

**FIRST RESOURCES' RESPONSE ADDRESSING THE GECKO PROJECT'S ARTICLES**

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In November 2023, The Gecko Project published an [article](#) alleging that First Resources Limited (“**First Resources**” or the “**Company**”) may be functionally part of the same group or have control over other groups such as FAP Agri (FAPA), Ciliandry Anky Abadi (CAA) and New Borneo Agri (NBA)/Sulaidy Group, who were alleged to be clearing rainforests in Indonesia. In March 2024, The Gecko Project published a [follow-up article](#) on the same issue.

First Resources recognises that the allegations involving FAPA, CAA, and NBA/Sulaidy Group are similar to a case filed under the RSPO complaint system with the complaint reference [RSPO/2021/04/EN](#). While we are still awaiting the outcome of this complaint, First Resources has continued to meticulously adhere to and respect the processes set out by the RSPO, maintaining full cooperation throughout.

**First Resources has no relationship with CAA and NBA/Sulaidy Group**

CAA and NBA/Sulaidy Group are not subsidiaries, associated companies, related parties, nor interested persons of First Resources. It is pivotal for us to highlight factual inaccuracies in the report, and we would like to state that First Resources does not have any ownership stake or hold any management roles in CAA and NBA/Sulaidy Group. We also do not share the same office addresses nor employees with CAA and NBA/Sulaidy Group.

First Resources has not purchased any palm oil products from, nor entered into any other transactions with CAA and NBA/Sulaidy 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 CAA or NBA/Sulaidy Group.

**First Resources' relationship with FAPA**

FAPA is not a subsidiary nor an associated company of First Resources. Instead, FAPA is a supplier to First Resources on an ad-hoc basis.

Purchase of palm oil materials from FAPA falls under the Company's Interested Person Transactions General Mandate covering transactions with the Prinsep group of companies, including the purchase of fresh fruit bunches, palm kernel and crude palm oil. During the financial year ended 31 December 2023, purchases of palm oil materials from FAPA amounted to US\$100 million, which works out to be approximately 10% of First Resources' consolidated sales during the year.

It is important to state that the Company has no control, management or otherwise, over FAPA. We also do not share the same office addresses nor employees with FAPA. We would also like to clarify that Ms. Wirastuty, a shareholder of Prinsep, does not have control over First Resources, nor hold any management or director position in the Company, even though she is an immediate family member of our Chief Executive Officer (“CEO”) and Deputy CEO.

## **Engagement to deliver First Resources' No Deforestation, No Peat and No Exploitation ("NDPE") commitment across supply chain**

To ensure First Resources delivers on our commitment to NDPE as per our [Policy on Sustainable Palm Oil](#), we developed a Sustainable Supply Chain Framework in 2017. It is a multi-pronged strategy comprising supply chain traceability, supplier engagement, supplier assessment and stakeholder collaboration. Since then, we have maintained 100% traceability to mill (TTM), and since 2020, we have achieved 100% traceability to plantation (TTP) for fresh fruit bunches (FFB) processed at our own mills. In 2023, we have further achieved our target of 100% traceability to plantation for third-party mills. With that, First Resources has achieved full TTM and TTP, underscoring our commitment in championing responsible and traceable supply chains.

As a direct consequence of our NDPE policy, we have been engaging with our suppliers, including FAPA, to ensure their compliance with our sustainability standards and commitments. In particular, in 2019, FAPA released their Sustainability Policy committing to no deforestation, peat land management and respect for human rights. The practical application of their policy is evident through the implementation of assessments such as High Conservation Value (HCV), High Carbon Stock (HCS), and Social & Environmental Impact Assessment (SEIA) at their plantation sites.

First Resources integrates supplier risk assessment as a key criterion in our onboarding procedure. Supplier risk assessment is carried out through GPS coordinate verification to determine the validity of the location of our supplier's mills/estates and to check its compliance with government zoning regulations etc. All our new suppliers are screened using both social and environmental criteria during the onboarding process. This process requires suppliers to submit written acknowledgement of their compliance with our Policy on Sustainable Palm Oil, in addition to any relevant information that fulfil our traceability requirements. We will verify the information provided, and companies who cannot meet our criteria will not be onboarded as a new supplier.

To minimise the risk of sourcing from non-compliant suppliers, we maintain a watch list of high-risk companies that we update quarterly. As part of this process, we regularly review and incorporate grievance lists from key industry peers into our watch list. We also actively monitor the grievances raised by external parties in case they involve our third-party suppliers. Suppliers found to be non-compliant will be required to undertake corrective actions within a certain timeline. We will suspend sourcing from non-compliant suppliers who do not take immediate remedial actions.

FAPA has met our supplier assessment criteria and has thus far also been accepted by key industry players, including those with NDPE commitments. In addition, we have not received any complaints nor uncovered any evidence of peatland burning by FAPA.

## **Appointment of Sustainability Consultant as Independent Advisor**

Given the seriousness of the allegations raised in The Gecko Project articles and the fact that we are still awaiting the outcome of the RSPO complaint, the Company, as part of its commitment to rigor, transparency, and due diligence, has engaged an independent advisor to help investigate these issues and develop an action plan. Robertsbridge, a global sustainability advisory firm, has been appointed to support us in conducting our own internal investigations and facilitate communication with the organisations involved in raising the

grievance against First Resources. This step ensures a thorough examination of these matters takes place and provides an additional channel for stakeholder communication.

Robertsbridge has a long track record of working on similar issues in the palm oil sector and facilitating dialogue between civil society and corporations. With extensive experience navigating the intricate market of Indonesia and the Asia Pacific region more broadly, they have previously worked with other large corporations facing suspension by customers and targeted NGO campaigns, helping these corporations address and respond to the alleged grievances to ensure re-engagement with the relevant parties.

We are confident that together, we will be able to reassure stakeholders that the concerns raised are being addressed in a comprehensive and transparent manner. First Resources commits to providing regular updates on our progress in the resolution of these matters and kindly requests all parties to respect the ongoing process and await the results before drawing conclusions or making any claims.

First Resources wishes to reiterate its commitment to its Policy on Sustainable Palm Oil, RSPO Principles and Criteria, and compliance with regulations. For further information on the Company's governance and sustainability practices, please refer to our [Annual Reports](#) and [Sustainability Reports](#). We also welcome feedback and collaboration to improve our practices further and may be contacted via email at [sustainability@first-resources.com](mailto:sustainability@first-resources.com).

BY ORDER OF THE BOARD  
FIRST RESOURCES LIMITED

Eunice Hooi  
Company Secretary  
17 April 2024