



FIRST RESOURCES LIMITED

Co.Reg.No.: 200415931M
8 Temasek Boulevard #36-02 Suntec Tower Three Singapore 038988
Tel: (65) 6602 0200 Fax: (65) 6333 6711
Email: contactus@first-resources.com

28 September 2026

Attention to:

Ms. Faith Doherty
Forest Programme Leader
Environmental Investigation Agency (EIA) UK
62–63 Upper Street, London N1 0NY, United Kingdom

Subject: Response to EIA Letter dated 14 September 2026

Dear Ms. Doherty,

First Resources welcomes the opportunity provided by the Environmental Investigation Agency (EIA) to respond to the matters raised in your letter ahead of the publication of your forthcoming report. In this regard, we note that the allegations set out in your letter appear to concern an alleged relationship between First Resources' operations and other companies or groups.

To address the allegations, we would like to clarify that Kalimantan Agro Sejahtera (KAS) Group, (mentioned in your letter to be previously known as New Borneo Agri (NBA)/Sulaidy Group) are not subsidiaries, associated companies, related parties, nor interested persons of First Resources. It is pivotal for us to address certain factual inaccuracies in your letter. First Resources has neither 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](#). Accordingly, First Resources cannot be held accountable for the actions or inactions of KAS Group.

In line with the above, with respect to the allegation that First Resources' facilities have been receiving palm oil supplies from the KAS Group, we firmly reject this allegation. First Resources remains strictly committed to delivering products to our buyers in line with the traceability information we disclose and subject to our rigorous sustainability due diligence procedures.

We would also like to highlight that similar allegations were seemingly filed under the RSPO complaint system under the complaint reference [RSPO/2021/04/EN](#). These allegations were independently investigated and adjudicated by the RSPO through its formal complaints process, 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. Accordingly, we respectfully request that EIA take due account of the RSPO's findings and respect the final decision rendered in the aforementioned case.



FIRST RESOURCES LIMITED

Co.Reg.No.: 200415931M
8 Temasek Boulevard #36-02 Suntec Tower Three Singapore 038988
Tel: (65) 6602 0200 Fax: (65) 6333 6711
Email: contactus@first-resources.com

With respect to the allegations concerning the two palm oil companies operating in South Sorong, we would like to provide the following clarification. In October 2025, following First Resources' strategic decision to streamline its plantation footprint by exiting the oil palm plantation business in Papua, the Group has disposed of its entire equity interests in PT Permata Putera Mandiri ("PT PPM") and PT Putera Manunggal Perkasa ("PT PMP"). Following the divestment, PT PPM and PT PMP ceased to be under the management or control of First Resources. Accordingly, First Resources firmly rejects any suggestion that the recruitment, training or deployment of employees by these companies following the divestment was undertaken by, or otherwise associated with, First Resources. We suggest that EIA seek further clarification directly from the acquiring company, PT Harmoni Agri Mandiri.

Employee mobility is common across the palm oil sector. It is also not unusual for executives to bring along trusted colleagues with them when they move between organisations. As with any established industry player, First Resources operates in a competitive labour market and has experienced its fair share of workforce and management turnover. First Resources does not seek to restrict the mobility of its employees, recognising their right to pursue alternative career opportunities, provided that such employee movements are conducted professionally, comply with applicable labor regulations, and do not compromise the proprietary information, property or other assets of First Resources.

At this point in time, we are not in the position to comment on all of your points in detail, as more specific informations are required to conduct a thorough investigation. We welcome the opportunity to review the complete draft of your publication and supporting evidence to ensure all factual assertions can be properly verified.

We sincerely hope our clarification above will assist EIA 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

**Ms. Faith Doherty**

Forest Programme Leader
Environmental Investigation Agency (EIA) UK
62-63 Upper Street, London N1 0NY, United Kingdom

Mr. Ridzki Sigit

Acting President
Kaoem Telapak
Jl. Sempur Dalam No. 5, Kota Bogor, Jawa Barat 16129, Indonesia

Re: Response of PT FAP Agri Tbk to the Letter of the Environmental Investigation Agency and Kaoem Telapak dated 14 September 2026 — Right of Reply

Dear Ms. Doherty and Mr. Sigit,

PT FAP Agri Tbk ("FAPA" or "the Company") acknowledges receipt of the letter issued jointly by the Environmental Investigation Agency ("EIA") and Kaoem Telapak dated 14 September 2026, inviting comment on allegations intended for publication. We thank you for extending a right of reply ahead of publication.

This response is provided by FAPA solely in respect of matters concerning FAPA and its subsidiaries. FAPA is not in a position to comment on, and does not respond on behalf of, any other company or corporate group referred to in your letter.

FAPA sets out below its position on the matters raised.

1. FAPA'S CORPORATE POSITION

FAPA confirms, consistently with its previous public statements, that it has no financial, legal or operational relationship with the NBA / Sulaidy Group or the KAS Group. FAPA does not own, is not owned by, does not control and is not controlled by any entity within those groups. FAPA's position in this regard remains unchanged.

FAPA is a public company incorporated under the laws of the Republic of Indonesia and listed on the Indonesia Stock Exchange (IDX: FAPA). As a listed issuer, FAPA is subject to the supervision of the Indonesian Financial Services Authority (Otoritas Jasa Keuangan, "OJK") and to the disclosure, governance and reporting obligations applicable to Indonesian public companies. FAPA is governed by its own Board of Directors and Board of Commissioners. Its operational, commercial and financial decisions are taken through its own governance and management structures in accordance with applicable law and its corporate governance framework.

2. PERSONNEL AND INDIVIDUAL PROFESSIONAL MATTERS

Your letter refers to an individual identified as holding a commercial role at FAPA. As a matter of principle and of policy, FAPA does not comment publicly on the personal circumstances, private affairs or external activities of individual employees.

FAPA recruits and appoints personnel through a proper and professional selection process based on competence, qualifications and suitability for the relevant role.

FAPA also respects the right of its employees to pursue lawful professional and career opportunities. The Company does not interfere with lawful activities undertaken by employees outside the scope of their employment, provided that such activities are not prejudicial to the Company, its business or its reputation.

The personal or external professional activities of an individual should not, in themselves, be attributed to FAPA or treated as evidence of a corporate relationship between FAPA and other companies.

3. AFFILIATION AND RELATED-PARTY STATUS

The identification of an affiliated or related party is not a matter of impression. It is determined by defined legal and accounting criteria, which FAPA applies as a listed issuer.

3.1 The applicable framework

For purposes of Indonesian capital market regulation, OJK Regulation No. 42/POJK.04/2020 on Affiliated Transactions and Conflict of Interest Transactions defines “Afiliasi” by reference to specified relationships, including common members of boards of directors or commissioners, direct or indirect control, common control and relationships involving principal shareholders.

For financial reporting purposes, FAPA applies PSAK 224 on Related Party Disclosures, which has applied under its current numbering since 1 January 2024. The standard establishes defined criteria for identifying related parties, including control, joint control, significant influence and specified management relationships.

3.2 Application

Accordingly, the mere existence of an employment relationship, commercial transaction, accounting entry, logistics arrangement, shared office location or other circumstantial connection does not, **by itself**, establish that two separately incorporated companies are related parties or affiliates.

3.3 Disclosure

FAPA discloses its related parties, and its transactions and balances with them, in its audited financial statements in accordance with PSAK 224, distinguishing them from transactions with third parties. Those statements are examined by an independent public accountant, lodged with the OJK and the Indonesia Stock Exchange, and published. They are a matter of public record and open to inspection.

A spreadsheet is not a document of record. It carries no signature, no approval and no audit; it can be created, altered, extracted in part or assembled by any person with access to it; and the account name appearing in its properties identifies only where a file was last saved — neither its author, nor its accuracy, nor whether what it now contains is what it once contained. Material of that character cannot bear the weight of the inference your letter places upon it, and it is no proper foundation for an allegation against a listed company.

Unverified working files, whose provenance, authorship, completeness and integrity cannot be independently established, cannot be treated as authoritative evidence of the Company's accounting or legal position. That position is reflected in FAPA's audited financial statements and regulatory disclosures, and nowhere else.

4. COMMERCIAL TRANSACTIONS, COUNTERPARTIES AND LOGISTICS

FAPA is entitled, as is any company, to transact with any counterparty on lawful and commercially reasonable terms. FAPA does not own downstream refining facilities, and accordingly sells its crude palm oil and palm oil products to buyers offering the most commercially advantageous terms available at the material time. Such transactions are conducted on an arm's-length basis.

In relation to PT Wahana Prima Sejati ("WPS"), WPS is a commercial counterparty of FAPA for the purchase of crude palm oil, and that relationship is recorded in FAPA's accounting records and reported in its audited financial statements in accordance with the prevailing standards. A business relationship between two separately incorporated companies does not confer upon either party the ability to direct the management, governance or operations of the other, and the concentration of sales with a single buyer is a function of market structure, refining capacity and freight economics rather than of common control. The same observation applies to shipping and port logistics: FAPA is an upstream producer, and the ownership of vessels and the other cargoes they may carry lie outside its control and outside its knowledge.

5. OFFICE LOCATION

FAPA's head office is located in a multi-tenant commercial building which accommodates a number of separately incorporated businesses. FAPA leases office premises on ordinary commercial terms. It has no authority over, and no knowledge of, the leasing decisions of other tenants in the same building, and no means of influencing which companies take space there.

Shared occupancy of a commercial building carries no evidential weight as to corporate relationship, and FAPA would ask that it not be presented as such.

6. CONCLUSION AND REQUEST

FAPA has considered the matters raised in your letter and has provided clarification on the points that concern FAPA.

FAPA reiterates, consistently with its previous statements, that it has no financial, legal or operational relationship with the NBA/Sulaidy Group or the KAS Group. The matters referred to in your letter — including individual professional circumstances, commercial transactions, accounting references, logistics arrangements and office location — do not establish such a relationship.

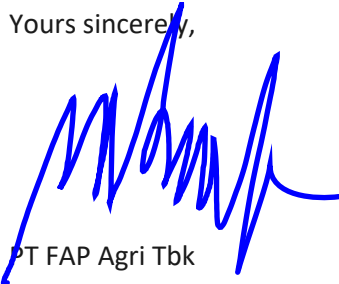
FAPA respectfully asks that its position be presented in its entirety and in its proper context, and that FAPA be clearly distinguished from any other company or corporate group referred to in your report. The absence of specific comment on any particular statement should not be construed as acceptance of it.

We note and appreciate your undertaking that any response received will be fairly and accurately reflected in the published report. Given the importance of enabling readers to distinguish an allegation from the Company's actual position, we would ask that this letter be reproduced accurately and in full wherever FAPA's position is characterized or discussed.

Nothing in this response should be construed as acceptance of any allegation or characterization not expressly addressed herein. FAPA reserves the right to supplement or clarify its position, and reserves all rights available to it in respect of statements published concerning the Company.

We thank you again for the opportunity to comment and correspondence may be directed to corp.secretary@fap-agri.com for the attention of the undersigned.

Yours sincerely,



PT FAP Agri Tbk
Henryzal M Panjaitan
Corporate Secretary