

**RESPONSE TO QUERIES RECEIVED FROM THE SINGAPORE EXCHANGE
REGULATION PTE. LTD. ("SGX REGCO") ON 28 OCTOBER 2026**

Bumitama Agri Ltd. ("**Bumitama**" or the "**Company**") and its subsidiaries (the "**Group**") sets out its responses to the following queries raised by SGX RegCo concerning forest and land fires in Indonesia and the associated haze, including in relation to the operations of the Company's subsidiaries.

Unless the context otherwise requires, references in these responses to the Company's operations, activities, actions or measures include those of its subsidiaries.

These responses should be read with Bumitama's announcement dated 16 October 2026.

As announced by the Company on 24 October 2026, the Company has received a notice ("**NEA Notice**") from the National Environment Agency of Singapore ("**NEA**") under section 10(1) of the Transboundary Haze Pollution Act 2014. The Company is in the process of reviewing its records and compiling the documents and information requested. Several of SGX RegCo's questions relate to matters covered by the NEA Notice. The responses below are based on the information available to the Company and the records reviewed as at the date of this announcement. The Company will make further announcements as and when there are material developments.

- 1. The Company has stated that it maintains a Zero Burning Policy and an integrated approach covering prevention, early detection, preparedness, suppression and recovery. Please elaborate on:**
 - (a) the procedures and processes in place to monitor compliance with the Company's Zero Burning Policy and related fire prevention measures;**

The Company monitors compliance with the Zero Burning Policy through a combination of operational supervision and field inspections, fire-detection and verification systems, procedures for escalating and investigating suspected breaches, and independent audits conducted as part of the Roundtable on Sustainable Palm Oil (RSPO) certification process.

These procedures and processes are summarised below.

Prevention

The Company implements preventive measures directed at reducing the risk of fires arising or spreading within and around its operational areas.

These include maintaining water-management infrastructure, including reservoirs and canal overflow dams in peat areas, conducting field patrols during periods of heightened fire risk, monitoring weather, peat and surrounding fire conditions, and undertaking fire-prevention and preparedness activities with surrounding communities through the Fire-Free Village (*Desa Bebas Api*) and Community Fire Prevention (*Masyarakat Peduli Api*) programmes.

Ahead of and during the dry season, these measures are supplemented by joint patrols, training and response simulations, equipment-readiness checks and coordination with local authorities, neighbouring companies and surrounding communities.

These preventive measures also seek to address fire risks arising from activities by third parties, including local community landholders and other people within the Company's concessions. In areas under its operational control, the Company maintains signage prohibiting burning, conducts regular patrols and implements access controls on plantation roads where appropriate, to discourage burning and facilitate the early identification of potential fire risks.

Early detection and monitoring

The Company uses AI-enabled CCTV fire-monitoring systems, satellite-based hotspot information, drone patrols and ground inspections to identify and verify potential fire incidents.

Preparedness, suppression and recovery

The Company maintains dedicated firefighting personnel, equipment and water-management infrastructure to support its response to fire incidents.

Preparedness measures take account of prevailing conditions and local fire risks, including dry weather, peatland conditions, water availability and fire activity in surrounding areas.

Where a fire is identified, personnel and resources are deployed to contain and extinguish the fire and minimize the risk of further spread.

Once conditions permit, the Company assesses affected areas to determine what remedial, rehabilitation or restoration measures are appropriate. The Company remains committed to working with local communities, technical experts, relevant authorities and other stakeholders to support the rehabilitation and restoration of fire-affected areas.

Escalation, investigation and corrective action

Any suspected breach of the Zero Burning Policy involving the Company's operations is escalated for verification and investigation.

The circumstances of the incident and the available evidence are assessed to determine its cause, whether a breach has occurred and whether corrective action is required.

Where an investigation substantiates a breach, the findings would be documented and referred to the appropriate department and control functions for follow-up and corrective action, as appropriate.

To date, the Company has not identified any breaches of its Zero Burning Policy by its employees or contractors engaged in its operations. Accordingly, there have been no instances requiring disciplinary action against employees or termination of contractor engagements for breaches of the policy.

RSPO certification and independent verification

The prohibition on the use of fire for land preparation is also reflected in the RSPO's Principles & Criteria (P&C).

As part of the RSPO certification process, independent certification bodies accredited by Assurance Services International (ASI) under the RSPO certification system, assess the Company's compliance with the applicable RSPO

requirements, including through review of relevant procedures and records and verification of their implementation in the field.

Any identified non-conformities on the part of the Company are subject to the applicable corrective-action process under the RSPO P&C. This provides an additional, independent layer of assurance alongside the Company's internal monitoring and oversight.

RSPO certification of the Company's mills and their supply bases are in progress. Pending certification, the Company's uncertified operations are subject to the same zero-burning policy and internal monitoring and oversight described above. In addition, the RSPO monitors satellite-detected hotspots across its members' concessions, including both certified and uncertified operations, and may require clarification and field verification of potential fire incidents. Accordingly, uncertified operations remain subject to external RSPO scrutiny, notwithstanding that they have not yet undergone independent certification audits.

(b) the frequency with which compliance reviews or audits are conducted;

The frequency of the Company's monitoring and review processes varies according to the nature of the relevant control and the prevailing level of fire risk. Operational monitoring is conducted on an ongoing basis, while formal assessments and independent reviews are conducted periodically. Additional reviews are undertaken where heightened or exceptional fire conditions warrant.

The Company's principal monitoring and review processes, and their respective frequencies, are set out below.

Ongoing operational monitoring

On a daily basis, the regional operational team undertakes field supervision, fire-risk monitoring, and satellite-based hotspot detection, supported by continuous automated CCTV surveillance. Any potential incident detected through these measures is investigated to verify the circumstances and determine the appropriate response. During periods of high fire alert due to hot and dry weather, the regional operational team maintains 24-hour field monitoring and conducts hourly patrols, supported by drone surveillance where appropriate.

Biannual assessments by the Conservation & Climate Risk Mitigation (CCR) department

The CCR department conducts assessments twice a year, before and after the dry season, across all regions at the plantation company level. The assessments cover land-fire mitigation, firefighting equipment and infrastructure, firefighting team capacity, building-fire mitigation, warehouse management, priority-village fire mitigation and water management.

During periods of high fire alert, the regional operational team also submits monthly emergency-preparedness reports to the CCR department for consolidation and assessment.

Assessments by the Safety, Quality & Assurance (SQA) department

The SQA department conducts annual pre-dry-season assessments of land-fire mitigation and warehouse management across all regions. Water management is assessed monthly (12 times annually), providing additional oversight of a key element of fire prevention, particularly in peatland areas.

Internal Audit (IA) department

The Internal Audit department conducts an Enterprise Risk Management (ERM) review based on Annual Review Plan under a three-year ERM strategic plan cycle focusing on company-level controls, including sampling at the subsidiary level.

The ERM reviews cover risks arising from natural disasters, including fires, floods, and droughts, as well as controls relating to land-fire mitigation, firefighting equipment, firefighting equipment and team capacity, building-fire mitigation, warehouse management and priority-village fire mitigation.

Additional and targeted assessments

Where heightened or exceptional fire conditions warrant, the Company may undertake additional assessments of fire preparedness and emerging risks.

In 2026, in response to the heightened fire risks associated with the dry-season conditions, the Company conducted a special operational audit of forest and land firefighting equipment and related preparedness controls.

The audit assessed the availability and condition of firefighting equipment against the applicable regulatory and internal requirements, with any matters identified through the audit subject to the appropriate corrective action or management follow-up. In addition, the IA department conducted targeted reviews of specific operational and compliance risks and reported its findings to the management. These findings will be presented to the Board at its next quarterly meeting.

(c) the personnel or committees responsible for oversight of compliance;

Oversight of compliance with the Zero Burning Policy is undertaken through the Company's three-lines-of-defence framework, which allocates responsibility among the regional operational team, specialist oversight functions and independent assurance functions.

First line of defence

The regional operational team is responsible for implementing the Zero Burning Policy and supervising activities within its operational areas, including activities undertaken by contractors. Dedicated firefighting teams, comprising operational, security, sustainability and technical personnel, support fire prevention, monitoring, incident reporting and response.

Second line of defence

The CCR department provides specialist oversight and technical support in relation to fire prevention and management. The CCR department supports the operational team in implementing preventive measures, assesses readiness, compliance and fire preparedness, and supports the strengthening of fire-risk management across the Company's operations.

Third line of defence

The SQA department assesses fire-management practices at the regional level, reviews the Company's fire-management systems and related controls. Findings are reported to the management for follow-up and corrective action, where appropriate.

Findings of the CCR and SQA departments are reported to the Sustainability Steering Committee, which oversees, reviews and evaluates the Company's sustainability performance, including compliance with applicable regulatory

requirements. The Sustainability Steering Committee reports quarterly to the management and the Board.

Matters requiring urgent attention, including material fire incidents or suspected breaches of the Zero Burning Policy, are escalated directly to the Company's management, which will determine and coordinate an appropriate response.

This framework provides for operational accountability, independent review and appropriate escalation to the management and the Board in relation to the implementation of the Company's Zero Burning Policy.

(d) the actions taken by the Company in the event of non-compliance by employees, contractors, suppliers or third parties operating within the Group's concessions; and

The Company's Sustainability Policy contains the Zero Burning Policy, which prohibits the use of fire for land clearing or preparation. That prohibition applies to employees and contractors engaged in the Company's operations as well as suppliers.

Where suspected non-compliance is identified, the matter is escalated for verification and investigation. The Company takes appropriate immediate steps to stop any prohibited activity, mitigate any associated fire risk and establish the circumstances of the incident and the parties responsible. Where a breach is substantiated, the action taken depends on the nature and seriousness of the breach.

Employees

Any substantiated breach is addressed in accordance with the Company's Code of Ethics, internal policies and applicable employment laws, and may result in disciplinary action proportionate to the nature and severity of the breach.

Contractors

Contractors engaged in land preparation or other operational activities are required to comply with the Zero Burning Policy. A substantiated breach may result in corrective action, suspension of the relevant activities or, where appropriate and subject to the applicable contractual terms, termination of the contractual engagement.

Suppliers

Fresh fruits bunch (FFB) suppliers are required to comply with the Company's Zero Burning Policy. The Company conducts due diligence when onboarding new suppliers. Any suspected breach identified during an ongoing supply relationship is investigated and addressed through the Company's grievance-handling procedure.

A substantiated breach may result in the imposition of remedial or corrective requirements, including the exclusion or suspension of sourcing from affected sources or, where appropriate, termination of the supplier relationship in accordance with the Company's Sustainability Policy and applicable procedures.

The Company has applied these measures in practice, including excluding FFB from identified areas associated with non-compliant land development and suspending or terminating supplier relationships following the identification of breaches of its responsible sourcing requirements.

Other third parties

Where suspected burning involves local community landholders whose land is located within the Company's concession boundaries but who are not subject to the Company's employment or contractual control, the Company investigates the circumstances to the extent within its authority, takes appropriate steps to address any immediate fire risk and, where appropriate, coordinates with or reports the matter to the relevant authorities.

The Company also supports affected local landholders through assistance with land rehabilitation and engages surrounding communities through education and training on the risks associated with the use of fire, prevention and mitigation.

- (e) **whether the Group's Zero Burning Policy, and its fire prevention, monitoring and firefighting practices, are subject to any independent or external verification, audit or assurance. If so, please provide details of such verification, audit or assurance, and the key findings from the latest verification, audit or assurance.**

Yes, the Company's Zero Burning Policy and associated fire prevention, monitoring and firefighting practices are subject to independent verification through RSPO certification audits and to inspections and assessments by relevant Indonesian government authorities. These external processes are supplemented by regular internal reviews and targeted operational audits.

RSPO certification audits

The Company's Zero Burning Policy is aligned with the RSPO Principles and Criteria (P&C), including Indicator 7.6.5 (Critical), which prohibits the use of fire for land preparation, new planting, development and replanting, and Indicator 7.6.6, which requires fire prevention procedures to be established and implemented to minimise fire risks.

These requirements are incorporated into the Company's standard operating procedures and applied consistently across its plantation operations, irrespective of the RSPO certification status of the individual plantation operation.

Compliance is independently assessed by accredited third-party certification bodies during RSPO certification and annual surveillance audits of the Company's operations. These audits include reviews of relevant policies, procedures and implementation records, together with field inspections and interviews to assess the effectiveness of fire prevention and management measures. Any non-conformities identified are subject to corrective action and follow-up under the RSPO certification framework.

The recent RSPO surveillance audit provided as an example was conducted by an RSPO-accredited certification body, from July to August 2026 at one of the Company's mills and its three supplying estates in Central Kalimantan. The audit recorded no non-conformities in relation to Indicators 7.6.5 or 7.6.6. Accordingly, no non-compliance with the RSPO requirements relating to the use of fire and fire-prevention procedures was identified in the operations covered by that audit.

RSPO certification and surveillance audits are conducted on a rolling basis across the Company's certified operations, including those located in West Kalimantan, which are subject to their respective independent certification and surveillance audits. The above audit is mentioned as a recent example of this external verification framework, demonstrating how compliance with the Company's zero burning and fire prevention commitments is independently assessed across its certified operations.

External government inspections and assessments

The Company's fire prevention and preparedness arrangements are also subject to ad-hoc external assessments by relevant Indonesian authorities, including the Regency Environmental Agency in West Kalimantan.

These assessments may include reviews of operational fire preparedness, including the availability and condition of firefighting equipment, personnel readiness, monitoring arrangements, and the capacity to respond to fire incidents. They provide an additional layer of external oversight and help identify opportunities to strengthen operational readiness.

In May 2026, the Regency Environmental Agency in West Kalimantan inspected one of the fire prevention and firefighting arrangements of one of the Company's subsidiaries. The inspection covered, among other matters, firefighting facilities and equipment, the structure of the fire-management team, monitoring towers and water reservoirs. The inspection concluded that the forest and land-fire management equipment and infrastructure were in accordance with the relevant regulations.

Taken together, the independent certification audits, government inspections and the Company's internal assurance processes provide multiple layers of review of the Company's Zero Burning Policy and associated fire management practices. The Company continues to review and strengthen its fire prevention, preparedness, monitoring and response capabilities across its operations.

2. The Company has stated that fire risks are monitored through satellite-based hotspot tracking, 24-hour field monitoring and hourly patrols, AI-enabled CCTV, thermal-imaging drones and intelligent weather stations and dedicated firefighting personnel are equipped with response resources while water-management infrastructure is maintained. Please explain:

(a) how the Company assesses the effectiveness of these measures; and

The Company assesses the effectiveness of its fire-prevention, monitoring and response measures through field verification of alerts, post-incident reviews, biannual CCR assessments, annual SQA readiness assessments, water-management assessments, and internal audit reviews, including the special audit of firefighting equipment referred to in the response to Query 1(b).

These assessments consider, among other things, the timeliness and effectiveness of the detection and verification of potential fires, the readiness and deployment of firefighting personnel and equipment, and the operational effectiveness of preventive and water-management infrastructure under prevailing conditions. The Company also draws on operational experience and post-incident reviews, including challenges encountered during fire suppression, to identify areas requiring improvement and determine appropriate follow-up actions.

In addition, the Company's fire-prevention and preparedness measures are subject to checks by relevant government authorities, including the Regional Disaster Management Agency (*Badan Penanggulangan Bencana Daerah*), local government (*Pemerintah Daerah*), the Environmental Agency (*Dinas Lingkungan Hidup*), and the Agriculture, Livestock and Plantation Agency (*Dinas Pertanian, Peternakan, dan Perkebunan*).

In addition, the Ministry of Forestry (*Manggala Agni*) conducts training for members of the Company's fire-fighting teams and local communities.

(b) the basis for the Company's assessment that these measures are adequate to prevent, detect and respond to fires.

The Company is of the view that the above measures are adequate to prevent, detect and respond to fires presently, taking into consideration and subject to the following.

The Company's assessment is based on the design and operation of the Company's established controls, the personnel and resources available to implement them, their performance in practice, and the results of operational assessments and audits described above.

In particular, the Company evaluates whether preventive measures are appropriate to the identified fire risks, whether monitoring systems enable timely detection, and whether firefighting personnel, equipment and supporting infrastructure are prepared to respond effectively. These assessments draw on equipment and infrastructure inspections, emergency response simulations, field verification and incident records, and findings from internal assessments and audits. Identified deficiencies are reviewed and addressed through operational improvements and corrective actions.

The Company's assessment also takes into account the conditions in which those measures are required to operate, including accessibility, water availability, terrain, the duration and severity of dry conditions, prevailing wind conditions and the risk of fire spreading from surrounding areas.

Accordingly, the adequacy of the Company's measures is assessed having regard to both the controls and resources in place and the particular fire risks and conditions in which those measures are required to operate.

The Company considers that these measures provide a comprehensive framework for fire prevention, early detection and response. Nevertheless, the occurrence of fires cannot be entirely eliminated, particularly under exceptional conditions involving prolonged drought, highly combustible peat soils, strong winds and fires spreading from surrounding areas. The occurrence of the recent fires has highlighted the challenges and limitations that may arise under such conditions, notwithstanding the preventive and response measures in place.

The Company keeps the effectiveness of these measures under review and continues to enhance its fire-prevention, preparedness, detection and response capabilities, including through the use of satellite hotspot monitoring, AI-enabled CCTV and thermal-imaging drones. In light of the current dry season, the Company is further reviewing its preparedness and response measures to identify and implement additional improvements where necessary.

3. **With reference to the Company's clarification statement dated 16 October 2026, please provide the Board's assessment on whether the recent fires and the transboundary haze have resulted, or are reasonably likely to result in, any material operational, financial, legal, regulatory or reputational impact on the Group. Please provide the basis for the Board's assessment.**

Based on the information currently available, the Board has assessed that the recent fires and transboundary haze have not resulted in, and are not presently reasonably likely to result in, any material adverse operational, financial, legal, regulatory or reputational impact on the Group.

This assessment is based on the matters set out below and information currently available and remains subject to the outcome of the ongoing investigations and the Company's continuing assessment of the affected areas.

Operational impact

The fires have not caused any material disruption to the Company's plantation operations, milling activities or overall production. The affected areas identified to date comprise particularly community-managed, conservation, and other unplanted areas within and/or adjoining the Group's concessions. The Company is continuing to assess the extent of the areas affected and their land-use classifications.

Financial impact

The Company has incurred, and expects to continue to incur, expenditure in connection with firefighting, monitoring, remediation and related response measures.

The potential impact remains under review by the Board, with its assessment subject to further information and findings from the relevant authorities.

Legal and regulatory impact

The Company has received and responded to requests for clarification and information from the RSPO and the West Kalimantan Provincial Environmental Agency. Based on the information presently available, none of these requests has resulted in any adverse finding against the Company.

Save as disclosed above and in the Company's response to Query (5), the Company has not received any notice that it is subject to any investigation, review, enforcement action or other regulatory engagement, by any authorities or agencies in Singapore, Indonesia or elsewhere in relation to the recent fires and transboundary haze situation.

The Company will continue to provide information and assistance requested by the relevant authorities.

Reputational impact

The Board recognises the seriousness of the fires and the haze, including their environmental and community impacts. The Board take these matters seriously and continues to closely monitor the situation.

The Company has a Zero Burning Policy and monitors compliance with that policy through a combination of operational supervision and field inspections, fire-detection and verification systems, procedures for escalating and investigating suspected breaches, and independent audits conducted as part of the RSPO certification process.

The Company has not excluded the possibility that certain fires may have originated within the boundaries of the Group's concessions, and the origin and circumstances of the relevant fires remain under investigation by the Indonesian authorities, with whom the Company continues to cooperate. The information presently available has not established that any of the relevant fires was initiated by the Group's operations, employees or contractors, or by any third party acting on the Group's instructions.

4. On 16 October 2026 and 19 October 2026, the National Environment Agency of Singapore issued Preventive Measure Notices under the Transboundary Haze Pollution Act 2014 to the following companies:

- (i) PT Bumi Andalas Permai;**
- (ii) PT Bumi Mekar Hijau;**
- (iii) PT Paramitra Mulia Langgeng;**
- (iv) PT Sumatera Alam Anugerah;**
- (v) PT SBA Wood Industries;**
- (vi) PT Hutan Lestari Raya;**

- (vii) PT Bangkanesia;
- (viii) PT Buana Megatama Jaya;
- (ix) PT Mananjung Hayak; and
- (x) PT Baratama Putra Perkasa.

Please confirm whether any of the above entities are subsidiaries or entities with which the Group has any material operational, supply-chain or business relationship. If so, please identify the relevant entity and describe the nature of the relationship.

None of the 10 companies named above is a subsidiary, associate or joint venture of the Group, and based on the Group's records reviewed to date, the Group has not identified any shareholding in, or direct operational, supply-chain or business relationship with any of them.

- 5. The Company has stated that it is working closely with the relevant authorities and providing information and assistance for ongoing investigations. Please confirm whether the Group has received queries or is subject to any investigation, review, enforcement action, notice or other regulatory engagement by any authorities or agencies in Singapore, Indonesia or elsewhere in relation to the recent fires and transboundary haze situation.**

As described in the response to Query 1(a), the Company's established fire response procedures involve deploying firefighting personnel and available resources to contain and extinguish fires and prevent further spread, alongside reporting to and coordination with the relevant authorities. These fire preparedness and response arrangements are also subject to review by the relevant authorities.

In late September 2026, the West Kalimantan Provincial Environmental and Forestry Agency directed its officers to review, among other matters, the measures taken by one of the Company's subsidiaries, PT Damai Agro Sejahtera ("PT DAS"), to extinguish any fires and prevent further outbreaks. The inspection was conducted accordingly and included verification of firefighting personnel, equipment, fire mitigation facilities, monitoring infrastructure and response procedures. The Company has cooperated fully with the relevant authorities throughout these processes and provided the information and assistance requested.

In late October 2026, the Company received a letter from Singapore Government inviting the Chairman of the Company for a discussion on the transboundary haze condition at which the Government indicated it will outline its approach and any further steps. As at the date of this response, the Chairman of the Company has fulfilled the invitation.

As mentioned above, on 24 October 2026, the Company has received the NEA Notice. The Company is in the process of reviewing its records and compiling the documents and information requested and will continue to engage and cooperate with the NEA on the provision of such documents and information.

The Company continues to cooperate with the relevant authorities and organisations, both in Indonesia and Singapore, and to provide information and assistance as requested. As at the date of this response, no authority has communicated to the Group any enforcement action or adverse finding against it in relation to the recent fires or transboundary haze.

Apart from the matters above, at the date of this response, the Company is not aware any other notices and is not aware of any investigation, review, enforcement action or other regulatory engagement, by any authorities or agencies in Singapore, Indonesia or elsewhere in relation to the recent fires and transboundary haze situation.

By Order of the Board

Lim Gunawan Hariyanto
Executive Chairman and CEO

30 October 2026