



FIRST RESOURCES LIMITED

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16 September 2026

Attention to:

Ms. Ginger Cassidy
Executive Director, Rainforest Action Network (RAN)

Subject: Response to RAN letter dated 7 September 2026

Dear Ms. Cassidy,

We appreciate the opportunity to re-engage with RAN, continuing the constructive dialogue we established in 2024, which led to a mutual understanding regarding the issues concerning PT Kalimantan Green Persada.

Thank you for your letter and for providing First Resources the opportunity to respond to your upcoming publication. We note that the allegations contained in your letter concern the relationship between First Resources' operations and other companies or groups. To address the allegations, we would like to clarify that FAPA is not a subsidiary nor an associated company of First Resources. Rather, FAP Agri (FAPA) is a supplier to First Resources on an ad-hoc basis, and subject to our rigorous sustainability due diligence procedures.

Meanwhile, Kalimantan Agro Sejahtera (referred to in your letter as the "KAS Group") are not subsidiaries, associated companies, related parties, nor interested persons of First Resources. It is pivotal for us to highlight factual inaccuracies in your letter, First Resources has not purchased any palm oil products from, nor entered into any other transactions with KAS Group, and will not buy from any company that is not in compliance with our [Policy on Sustainable Palm Oil](#). Therefore, First Resources cannot be held accountable for the actions or inactions of KAS Group.

We would also like to highlight that similar allegations were previously filed under the RSPO complaint system with the complaint reference [RSPO/2021/04/EN](#). These allegations were previously investigated and adjudicated by the RSPO through its formal complaints system, culminating in a final decision that closed the case. First Resources respects the decision of the RSPO, which reaffirmed First Resources' compliance with sustainability standards and concluded that both the Complainant's allegations and appeals were dismissed. In the interest of righteousness, we respectfully request that RAN take due account of the RSPO's findings and respect the final decision rendered in the aforementioned case.

Regarding the allegation that First Resources, FAPA, and KAS Group have coordinated, integrated, and co-mingled Crude Palm Oil (CPO) supply chains, we deny these claims and wish to clarify that First Resources does not conduct any blending or co-mingling of CPO products with third-party entities, and



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remains strictly committed to delivering products to our buyers, in line with the traceability information we disclose.

With regard to the deforestation allegations, our review and clarification are strictly limited to the operational scope of our subsidiary mentioned in your letter, i.e., PT Borneo Damai Lestari (PT BDL). However, to properly assess these issues, we would appreciate receiving supporting information regarding the alleged deforestation identified by RAN, including any specific spatial alerts. In the meantime, we would like to emphasize that any plantation development within PT BDL has been conducted strictly on areas classified as "Go areas"—meaning land recommended for development based on the findings of our comprehensive High Conservation Value (HCV) and High Carbon Stock (HCS) assessments. For your reference, PT BDL completed its HCV assessment in 2012 through an independent assessor listed as an RSPO-approved assessor, followed by its HCS assessment in 2017 conducted by a registered HCSA Practitioner Organization.

We would like to clarify that First Resources and its subsidiaries, as companies operating in Indonesia, are committed to complying with applicable laws and regulations, including evolving regulatory landscapes such as Minister of Forestry Decree No. 36 of 2025 (SK Menhut No. 36/2025). Furthermore, we encourage any parties seeking further information regarding the ongoing process resulting from the Decree, to communicate directly with the relevant government authorities responsible for such matters. As members of the Roundtable on Sustainable Palm Oil (RSPO), we are also committed to complying with the applicable RSPO requirements, including [*the Interim Audit Guidelines for Certification Bodies Navigating Indonesian Forest Permit Regulations*](#), issued by the RSPO on 12 November 2025.

At this point in time, we are unable to comment on all of your points in detail, as we require more specific information to conduct a thorough investigation. We are keen to review the complete draft of your publication to ensure all factual assertions can be properly verified.

We sincerely hope our clarification above will assist RAN in presenting an accurate and balanced publication. We appreciate your consideration of our response and would welcome continued constructive engagement on this matter.

Yours sincerely,

Bambang Dwi Laksono
Head of Sustainability