

1) PT GHM (GHM):

Bumitama had a management agreement with GHM, which was disclosed in our IPO [prospectus](#) from 2012 (p. 145). However due to delay in legality matters of obtaining the approval from the Minister of Marine and Fishery, we terminated the management contract as part of risk mitigation. This was also communicated through an SGX announcement (<http://ir.bumitama-agri.com/static-files/e07bf8be-5885-4eb0-bc14-a8b5fa004369>). However the company was acquired by Bumitama in 2016, which we have informed/updated through the 2015 Annual report (p. 138) (<http://ir.bumitama-agri.com/static-files/bdf9854a-ca57-491b-912e-f66f1ebd0290>) as well as in an announcement from 3 February 2016 (<http://ir.bumitama-agri.com/static-files/3b15d004-79b2-4ef6-b582-144593d83df6>). Since its acquisition, we have continued with the Indonesian licensing process and elevated its land ownership status to HGU, while any non-compliant land clearing has been reported to RSPO in line with the RaCP procedure, including the period prior to Bumitama's ownership.

2) PT HPA (HPA):

Bumitama made multiple announcements on HPA through SGX as the matter related to its permits and the subsequent court case as it unfolded. After it has been brought to the RSPO Complaints procedure, the issue has been thoroughly communicated through their case tracker. Bumitama had clarified the legality, sale of assets and acquisition by PT LMS in much detail in our announcement, Sustainability and Annual reports.

- Receipt of permit revocation letter <http://ir.bumitama-agri.com/static-files/31266872-caca-4dbc-972a-4b4219c8efbc>
- Instituting a legal proceeding <http://ir.bumitama-agri.com/static-files/dda65f44-b9f5-4881-b8c3-3b21bfb2db88>
- After 1st round of proceeding <http://ir.bumitama-agri.com/static-files/477ad3ec-264b-4ebc-8a12-e04e42628ae6>
- After 2nd round of proceeding <http://ir.bumitama-agri.com/static-files/15ce2064-1ebd-4929-85f3-5fa51f2afaf3>
- Appeal against 2nd round of proceeding decision <http://ir.bumitama-agri.com/static-files/4bdf927e-47f5-4a07-bfcf-bf5afa560e61>
- Clarification after 3rd and final decision <http://ir.bumitama-agri.com/static-files/4328c528-061c-4bdc-bb92-3a1fb479ad75>
- Sale of assets through CSPA to new permit owners PT LMS <http://ir.bumitama-agri.com/static-files/6dda383e-052b-4f64-9c4d-aefabb56167d>
- Failure to fulfill the CSPO resulting in acquisition of LMS <http://ir.bumitama-agri.com/static-files/79b9ae2b-9346-49a5-a3d2-b39a0ad6389b>
- Clarification on the acquisition in 2016 Sustainability report <http://www.bumitama-agri.com/asset/upload/storage/report/Bumitama%20-%20Sustainability%20Report%202016.pdf>

- Further clarification on the acquisition in Annual Report 2017 - <http://ir.bumitama-agri.com/static-files/a1508f86-9e29-4b30-9b31-c8f45f8dea6e>

Any clearance of potential HCV areas by PT HPA had been analysed and disclosed to RSPO to be compensated in line with the RaCP procedure. All requirements related to land ownership legality have been fulfilled when Bumitama obtained a HGU license for PT LMS.