

BENEFICIAL OWNERSHIP POLICY BRIEF

JANUARY 2024

Indonesia leads on promising corporate transparency initiative

An assessment of beneficial ownership reporting compliance in Indonesia's pulp sector

Indonesia has recently taken an important step towards greater accountability in the forestry sector. In March 2023, the Ministry of Environment and Forestry (MoEF) established a requirement that all forestry concession-holders report detailed information about who actually controls each forestry company.¹

This new forestry sector policy reflects a broader push by the Government of Indonesia for greater transparency in corporate ownership. In 2018, the Government of Indonesia introduced a regulation that requires all companies to report their beneficial owners. In 2022, the Government also began providing public access to an online registry of the reported beneficial owners maintained by the Ministry of Law and Human Rights.²

These policies promise to bring about a fundamental shift towards greater corporate accountability among Indonesian forestry companies. Five years after the beneficial ownership regulation was issued and a year after the public registry was launched, it is a good time to start assessing its performance. How complete and accurate are the data? And are any adjustments needed to strengthen this transparency initiative?

To start to answer these questions, we collected and analyzed data from the beneficial ownership registry for Indonesia's pulp sector, consisting of seven pulp mill companies and 277 industrial wood fiber plantation companies.

² The registered beneficial ownership data is accessible from https://ahu.go.id/pencarian/profil-pemilik-manfaat.









¹ Ministry of Environment and Forestry Circular SE.2/PHL/SET.5/KUM.1/3/2023 on Transparency of Beneficial Owner. https://jdih.menlhk.go.id/new2/home/portfolioDetails/2/2023/11.

The main findings from this preliminary analysis, as of November 30, 2023, are:

- Out of 284 companies, 80% (229 companies) have reported beneficial owners, 16% (44) have not reported, and 4% (11) could not be found in the registry search.³
- All seven of the pulp mills companies have reported beneficial owners, however the accuracy of the reporting by some companies is questionable.
- An individual who is widely reported to be one of the largest investors in Indonesia's pulp sector is not reported as the beneficial owner of any company in the sector.
- Offshore companies, rather than natural persons, are reported as beneficial owners for six companies in the pulp sector.

The findings highlight that verification mechanisms and penalties for non-compliance and mis-reporting are critical to the success of this corporate transparency initiative. The recommendations are applicable to broader efforts to increase the effectiveness of beneficial ownership reporting requirements in other natural resource sectors and across the wider economy.⁴

Overview of Indonesia's pulp sector

Indonesia's pulp sector is an important part of the nation's economy, providing employment to more than 161,000 people and earning US\$7.5 billion in export revenue in 2021, according to the Ministry of Industry.⁵ The pulp sector consists of seven companies operating kraft pulp lines in Sumatra and 92 companies with active pulpwood plantation concessions, mostly in Sumatra and Kalimantan, with a total area of 4.5 million hectares (see Figure 1).⁶ Another 185 companies, with a combined concession area of 6.8 million ha, hold forestry licenses designated to produce industrial wood fiber, but do not currently supply any wood to the mills.⁷

Indonesia's pulp sector is dominated by two large corporate groups: the Royal Golden Eagle (RGE) Group and the Sinar Mas Group. The RGE Group is the parent conglomerate for Asia Pacific Resources International Limited (APRIL), and it has two affiliates that operate pulp mills in Sumatra: PT Toba Pulp Lestari and PT Riau Andalan Pulp & Paper (PT RAPP).⁸ Under APRIL, the RGE Group reports that it sources wood from 12 concessions owned by PT RAPP and from 32 "long-term" wood supply companies. RGE also reports that an additional 9 pulpwood companies, with a combined plantation concession area of 500,000 hectares, serve as "open market suppliers" to the group.⁹

³ The deadline to report the beneficial owner according to the regulation was March 2019. Article 30 of the Presidential Regulation on Beneficial Ownership Identification, "By the latest 1 year of the enactment, corporations... are obligated to implement the principle of identifying the beneficial owner in accordance with this regulation."

⁴ Transparency International Indonesia. 2023. *Transparency in Corporate Reporting: Penilaian 50 Perusahaan Sawit di Indonesia*. https://ti.or.id/wp-content/uploads/2023/12/Laporan-TRAC-Sawit-.pdf.

⁵ Assegaf, Fardah. 2022. "Ministry Highlights Improvement in Pulp and Paper Industry Ranking". *Antara News*. November 25, 2022. https://en.antaranews.com/news/262313/ministry-highlights-improvement-in-pulp-and-paper-industrys-ranking.

⁶ Trase Earth. 2022. Trase 'SEI-PCS Indonesia pulp v3.1.0' supply chain map. https://www.trase.earth/.

⁷ Trase Earth. 2022. Trase 'SEI-PCS Indonesia pulp v3.1.0' supply chain map. https://www.trase.earth/.

⁸ Forest Stewardship Council. APRIL Corporate Group List. https://connect.fsc.org/media/april-corporate-group-list. PT Toba Pulp Lestari mentioned in FSC's APRIL group corporate review. https://connect.fsc.org/asia-pacific-resources-internationalholdings-ltd-group-april#corporate-group-review.

⁹ APRIL. 2023. "APRIL Fiber Supply Source as of 31 October 2023". Company webpage. https://sustainability.aprilasia.com/en/april-fiber-supply-source/.

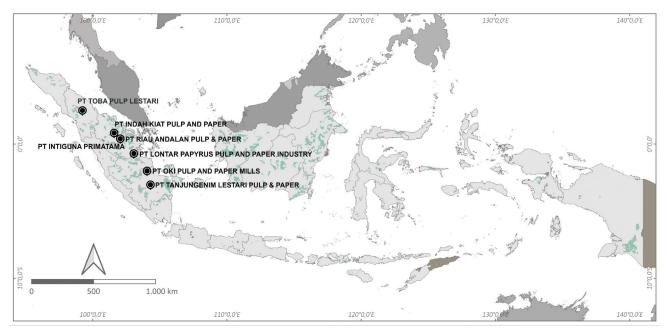


Figure 1. Indonesia's pulp mills and pulpwood concessions

It has been widely reported that Sukanto Tanoto, the group's founder, and members of the Tanoto family are the ultimate controlling owners of the RGE Group and its major operating companies.¹⁰ However, both within and outside Indonesia, many of the companies affiliated with the RGE Group are held through complex ownership structures, with layers of holding companies extending across numerous jurisdictions, which have the effect of obscuring their beneficial owners.¹¹

The Sinar Mas Group is the parent conglomerate for Asia Pulp & Paper (APP), and it has three affiliates which operate pulp mills in Sumatra: PT Indah Kiat Pulp & Paper; Lontar Papyrus Pulp & Paper; and PT OKI Pulp & Paper Mills. Through its subsidiaries APP and Sinar Mas Forestry, the Sinar Mas Group has reported that it directly owns six pulpwood plantation companies, which collectively control 1.0 million hectares in plantation concession licenses. Sinar Mas has also reported that it receives wood fiber from at least 27 additional "independent" pulpwood companies, with a combined plantation concession area of 1.6 million hectares, which it has claimed are "third party suppliers".¹² Investigative reports by media and NGOs documented that 24 of these "independent" suppliers were legally owned by individuals who are current or former staff members of Sinar Mas and its affiliates, including Asia Pulp & Paper and Sinar Mas Forestry, suggesting that they may be nominee shareholders for the group's beneficial owners.¹³

It has been widely reported that the ultimate controlling owners of the Sinar Mas Group and its major operating companies are Teguh Ganda Widjaja (aka Oei Tjie Goan), son of the group's founder, Eka Tjipta Widjaja, and other

¹⁰ Royal Golden Eagle. 2023. "Sukanto Tanoto". Company profile on RGE web page. https://www.rgei.com/about/governance-leadership/ sukanto-tanoto.

Rosendar, Yessar. 2022. "Billionaire Sukanto Tanoto Invests \$2.3 Billion In Environmentally Friendly Paperboard Factory." Forbes. March 30, 2022. https://www.forbes.com/sites/yessarrosendar/2022/03/30/billionaire-sukanto-tanoto-invests-23-billion-in-environmentally-friendly-paperboard-factory/.

¹¹ Scilla, Alleci. 2017. "Leaked Records Reveal Offshore's Role In Forest Destruction". *International Consortium of Investigative Journalists (ICIJ)*. November 8, 2017. https://www.icij.org/investigations/paradise-papers/leaked-records-reveal-offshores-role-in-forest-destruction/.

¹² Asia Pulp & Paper. "APP Indonesia's Pulpwood Suppliers." https://sustainability-dashboard.com/supplier-management/pulpwood-suppliers.

¹³ Wright, Stephen. 2017. "Pulp giant's makeover obscures supplier ties". AP Exclusive. Associated Press. December 19, 2017. https://financialpost.com/pmn/business-pmn/ap-exclusive-pulp-giants-makeover-obscures-supplier-ties. Auriga Nusantara et al., 2018. Removing the Corporate Mask: An Assessment of the Ownership and Management Structures of Asia Pulp & Paper's Declared Wood Suppliers in Indonesia. https://auriga.or.id/flipbooks/report/en/53.

members of the Widjaja (also spelled Wijaya) family.¹⁴ However, as with the RGE Group, the Sinar Mas Group has used corporate structuring techniques that have the effect of obscuring beneficial ownership for many of the companies under the group's control.¹⁵

Methods and data

This analysis of beneficial ownership reporting in Indonesia's pulp sector is based on data from 284 companies incorporated in Indonesia. This includes the seven companies operating six pulp mills (one mill is owned by two companies) and 277 pulpwood plantation companies that are listed in the Ministry of Environment and Forestry's data for 2023.¹⁶ It is important to note that one company may have more than one concession license, and in some cases, a company owns both a pulp mill and a pulpwood plantation.

The first step of the analysis was to search each company name in the Ministry of Law and Human Rights beneficial ownership registry. The name of the beneficial owner for each company, as reported in the registry, was recorded (see Appendix A).¹⁷ This information was compared with what is publicly known about the ownership and control of particular companies through financial disclosures, media reports, NGO publications, corporate profiles¹⁸, and other public sources of data. Basic metrics were captured regarding overall compliance with reporting requirements and the extent to which the reported data broadly reflect knowledge from other sources relating to the beneficial ownership of Indonesia's pulp sector.

The data obtained from the beneficial ownership registry maintained by the Ministry of Law and Human Rights are current as of November 30, 2023.

Reporting of beneficial ownership by pulp producers and pulpwood plantation companies

Out of the total 284 corporations analyzed, 229 (or 80%) have reported beneficial ownership information that is represented in the public registry, while 44 (16%) have not, according to registry searches as of November 30, 2023 (see Figure 2). Another 11 companies (4%) were not found in the beneficial ownership registry search. Of Indonesia's seven active pulp mill companies, all of them have reported beneficial owners, according to the registry's data. Of the 277 pulpwood concession companies analyzed, 222 (or 80%) have reported beneficial owners. This is a high level of reporting that represents an important achievement for Indonesia's beneficial ownership policy.

Otto, Ben. 2019. "His Business Empire Survived Two Wars and a \$14 Billion Default." Wall Street Journal. February 7, 2019. https://www.wsj.com/articles/his-business-empire-survived-two-wars-and-a-14-billion-default-11549558331.
Sipahutar, Tassia. 2020. "Feud Erupts Over Inheritance of \$46 Billion Indonesia Empire." Bloomberg. July 13, 2020. https://bloomberg. com/news/articles/2020-07-14/inheritance-suit-exposes-family-feud-at-indonesian-conglomerate.
Webb, Sara. 2016. "Asia: The Untouchables – Indonesia's Widjajas." Euromoney. January 6, 2016. https://www.euromoney.com/article/ b12kp1g5cbcvcb/asia-the-untouchables-indonesias-widjajas.

 ¹⁵ Wright, Stephen. 2017. "Pulp giant's makeover obscures supplier ties". AP Exclusive. Associated Press. December 19, 2017. https://financialpost.com/pmn/business-pmn/ap-exclusive-pulp-giants-makeover-obscures-supplier-ties.
Auriga Nusantara et al., 2018. Removing the Corporate Mask: An Assessment of the Ownership and Management Structures of Asia Pulp & Paper's Declared Wood Suppliers in Indonesia. https://auriga.or.id/flipbooks/report/en/53.

¹⁶ Kementerian Lingkungan Hidup dan Kehutanan. 2023. Satu Data PHL: Data Spasial Perizinan Berusaha Pemanfaatan Hutan. https:// spatial.phl.menlhk.go.id/spatialphl/. The list also confirmed with the Performance Report 2021 of the Sustainable Forest Management Directorate General accessed from https://phl.menlhk.go.id/static/file/publikasi/1649049430-LKJ%20KPHP%202021.pdf.

¹⁷ Along with the lists of reporting companies, the MoLHR also published non compliance company names on different platforms, https:// bo.ahu.go.id/site/unreported-bo, that are also publicly accessible.

¹⁸ The corporate profiles in Indonesia are *mostly* accessible to the public upon payment of a specified tax fee, https://ahu.go.id/pencarian/ profil-pt.

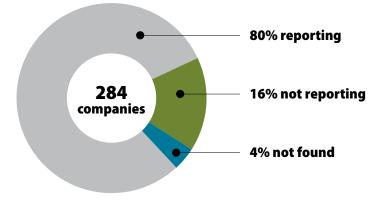


Figure 2. Level of beneficial ownership reporting compliance in Indonesia's pulp sector

Source: Beneficial ownership data collected in August 2023–November 2023

Accuracy issues in reporting of beneficial owners

A review of the reported data indicates the beneficial owners that are reported do not appear to fully capture the ownership dynamics in the sector. The most striking omission is that of Sukanto Tanoto, the founding Chairman of the APRIL Group, who is known to be the controlling shareholder for two pulp mills and a number of pulpwood companies with large landholdings.¹⁹ Neither Sukanto Tanoto nor his close family members were reported to be the beneficial owners for any companies analyzed in the pulp sector, based on registry information collected as of November 2023 (see Appendix B).

Instead of reporting Sukanto Tanoto as the beneficial owner, most companies affiliated with the APRIL Group either report a company manager to be the beneficial owner; do not report a beneficial owner; or report an offshore corporation as the beneficial owner. Several APRIL companies report that Praveen Singhavi and Sanjay Tanwani are the beneficial owners.²⁰ Both Praveen Singhavi and Sanjay Tanwani are long-time executives of the APRIL Group,²¹ and are believed to be senior employees who are ultimately accountable to the controlling shareholder, Sukanto Tanoto. Assuming this is the case, they would generally not qualify under the internationally-accepted criteria for beneficial ownership.²² It appears that Indonesia's instructions to companies on reporting beneficial owners may allow company managers to be reported as beneficial owners even though it is clearly not the intent of the regulation.²³ In response to the findings of this brief, APRIL's corporate parent RGE responded that it complies with all applicable laws and regulations in Indonesia (see Appendix D).

¹⁹ Royal Golden Eagle. 2023. "Sukanto Tanoto" profile on company website. https://www.rgei.com/about/governance-leadership/ sukanto-tanoto.

Echha Jain, Yantoultra Ngui and Kane Wu. 2023. "Hong Kong diaper maker Vinda gets \$3.35 bln offer from Royal Golden Eagle." *Reuters*. December 15, 2023. https://www.reuters.com/markets/deals/vinda-gets-335-bln-offer-indonesian-billionaire-tanotos-rge-2023-12-15/. Leong, Grace. 2022. "Tanglin Shopping Centre sold to Indonesian billionaire Sukanto Tanoto's RGE for \$868m." *Straits Times*. February 23, 2022. https://www.straitstimes.com/business/property/tanglin-shopping-centre-sold-to-royal-golden-eagle-for-868m-10-per-cent-above-reserve-price.

²⁰ See registered beneficial owner of PT Intiguna Primatama for Praveen Singhavi, and PT ITCI Hutani Manunggal and PT Riau Andalan Pulp & Paper for Sanjay Tanwani.

²¹ Praveen Singhavi, currently President of Bracell was previously President of APRIL Group that as of January 2023 succeeded by Wang Bo, meanwhile Sanjay Tanwani currently is Finance Director of APRIL Group, https://www.aprilasia.com/en/about-us/leadership. See also APRIL Sustainability Report 2022. https://www.aprilasia.com/images/pdf_files/sr/april-sustainability-report-2022.pdf.

²² Financial Action Task Force. 2014. FATF Guidance: Transparency and Beneficial Ownership. October 2014. https://www.fatf-gafi.org/ content/dam/fatf/documents/reports/Guidance-transparency-beneficial-ownership.pdf.

²³ See article 4 of the Presidential Regulation on Beneficial Ownership Identification. "*The beneficial owners of a company are individuals who meet the criteria*...*f. entitled to receive benefits from the company*". This definition is easily interpreted to encompass individuals who derive income from the company.



Pulpwood supplier PT Mutiara Sabuk Khatulistiwa © TEMPO/Zulkarnain; ZN2007090634

For another company reported to be controlled by Sukanto Tanoto, the beneficial owner is reported to be a corporation domiciled outside of Indonesia. PT Toba Pulp Lestari, which operates a pulp mill and pulpwood plantation in North Sumatra, reported its beneficial owner to be Pinnacle Company Pte Ltd, a holding company registered in Singapore (see Figure 3).²⁴ In this case, Indonesia's regulatory instructions are clear that beneficial owners are natural persons, and this type of mis-reporting appears to violate Indonesia's policy on defining and identifying the beneficial owner.²⁵

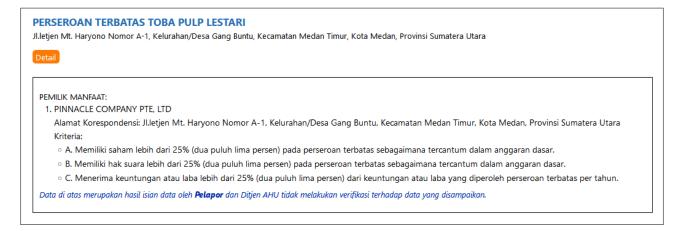


Figure 3. PT Toba Pulp Lestari's registered beneficial owner

Source: Kementerian Hukum dan Hak Asasi Manusia. 2022. AHU Online: Data Pemilik Manfaat.²⁶

26 Accessed from https://ahu.go.id/pencarian/profil-pemilik-manfaat/?tipe=bo.

²⁴ Accounting and Corporate Regulatory Authority (ACRA) of Singapore. 2020. "Pinnacle Company Pte. Ltd." Business Profile.

²⁵ See article 1 of the Presidential Regulation on Beneficial Ownership Identification, "*Beneficial owner is individuals*...", the term individuals in the definition of beneficial owner refer to a natural person, rather than a legal entity.

In contrast, all of the companies that the Sinar Mas Group has acknowledged as being under its direct control have reported their beneficial owners as Oei Tjie Goan, also known as Teguh Ganda Widjaja, the group's Chairman and patriarch of the Wijaya family.²⁷ This includes the Sinar Mas Group's three pulp mills – PT Indah Kiat Pulp & Paper, PT Lontar Papyrus Pulp & Paper, and PT OKI Pulp & Paper Mills – and the six pulpwood plantation companies that Sinar Mas has declared as being owned and controlled by the group.

Neither Oei Tjie Goan aka Teguh Ganda Widjaja nor any other member of the Wijaya family are reported as beneficial owners for the 24 plantation companies suspected to be controlled by the Sinar Mas Group through a system of nominee ownership (see Appendix C).²⁸ The beneficial owners reported for these 24 companies match the formal shareholders, rather than Wijaya family members who are thought to ultimately control and benefit from these companies' operations.

Limited sanctions and verification mechanisms

Experience from other countries that have implemented beneficial ownership registries indicates that reporting quality can be difficult to achieve without clear penalties in place for companies that do not comply with disclosure requirements.²⁹ Currently, Indonesia's beneficial ownership reporting regulations make it unlawful for companies either to fail to register or to report beneficial ownership in a fraudulent manner. However, the Government's policy framework for beneficial ownership reporting has limited penalties for inaccurate reporting.³⁰

Effective implementation of such penalties would also require the creation of proper verification mechanisms. The Ministry of Law and Human Rights, however, indicates on the top page of the registry that it has not verified the data on beneficial ownership submitted by the reporting companies.

To achieve the transparency and accountability goals envisioned for the beneficial ownership policy, it will be important to introduce ways for the Ministry to verify the information submitted by companies. The Ministry of Environment and Forestry is making an effort to do so by requiring companies to submit official corporate shareholder information and other relevant documents that support their respective declarations of beneficial ownership (see Figure 4). Its experience in using these supporting documents to verify the beneficial ownership disclosures will be important for the Ministry of Law and Human Rights to consider in its broader implementation of beneficial ownership requirements across Indonesia's economy.

²⁷ Webb, Sara. 2016. "Asia: The Untouchables – Indonesia's Widjajas." *Euromoney*. January 6, 2016. https://www.euromoney.com/article/ b12kp1g5cbcvcb/asia-the-untouchables-indonesias-widjajas.

²⁸ Wright, Stephen. 2017. "Pulp giant's makeover obscures supplier ties". AP Exclusive. Associated Press. December 19, 2017. https://financialpost.com/pmn/business-pmn/ap-exclusive-pulp-giants-makeover-obscures-supplier-ties. Auriga Nusantara et al., 2018. Removing the Corporate Mask: An Assessment of the Ownership and Management Structures of Asia Pulp & Paper's Declared Wood Suppliers in Indonesia. https://auriga.or.id/flipbooks/report/en/53.

²⁹ Knobel, Andres. 2019. Beneficial Ownership Verification: Ensuring the Truthfulness and Accuracy of Registered Ownership Information. https://ssrn.com/abstract=3320600 or http://dx.doi.org/10.2139/ssrn.3320600.

Zigo, D. & Vincent, F. 2021. "Beneficial Owners" Policy: Comparison of Its Efficacy in the West with Prospects for Curbing Corruption in China. DANUBE, 12(4) 273-292. https://doi.org/10.2478/danb-2021-0018.

Martini, Maira. 2019. *The Weakest Links: The Consequences Of Non-Comprehensive Beneficial Ownership Standards*. In Who Is Behind The Wheel?: Fixing The Global Standards On Company Ownership (pp. 23–25). Transparency International. http://www.jstor.org/stable/resrep20536.6.

³⁰ See article 12 The Ministry of Law and Human Right Ordinance on Monitoring on Beneficial Ownership Identification, "(1) In the event that the Corporation fails to implement the recommendations within the stipulated time frame, the Minister may impose measures against the said Corporation . . . (2a) The Minister may impose a blocking of access to the relevant Corporation in the Online Company Registration System (AHU Online)."

See also Open Ownership. 2022. Designing sanctions and their enforcement for beneficial ownership disclosure: Ensuring compliance for adequate, accurate, and up-to-date information. Accessed from https://openownershiporgprod-1b54.kxcdn.com/media/ documents/oo-briefing-sanctions-enforcement-2022-04.pdf.

Pekerjaan BO	:		
Nama Instansi /Perusahaan Pemberi kerja BO	:		
Alamat Instansi/Perusahaan Bekerja BO (termasuk RT/RW, Kelurahan/Desa,Kecamatan dan Kode Pos)	:		
Alamat Instansi/Perusahaan Bekerja BO di negara asal (dalam hal BO warga negara asing)			
Jenis Usaha / Bidang Usaha Instansi/Perusahaan Bekerja BO	:		
No. Telepon Kantor BO	:		
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Jumlah Pendapatan BO	:	□ < 100 miliar □ > 500 miliar – 1 triliun □ > 5 triliun **)	□ > 100 – 500 miliar □ > 1 triliun – 5 triliun
Tujuan Investasi BO	:	pendek	kulasi □ Investasi jangka ng □ Apresiasi harga/ <i>capital</i>

Figure 4. Excerpt of beneficial ownership information requirement in the MoEF's circular letter

Source: Kementerian Lingkungan Hidup dan Kehutanan. 2023. Surat Edaran tentang Transparansi Pemilik Manfaat.³¹

A number of countries have implemented sanctions regimes and verification mechanisms to incentivize beneficial ownership disclosures, offering valuable examples for Indonesia's consideration as it seeks greater compliance and accuracy in beneficial ownership reporting.³² As such, another brief in this series will present some of these examples from other countries to inform Indonesia's policy and regulatory considerations.

³¹ Accessed from https://jdih.menlhk.go.id/new2/home/portfolioDetails/2/2023/11.

³² Open Ownership. 2022. Designing sanctions and their enforcement for beneficial ownership disclosure: Ensuring compliance for adequate, accurate, and up-to-date information. https://openownershiporgprod-1b54.kxcdn.com/media/documents/oo-briefing-sanctionsenforcement-2022-04.pdf.

Appendix A. Pulp sector beneficial ownership reporting as of November 30, 2023

Company	Business type	Beneficial owner reported in 2023
CV ALAM LESTARI	Pulpwood concession	Agus Dwiyanto
CV BHAKTI PRAJA MULIA	Pulpwood concession	Not reporting
CV MUTIARA LESTARI	Pulpwood concession	Not reporting
CV PUTRI LINDUNG BULAN	Pulpwood concession	Yudi Febrian Rahman
PT ACACIA ANDALAN UTAMA	Pulpwood concession	Muliadi Sutjitro
PT ACEH NUSA INDRAPURI	Pulpwood concession	Supriatno
PT ADINDO HUTANI LESTARI	Pulpwood concession	Christian Jason Ang Chan
PT AGRINDO PERSADA LESTARI	Pulpwood concession	Riko Setyabudhy Handoko
PT AGRO BORNEO LESTARI	Pulpwood concession	Muhammad Aziz Wellang
PT AGRO PRATAMA SEJAHTERA	Pulpwood concession	Lim Cheong Guan
PT AGRONUSA ALAM SEJAHTERA	Pulpwood concession	Harry
PT ALAM LESTARI NUSANTARA	Pulpwood concession	Bangkar Siagian
PT ALFA BORNEO LESTARI	Pulpwood concession	Not found
PT AMAL NUSANTARA	Pulpwood concession	Not reporting
PT ANDALAN KARYA PERTIWI	Pulpwood concession	Didi Suryadi Effendi
PT ANUGERAH RIMBA MAKMUR	Pulpwood concession	Musa Ichwansyah Anif, Musa Idishah, Musa Rajekshah
PT ARARA ABADI	Pulpwood concession	Oei Tjie Goan
PT ARTELINDO WIRATAMA	Pulpwood concession	Lioe Tha Nen
PT ASIA TANI PERSADA	Pulpwood concession	Muliadi Sutjitro
PT ASTA WEDYA BERSAMA	Pulpwood concession	Muchtar
PT AYA YAYANG INDONESIA	Pulpwood concession	PT MUKTILESTARI KENCANA
PT BABUGUS WAHANA LESTARI	Pulpwood concession	Not reporting
PT BADE MAKMUR ORISSA	Pulpwood concession	Robert Seung
PT BAKAYAN JAYA ABADI	Pulpwood concession	Viroj Tangjetanaporn
PT BALAI KAYANG MANDIRI	Pulpwood concession	Muliadi Sutjitro
PT BALANGAN INDAH LESTARI	Pulpwood concession	Not reporting
PT BANGKANESIA	Pulpwood concession	Not reporting
PT BANGUN RIMBA SEJAHTERA	Pulpwood concession	Johan
PT BARATAMA PUTRA PERKASA	Pulpwood concession	Umar Suwandi
PT BATULICIN BUMI BERSUJUD	Pulpwood concession	Mardani Haji Maming, Rois Sunandar
PT BELANTARA PERSADA	Pulpwood concession	Ignatius Triaji Cahyadi
PT BELANTARA PUSAKA	Pulpwood concession	PT WANA TIRTA LESTARI
PT BELANTARA SUBUR	Pulpwood concession	Sung Hon Lee
PT BERKAT HUTAN PUSAKA	Pulpwood concession	Not reporting
PT BHATARA ALAM LESTARI	Pulpwood concession	PT MITRA DJAYAINDAH PRIMA
PT BHINNEKA WANA	Pulpwood concession	Hunawan Widjajanto
PT BINA DAYA BENTALA	Pulpwood concession	Effendy Saputra Tjua

Company	Business type	Beneficial owner reported in 2023
PT BINA DUTA LAKSANA	Pulpwood concession	Not reporting
PT BINA SILVA NUSA	Pulpwood concession	Not reporting
PT BIOMASS ANDALAN ENERGI	Pulpwood concession	Jeffri Nedi
PT BOMA PLANTATION	Pulpwood concession	Not reporting
PT BORNEO GREEN LESTARI	Pulpwood concession	Arim
PT BORNEO KUTAI LESTARI	Pulpwood concession	Robi Susanto
PT BORNEO SUBUR AGRO	Pulpwood concession	Suheldi
PT BORNEO UTARA LESTARI	Pulpwood concession	Adriat Halim
PT BUANA INTI ENERGI	Pulpwood concession	David Togar Pandjaitan, Kefri Nabasaria Pandjaitan, Paulina Maria Dame Uli, Paulus Tahan Pandjaitan
PT BUANA MEGATAMA JAYA	Pulpwood concession	Mulyadi Gani
PT BUANA SRIWIJAYA SEJAHTERA	Pulpwood concession	Wilson Sutanto
PT BUDI LAMPUNG SEJAHTERA	Pulpwood concession	Santoso Winata
PT BUKIT BATABUH SEI INDAH	Pulpwood concession	Nandhya Hapsari
PT BUKIT BATU HUTANI ALAM	Pulpwood concession	Mulyadi Gani
PT BUKIT BERINGIN MAKMUR	Pulpwood concession	Jimmy Budiarto
PT BUKIT RAYA MUDISA	Pulpwood concession	Not reporting
PT BUMI ANDALAS PERMAI	Pulpwood concession	Not reporting
PT BUMI HIJAU PRIMA	Pulpwood concession	Michael Gunawan
PT BUMI MEKAR HIJAU	Pulpwood concession	Muliadi Sutjitro
PT BUMI PERSADA PERMAI	Pulpwood concession	Stefanus Najoan
PT BUMIMAS ALAM MAKMUR	Pulpwood concession	Po Suwandi
PT CAHAYA MITRA WIRATAMA	Pulpwood concession	Muliadi Sutjitro
PT CERIA KARYA PRANAWA	Pulpwood concession	Ignatius Triaji Cahyadi
PT CIPTA MAS BUMI SUBUR	Pulpwood concession	Wilson Sutanto
PT CITRA MULIA INTI	Pulpwood concession	Po Suwandi
PT CITRA SUMBER SEJAHTERA	Pulpwood concession	Not reporting
PT DAYA TANI KALBAR	Pulpwood concession	Muliadi Sutjitro
PT DELONIX LESTARI RAYA	Pulpwood concession	PT DOHOY MEMBANGUN BUMI
PT DHARA SILVA LESTARI	Pulpwood concession	Ridwan Gunawan
PT DHARMA HUTANI MAKMUR	Pulpwood concession	Viroj Tangjetanaporn
PT DIVA PERDANA PESONA	Pulpwood concession	Agus Lasmono, Wiwoho Basuki Tjokronegoro
PT DUTA ANDALAN SUKSES	Pulpwood concession	PT BUMI MADANI LESTARI
PT DUTA BINTANG GEMILANG	Pulpwood concession	Not reporting
PT DWIMA INTIGA	Pulpwood concession	Yulius Leonardo
PT E-GRENNDO	Pulpwood concession	Not found
PT EKAWANA LESTARIDHARMA	Pulpwood concession	Muharno Ngadimin
PT EKSPLOITASI DAN INDUSTRI HUTAN (INHUTANI)	Pulpwood concession	Not found
PT ESA SAMPOERNA AGRO	Pulpwood concession	Sunarjo Sampoerna
PT ESA YASA DINAMIKA	Pulpwood concession	Said Umar
PT ESA YASA DINAMIKA PT FAJAR SURYA SWADAYA	· ·	Said Umar Lee Mon Lun

Company	Business type	Beneficial owner reported in 2023
PT FINNANTARA INTIGA	Pulpwood concession	Oei Tjie Goan
PT GADING KARYA MAKMUR	Pulpwood concession	Not reporting
PT GAMBARU SELARAS ALAM	Pulpwood concession	Gabriel Michael Jeno
PT GAPURA PERSADA KATULISTIWA	Pulpwood concession	Not reporting
PT GEMA NUSANTARA JAYA	Pulpwood concession	Andy Indigo
PT GORONTALO CITRA LESTARI	Pulpwood concession	Andy Indigo
PT GRACE PUTRI PERDANA	Pulpwood concession	Citra Gunawan
PT HANUJAYA HUTANINDO	Pulpwood concession	Hendry Lesmana, Lauw Juanda Lesmana
PT HARAPAN JAYA MAKMUR LESTARI	Pulpwood concession	Not reporting
PT HIJAU ARTHA NUSA	Pulpwood concession	Han Man Seong
PT HIJAU LESTARI MAKMUR	Pulpwood concession	Eko Gunawan Ang
PT HUTAN BARUMUN PERKASA	Pulpwood concession	Kendrik Ali
PT HUTAN BERAU LESTARI	Pulpwood concession	PT TRITUNGGAL EKA PERKASA
PT HUTAN KETAPANG INDUSTRI (DH. KERTAS BASUKI R)	Pulpwood concession	Putera Sampoerna
PT HUTAN KUSUMA	Pulpwood concession	Untung Agus Pramono
PT HUTAN LESTARI RAYA	Pulpwood concession	Erik Setiawan
PT HUTAN MAHLIGAI	Pulpwood concession	PT TIMBERDANA
PT HUTAN PRODUKSI LESTARI	Pulpwood concession	Iman Barlianto
PT HUTAN RINDANG BANUA	Pulpwood concession	Franky Oesman Widjaja, Indra Widjaja, Linda Suryasari Wijaya Limantara, Muktar Widjaja
PT HUTAN SEMBADA	Pulpwood concession	Michael
PT INDADI VERYO	Pulpwood concession	Indadi Juver
PT INDAH KIAT PULP & PAPER	Pulp mill	Oei Tjie Goan
PT INDO PUTRA BERSAMA	Pulpwood concession	Santyoso Tio
PT INDOSUBUR SUKSES MAKMUR	Pulpwood concession	PT KILAU SUKSES PERMATA
PT INDOSUKSES LESTARI MAKMUR	Pulpwood concession	Mohammad Helmy bin Othman Basha
PT INDUSTRIAL FOREST PLANTATION	Pulpwood concession	Wang Szu Hua
PT INNI JOA	Pulpwood concession	Not reporting
PT INTIGUNA PRIMATAMA	Pulp mill	Praveen Singhavi
PT INTRACA HUTANI LESTARI	Pulpwood concession	Not reporting
PT ISTANA KAWI KENCANA	Pulpwood concession	Erik Setiawan
PT ITCI HUTANI MANUNGGAL	Pulpwood concession	Sanjay Tanwani
PT JAYA BUMI PASER	Pulpwood concession	PT INDIKA MULTI PROPERTI
PT JEBUS MAJU	Pulpwood concession	Not reporting
PT JENGGALA SEMESTA	Pulpwood concession	Not found
PT JHONLIN AGRO MANDIRI	Pulpwood concession	PT ESHAN WANALESTARI
PT KALIMANTAN SUBUR PERMAI	Pulpwood concession	Muliadi Sutjitro
PT KALPIKA WANATAMA	Pulpwood concession	PT SUMBER GRAHA MALUKU
PT KALTENG GREEN RESOURCES	Pulpwood concession	Paulus George Hung

T K AWANUA KAHURIPAN PANTERAPulpwood concessionSusilo WonowidjojoPT KAYNA MAKMUR SEJAHTERAPulpwood concessionHendry LesmanaPT KAYNA RESOURCESPulpwood concessionJelian Anak KasimPT KELAWIT HUTANI LESTARIPulpwood concessionNot reportingPT KELAWIT HUTANI LESTARIPulpwood concessionNot reportingPT KEATUAN MAS ABADIPulpwood concessionYeo HowPT KIRANA CARRAWALAPulpwood concessionWulladi SutjitroPT KARTANA CARRAWALAPulpwood concessionNot reportingPT KODECO TIMBERPulpwood concessionNot reportingPT KOIN NESIAPulpwood concessionKot reportingPT KUBUMULA FORESTRYPulpwood concessionEdd PramudjaPT KUSUMA PUSPAWANAPulpwood concessionUntung Agus PramudjaPT LANGARKASA WANAPulpwood concessionUntung Agus PramudjaPT LANGARKASA WANAPulpwood concessionNot reportingPT LANGARKASA WANAPulpwood concessionNot reportingPT LANGARKASA MANAPulpwood concessionNot reportingPT LANGARKASA MANAPulpwood concessionNot reportingPT LANGARKA BAKTI PERSADAPulpwood concessionNot reportingPT LEMBAH JATI MUTIARAPulpwood concessionNot reportingPT LEMBAH JATI MUTIARAPulpwood concession	Company	Business type	Beneficial owner reported in 2023
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PT MERANTI LAKSANAPulpwood concessionMaria TiurmaPT MERANTI LESTARIPulpwood concessionMaria TiurmaPT MERANTI SEMBADAPulpwood concessionPT BARITO PACIFIC LUMBERPT MERAUKE RAYON JAYAPulpwood concessionKanesan DewadasPT MERBAU PELALAWAN LESTARIPulpwood concessionNot reporting	PT MEDCOPAPUA ALAM LESTARI	Pulpwood concession	Yaser Raimi Panigoro
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PT MERANTI SEMBADAPulpwood concessionPT BARITO PACIFIC LUMBERPT MERAUKE RAYON JAYAPulpwood concessionKanesan DewadasPT MERBAU PELALAWAN LESTARIPulpwood concessionNot reporting	PT MERANTI LAKSANA	Pulpwood concession	Maria Tiurma
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PT MERBAU PELALAWAN LESTARI Pulpwood concession Not reporting	PT MERANTI SEMBADA	Pulpwood concession	PT BARITO PACIFIC LUMBER
	PT MERAUKE RAYON JAYA	Pulpwood concession	Kanesan Dewadas
PT MITRA HUTANI JAYA Pulpwood concession Lioe Tha Nen	PT MERBAU PELALAWAN LESTARI	Pulpwood concession	Not reporting
	PT MITRA HUTANI JAYA	Pulpwood concession	Lioe Tha Nen

PT MITRA JAYA NUSAINDAH Pulpwood concession Kartika Dianingsih Antono, Pieter Tanuri PT MITRA KEMBANG SELARAS Pulpwood concession Mendry Lesmana PT MITRA TANI NUSA SEJAT Pulpwood concession Not reporting PT MITRA TANI NUSA SEJAT Pulpwood concession Not reporting PT MUGITRIMAN INTERNATIONAL Pulpwood concession Not reporting PT MULTI KUSUMA CEMERLANG Pulpwood concession COMPAGNIE GENERALE DES ETABLISSEMENTS MICHELIN, Prajogo Pangestu PT MUSI HUTAN PERSADA Pulpwood concession Yasuharu Nakabashi PT INE PLATATION Pulpwood concession Not reporting PT NUSA LESTARI INDAH Pulpwood concession Not reporting PT NUSA RAKA KALIMANTAN Pulpwood concession Marzum PT NUSAN RAKA KALIMANTAN Pulpwood concession Marzum PT NUSAN RAKA KALIMANTAN Pulpwood concession Marzum PT OCEAN BAGUS JAYA Pulpwood concession Rony Tanoko PT OKE PLATARK KALIMANTAN Pulpwood concession Rody Tanoko PT OCEAN BAGUS JAYA Pulpwood concession Rody Tanoko PT OCEAN BAGUS JAYA Pulpwood concession Rody Tanoko PT OKANTARA MULILA	Company	Business type	Beneficial owner reported in 2023
PT MITRA MULIA MAHAKAM Pulpwood concession Hendry Lesmana PT MITRA TANI NUSA SEJATI Pulpwood concession Not reporting PT MUARA SUNGAI LANDAK Pulpwood concession Not reporting PT MUGTRIMAN INTERNATIONAL Pulpwood concession Not reporting PT MUGTRIMAN INTERNATIONAL Pulpwood concession COMPAGNIE GENERALE DES ETABLISSEMENTS MICHELIN, Prajogo Pangestu PT MUST HUTAN PERSADA Pulpwood concession SHANTOU MARIA INVESTMENT CO LTD PT NUSA PRIMA MANUNGAL Pulpwood concession Not reporting PT NUSA PRIMA MANUNGGAL Pulpwood concession Matraum PT NUSA PRIMA MANUNGGAL Pulpwood concession Matraum PT NUSANTARA KALIMANTAN Pulpwood concession Matraum PT NUSANTARA SENTOSA RAYA Pulpwood concession Nelson Bahtiar Sianturi PT OCEANIS TIMEER PRODUCT Pulpwood concession Rony Tanoko PT OKI PULP AND PAPER MILLS Pulp mood concession Not reporting PT PANCARAN WANANUSA Pulpwood concession Not reporting PT PANCARAN TIMBER Pulpwood concession Not reporting PT PANCARAN WANANUSA Pulpwood concession Mutatatatatatatatatatatatatatatatatatata	PT MITRA JAYA NUSAINDAH	Pulpwood concession	Kartika Dianingsih Antono, Pieter Tanuri
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PT MUARA SUNGAI LANDAK Pulpwood concession Justinus Indrayanto PT MUGITRIMAN INTERNATIONAL Pulpwood concession Not reporting PT MULTI KUSUMA CEMERLANG Pulpwood concession COMPAGNIE GENERALE DES ETABLISSEMENTS MICHELIN, Prajogo Pangestu PT MITYASA IDOLA Pulpwood concession Yasuharu Nakabashi PT NITYASA IDOLA Pulpwood concession SHANTOU MARIA INVESTMENT CO LTD PT NEP LANTATION Pulpwood concession Natrum PT NUSA RIMA MANUNGGAL Pulpwood concession Marzum PT NUSANTARA KALIMANTAN Pulpwood concession Abdi Tunggal PT NUSANTARA KALIMANTAN Pulpwood concession Nelson Bahtiar Sianturi PT OCEANIS TIMBER PRODUCT Pulpwood concession Not reporting PT OKI PAPER MILLS Pulpwood concession Not reporting PT PANCARAN WANANUSA Pulpwood concession Not reporting PT PARCARAN WANANUSA Pulpwood concession Not reporting PT PARAMITRA MULIA LANGENG Pulpwood concession Widarto PT PARAMATIRA MULIA LANGENG Pulpwood concession Widarto PT PRANCARAN WANANUSA Pulpwood concession<	PT MITRA MULIA MAHAKAM	Pulpwood concession	Hendry Lesmana
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PT RENCONG PULP & PAPER Pulpwood concession Not found INDUSTRY	PT RAMANG AGRO LESTARI	Pulpwood concession	Bedjo Santoso
INDUSTRY	PT RAMBA ARYA CITRA	Pulpwood concession	Phinarto Basrie
PT RIAU ABADI LESTARI Pulpwood concession Oei Tjie Goan		Pulpwood concession	Not found
	PT RIAU ABADI LESTARI	Pulpwood concession	Oei Tjie Goan

PT RIAU INDO AGROPALMA Pulpwood concession Lioe Tha Nen PT RIMBA ELOK Pulpwood concession PT KARYA BAKTI AGRO PT RIMBA EQUATOR PERMAI Pulpwood concession PT KARYA BAKTI AGRO PT RIMBA HUTANI MAS Pulpwood concession Lioe Tha Nen PT RIMBA HUTANI MAS Pulpwood concession Wikendy PT RIMBA MANDAU LESTARI Pulpwood concession Muharno Ngadimin PT RIMBA MUTIARA PERMAI Pulpwood concession Muharno Ngadimin PT RIMBA PERANAP INDAH Pulpwood concession Muterno Ngadimin PT RIMBA RAYA LESTARI Pulpwood concession Muternot PT RIMBA RAYA LESTARI Pulpwood concession Not reporting PT RIMBA RAYA LESTARI Pulpwood concession Not reporting PT RIMBA RAYA LESTARI Pulpwood concession Not reporting PT RIMBA RAYA PERMAI Pulpwood concession Not reporting PT RUAS UTAMA JAYA Pulpwood concession Stafanus Najoan PT SAMPE WALI Pulpwood concession Stafanus Najoan PT SAMPE WALI Pulpwood concession Putagoan PT SAMPE WALI Pulpwood concession Not reporting	Company	Business type	Beneficial owner reported in 2023
PT RIMBA ELOK Pulpwood concession PT KARYA BAKTI AGRO PT RIMBA EQUATOR PERMAI Pulpwood concession PT BARITO PACIFIC TBK PT RIMBA HUTANI MAS Pulpwood concession Lice Tha Nen PT RIMBA HAZUARDI Pulpwood concession Jelian Anak Kasim PT RIMBA MADAU LESTARI Pulpwood concession Muharno Ngadimin PT RIMBA MUTIARA PERMAI Pulpwood concession Mutarno Ngadimin PT RIMBA PERANAP INDAH Pulpwood concession Mutarno Ngadimin PT RIMBA TANAMAN INDUSTRI Pulpwood concession Not reporting PT RIMBA TIMUR SENTOSA Pulpwood concession Not reporting PT RIMBA TIMUR SENTOSA Pulpwood concession Not reporting PT RIMBA TIMUR SENTOSA Pulpwood concession Not reporting PT RIMBA TANAMAN INDUSTRI Pulpwood concession Not reporting PT RIMBA TANAMAN PREMAN Pulpwood concession Not reporting PT RIMBA TANAMA PREMANA Pulpwood concession Stefanus Najoan PT SAMHUTANI Pulpwood concession Stefanus Najoan PT SAMHUTANI Pulpwood concession Not reporting PT SAMHUTANI Pulpwood concession Not reporting	PT RIAU ANDALAN PULP & PAPER	Integrated	Sanjay Tanwani
PT RIMBA EQUATOR PERMAI Pulpwood concession PT BARITO PACIFIC TBK PT RIMBA LAZUARDI Pulpwood concession Lioe Tha Nen PT RIMBA LAZUARDI Pulpwood concession Wikendy PT RIMBA MANDAU LESTARI Pulpwood concession Muharno Ngadimin PT RIMBA MITARA PERMAI Pulpwood concession Muharno Ngadimin PT RIMBA MITARA PERMAI Pulpwood concession Muharno Ngadimin PT RIMBA MANDAU LESTARI Pulpwood concession Mutenon Ngadimin PT RIMBA TANAMAN INDUSTRI Pulpwood concession Not reporting PT RIMBA TWIN SENTOSA Pulpwood concession Not reporting PT RIMBA WAWASAN PERMAI Pulpwood concession Not reporting PT RIMBA TWINK SENTOSA Pulpwood concession Not reporting PT RIMBA TWINK SENTOSA Pulpwood concession Not reporting PT SADHANA ARIFNUSA Pulpwood concession Strafanus Najoan PT SADHANA ARIFNUSA Pulpwood concession Not reporting PT SADHANA ARIFNUSA Pulpwood concession Not reporting PT SADHANA ARIFNUSA Pulpwood concession Not reporting PT SADHANA ARIFNUSA Pulpwood concession Not repor	PT RIAU INDO AGROPALMA	Pulpwood concession	Lioe Tha Nen
PT RIMBA HUTANI MAS Pulpwood concession Lioe Tha Nen PT RIMBA LAZUARDI Pulpwood concession Wikendy PT RIMBA MADAU LESTARI Pulpwood concession Jelian Anak Kasim PT RIMBA MUTIARA PERMAI Pulpwood concession Muharno Ngadimin PT RIMBA PENYANGGA UTAMA Pulpwood concession Not reporting PT RIMBA PENYANGGA UTAMA Pulpwood concession Muharno Ngadimin PT RIMBA PENYANGGA UTAMA Pulpwood concession Not reporting PT RIMBA TANAMAN INDUSTRI Pulpwood concession Not reporting PT RIMBA WAWASAN PERMAI Pulpwood concession Not reporting PT RIMBA WAWASAN PERMAI Pulpwood concession Not reporting PT RIMBU SERUYAN Pulpwood concession Stefanus Najoan PT SAMUTANA JAYA Pulpwood concession Stefanus Najoan PT SAMULTANI Pulpwood concession Not reporting PT SAMULTANI Pulpwood concession Not reporting PT SAMULTANI Pulpwood concession Not reporting PT SAMULTANA Pulpwood concession Not reporting PT SAMULTANA Pulpwood concession Not reporting PT SAMULT	PT RIMBA ELOK	Pulpwood concession	PT KARYA BAKTI AGRO
PT RIMBA LAZUARDI Pulpwood concession Wikendy PT RIMBA MUTIARA PERMAI Pulpwood concession Jelian Anak Kasim PT RIMBA MUTIARA PERMAI Pulpwood concession Muharno Ngadimin PT RIMBA PERNANG A UTAMA Pulpwood concession Not reporting PT RIMBA PERNANP INDAH Pulpwood concession Not reporting PT RIMBA TANAMA INDUSTRI Pulpwood concession Not reporting PT RIMBA TIMUR SENTOSA Pulpwood concession Not reporting PT RIMBA WAWASAN PERMAI Pulpwood concession Not reporting PT RIMBA WAWASAN PERMAI Pulpwood concession PT GEO MINERAL TRADING, PT MITRA RIAU PRATAMA, PT ROYAL GLOBAL DIGITAL PT RUAS UTAMA JAYA Pulpwood concession Stefanus Najoan PT SAMPE WALL Pulpwood concession Stefanus Najoan PT SAMPE WALL Pulpwood concession Not reporting PT SAMPE WALL Pulpwood concession Not reporting PT SANTAN BORNEO ABADI Pulpwood concession Viro Tangietanaporn PT SATRIA PERKASA AGUNG Pulpwood concession Not reporting PT SANTAN DORNEO ABADI Pulpwood concession Not reporting PT SATRIA PERKASA AGUNG <td< td=""><td>PT RIMBA EQUATOR PERMAI</td><td>Pulpwood concession</td><td>PT BARITO PACIFIC TBK</td></td<>	PT RIMBA EQUATOR PERMAI	Pulpwood concession	PT BARITO PACIFIC TBK
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PT SAMPE WALIPulpwood concessionNot reportingPT SANTAN BORNEO ABADIPulpwood concessionViroj TangjetanapornPT SANUR HASTRA MITRAPulpwood concessionDelia Yunia MoepraptoBERSAMAPulpwood concessionNot reportingPT SARI HIJAU MUTIARAPulpwood concessionNot reportingPT SARI HIJAU MUTIARAPulpwood concessionOei Tjie GoanPT SEARAGUN BUMI ANDALASPulpwood concessionMulyadi GaniPT SEGAH BANGUN PERSADAPulpwood concessionNot reportingPT SEGAH BANGUN PERSADAPulpwood concessionMulyadi GaniPT SELARAS ABADI UTAMAPulpwood concessionMulyadi GaniPT SELARAS AGRIPulpwood concessionMulyadi TunggalPT SELARAS AGRIPulpwood concessionHam Eddy TampiPT SENDAWAR ADHI KARYAPulpwood concessionCharliePT SENTOSA BAHAGIA BERSAMAPulpwood concessionKermas Haji Abdul Halim AliPT SILVA INHUTANI LAMPUNGPulpwood concessionHardyanto, Leo Gunawan Siemon, Setiawan Siemon, Yohanes Haryadi SiemonPT SILVA RIMBA LESTARIPulpwood concessionLee Mon LunPT SILVA SELARAS UTAMAPulpwood concessionFandi UtomoPT SINAR BELANTARA INDAHPulpwood concessionAbdi Tunggal	PT SADHANA ARIFNUSA	Pulpwood concession	Sunarjo Sampoerna
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PT SINAR BELANTARA INDAH Pulpwood concession Abdi Tunggal	PT SILVA RIMBA LESTARI	Pulpwood concession	Lee Mon Lun
	PT SILVA SELARAS UTAMA	Pulpwood concession	Fandi Utomo
PT SINAR CERIA SEJATI Pulpwood concession Not reporting	PT SINAR BELANTARA INDAH	Pulpwood concession	Abdi Tunggal
	PT SINAR CERIA SEJATI	Pulpwood concession	Not reporting

PT SINAR KALBAR RAYA Pulpwood concession Christopher Samasto Tija, Edi Rahmat Lie, Nicholas Samasto PT SINAR MAKMUR DWISESA Pulpwood concession Ali Suyanto PT SUKSES JAYA WOOD Pulpwood concession Ali Suyanto PT SUMALINDO ALAM LESTARI Pulpwood concession Oei Tjie Goan PT SUMATENA ALAM ANUGERAH Pulpwood concession Oei Tjie Goan PT SUMATENA ALAM ANUGERAH Pulpwood concession Abdi Tunggal PT SUMATENA ALAM ANUGERAH Pulpwood concession Harris Dharsono PT SUMATENA ALAM ANUGERAH Pulpwood concession Andi Taufik Patarai PT SUMATENA SLIVA LESTARI Pulpwood concession Mulyadi Gani PT SUMATENA ALAM PERTMAI Pulpwood concession Sunarta PT SUNATENA SLIVA LESTARI Pulpwood concession Stefanus Najoan PT SUNATENA KASA Pulpwood concession Not reporting PT SUNATUTAN JAYA Pulpwood concession Not reporting PT TANYONG ENGREEN Pulpwood concession Not reporting PT TANYOUNG ENGREEN Pulpwood concession Not reporting PT TANYOUNG REDEB HUTANI Pulpwood concession Not reporting PT TANJONG REDEB HUTANI	Company	Business type	Beneficial owner reported in 2023
PT SUKSES JAYA WOOD Pulpwood concession Ali Suyanto PT SUMALINDO ALAM LESTARI Pulpwood concession Tan Agustinus Dermawan qq PT SALIM IVOMAS TBK PT SUMALINDO HUTANI JAYA I & II Pulpwood concession Oei Tjie Goan PT SUMATERA ALAM ANUGERAH Pulpwood concession Sugeng Santoso PT SUMATERA SILVA LESTARI Pulpwood concession Abdi Tunggal PT SUMATERA SILVA LESTARI Pulpwood concession Abdi Tunggal PT SUMATERA ALAM PERTIWI Pulpwood concession Andi Taufik Patarai PT SUMSER ALAM PERTIWI Pulpwood concession Suranta PT SUNTARA GAJAPATI Pulpwood concession Suranta PT SUNATARA GAJAPATI Pulpwood concession Stefanus Najoan PT SYNADUTA CORPORATION Pulpwood concession Not found PT TANUONG ENGREEN Pulpwood concession Not reporting PTTANANAN INDUSTRI LESTARI Pulpwood concession Not reporting PTTANJUNG REDEB HUTANI Pulpwood concession Not reporting PTTANJUNG REDEB HUTANI Pulpwood concession Not reporting PTTANJUNG REDEB HUTANI Pulpwood concession Stafanus Najoan, PT TEBO HUTANI ARAPULP CORPORATION/ Mutsumi Ishizuki, SUMALTRA PULP CORPO	PT SINAR KALBAR RAYA	Pulpwood concession	
PT SUMALINDO ALAM LESTARI Pulpwood concession Tan Agustinus Dermawan qq PT SALIM IVOMAS TBK PT SUMATERA ALAM ANUCASRI Pulpwood concession Sugeng Santoso PT SUMATERA ALAM ANUCASRI Pulpwood concession Abdi Tunggal PT SUMATERA ALAM ANUCASTARI Pulpwood concession Abdi Tunggal PT SUMATERA ALAM PERKARI Pulpwood concession Abdi Tunggal PT SUMATERA ALAM PERKARI Pulpwood concession Abdi Tunggal PT SUMATERA ALAM PERKARI Pulpwood concession Mulyadi Gani PT SUMATRA GAJAPATI Pulpwood concession Stefanu Najoan PT SUNATRA GAJAPATI Pulpwood concession Eddy Sanusi PT SUNATRA GAJAPATI Pulpwood concession Not found PT TANADAYA PERKASA Pulpwood concession Not found PT TANIYONG ENGREEN Pulpwood concession Not reporting PTTANANANI NDUSTRI LESTARI Pulpwood concession Not reporting PTTANANANI NDUSTRI LESTARI Pulpwood concession Not reporting PTTANUNG REDEB HUTANI Pulpwood concession Stefanus Najoan, PT TEBO HUTAMA CIPTA PT TEBO MULTI AGRO Pulpwood concession Stefanus Najoan, PT TEBO HUTAMA CIPTA PT T	PT SINAR MAKMUR DWISESA	Pulpwood concession	Not reporting
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PT TRIKORINDOTAMA WANAKARYAPulpwood concessionErwin Prabawa Surya, Fredy Purnama Surya, Nini Natalia Surya, Sandi Sastra SuryaPT TRIOMAS FDI/PT ESSA INDAH TIMBERPulpwood concessionMuharno NgadiminPT TUAH NEGERIPulpwood concessionNot reportingPT TUSAM HUTANI LESTARIPulpwood concessionPrasetyo HadiPT UNGGUL KARYA INTI JAYAPulpwood concessionWidartoPT USAHA TANI LESTARI (NTT)Pulpwood concessionNot reportingPT USAHATANI LESTARI (NTT)Pulpwood concessionNot reportingPT WAENIBE WOOD INDUSTRIESPulpwood concessionFerry TanayaPT WAHANA AGRO MULIAPulpwood concessionKusumo Agus WinotoPT WAHANA LESTARI MAKMUR SUKSESPulpwood concessionHeffy Hartono	PT TOBA PULP LESTARI Tbk	Integrated	PINNACLE COMPANY PTE LTD
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PT WAHANA AGRO MULIA Pulpwood concession Kusumo Agus Winoto PT WAHANA LESTARI MAKMUR Pulpwood concession Heffy Hartono SUKSES SUKSES Heffy Hartono		Pulpwood concession	Not found
PT WAHANA LESTARI MAKMUR Pulpwood concession Heffy Hartono SUKSES	PT WAENIBE WOOD INDUSTRIES	Pulpwood concession	Ferry Tanaya
SUKSES	PT WAHANA AGRO MULIA	Pulpwood concession	Kusumo Agus Winoto
PT WAHANA SAMUDERA SENTOSA Pulpwood concession Not found		Pulpwood concession	Heffy Hartono
	PT WAHANA SAMUDERA SENTOSA	Pulpwood concession	Not found

Company	Business type	Beneficial owner reported in 2023
PT WANA ARGA NUSANTARA	Pulpwood concession	Hermawan Santoso Gunawan
PT WANA DIPA PERKASA	Pulpwood concession	Not reporting
PT WANA HIJAU PESAGUAN	Pulpwood concession	Lee Mon Lun
PT WANA KALTIM LESTARI	Pulpwood concession	COMPAGNIE GENERALE DES ETABLISSEMENTS MICHELIN, Prajogo Pangestu
PT WANA LESTARI JAYA	Pulpwood concession	Latip
PT WANA MUKTI WISESA	Pulpwood concession	Not found
PT WANA PERINTIS	Pulpwood concession	Erwadi Gunawan
PT WANA RINDANG LESTARI	Pulpwood concession	PT BINTANG GEMILANG PERMAI
PT WANA SUBUR LESTARI	Pulpwood concession	Masami Kitahashi
PT WANA SUBUR PERSADA	Pulpwood concession	PT BUMI MADANI LESTARI
PT WANAKASITA NUSANTARA	Pulpwood concession	Heffy Hartono
PT WANAKERTA EKALESTARI	Pulpwood concession	Lioe Tha Nen
PT WANAMULIA SUKSES SEJATI	Pulpwood concession	David Honoris
PT WANANUGRAHA BIMALESTARI	Pulpwood concession	Abdi Tunggal
PT WARNA AGUNG SEJAHTERA	Pulpwood concession	Arifai, Pauliyan
PT WIRA KARYA SAKTI	Pulpwood concession	Oei Tjie Goan
PT WONO INHUTANI NIAGA	Pulpwood concession	Not found
PT WOYLA RAYA ABADI	Pulpwood concession	Abdullah Puteh

Appendix B. Beneficial Ownership reporting of Royal Golden Eagle / APRIL Group and suppliers as of November 30, 2023

Company	Province	Business type	Beneficial owner reported in 2023	Relation to RGE/APRIL	Source
PT RIAU ANDALAN PULP & PAPER	Riau	Pulp mill and pulpwood concession	Sanjay Tanwani	Owned company	Company declaration
CV ALAM LESTARI	Riau	Pulpwood concession	Agus Dwiyanto	Supply partner	Company declaration
CV BHAKTI PRAJA MULIA	Riau	Pulpwood concession	Not reporting	Supply partner	Company declaration
CV MUTIARA LESTARI	Riau	Pulpwood concession	Not reporting	Supply partner	Company declaration
CV PUTRI LINDUNG BULAN	Riau	Pulpwood concession	Yudi Febrian Rahman	Supply partner	Company declaration
PT BINA DAYA BINTARA	Riau	Pulpwood concession	Semuel Soengdjadi	Supply partner	Company declaration
PT BUKIT BATABUH SEI INDAH	Riau	Pulpwood concession	Nandhya Hapsari	Supply partner	Company declaration
PT BUKIT RAYA MUDISA	West Sumatra	Pulpwood concession	Not reporting	Supply partner	Company declaration
PT CITRA SUMBER SEJAHTERA	Riau	Pulpwood concession	Not reporting	Supply partner	Company declaration
PT EKAWANA LESTARIDHARMA	Riau	Pulpwood concession	Muharno Ngadimin	Supply partner	Company declaration
PT TRIOMAS FDI/PT ESSA INDAH TIMBER	Riau	Pulpwood concession	Muharno Ngadimin	Supply partner	Company declaration
PT HARAPAN JAYA MAKMUR LESTARI	Riau	Pulpwood concession	Not reporting	Supply partner	Company declaration
PT MADUKORO	Riau	Pulpwood concession	Abdi Tunggal	Supply partner	Company declaration
PT MITRA KEMBANG SELARAS	Riau	Pulpwood concession	Jimmy Bonaldi Pangestu	Supply partner	Company declaration
PT MITRA TANI NUSA SEJATI	Riau	Pulpwood concession	Not reporting	Supply partner	Company declaration
PT NUSA PRIMA MANUNGGAL	Riau	Pulpwood concession	Marzum	Supply partner	Company declaration
PT NUSA WANA RAYA	Riau	Pulpwood concession	Abdi Tunggal	Supply partner	Company declaration
PT NUSANTARA SENTOSA RAYA	Riau	Pulpwood concession	Nelson Bahtiar Sianturi	Supply partner	Company declaration
PT PERANAP TIMBER	Riau	Pulpwood concession	Muharno Ngadimin	Supply partner	Company declaration
PT RIMBA LAZUARDI	Riau	Pulpwood concession	Wikendy	Supply partner	Company declaration
PT RIMBA MUTIARA PERMAI	Riau	Pulpwood concession	Muharno Ngadimin	Supply partner	Company declaration

Company	Province	Business type	Beneficial owner reported in 2023	Relation to RGE/APRIL	Source
PT RIMBA PERANAP INDAH	Riau	Pulpwood concession	Wikendy	Supply partner	Company declaration
PT SELARAS ABADI UTAMA	Riau	Pulpwood concession	Abdi Tunggal	Supply partner	Company declaration
PT SERAYA SUMBER LESTARI	Riau	Pulpwood concession	Widianto Ngadimin	Supply partner	Company declaration
PT SINAR BELANTARA INDAH	North Sumatra	Pulpwood concession	Abdi Tunggal	Supply partner	Company declaration
PT SUMATERA RIANG LESTARI	North Sumatra	Pulpwood concession	Abdi Tunggal	Supply partner	Company declaration
PT SUMATERA SILVA LESTARI	Riau	Pulpwood concession	Harris Dharsono	Supply partner	Company declaration
PT WANANUGRAHA BIMALESTARI	Riau	Pulpwood concession	Abdi Tunggal	Supply partner	Company declaration
PT ADINDO HUTANI LESTARI	North Kalimantan	Pulpwood concession	Christian Jason Ang Chan	Open market supplier	Company declaration
PT ITCI HUTANI MANUNGGAL	East Kalimantan	Pulpwood concession	Sanjay Tanwani	Open market supplier	Company declaration
PT MAYANGKARA TANAMAN INDUSTRI	West Kalimantan	Pulpwood concession	Masami Kitahashi	Open market supplier	Company declaration
PT WAHANA LESTARI MAKMUR SUKSES	South Sumatra	Pulpwood concession	Heffy Hartono	Open market supplier	Company declaration
PT KORINTIGA HUTANI	Central Kalimantan	Pulpwood concession	Eun Ho Sung	Open market supplier	Company declaration
PT NUSANTARA KALIMANTAN LESTARI	West Kalimantan	Pulpwood concession	Viroj Tangjetanaporn	Open market supplier	Company declaration
PT INTIGUNA PRIMATAMA		Pulp mill	Praveen Singhavi	Owned company	Company declaration
PT TOBA PULP LESTARI	North Sumatra	Pulp mill and pulpwood concession	Pinnacle Company Pte Ltd		FSC review disclosure

Appendix C. Beneficial ownership reporting of Sinar Mas Group / Asia Pulp & Paper and suppliers as of November 30, 2023

Company	Province	Business type	Beneficial owner reported in 2023	Relation to Sinar Mas/APP	Source
PT ACACIA ANDALAN UTAMA	East Kalimantan	Pulpwood concession	Muliadi Sutjitro	Long-term supplier	Company declaration
PT ARARA ABADI	Riau	Pulpwood concession	Oei Tjie Goan	Owned company	Company declaration
PT ARTELINDO WIRATAMA	Riau	Pulpwood concession	Lioe Tha Nen	Open market supplier	Company declaration
PT ASIA TANI PERSADA	West Kalimantan	Pulpwood concession	Muliadi Sutjitro	Long-term supplier	Company declaration
PT BALAI KAYANG MANDIRI	Riau	Pulpwood concession	Muliadi Sutjitro	Long-term supplier	Company declaration
PT BINA DAYA BENTALA	Riau	Pulpwood concession	Effendy Saputra Tjua	Long-term supplier	Company declaration
PT BINA DUTA LAKSANA	Riau	Pulpwood concession	Not reporting	Long-term supplier	Company declaration
PT BUANA MEGATAMA JAYA	West Kalimantan	Pulpwood concession	Mulyadi Gani	Long-term supplier	Company declaration
PT BUKIT BATU HUTANI ALAM	Riau	Pulpwood concession	Mulyadi Gani	Long-term supplier	Company declaration
PT BUMI ANDALAS PERMAI	South Sumatra	Pulpwood concession	Not reporting	Long-term supplier	Company declaration
PT BUMI MEKAR HIJAU	South Sumatra	Pulpwood concession	Muliadi Sutjitro	Long-term supplier	Company declaration
PT BUMI PERSADA PERMAI	South Sumatra	Pulpwood concession	Stefanus Najoan	Long-term supplier	Company declaration
PT BUMI PERSADA PERMAI	South Sumatra	Pulpwood concession	Stefanus Najoan	Long-term supplier	Company declaration
PT DAYA TANI KALBAR	West Kalimantan	Pulpwood concession	Muliadi Sutjitro	Long-term supplier	Company declaration
PT FINNANTARA INTIGA	West Kalimantan	Pulpwood concession	Oei Tjie Goan	Owned company	Company declaration
PT INDAH KIAT PULP & PAPER	Riau	Pulp mill	Oei Tjie Goan	Owned company	Company declaration
PT KALIMANTAN SUBUR PERMAI	West Kalimantan	Pulpwood concession	Muliadi Sutjitro	Long-term supplier	Company declaration
PT KELAWIT HUTANI LESTARI	East Kalimantan	Pulpwood concession	Jelian Anak Kasim	Long-term supplier	Company declaration
PT KELAWIT WANA LESTARI	East Kalimantan	Pulpwood concession	Not reporting	Long-term supplier	Company declaration
PT KUBU MULIA FORESTRY	West Kalimantan	Pulpwood concession	Hiroshi Aoki	Open market supplier	Company declaration
PT LONTAR PAPYRUS PULP AND PAPER INDUSTRY	Jambi	Pulp mill	Oei Tjie Goan	Owned company	Company declaration

Company	Province	Business type	Beneficial owner reported in 2023	Relation to Sinar Mas/APP	Source
PT MITRA HUTANI JAYA	Riau	Pulpwood concession	Lioe Tha Nen	Long-term supplier	Company declaration
PT OKI PULP AND PAPER MILLS	South Sumatra	Pulp mill	Oei Tjie Goan	Owned company	Company declaration
PT PERAWANG SUKSES PERKASA INDUSTRI	Riau	Pulpwood concession	Muliadi Sutjitro	Long-term supplier	Company declaration
PT RIAU ABADI LESTARI	Riau	Pulpwood concession	Oei Tjie Goan	Owned company	Company declaration
PT RIAU INDO AGROPALMA	Riau	Pulpwood concession	Lioe Tha Nen	Long-term supplier	Company declaration
PT RIMBA HUTANI MAS	Jambi	Pulpwood concession	Lioe Tha Nen	Long-term supplier	Company declaration
PT RIMBA MANDAU LESTARI	Riau	Pulpwood concession	Jelian Anak Kasim	Long-term supplier	Company declaration
PT RUAS UTAMA JAYA	Riau	Pulpwood concession	Stefanus Najoan	Long-term supplier	Company declaration
PT SATRIA PERKASA AGUNG	Riau	Pulpwood concession	Oei Tjie Goan	Owned company	Company declaration
PT SEBANGUN BUMI ANDALAS WOOD INDUSTRIES	South Sumatra	Pulpwood concession	Mulyadi Gani	Long-term supplier	Company declaration
PT SEKATO PRATAMA MAKMUR	Riau	Pulpwood concession	Mulyadi Gani	Long-term supplier	Company declaration
PT SUMALINDO HUTANI JAYA	East Kalimantan	Pulpwood concession	Oei Tjie Goan	Owned company	Company declaration
PT SUMBER HIJAU PERMAI	South Sumatra	Pulpwood concession	Mulyadi Gani	Long-term supplier	Company declaration
PT SUNTARA GAJAPATI	Riau	Pulpwood concession	Sunarta	Long-term supplier	Company declaration
PT SURYA HUTANI JAYA	East Kalimantan	Pulpwood concession	Stefanus Najoan	Long-term supplier	Company declaration
PT TEBO MULTI AGRO	Jambi	Pulpwood concession	Stefanus Najoan, PT TEBO HUTAMA CIPTA	Long-term supplier	Company declaration
PT TRI PUPAJAYA	South Sumatra	Pulpwood concession	Agus Santoso Atmadja	Long-term supplier	Company declaration
PT WANA SUBUR LESTARI	West Kalimantan	Pulpwood concession	Masami Kitahashi	Open market supplier	Company declaration
PT WANAKERTA EKALESTARI	West Kalimantan	Pulpwood concession	Lioe Tha Nen	Long-term supplier	Company declaration
PT WIRA KARYA SAKTI	Jambi	Pulpwood concession	Oei Tjie Goan	Owned company	Company declaration

Appendix D. APRIL and RGE's response to the findings of this brief

Jakarta, 29 Januari 2024	PT. RGE Indonesia Jl. M.H. Thamrin No. 31 Jakarta 10230, Indonesia Tel : +62 21 392 3189 Fax : +62 21 392 3157 Website : www.rgei.com
Kepada Yth,	
Direktur APRIL Grup	
Di Jakarta	
Dengan hormat, Menjawab surat Saudara pada tanggal 26 Januari 2024 terkai pemegang saham perusahaan, kami sampaikan sebagai berik PT RGE Indonesia dan perusahaan grup RGE yang beroperasi peraturan perundangan yang berlaku di Indonesia, termasuk pengungkapan informasi korporat. Terima kasih.	di Indonesia mematuhi semua
Hormat kami, Jgnatius Purnomo Head of Corporate Communications PT RGE Indonesia	

English translation provided by authors of this brief:

Responding to your letter on January 26, 2024 regarding questions about the company's shareholder structure, we share the following:

PT RGE Indonesia and RGE group companies operating in Indonesia comply with all applicable laws and regulations in Indonesia, including but not limited to the provisions for disclosure of corporate information.

Disclaimer

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