Rakyat ("HTR")] area.	30-Nov-19
Kwantas Corporation	Reports of deforestation in the following concessions: - Miracle Harvest Sdn Bhd	Mighty Earth Rapid Response Report 20, 21	Indirect with parent company via third party suppliers/traders.	ADM reached out to direct supplier for investigation. ADM is requesting information to our direct supplier to clarify the situation.	30-Nov-19
Kwantas Corporation	Reports of deforestation in the following concessions: - Kwantas Corporation	Mighty Earth Rapid Response Report 17, 21	Indirectly with parent company via third party suppliers/traders.	ADM reached out to direct supplier for investigation. ADM is requesting information to our direct supplier to clarify the situation.	30-Nov-19
NaturAceites	Allegations with respect to human rights	Reuters	Indirect with parent company via third party suppliers/traders.	ADM reached out to direct supplier for investigation. Our direct supplier informed us that he immediately engaged Naturaceites following the allegations. To date, evaluations conducted by neutral third parties have shown that Naturaceites has been in compliance with the sustainable palm oil policy from our supplier.	30-Nov-19
Perkebunan Nusantara	Reports of deforestation in the following concessions: - PT Perkebunan Nusantara II Prati	Mighty Earth Rapid Response Report 15	Indirect with parent company via third party suppliers/traders.	Our direct supplier informed us that PT Perkebunan Nusantara has divested the concession in question since 2014. ADM is monitoring that any product will be received from the concerned mill via another third party.	30-Nov-19

Group	Issues	Reported by	Relationship	Progress	Last Update
PT. Bangun Sampurna Lestari	<ul style="list-style-type: none"> Risk of sourcing from the Singkil-Bengkung region of the Leuser Ecosystem 	RAN - Rainforest Action Network	Indirect via third party suppliers/traders	ADM reached out to direct supplier for investigation. Our direct supplier informed us that they have sent a letter to them to make sure they are aware of the issue and ask for actions taken/planned especially on their traceability progress.	30-Nov-19
PT. Bumi Daya Agrotamas	<ul style="list-style-type: none"> Risk of sourcing from the Singkil-Bengkung region of the Leuser Ecosystem 	RAN - Rainforest Action Network	Indirect via third party suppliers/traders	ADM reached out to direct supplier for investigation. ADM is requesting information to our direct supplier to clarify the situation.	30-Nov-19
PT. Delima Makmur	<ul style="list-style-type: none"> Risk of sourcing from the Singkil-Bengkung region of the Leuser Ecosystem 	RAN - Rainforest Action Network	Indirect via third party suppliers/traders	ADM reached out to direct supplier for investigation. ADM is requesting information to our direct supplier to clarify the situation.	30-Nov-19
PT. Ensem Sawita Lestari	<ul style="list-style-type: none"> Risk of sourcing from the Singkil-Bengkung region of the Leuser Ecosystem 	RAN - Rainforest Action Network	Indirect via third party suppliers/traders	ADM reached out to direct supplier for investigation. Our direct supplier informed us that they have sent a letter to them to make sure they are aware of the issue and ask for actions taken/planned especially on their traceability progress.	30-Nov-19
PT. Global Sawit Semesta	<ul style="list-style-type: none"> Palm oil grown illegally at the expense of the protected peat forests of Rawa Singkil Wildlife Reserve in the Singkil-Bengkung region of the Leuser Ecosystem Risk of sourcing from the Singkil-Bengkung region of the Leuser Ecosystem 	RAN - Rainforest Action Network	Indirect via third party suppliers/traders	ADM reached out to direct supplier for investigation. Our direct supplier informed us that he is engaging with the PT GSS to seek responses to the allegations contained in the RAN report. Furthermore PT GSS has agreed that our direct supplier would send grievance teams to conduct a field visit to learn more about the issue on the ground and also to help PT GSS to develop an action plan for future improvement. The visit has been scheduled for October 2019.	30-Nov-19
PT. Nafasindo	<ul style="list-style-type: none"> Risk of sourcing from the Singkil-Bengkung region of the Leuser Ecosystem 	RAN - Rainforest Action Network	Indirect via third party suppliers/traders	ADM reached out to direct supplier for investigation. Our direct supplier informed us that they have sent a letter to them to make sure they are aware of the issue and ask for actions taken/planned especially on their traceability progress.	30-Nov-19
PT. Perkebunan Lembah Bakti I	<ul style="list-style-type: none"> Risk of sourcing from the Singkil-Bengkung region of the Leuser Ecosystem 	RAN - Rainforest Action Network	Indirect via third party suppliers/traders	ADM reached out to direct supplier for investigation. Our direct supplier informed us that they have sent a letter to them to make sure they are aware of the issue and ask for actions taken/planned especially on their traceability progress.	30-Nov-19
PT. Perkebunan Lembah Bakti II	<ul style="list-style-type: none"> Risk of sourcing from the Singkil-Bengkung region of the Leuser Ecosystem 	RAN - Rainforest Action Network	Indirect via third party suppliers/traders	ADM reached out to direct supplier for investigation. ADM is requesting information to our direct supplier to clarify the situation.	30-Nov-19
PT. Runding Putra Persada	<ul style="list-style-type: none"> Risk of sourcing from the Singkil-Bengkung region of the Leuser Ecosystem 	RAN - Rainforest Action Network	Indirect via third party suppliers/traders	ADM reached out to direct supplier for investigation. Our direct supplier informed us that they have sent a letter to them to make sure they are aware of the issue and ask for actions taken/planned especially on their traceability progress.	30-Nov-19
PT. Samudera Sawit Nabati	<ul style="list-style-type: none"> Palm oil grown illegally at the expense of the protected peat forests of Rawa Singkil Wildlife Reserve in the Singkil-Bengkung region of the Leuser Ecosystem Risk of sourcing from the Singkil-Bengkung region of the Leuser Ecosystem 	RAN - Rainforest Action Network	Indirect via third party suppliers/traders	ADM reached out to direct supplier for investigation. Our direct supplier informed us that he is engaging with the PT GSS to seek responses to the allegations contained in the RAN report. Furthermore PT SSN declared that they did not source from CV Buana Indah as mentioned in the RAN report. PT SSN has given consent for our direct supplier to conduct on-site field verification of the allegations with specific focus on the claims that the mill is sourcing via the named broker. Our direct supplier will also provide PT SSN with a recommended action plan for future improvement. The visit has been scheduled for October 2019.	30-Nov-19

Group	Issues	Reported by	Relationship	Progress	Last Update
PT.Socfindo	• Risk of sourcing from the Singkil-Bengkung region of the Leuser Ecosystem	RAN - Rainforest Action Network	Indirect via third party suppliers/traders	ADM reached out to direct supplier for investigation. ADM is requesting information to our direct supplier to clarify the situation.	30-Nov-19
Salim Group	Reports of deforestation in the following concessions: - PT Agro Subur Permai	Mighty Earth Rapid Response Report 20, 21	Indirect via third party suppliers/traders	ADM adopts a no buy position on the company.	30-Nov-19
Salim Group	Reports of deforestation in the following concessions: -PT Bintuni Agro Prima Perkasa	Mighty Earth Rapid Response Report 1	No direct or indirect connection between ADM and the parent company or mill.	ADM adopts a no buy position on the company.	30-Nov-19
Salim Group	Reports of deforestation in the following concessions: -PT Duta Rendra Mulya	Mighty Earth Rapid Response Report 2	No direct or indirect connection between ADM and the parent company or mill.	ADM adopts a no buy position on the company.	30-Nov-19
Samling	Reports of peat development in the following concessions: -PT Syarikat Samling Timber Sdn Bhd	Mighty Earth Rapid Response Report 17, 19, 20	Indirect via third party suppliers/traders	ADM reached out to direct supplier for investigation. Our direct supplier confirmed that the operation / planting are not related to palm oil production.	30-Nov-19
Surya Dumai	Reports of clearance prep/stacking lines in the following concessions: - PT Kalimantan Agro Kencana	Mighty Earth Rapid Response Report 20	Indirect with parent company via third party suppliers/traders.	ADM reached out to direct supplier for investigation. ADM is requesting information to our direct supplier to clarify the situation.	30-Nov-19
TH Plantations Bhd	Reports of deforestation in the following concessions: - Ladang Tabung Haji	Mighty Earth Rapid Response Report 15, 18, 20	Indirect with parent company via third party suppliers/traders.	Our direct supplier informed us that the concession Ladang Tabung Haji doesn't belong to TH Plantation Berhad since 2002 after it was divested to a non-related party. ADM is monitoring that any product will be received from the concerned mill via another third party.	30-Nov-19
Triputra	Reports of deforestation in the following concessions: - PT Gawi Bahandep Sawit Mekar	Mighty Earth Rapid Response Report 21	Indirect with parent company via third party suppliers/traders.	ADM reached out to direct supplier for investigation. ADM is requesting information to our direct supplier to clarify the situation.	30-Nov-19
Triputra Agro Persada	Reports of deforestation in the following concessions: - PT Berau Karetindo Lestari (area 2)	Mighty Earth Rapid Response Report 2, 16, 19, 20, 21	Indirectly with parent company via third party suppliers/traders.	ADM reached out to direct supplier for investigation. ADM is requesting information to our direct supplier to clarify the situation.	30-Nov-19
Brazil - Sixteen properties as listed in the report in the municipalities of Piauí, Bahia, Goiás, Maranhão, Tocantins, Pará, and Mato Grosso	Reports of land clearing for soy and cattle	Mighty Earth Rapid Response Soy and Cattle Report 5	No direct connection between soy sourced by ADM and the areas of deforestation identified in this report.	The investigation concluded that there was no sourcing from the reported deforestation areas. We will closely monitor land use change in the properties listed to make sure they are in compliance with the local legislation and our No Deforestation Policy.	23-Sep-19

Group	Issues	Reported by	Relationship	Progress	Last Update
Evershine Asset Corporation / Everbright Resources Corporation	Reports of deforestation in the following concessions: - PT Sentrakarya Manunggal	Mighty Earth Rapid Response Report 19	Indirectly via third party suppliers/traders.	ADM adopts a no buy position on the company.	23-Sep-19
Goodhope Group	Reports of deforestation in the following concessions: - PT Sumber Hasil Prima	Mighty Earth Rapid Response Report 19	Indirectly with parent company via third party suppliers/traders.	ADM reached out to direct supplier for investigation. Our direct supplier informed us that both the satellite imagery interpretation and field verification (ground truthing) demonstrate that the land clearing of the particular spots reported in the Mighty Earth Rapid Response 19 were taking place in areas owned by local community located outside the concessions of PT SHP.	23-Sep-19
Lyman Agro Group	Reports of deforestation in the following concessions: - PT Bonti Permai Jayaraya	Mighty Earth Rapid Response Report 19	Indirectly with parent company via third party suppliers/traders.	ADM reached out to direct supplier for investigation. Our direct supplier informed us that BPJ was not involved in any land clearing and the land clearing mentioned by Mighty Earth 19 was located outside their concession.	23-Sep-19
Rimbunan Hijau Group	Reports of clearance prep/stacking lines in the following concessions: - RH Plantation (Selangor Estate)	Mighty Earth Rapid Response Report 19	Indirectly with parent company via third party suppliers/traders.	ADM reached out to direct supplier for investigation. Our direct supplier informed us that the clearing is non-palm related.	23-Sep-19
Sime Darby Group	Reports of deforestation in the following concessions: - Sime Darby Plantation Sdn Bhd (Derawan, SOU 33)	Mighty Earth Rapid Response Report 19	Indirectly with parent company via third party suppliers/traders.	ADM reached out to direct supplier for investigation. Our direct supplier informed us that the location of land clearing mentioned by Mighty Earth 19 was just outside Derawan SOU 33 concession.	23-Sep-19
Tunas Baru Lampung / Sungai Budi Group	Reports of deforestation in the following concessions: - PT Samora Usaha Jaya (B)	Mighty Earth Rapid Response Report 19	Indirectly with parent company via third party suppliers/traders.	ADM adopts a no buy position on the company.	23-Sep-19
WTK	Reports of deforestation in the following concessions: - Southwind Plantation Sdn Bhd	Mighty Earth Rapid Response Report 17, 19	Indirectly via third party suppliers/traders.	ADM reached out to direct supplier for investigation. Our direct supplier confirmed that WTK was not involved in the land clearing. The clearance happened either outside their concession boundary or within "Native Dispute Land" inside their boundary. For clearance within "Native Dispute Land", we are engaging with WTK for more details on the nature of the dispute and the detail boundary of the disputed land.	23-Sep-19
Brazil - Twelve properties as listed in the report in the municipalities of Piauí, Bahia, Maranhão, Mato Grosso, and Pará	Reports of land clearing for soy and cattle	Mighty Earth Rapid Response Soy and Cattle Report 4	No direct connection between soy sourced by ADM and the areas of deforestation identified in this report.	The investigation concluded that there was no sourcing from the reported deforestation areas. We will closely monitor land use change in the properties listed to make sure they are in compliance with the local legislation and our No Deforestation Policy.	18-Sep-19
GAMA Group	Reports of deforestation in the following concessions: - PT Sumatera Unggul Makmur	Mighty Earth Rapid Response Report 18	Indirectly with parent company via third party suppliers/traders.	We were informed from one supplier that there is no legal entity of "Gama Group", instead this is a situation of unstructured family-owned companies without any formal overarching management. ADM is following up on this issue.	26-Aug-19
Golden Plantation Tbk	Reports of deforestation in the following concessions: - PT Airlangga Sawit Jaya	Mighty Earth Rapid Response Report 18	Indirectly via third party suppliers/traders.	We were informed from one supplier that the land clearing location mentioned by Mighty Earth was outside PT ASJ ILOK.	26-Aug-19

Group	Issues	Reported by	Relationship	Progress	Last Update
Pactra Group	Reports of deforestation in the following concessions: - PT Arjuna Utama Sawit (area 1)	Mighty Earth Rapid Response Report 14, 18	Indirectly with parent company via third party suppliers/traders.	ADM reached out to direct supplier for investigation. Our direct supplier informed us that they contacted PT AUS to seek feedback and stressed again our NDPE commitment. PT AUS confirmed that the peat forest clearance for plasma area. Our supplier sent an official letter to PT AUS requesting an immediate moratorium.	26-Aug-19
Pactra Group	Reports of deforestation in the following concessions: - PT Arjuna Utama Sawit (area 2)	Mighty Earth Rapid Response Report 14, 18	Indirectly with parent company via third party suppliers/traders.	ADM reached out to direct supplier for investigation. Our direct supplier informed us that they contacted PT AUS to seek feedback and stressed again our NDPE commitment. PT AUS confirmed that the peat forest clearance for plasma area. Our supplier sent an official letter to PT AUS requesting an immediate moratorium.	26-Aug-19
Rimbunan Hijau	Reports of peat development and clearance prep/stacking lines in the following concessions: - Erajaya Synergy Sdn Bhd (Lassa division, part of LPF/0029)	Mighty Earth Rapid Response Report 18	Indirectly with parent company via third party suppliers/traders.	We were informed that they are maintaining a moratorium as of 20 September 2018. They have shared concession maps and committed to NDPE.	26-Aug-19
Tunas Baru Lampung/Sungai Budi Group	Alleged clearance of forested peatlands by PT Solusi Jaya Perkasa and PT Dinamika Graha Sarina, subsidiaries of PT Tunas Baru Lampung Tbk (TBL) from Sungai Budi Group.	Chain Reaction Research, Greenpeace	Indirect via third party suppliers/traders	ADM adopts a no buy position on the company.	26-Aug-19
Boustead Plantation Bhd	Reports of clearance prep/stacking line in the following concessions: -Boustead Pelita Kanowit Snd Bhd	Mighty Earth Rapid Response Report 17	Indirectly via third party suppliers/traders.	ADM reached out to direct supplier for investigation. Our direct supplier confirmed that the concession is not involved in the land clearing, and it happened outside their concession.	15-Aug-19
Evershine Asset Corporation & Everbright Resources Corporation	Reports of deforestation in the following concessions: - PT Anugerah Makmur Sejati	Mighty Earth Rapid Response Report 17	Indirectly via third party suppliers/traders.	ADM adopts a no buy position on the company.	15-Aug-19
Kencana Agri Ltd	Reports of deforestation in the following concessions: - PT Agro Sawit Mas Lestari	Mighty Earth Rapid Response Report 17	Indirectly with parent company via third party suppliers/traders.	ADM reached out to direct supplier for investigation. Our direct supplier confirmed that the concession is not involved in the land clearing, and it happened outside their concession.	15-Aug-19
Sumber Tani Agung	Reports of deforestation, clearance prep/stacking lines in the following concessions: - PT Tantahan Panduhup Asi	Mighty Earth Rapid Response Report 17	ADM reached out to direct supplier for investigation. Our direct supplier confirmed that the concession is not involved in the land clearing, and it happened outside their concession.	Land clearing identified was proved to happen outside the concession	15-Aug-19

Group	Issues	Reported by	Relationship	Progress	Last Update
Woodman Group	Reports of peat development in the following concessions: -Liku estate, part of LPF 004	Mighty Earth Rapid Response Report 17, 18	Indirectly with parent company via third party suppliers/traders.	ADM reached out to direct supplier for investigation. Our direct supplier confirmed that the operation / planting of the above are not related to palm oil production. Furthermore, those estates are not within Woodman's concession.	15-Aug-19
Yuwang/ Empresa (M) Sdn Bhd	Reports of deforestation in the following concessions: - Empresa (M) sdn Bhd (OT/0351)	Mighty Earth Rapid Response Report 17, 18	Indirectly with parent company via third party suppliers/traders.	ADM reached out to direct supplier for investigation. Our direct supplier confirmed that the concession is not involved in the land clearing, and it happened outside their concession.	15-Aug-19
Brazil - Fourteen properties as listed in the report in the municipalities of Piauí, Bahia, Maranhão, Mato Grosso, and Roraima	Reports of land clearing for soy and cattle	Mighty Earth Rapid Response Soy and Cattle Report 2	No direct connection between soy sourced by ADM and the areas of deforestation identified in this report.	The investigation concluded that there was no sourcing from the reported deforestation areas. We will closely monitor land use change in the properties listed to make sure they are in compliance with the local legislation and our No Deforestation Policy.	12-Aug-19
Brazil - Ten properties as listed in the report in the municipalities of Piauí, Bahia, Maranhão, and Mato Grosso	Reports of land clearing for soy and cattle	Mighty Earth Rapid Response Soy and Cattle Report 3	No direct connection between soy sourced by ADM and the areas of deforestation identified in this report.	The investigation concluded that there was no sourcing from the reported deforestation areas. We will closely monitor land use change in the properties listed to make sure they are in compliance with the local legislation and our No Deforestation Policy.	12-Aug-19
Saban Sawit Subur	Reports of deforestation in the following concessions: - Saban Sawit Subur (516.82 ha)	Mongabay	Indirect via third party suppliers/traders	According to the investigation of our direct supplier, land clearing is located outside of PT Saban Sawit Subur (SSS)'s areas. The detected land clearing took place inside Saraswanti Agro Estate, and PT SSS has no link to this company, and they are not suppliers to PT SSS. PT SSS is covered under our suppliers's existing monitoring programme and there is no known deforestation alert for PT SSS in 2019.	12-Aug-19
BLD Plantation	Reports of peat forest in the following concessions: -BLD Plantation	Mighty Earth Rapid Response Report 11, 7, 6, 5, 4	Indirectly with parent company via third party suppliers/traders.	BLDP has been working with Earthworm Foundation (EF) and has published their Sustainable Palm Oil Policy with NDPE commitments in May 2019 (http://www.bldpb.com.my/downloads/BLDP_Sustainable_Palm_Oil_Policy.pdf) EF is the advisory consultant and is supporting BLD in the crafting of a road map for the delivery and implementation of this policy and a grievance mechanism/procedure to address issues from both internal and external stakeholders. BLD has announced a moratorium on all future new development until the finalization of their policy implementation plan. And there will be no development of peatlands regardless of depth and HCS and HCV assessment will be conducted for all future developments. ADM is monitoring the progress through direct suppliers and public communications.	13-Jul-19

Group	Issues	Reported by	Relationship	Progress	Last Update
Brazil - Twelve properties as listed in the report in municipalities of Bahia and Mato Grosso	Reports of land clearing for soy and cattle	Mighty Earth Rapid Response Soy and Cattle Report 1	No direct connection between soy sourced by ADM and the areas of deforestation identified in this report.	The investigation concluded that there was no sourcing from the reported deforestation areas. We will closely monitor land use change in the properties listed to make sure they are in compliance with the local legislation and our No Deforestation Policy.	13-Jul-19
Fangiono Agro Plantation Group	Reports of deforestation in the following concessions: - PT Ketapang Hijau Lestari	Mighty Earth Rapid Response Report 9	Indirectly with parent company via third party suppliers/traders.	HCS/HCV assessment at PT Ketapang Hijau Lestari was completed in 2017 by a registered organisation with the HCSA. Based on our supplier's monitoring system, there was no land clearing at the HCV/HCS area identified at the integrated HCV/HCS map. FAP adopted a NDPE policy as well as other environmental certifications (http://fap-agri.com/tentang-kami/). ADM is monitoring the progress through direct suppliers and public communications.	13-Jul-19
Felda Global Ventures Holding Bhd	Reports of peat development in the following concessions: - PT Temila Agro Abadi	Mighty Earth Rapid Response Report 9	Indirectly with parent company via third party suppliers/traders.	Our direct suppliers connected with Felda Global Ventures Holding are closely following up their actions. FGV continues to publicly reporting their progress and effort in addressing the grievances via their website. ADM continue to check the updates on their website and requesting information about progress via our direct suppliers. http://www.fgvholdings.com/sustainability/stakeholder-engagement/sustainability-updates	13-Jul-19
Incasi Raya Group	Reports of deforestation, peat development and peat forest development in the following concessions: - PT Sumatera Jaya Agro Lestari	Mighty Earth Rapid Response Report 10	Indirectly with parent company via third party suppliers/traders.	Our supplier was informed that a constructive engagement meeting was held with Incasi Raya in February. Incasi Raya has stopped any further land clearing and they have been considering a reforestation program. ADM is monitoring the progress through direct suppliers and public communications.	13-Jul-19
Musirawas Group	Reports of peat development in the following concessions: -PT Sumur Pandanwangi	Mighty Earth Rapid Response Report 6, 10, 11	No direct or indirect connection between ADM and the parent company or mill.	ADM adopts a no buy position on the company.	13-Jul-19
Pundi Group	Reports of peat forest development, clearance prep/stacking lines in the following concessions: -PT Pinang Witmas Abadi	Mighty Earth Rapid Response Report 10, 11, 12, 18	Indirectly with parent company via third party suppliers/traders.	ADM adopts a no buy position on the company.	13-Jul-19
Samuel International Group	Reports of deforestation in the following concessions: -PT Prasetya Mitra Muda Blok II	Mighty Earth Rapid Response Report 6	No direct or indirect connection between ADM and the parent company or mill.	Our supplier began an engagement process with parent company. According to this, Samuel Group has signed a letter of commitment in complying with the NDPE policy and currently exploring options for various assessment. In the meantime, our supplier continue to monitor PT Prasetya Mitra Muda Blok II's activities on monthly basis.	13-Jul-19
Shin Yang group	Reports of deforestation in the following concessions: -LPF/0039 Zedtee SB	Mighty Earth Rapid Response Report 4	No direct or indirect connection between ADM and the parent company or mill.	ADM adopts a no buy position on the company.	13-Jul-19

Group	Issues	Reported by	Relationship	Progress	Last Update
Ta Ann Group	Reports of deforestation in the following concessions: - Ladang Selezu Sdn Bhd	Mighty Earth Rapid Response Report 15	Indirectly with parent company via third party suppliers/traders.	Our supplier is investigating the allegation and a field verification on the deforestation allegation in the week of 23rd July. Moratorium of land clearing has been put in place while investigation is ongoing.	13-Jul-19
Tabung Haji Plantations (TH Plantations)	Reports of deforestation in the following concessions: -PT Persada Kencana Prima	Mighty Earth Rapid Response Report 5	Indirectly with parent company via third party suppliers/traders.	Our supplier began the engagement process with this company in 2016. Through our direct supplier's monitoring, it was detected land use change at PT PKP in early July 2018. THP clarified that the area was originally cleared several years ago but was not planted due to operational constraints. THP claimed that the land use change detected is due the re-stacking of area now that planting is resuming. In the meantime, PT PKP continues to uphold their commitment to cease all activities on the ground. ADM is monitoring the progress through direct suppliers and public communications.	13-Jul-19
Tsani Hutani Abadi Group	Reports of deforestation in the following concessions: -PT Rayatama Jaya	Mighty Earth Rapid Response Report 2, 5, 6, 9, 14	No direct or indirect connection between ADM and the parent company or mill.	ADM adopts a no buy position on the company.	13-Jul-19
Tsani Hutani Abadi Group	Reports of deforestation in the following concessions: -PT Kruing Lestari Jaya	Mighty Earth Rapid Response Report 9	No direct or indirect connection between ADM and the parent company or mill.	ADM adopts a no buy position on the company.	13-Jul-19
Tsani Hutani Abadi Group	Reports of deforestation in the following concessions: -PT Harapan Rimba Jaya	Mighty Earth Rapid Response Report 9, 5, 2	No direct or indirect connection between ADM and the parent company or mill.	ADM adopts a no buy position on the company.	13-Jul-19
Unknown Group	Reports of deforestation in the following concessions: -PT Condong Garut	Mighty Earth Rapid Response Report 4	No direct or indirect connection between ADM and the parent company or mill.	ADM adopts a no buy position on the company.	13-Jul-19
Unknown Group	Reports of deforestation, clearance prep.Stracking lines in the following concessions: -PT Krida Dharma Kahuripan	Mighty Earth Rapid Response Report 5, 6, 11, 12	No direct or indirect connection between ADM and the parent company or mill.	ADM adopts a no buy position on the company.	13-Jul-19
Wings Group Indonesia	Reports of deforestation in the following concessions: -PT Sentosa Suksesutama	Mighty Earth Rapid Response Report 12	No direct or indirect connection between ADM and the parent company or mill.	ADM adopts a no buy position on the company.	13-Jul-19
Ahmad Zaki Resources Berhad (AZRB Group) Malaysia	Reports of deforestation in the following concessions: - Ichtar Gusti Pudi (425.97 ha)	Mongabay	Indirect via third party suppliers/traders	After investigation our direct supplier confirm that deforestation has not occurred on the concession mentioned.	10-Jul-19
Genting Plantations Berhad	Reports of deforestation in the following concessions: - Sepanjang Intisurya Mulia (649.47 ha)	Mongabay	Indirect via third party suppliers/traders	The area identified in the Maphubs report showing deforestation is not in the Sepanjang Intisurya Mulia concession.	10-Jul-19
Ketapang Agro Lestari	Reports of deforestation in the following concessions: -PT Ketapang Hijau Lestari (990.7 ha)	Mongabay	Indirect via third party suppliers/traders	The company confirmed that they are not sourcing from concessions indicated to be carrying out forest clearing	10-Jul-19

Group	Issues	Reported by	Relationship	Progress	Last Update
KL-Kepong Plantation Holdings Sdn Bhd	Reports of deforestation in the following concessions: -PT Jabontara Eka Karsa (442.06 ha)	Mongabay	Indirect via third party suppliers/traders	After investigation our direct supplier confirm that deforestation has not occurred on the concession mentioned.	10-Jul-19
Pundi	Reports of deforestation in the following concessions: - Pundi Lahan Khatulistiwa (480.49 ha)	Mongabay	Indirect via third party suppliers/traders	ADM adopts a no buy position on the company.	10-Jul-19
Industria Chiquibul	Allegations of labor rights violations by palm oil producer Chiquibul in Guatamala.	Reuters	Indirect via third party suppliers/traders	ADM adopts a no buy position on the company.	20-Jun-19