

**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.<sup>1</sup>

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.<sup>2</sup>

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.

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









<sup>1</sup> 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.<sup>3</sup>
- 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.<sup>4</sup>

## **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.<sup>5</sup> 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).<sup>6</sup> 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.<sup>7</sup>

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).<sup>8</sup> 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.<sup>9</sup>

<sup>3</sup> 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."

<sup>4</sup> 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.

<sup>5</sup> 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.

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

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

<sup>8</sup> 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.

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

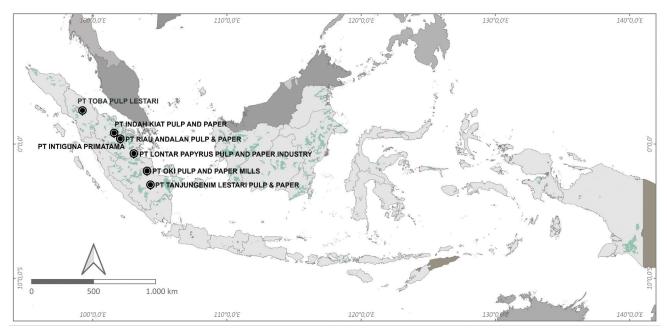


Figure 1. Indonesia's pulp mills and pulpwood concessions

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.<sup>10</sup> 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.<sup>11</sup>

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".<sup>12</sup> 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.<sup>13</sup>

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

<sup>10</sup> 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/.

<sup>11</sup> 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/.

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

<sup>13</sup> 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.<sup>14</sup> 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.<sup>15</sup>

# 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.<sup>16</sup> 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).<sup>17</sup> 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 profiles<sup>18</sup>, 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.

 <sup>15</sup> 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.

<sup>16</sup> 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.

<sup>17</sup> 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.

<sup>18</sup> 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.

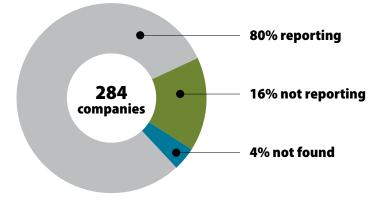


Figure 2. Level of beneficial ownership reporting compliance in Indonesia's pulp sector

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.<sup>19</sup> 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.<sup>20</sup> Both Praveen Singhavi and Sanjay Tanwani are long-time executives of the APRIL Group,<sup>21</sup> 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.<sup>22</sup> 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.<sup>23</sup> 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).

<sup>19</sup> 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.

<sup>20</sup> 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.

<sup>21</sup> 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.

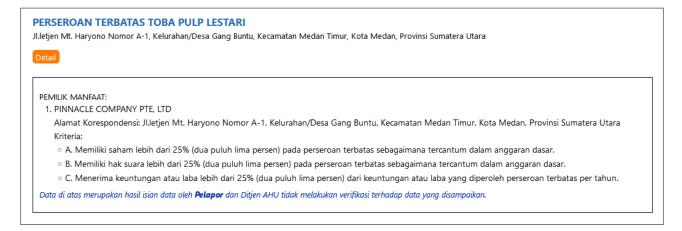
<sup>22</sup> Financial Action Task Force. 2014. FATF Guidance: Transparency and Beneficial Ownership. October 2014. https://www.fatf-gafi.org/ content/dam/fatf/documents/reports/Guidance-transparency-beneficial-ownership.pdf.

<sup>23</sup> 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).<sup>24</sup> 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.<sup>25</sup>



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

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

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

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

<sup>25</sup> 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.<sup>27</sup> 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).<sup>28</sup> 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.<sup>29</sup> 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.<sup>30</sup>

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.

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

<sup>28</sup> 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.

<sup>29</sup> 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.

<sup>30</sup> 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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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.<sup>31</sup>

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.<sup>32</sup> As such, another brief in this series will present some of these examples from other countries to inform Indonesia's policy and regulatory considerations.

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

<sup>32</sup> 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
PT KAYNA RESOURCES   Pulpwood concession   Cicilia Indraningsih Jeno     PT KELAWIT HUTANI LESTARI   Pulpwood concession   Jelian Anak Kasim     PT KELAWIT WANA LESTARI   Pulpwood concession   Not reporting     PT KEANA CAKRAWALA   Pulpwood concession   Yeo How     PT KIRANA CAKRAWALA   Pulpwood concession   Muliadi Sutjitro     PT KORNA CAKRAWALA   Pulpwood concession   Not reporting     PT KOIN NESIA   Pulpwood concession   Not reporting     PT KONIN NESIA   Pulpwood concession   Eun Ho Sung     PT KUBU MULIA FORESTRY   Pulpwood concession   Eddy Pramudja     PT KUSUMA PUSPAWANA   Pulpwood concession   Edie Herjadi     PT LAHAN SUKSES   Pulpwood concession   Not reporting     PT LANA SUKSES   Pulpwood concession   Not reporting     PT LAHAN SUKSES   Pulpwood concession   Not reporting     SEJAHTERA   Pulpwood concession   Not reporting     PT LAHAN SUKSES   Pulpwood concession   Suheldi     PT LAHAN SUKSES   Pulpwood concession   Suheldi     PT LENTERA SAWIT MAKMUR   Pulpwood concession   Ismail Haris     PT LENTBAH JATI MUTIARA   P		Pulpwood concession	Susilo Wonowidjojo
PT KELAWIT HUTANI LESTARI   Pulpwood concession   Jelian Anak Kasim     PT KELAWIT WANA LESTARI   Pulpwood concession   Not reporting     PT KESATUAN MAS ABADI   Pulpwood concession   Yeo How     PT KEARAWALA   Pulpwood concession   PT SUMBER GRAHA MALUKU     PT KIRANA CAKRAWALA   Pulpwood concession   Muliadi Sutjitro     PT KODECO TIMBER   Pulpwood concession   Not reporting     PT KONIN NESIA   Pulpwood concession   Eun Ho Sung     PT KUBU MULA FORESTRY   Pulpwood concession   Eun Ho Sung     PT KUSUMA PUSPAWANA   Pulpwood concession   Untung Agus Pramono     PT LAHAN CAKRAWALA   Pulpwood concession   Untung Agus Pramono     PT LAHAN SUKSES   Pulpwood concession   Not reporting     PT LANAN SUKSES   Pulpwood concession   Not reporting     SJAHIERA   Pulpwood concession   Not reporting     PT LANASURA MENTARI   Pulpwood concession   Not reporting     SJAHIERA   Pulpwood concession   Not reporting     PT LANASURA MENTARI   Pulpwood concession   Sindiaja Budidarmo     PT LANASURA SASIT PERSADA   Pulpwood concession   Not reporting     PT LEMBAH JA	PT KAYAN MAKMUR SEJAHTERA	Pulpwood concession	Hendry Lesmana
PT KELAWIT WANA LESTARI   Pulpwood concession   Not reporting     PT KESATUAN MAS ABADI   Pulpwood concession   Yeo How     PT KIRANA CAKRAWALA   Pulpwood concession   PT SUMBER GRAHA MALUKU     PT KIRANA CAKRAWALA   Pulpwood concession   Muliadi Sutjitro     PT KOEDECT TIMBER   Pulpwood concession   Muliadi Sutjitro     PT KOBIN NESIA   Pulpwood concession   Eun Ho Sung     PT KUBU MULIA FORESTRY   Pulpwood concession   Eun Ho Sung     PT KUSUMA PERKASA WANA   Pulpwood concession   Untung Agus Pramono     PT KUSUMA PERKASA WANA   Pulpwood concession   Not reporting     PT LAHAN CAKRAWALA   Pulpwood concession   Ng Tjuen Wie, Tan Tjin Kok     PT LANAGENG BAKTI PERSADA   Pulpwood concession   Not reporting     SIJAHTERA   Pulpwood concession   Not reporting     SIJAHTERA   Pulpwood concession   Not reporting     SIJAHTERA   Pulpwood concession   Not reporting     PT LEMBAH JATI MUTIARA   Pulpwood concession   Not reporting     PT LEMBAH JATI MAKMUR   Pulpwood concession   Not found     PT LEMBAH KAYU UTAMA   Pulpwood concession   Not found     PT L	PT KAYNA RESOURCES	Pulpwood concession	Cicilia Indraningsih Jeno
PT KESATUAN MAS ABADI   Pulpwood concession   Yeo How     PT KIRANA CAKRAWALA   Pulpwood concession   PT SUMBER GRAHA MALUKU     PT KIRANA CAKRAWALA   Pulpwood concession   Muliadi Sutjitro     PT KIRANA CHATULISTIWA   Pulpwood concession   Not reporting     PT KOIN NESIA   Pulpwood concession   Not reporting     PT KOIN NESIA   Pulpwood concession   Eun Ho Sung     PT KOIN NESIA   Pulpwood concession   Eun Ho Sung     PT KUSUMA PERKASA WANA   Pulpwood concession   Eddy Pramudja     PT KUSUMA PERKASA WANA   Pulpwood concession   Edie Herjadi     PT LAHAN SUKSES   Pulpwood concession   Ng Tjuen Wie, Tan Tjin Kok     PT LAHAN SUKSES   Pulpwood concession   Suheldi     PT LANTABURA MENTARI   Pulpwood concession   No treporting     SEJAHTERA   Pulpwood concession   No treporting     PT LEMTERA SAWIT MAKNUR   Pulpwood concession   No treporting     PT LEMTERA SAWIT MAKNUR   Pulpwood concession   Suheldi     PT LEMTERA SAWIT MAKNUR   Pulpwood concession   Not found     PT LENTERA SAWIT MAKNUR   Pulpwood concession   Not found     PT LEMTERA SAWIT MAKAUR	PT KELAWIT HUTANI LESTARI	Pulpwood concession	Jelian Anak Kasim
PT KIRANA CAKRAWALA     Pulpwood concession     PT SUMBER GRAHA MALUKU       PT KIRANA CHATULISTIWA     Pulpwood concession     Muliadi Sutjitro       PT KORIN NESIA     Pulpwood concession     Not reporting       PT KORINTIGA HUTANI     Pulpwood concession     Titus Sarijanto       PT KORINTIGA HUTANI     Pulpwood concession     Eun Ho Sung       PT KUBU MULIA FORESTRY     Pulpwood concession     Eddy Pramudja       PT KUSUMA PUSPAWANA     Pulpwood concession     Eddy Pramudja       PT LAHAN CAKRAWALA     Pulpwood concession     Muting Agus Pramono       PT LANGENGE BAKTI PERSADA     Pulpwood concession     Ng Tjuen Wie, Tan Tjin Kok       PT LANGENGE BAKTI PERSADA     Pulpwood concession     Ng Tjuen Wie, Tan Tjin Kok       PT LANGENGE BAKTI PERSADA     Pulpwood concession     Not reporting       SEJAHTERA     Pulpwood concession     Not reporting       PT LENTERA SAWIT MAKMUR     Pulpwood concession     Ismail Haris       PT LENTERA SAWIT MAKMUR     Pulpwood concession     Not found       PT LENTERA SAWIT MAKMUR     Pulpwood concession     Not found       PT LANTABLY PAPRUS PULP AND     Pulp mill     Oei Tjie Goan <tr< td=""><td>PT KELAWIT WANA LESTARI</td><td>Pulpwood concession</td><td>Not reporting</td></tr<>	PT KELAWIT WANA LESTARI	Pulpwood concession	Not reporting
PT KIRANA CHATULISTIWAPulpwood concessionMuliadi SutjitroPT KODECO TIMBERPulpwood concessionNot reportingPT KORINTIGA HUTANIPulpwood concessionTitus SarijantoPT KORINTIGA HUTANIPulpwood concessionEun Ho SungPT KUBU MULIA FORESTRYPulpwood concessionEddy PramudjaPT KUSUMA PUSPAWANAPulpwood concessionEddy PramudjaPT KUSUMA PUSPAWANAPulpwood concessionEdidy PramudjaPT LAHAN CAKRAWALAPulpwood concessionEdid HerjadiPT LAHAN SUKSESPulpwood concessionNot reportingSEJAHTERAPulpwood concessionSuheldiPT LANGGENG BAKTI PERSADAPulpwood concessionNot reportingSEJAHTERAPulpwood concessionSuheldiPT LENTERA SAWIT MAKMURPulpwood concessionIsmail HarisPT LENTERA SAWIT MAKMURPulpwood concessionIsmail HarisPT LIMBAH KAYU UTAMAPulpwood concessionNot foundPT LIMBAH KAYU UTAMAPulpwood concessionNot foundPT MADUKOROPulpwood concessionNot foundPT MADUKOROPulpwood concessionNot reportingPT MAHAKAM PERSADA SAKTIPulpwood concessionNot reportingPT MAHAKAM PERSADA SAKTIPulpwood concessionNot reportingPT MAHAKAM PERSADA SAKTIPulpwood concessionNot reportingPT MAHAKAM PERSADAPulpwood concessionNot reportingPT MAHAKAM PERSADAPulpwood concessionNot reportingPT MALKAKAM PERSADAPulpwood concessionNot r	PT KESATUAN MAS ABADI	Pulpwood concession	Yeo How
PT KODECO TIMBERPulpwood concessionNot reportingPT KOIN NESIAPulpwood concessionTitus SarijantoPT KOIN NESIAPulpwood concessionEun Ho SungPT KUBU MULIA FORESTRYPulpwood concessionHiroshi AokiPT KUSUMA PERKASA WANAPulpwood concessionEddy PramudjaPT KUSUMA PUSPAWANAPulpwood concessionUntung Agus PramonoPT LAHAN CAKRAWALAPulpwood concessionEdie HerjadiPT LAHAN SUKSESPulpwood concessionSuheldiPT LANAGENG BAKTI PERSADAPulpwood concessionSuheldiPT LANAGENG BAKTI PERSADAPulpwood concessionNot reportingSZJAHTERAPulpwood concessionSuheldiPT LEMBAH JATI MUTIARAPulpwood concessionIsmail HarisPT LENTERA SAWIT MAKMURPulpwood concessionIsmail HarisPT LONTAR PAPYRUS PULP ANDPulpwood concessionNot foundPT LONTAR PAPYRUS PULP ANDPulpwood concessionNot foundPT MAHAKAM PERSADA SAKTIPulpwood concessionNot foundPT MAHAKAM PERSADA SAKTIPulpwood concessionNot foundPT MAHAKAM PERSADA SAKTIPulpwood concessionNot reportingPT MAHAKAM PERSADA SAKTIPulpwood concessionNot reportingPT MAHAKAM PERSADA SAKTIPulpwood concessionNot reportingPT MAHAKAM PERSADAPulpwood concessionNot reportingPT MAHAKAM PERSADAPulpwood concessionNot reportingPT MAYANGARA TANAMANPulpwood concessionYiroj TangjetanapornPT MAHAKAM PERSADA <td>PT KIRANA CAKRAWALA</td> <td>Pulpwood concession</td> <td>PT SUMBER GRAHA MALUKU</td>	PT KIRANA CAKRAWALA	Pulpwood concession	PT SUMBER GRAHA MALUKU
PT KOIN NESIAPulpwood concessionTitus SarijantoPT KORINTIGA HUTANIPulpwood concessionEun Ho SungPT KUBU MULIA FORESTRYPulpwood concessionEddy PramudjaPT KUSUMA PERKASA WANAPulpwood concessionEddy PramudjaPT KUSUMA PUSPAWANAPulpwood concessionUntung Agus PramonoPT LAHAN CAKRAWALAPulpwood concessionEdie HerjadiPT LAHAN SUKSESPulpwood concessionSuheldiPT LAHAN SUKSESPulpwood concessionSuheldiPT LANA SUKSESPulpwood concessionNot reportingSEJAHTERAPulpwood concessionNot reportingPT LEMBAH JATI MUTIARAPulpwood concessionIsmail HarisPT LENBAH JATI MUTIARAPulpwood concessionIsmail HarisPT LENTARI SAWIT MAKMURPulpwood concessionCOMPAGNIE GENERALE DES ETABLISSEMENTS MICHELIN, Prajogo PangestuPT LIMBAH KAYU UTAMAPulpwood concessionNot foundPT LONTAR PAPYRUS PULP AND PAPER INDUSTRYPulpwood concessionNot reportingPT MADUKOROPulpwood concessionAbdi TunggalPT MAHKOTA RIMBA UTAMAPulpwood concessionNot reportingPT MAHKAA AGRO PERKASAPulpwood concessionNot reportingPT MAHKOTA RIMBA UTAMAPulpwood concessionNot reportingPT MAHKOTA RIMBA UTAMAPulpwood concessionNot reportingPT MAHKOTA RIMBA UTAMAPulpwood concessionNot reportingPT MAHKAA AGRO PERKASAPulpwood concessionNot reportingPT MAHKAA AGRO PERKASAPulpwood concession </td <td>PT KIRANA CHATULISTIWA</td> <td>Pulpwood concession</td> <td>Muliadi Sutjitro</td>	PT KIRANA CHATULISTIWA	Pulpwood concession	Muliadi Sutjitro
PT KORINTIGA HUTANIPulpwood concessionEun Ho SungPT KUBU MULIA FORESTRYPulpwood concessionHiroshi AokiPT KUSUMA PERKASA WANAPulpwood concessionEddy PramudjaPT KUSUMA PUSPAWANAPulpwood concessionUntung Agus PramonoPT LAHAN CAKRAWALAPulpwood concessionEdie HerjadiPT LAHAN SUKSESPulpwood concessionNg Tjuen Wie, Tan Tjin KokPT LAHAN SUKSESPulpwood concessionSuheldiPT LANTABURA MENTARIPulpwood concessionSuheldiPT LANTABURA MENTARIPulpwood concessionNot reportingSEJAHTERAPulpwood concessionIsmail HarisPT LENTERA SAWIT MAKMURPulpwood concessionIsmail HarisPT LETETARI ASRI JAYAPulpwood concessionCOMPAGNIE GENERALE DES ETABLISSEMENTS MICHELIN, Prajogo PangestuPT LIMBAH KAYU UTAMAPulpwood concessionNot foundPT MALKAA GRO PERKASAPulpwood concessionAbdi TunggalPT MALKAA AGRO PERKASAPulpwood concessionNot reportingPT MALKAA AGRO PERKASAPulpwood concessionNot reportingPT MALKAA AGRO PERKASAPulpwood concessionNot reportingPT MAQULCROPulpwood concessionNot reportingPT MALKAA AGRO PERKASAPulpwood concessionNot reportingPT MAYAWANA PERSADAPulpwood concessionNot reportingPT MAYAWANA PERSADAPulpwood concessionYroj TangietanapornPT MALKAA AGRO PERKASAPulpwood concessionYroj TangietanapornPT MAYAWANA PERSADAPulpwood concession<	PT KODECO TIMBER	Pulpwood concession	Not reporting
PT KUBU MULIA FORESTRYPulpwood concessionHiroshi AokiPT KUSUMA PERKASA WANAPulpwood concessionEddy PramudjaPT KUSUMA PUSPAWANAPulpwood concessionUntung Agus PramonoPT LAHAN CAKRAWALAPulpwood concessionEdie HerjadiPT LAHAN SUKSESPulpwood concessionSuheldiPT LANGGENG BAKTI PERSADAPulpwood concessionSuheldiPT LANGABURA MENTARIPulpwood concessionSuheldiPT LEMTABURA MENTARIPulpwood concessionNot reportingSEJAHTERAPulpwood concessionAli Sandjaja BudidarmoPT LENTERA SAWIT MAKMURPulpwood concessionIsmail HarisPT LESTARI ASRI JAYAPulpwood concessionCOMPAGNIE GENERALE DES ETABLISSEMENTS MICHELIN, Prajogo PangestuPT LONTAR PAPYRUS PULP AND PAPER INDUSTRYPulpwood concessionNot foundPT MAHAKAM PERSADA SAKTIPulpwood concessionViroj TangjetanapornPT MAHKAM PERSADA SAKTIPulpwood concessionNot reportingPT MAHKAM PERSADA SAKTIPulpwood concessionNot reportingPT MAHKAM PERSADA SAKTIPulpwood concessionNot reportingPT MAHAKAM PERSADA SAKTIPulpwood concessionNot reportingPT MAHAKAM PERSADAPulpwood concessionNot reportingPT MAYANAKARA TANAMANPulpwood concessionPT SUMBER GRAHA MALUKUPT MAYANAKARA TANAMANPulpwood concessionYaas TanaporoPT MAYANAKARA TANAMANPulpwood concessionYaas KahashiNDUSTRIPUlpwood concessionYaas KahashiPT MERGALA R	PT KOIN NESIA	Pulpwood concession	Titus Sarijanto
PT KUSUMA PERKASA WANAPulpwood concessionEddy PramudjaPT KUSUMA PUSPAWANAPulpwood concessionUntung Agus PramonoPT LAHAN CAKRAWALAPulpwood concessionEdie HerjadiPT LAHAN SUKSESPulpwood concessionNg Tjuen Wie, Tan Tjin KokPT LANGGENG BAKTI PERSADAPulpwood concessionSuheldiPT LANTABURA MENTARIPulpwood concessionNot reportingSEJAHTERAPulpwood concessionNot reportingPT LEMBAH JATI MUTIARAPulpwood concessionIsmail HarisPT LENTERA SAWIT MAKMURPulpwood concessionIsmail HarisPT LENTERA SAWIT MAKMURPulpwood concessionCOMPAGNIE GENERALE DES ETABLISSEMENTS MICHELIN, Prajogo PangestuPT LIMBAH KAYU UTAMAPulpwood concessionNot foundPT LONTAR PAPYRUS PULP AND PAPER INDUSTRYPulpwood concessionNot foundPT MADUKOROPulpwood concessionViroj TangjetanapornPT MALAKA AGRO PERKASAPulpwood concessionNot reportingPT MANGOLE TIMBER PRODUCERSPulpwood concessionNot reportingPT MAYANGKARA TANAMAN INDUSTRIPulpwood concessionNot reportingPT MAYANGKARA TANAMAN INDUSTRIPulpwood concessionYaser Raimi PanigoroPT MERSADAPulpwood concessionYaser Raimi PanigoroPT MERGALA RAMBU UTAMAPulpwood concessionYaser Raimi PanigoroPT MAYANGKARA TANAMAN INDUSTRIPulpwood concessionYaser Raimi PanigoroPT MERGALA RAMBU UTAMAPulpwood concessionYaser Raimi PanigoroPT MERANTI LASANA	PT KORINTIGA HUTANI	Pulpwood concession	Eun Ho Sung
PT KUSUMA PUSPAWANAPulpwood concessionUntung Agus PramonoPT LAHAN CAKRAWALAPulpwood concessionEdie HerjadiPT LAHAN SUKSESPulpwood concessionNg Tjuen Wie, Tan Tjin KokPT LANGGENG BAKTI PERSADAPulpwood concessionSuheldiPT LANTABURA MENTARIPulpwood concessionNot reportingSEJAHTERAPulpwood concessionNot reportingPT LEMBAH JATI MUTIARAPulpwood concessionIsmail HarisPT LENTERA SAWIT MAKMURPulpwood concessionCOMPAGNIE GENERALE DES ETABLISSEMENTS MICHELIN, Prajogo PangestuPT LINBAH KAYU UTAMAPulpwood concessionNot foundPT LONTAR PAPRUS PULP AND PAPER INDUSTRYPulpwood concessionNot foundPT MADUKOROPulpwood concessionAbdi TunggalPT MAHAKAM PERSADA SAKTIPulpwood concessionNot reportingPT MAHAKAM PERSADA SAKTIPulpwood concessionNot reportingPT MAHAKAM PERSADA SAKTIPulpwood concessionNot reportingPT MAHAKAM PERSADAPulpwood concessionNot reportingPT MAHAKAM PERSADAPulpwood concessionNot reportingPT MAYANGKARA TANAMANPulpwood concessionNot reportingPT MAYAWANA PERSADAPulpwood concessionYay Xian LongPT MAYAWANA PERSADAPulpwood concessionYay Xian LongPT MEQCOPAPUA ALAM LESTARIPulpwood concessionYay Xian LongPT MERGALA RAMBU UTAMAPulpwood concessionYay Xian LongPT MERANTI LAKSANAPulpwood concessionAria TiurmaPT MERANTI LESTARI </td <td>PT KUBU MULIA FORESTRY</td> <td>Pulpwood concession</td> <td>Hiroshi Aoki</td>	PT KUBU MULIA FORESTRY	Pulpwood concession	Hiroshi Aoki
PT LAHAN CAKRAWALAPulpwood concessionEdie HerjadiPT LAHAN SUKSESPulpwood concessionNg Tjuen Wie, Tan Tjin KokPT LANGGENG BAKTI PERSADAPulpwood concessionSuheldiPT LANTABURA MENTARI SEJAHTERAPulpwood concessionNot reportingPT LEMBAH JATI MUTIARAPulpwood concessionAli Sandjaja BudidarmoPT LENTERA SAWIT MAKMURPulpwood concessionIsmail HarisPT LENTERA SAWIT MAKMURPulpwood concessionCOMPAGNIE GENERALE DES ETABLISSEMENTS MICHELIN, Prajogo PangestuPT LISTARI ASRI JAYAPulpwood concessionNot reportingPT LONTAR PAPYRUS PULP AND PAPER INDUSTRYPulp millOei Tjie GoanPT MAHAKAM PERSADA SAKTIPulpwood concessionAbdi TunggalPT MAHKOTA RIMBA UTAMAPulpwood concessionViroj TangjetanapornPT MAHKOTA RIMBA UTAMAPulpwood concessionNot reportingPT MAHKOTA RIMBA UTAMAPulpwood concessionNot reportingPT MANGOLE TIMBER PRODUCERSPulpwood concessionPT SUMBER GRAHA MALUKUPT MAYANGKARA TANAMAN INDUSTRIPulpwood concessionYaser Raimi PanigoroPT MENGGALA RAMBU UTAMAPulpwood concessionYaser Raimi PanigoroPT MERANTI LAKSANAPulpwood concessionMaria TiurmaPT MERANTI LESTARIPulpwood concessionMaria TiurmaPT MERANTI SEMBADAPulpwood concessionMaria TiurmaPT MERANTI SEMBADAPulpwood concessionMaria TiurmaPT MERANTI SEMBADAPulpwood concessionMaria TiurmaPT MERANTI SEMBADAPul	PT KUSUMA PERKASA WANA	Pulpwood concession	Eddy Pramudja
PT LAHAN SUKSESPulpwood concessionNg Tjuen Wie, Tan Tjin KokPT LANGGENG BAKTI PERSADAPulpwood concessionSuheldiPT LANTABURA MENTARI SEJAHTERAPulpwood concessionNot reportingPT LEMBAH JATI MUTIARAPulpwood concessionAli Sandjaja BudidarmoPT LENTERA SAWIT MAKMURPulpwood concessionIsmail HarisPT LESTARI ASRI JAYAPulpwood concessionCOMPAGNIE GENERALE DES ETABLISSEMENTS MICHELIN, Prajogo PangestuPT LIMBAH KAYU UTAMAPulpwood concessionNot foundPT LONTAR PAPYRUS PULP AND PAPER INDUSTRYPulpwood concessionNot reportingPT MADUKOROPulpwood concessionAbdi TunggalPT MALKAA AGRO PERKASAPulpwood concessionNot reportingPT MALKAA AGRO PERKASAPulpwood concessionNot reportingPT MANGOLE TIMBER PRODUCERSPulpwood concessionNot reportingPT MAYANGKARA TANAMANPulpwood concessionPT SUMBER GRAHA MALUKUPT MAYANGKARA TANAMANPulpwood concessionMasami KitahashiPT MAYANGKARA TANAMANPulpwood concessionYay Xian LongPT MENGGALA RAMBU UTAMAPulpwood concessionYay Xian LongPT MERANTI LAKSANAPulpwood concessionYay Xian LongPT MERANTI LAKSANAPulpwood concessionMaria TiurmaPT MERANTI LESTARIPulpwood concessionMaria TiurmaPT MERANTI LESTARIPulpwood concessionMaria TiurmaPT MERANTI LESTARIPulpwood concessionMaria TiurmaPT MERANTI LESTARIPulpwood concessionMaria Tiurma	PT KUSUMA PUSPAWANA	Pulpwood concession	Untung Agus Pramono
PT LANGGENG BAKTI PERSADAPulpwood concessionSuheldiPT LANTABURA MENTARI SEJAHTERAPulpwood concessionNot reportingPT LEMBAH JATI MUTIARAPulpwood concessionAli Sandjaja BudidarmoPT LEMBAH JATI MUTIARAPulpwood concessionIsmail HarisPT LENTERA SAWIT MAKMURPulpwood concessionIsmail HarisPT LENTERA SAWIT MAKMURPulpwood concessionCOMPAGNIE GENERALE DES ETABLISSEMENTS MICHELIN, Prajogo PangestuPT LIMBAH KAYU UTAMAPulpwood concessionNot foundPT LONTAR PAPYRUS PULP AND PAPER INDUSTRYPulp millOei Tjie GoanPT MADUKOROPulpwood concessionAbdi TunggalPT MALKAM PERSADA SAKTIPulpwood concessionNot reportingPT MALKAA GRO PERKASAPulpwood concessionNot reportingPT MANGOLE TIMBER PRODUCERSPulpwood concessionPT SUMBER GRAHA MALUKUPT MAYANGKARA TANAMANPulpwood concessionYap Xian LongPT MENGGALA RAMBU UTAMAPulpwood concessionYap Xian LongPT MENGGALA RAMBU UTAMAPulpwood concessionYaser Raimi PanigoroPT MAYAWANA PERSADAPulpwood concessionYaser Raimi PanigoroPT MENGGALA RAMBU UTAMAPulpwood concessionMaria TiurmaPT MERANTI LESTARIPulpwood concessionMaria Tiurm	PT LAHAN CAKRAWALA	Pulpwood concession	Edie Herjadi
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PT LONTAR PAPYRUS PULP AND PAPER INDUSTRYPulp millOei Tjie GoanPT MADUKOROPulpwood concessionAbdi TunggalPT MAHAKAM PERSADA SAKTIPulpwood concessionViroj TangjetanapornPT MAHAKAM PERSADA SAKTIPulpwood concessionNot reportingPT MAHKOTA RIMBA UTAMAPulpwood concessionNot reportingPT MALAKA AGRO PERKASAPulpwood concessionBambang Setiawan WydiantoPT MALAKA AGRO PERKASAPulpwood concessionPT SUMBER GRAHA MALUKUPT MANGOLE TIMBER PRODUCERSPulpwood concessionPT SUMBER GRAHA MALUKUPT MAYANGKARA TANAMANPulpwood concessionMasami KitahashiINDUSTRIPulpwood concessionYap Xian LongPT MEDCOPAPUA ALAM LESTARIPulpwood concessionAgus Awali IsmantoroPT MERANTI LAKSANAPulpwood concessionMaria TiurmaPT MERANTI LESTARIPulpwood concessionMaria TiurmaPT MERANTI SEMBADAPulpwood concessionMaria TiurmaPT MERANTI SEMBADAPulpwood concessionPT BARITO PACIFIC LUMBERPT MERAUKE RAYON JAYAPulpwood concessionKanesan DewadasPT MERAU PELALAWAN LESTARIPulpwood concessionNot reporting	PT LESTARI ASRI JAYA	Pulpwood concession	
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PT MALAKA AGRO PERKASAPulpwood concessionBambang Setiawan WydiantoPT MANGOLE TIMBER PRODUCERSPulpwood concessionPT SUMBER GRAHA MALUKUPT MAYANGKARA TANAMANPulpwood concessionMasami KitahashiINDUSTRIPUlpwood concessionYap Xian LongPT MAYAWANA PERSADAPulpwood concessionYap Xian LongPT MEDCOPAPUA ALAM LESTARIPulpwood concessionYaser Raimi PanigoroPT MENGGALA RAMBU UTAMAPulpwood concessionAgus Awali IsmantoroPT MERANTI LAKSANAPulpwood concessionMaria TiurmaPT MERANTI LESTARIPulpwood concessionPT BARITO PACIFIC LUMBERPT MERANTI SEMBADAPulpwood concessionPT BARITO PACIFIC LUMBERPT MERAUKE RAYON JAYAPulpwood concessionKanesan DewadasPT MERBAU PELALAWAN LESTARIPulpwood concessionNot reporting	PT MAHAKAM PERSADA SAKTI	Pulpwood concession	Viroj Tangjetanaporn
PT MANGOLE TIMBER PRODUCERSPulpwood concessionPT SUMBER GRAHA MALUKUPT MAYANGKARA TANAMAN INDUSTRIPulpwood concessionMasami KitahashiPT MAYAWANA PERSADAPulpwood concessionYap Xian LongPT MEDCOPAPUA ALAM LESTARIPulpwood concessionYaser Raimi PanigoroPT MENGGALA RAMBU UTAMAPulpwood concessionAgus Awali IsmantoroPT MERANTI LAKSANAPulpwood concessionMaria TiurmaPT MERANTI LESTARIPulpwood concessionMaria TiurmaPT MERANTI SEMBADAPulpwood concessionPT BARITO PACIFIC LUMBERPT MERANTI SEMBADAPulpwood concessionPT BARITO PACIFIC LUMBERPT MERAUKE RAYON JAYAPulpwood concessionKanesan DewadasPT MERBAU PELALAWAN LESTARIPulpwood concessionNot reporting	PT MAHKOTA RIMBA UTAMA	Pulpwood concession	Not reporting
PT MAYANGKARA TANAMAN INDUSTRIPulpwood concessionMasami KitahashiPT MAYAWANA PERSADAPulpwood concessionYap Xian LongPT MEDCOPAPUA ALAM LESTARIPulpwood concessionYaser Raimi PanigoroPT MENGGALA RAMBU UTAMAPulpwood concessionAgus Awali IsmantoroPT 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 MALAKA AGRO PERKASA	Pulpwood concession	Bambang Setiawan Wydianto
INDUSTRIPT MAYAWANA PERSADAPulpwood concessionYap Xian LongPT MEDCOPAPUA ALAM LESTARIPulpwood concessionYaser Raimi PanigoroPT MENGGALA RAMBU UTAMAPulpwood concessionAgus Awali IsmantoroPT 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 MANGOLE TIMBER PRODUCERS	Pulpwood concession	PT SUMBER GRAHA MALUKU
PT MEDCOPAPUA ALAM LESTARIPulpwood concessionYaser Raimi PanigoroPT MENGGALA RAMBU UTAMAPulpwood concessionAgus Awali IsmantoroPT MERANTI LAKSANAPulpwood concessionMaria TiurmaPT MERANTI LESTARIPulpwood concessionMaria TiurmaPT MERANTI SEMBADAPulpwood concessionPT BARITO PACIFIC LUMBERPT MERAUKE RAYON JAYAPulpwood concessionKanesan DewadasPT MERBAU PELALAWAN LESTARIPulpwood concessionNot reporting		Pulpwood concession	Masami Kitahashi
PT MENGGALA RAMBU UTAMAPulpwood concessionAgus Awali IsmantoroPT 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 MAYAWANA PERSADA	Pulpwood concession	Yap Xian Long
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
PT MERANTI LESTARIPulpwood concessionMaria TiurmaPT MERANTI SEMBADAPulpwood concessionPT BARITO PACIFIC LUMBERPT MERAUKE RAYON JAYAPulpwood concessionKanesan DewadasPT MERBAU PELALAWAN LESTARIPulpwood concessionNot reporting	PT MENGGALA RAMBU UTAMA	Pulpwood concession	Agus Awali Ismantoro
PT MERANTI SEMBADAPulpwood concessionPT BARITO PACIFIC LUMBERPT MERAUKE RAYON JAYAPulpwood concessionKanesan DewadasPT MERBAU PELALAWAN LESTARIPulpwood concessionNot reporting	PT MERANTI LAKSANA	Pulpwood concession	Maria Tiurma
PT MERAUKE RAYON JAYAPulpwood concessionKanesan DewadasPT MERBAU PELALAWAN LESTARIPulpwood concessionNot reporting	PT MERANTI LESTARI	Pulpwood concession	Maria Tiurma
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
PT MITRA TANI NUSA SEJATI   Pulpwood concession   Not reporting     PT MUGRI SUNGAL LANDAK   Pulpwood concession   Justinus Indrayanto     PT MUGII TRIMAN INTERNATIONAL   Pulpwood concession   COMPAGNE GENERALE DES ETABLISSEMENTS MICHELIN, Prajogo Pangestu     PT MUSTI KUSUMA CEMERLANG   Pulpwood concession   Yasuharu Nakabashi     PT NUSTI HUTAN PERSADA   Pulpwood concession   Not reporting     PT NISP LANTATION   Pulpwood concession   Not reporting     PT NUSA LESTARI INDAH   Pulpwood concession   Marzum     PT NUSA REAKALIMANNINGGAL   Pulpwood concession   Marzum     PT NUSANTARA KALIMANTAN   Pulpwood concession   Not reporting     PT NUSANTARA KALIMANTAN   Pulpwood concession   Not reporting     PT NUSANTARA SENTOSA RAYA   Pulpwood concession   Not reporting     PT OCEAN BAGUS JAYA   Pulpwood concession   Not reporting     PT OCEAN BAGUS JAYA   Pulpwood concession   Not reporting     PT OCEAN BAGUS JAYA   Pulpwood concession   Not reporting     PT PANCARAN WANANUSA   Pulpwood concession   Not reporting     PT PANCARAN WANANUSA   Pulpwood concession   Not reporting     PT PANCARAN WANANUSA	PT MITRA KEMBANG SELARAS	Pulpwood concession	Jimmy Bonaldi Pangestu
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
PT MUGITRIMAN INTERNATIONAL   Pulpwood concession   Not reporting     PT MULTI KUSUMA CEMERLANG   Pulpwood concession   COMPAGNE GENERALE DES ETABLISSEMENTS MICHELIN, Prajogo Pangestu     PT MUSI HUTAN PERSADA   Pulpwood concession   Yasuharu Nakabashi     PT NITYASA IDOLA   Pulpwood concession   SHANTOU MARIA INVESTMENT CO LTD     PT NUSA PRINAM ANNUNGGAL   Pulpwood concession   Not reporting     PT NUSA WANA RAYA   Pulpwood concession   Marzum     PT NUSA WANA RAYA   Pulpwood concession   Marzum     PT NUSA WANA RAYA   Pulpwood concession   Viroj Tangjetanaporn     LESTARI   Pulowood concession   Not reporting     PT NUSA PRINARA SENTOSA RAYA   Pulpwood concession   Not reporting     PT OKEAN BAGUS JAYA   Pulpwood concession   Not reporting     PT OKA PRINARA SENTOSA RAYA   Pulpwood concession   Not reporting     PT OKANTRA SENTOSA RAYA   Pulpwood concession   Not reporting     PT PARAMITRA MULIA LANGGENG   Pulpwood concession   Not reporting     PT PARAMITRA MULIA LANGGENG   Pulpwood concession   Mularto     PT PERANAP TIMBER   Pulpwood concession   Mularto     PT PERANAP TIMBER   Pulpw	PT MITRA TANI NUSA SEJATI	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 INITYASA IDOLA     Pulpwood concession     SHANTOU MARIA INVESTMENT CO LTD       PT NUSA LESTARI INDAH     Pulpwood concession     Marzum       PT NUSA PRIMA MANUNGGAL     Pulpwood concession     Marzum       PT NUSA VARAR AKAIMANTAN     Pulpwood concession     Abdi Tunggal       PT NUSANTARA KALIMANTAN     Pulpwood concession     Nelson Bahtiar Sianturi       PT OCEAN BAGUS JAYA     Pulpwood concession     Nelson Bahtiar Sianturi       PT OCEANISTIMBER PRODUCT     Pulpwood concession     Rony Tanoko       PT OKI PULP AND PAPER MILLS     Pulp mill     Oei Tjie Goan       PT PANCARAN WANANUSA     Pulpwood concession     Not reporting       PT PARAMITRA MULIA LANGGENG     Pulpwood concession     Not reporting       PT PERAWATA RIMBA     Pulpwood concession     Mulaario Ngadimin       PT PERAWATA RIMBA     Pulpwood concession     Mulaario Ngadimin       PT PERAWATA RIMBA     Pulpwood concession     Mulaario Ngadimin       PT PERAWATA BORNEO ABADI     Pulpw	PT MUARA SUNGAI LANDAK	Pulpwood concession	Justinus Indrayanto
MICHELIN, Prajogo PangestuPT MUSI HUTAN PERSADAPulpwood concessionYasuharu NakabashiPT NITYIASA IDOLAPulpwood concessionSHANTOU MARIA INVESTMENT CO LTDPT INEP LANTATIONPulpwood concessionNot reportingPT NUSA LESTARI INDAHPulpwood concessionMarzumPT NUSA PRIMA MANUNGGALPulpwood concessionAbdi TunggalPT NUSA MARA RAYAPulpwood concessionAbdi TunggalPT NUSANTARA KALIMANTANPulpwood concessionNiroj TangjetanapornLESTARIPulpwood concessionNelson Bahtiar SianturiPT OLSANTARA SENTOSA RAYAPulpwood concessionRony TanokoPT OLCAN BAGUS JAYAPulpwood concessionRony TanokoPT OCEAN BAGUS JAYAPulpwood concessionNot reportingPT OKI PULP AND PAPER MILLSPulpwood concessionNot reportingPT PARAMITRA MULIA LANGGENGPulpwood concessionMulartoPT PARAMITRA MULIA LANGGENGPulpwood concessionMulartoPT PERNANA SUKSES PERKASAPulpwood concessionMulartoPT PERNANA SUKSES PERKASAPulpwood concessionMulartoPT PERNANA SUKSES PERKASAPulpwood concessionNatireapornPT PERNATA BORNEO ABADIPulpwood concessionNatireapornPT PENAMARIS ADIMANAPulpwood concessionMularti SutjitroPT PERNATA BORNEO ABADIPulpwood concessionNatireapornPT PERNATA BORNEO ABADIPulpwood concessionNaterportingPT PLASMA NUFTAH MARINDPulpwood concessionNaterportingPT PLASMA NUFTA	PT MUGITRIMAN INTERNATIONAL	Pulpwood concession	Not reporting
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PT PRIMA MULTI BUANAPulpwood concessionAnggraeni, Benny Susanto, Dian Heryandi, Lina Tjandra, Nanang MarwosoPT PURBA MARGANA LESTARIPulpwood concessionDenny SuriadinataPT PURWA PERMAIPulpwood concessionHasanudin LatiefPT PUSPAWARNA CEMERLANGPulpwood concessionNot reportingPT PUTRA LIKA PERKASAPulpwood concessionArsyad Lis, Kendrik Ali, Rusmin Ali, Yansen AliPT PUTRA RIAU PERKASAPulpwood concessionStefanus NajoanPT RAMANG AGRO LESTARIPulpwood concessionBedjo SantosoPT RAMBA ARYA CITRAPulpwood concessionPhinarto BasriePT RENCONG PULP & PAPER INDUSTRYPulpwood concessionNot found	PT POLA INTI RIMBA	Pulpwood concession	Oman Suherman
Tjandra, Nanang MarwosoPT PURBA MARGANA LESTARIPulpwood concessionDenny SuriadinataPT PURWA PERMAIPulpwood concessionHasanudin LatiefPT PUSPAWARNA CEMERLANGPulpwood concessionNot reportingPT PUTRA LIKA PERKASAPulpwood concessionArsyad Lis, Kendrik Ali, Rusmin Ali, Yansen AliPT PUTRA RIAU PERKASAPulpwood concessionStefanus NajoanPT RAMANG AGRO LESTARIPulpwood concessionBedjo SantosoPT RAMBA ARYA CITRAPulpwood concessionPhinarto BasriePT RENCONG PULP & PAPER INDUSTRYPulpwood concessionNot found	PT PRIMA BUMI SENTOSA	Pulpwood concession	Not reporting
PT PURWA PERMAIPulpwood concessionHasanudin LatiefPT PUSPAWARNA CEMERLANGPulpwood concessionNot reportingPT PUTRA LIKA PERKASAPulpwood concessionArsyad Lis, Kendrik Ali, Rusmin Ali, Yansen AliPT PUTRA RIAU PERKASAPulpwood concessionStefanus NajoanPT RAMANG AGRO LESTARIPulpwood concessionBedjo SantosoPT RAMBA ARYA CITRAPulpwood concessionPhinarto BasriePT RENCONG PULP & PAPER INDUSTRYPulpwood concessionNot found	PT PRIMA MULTI BUANA	Pulpwood concession	
PT PUSPAWARNA CEMERLANGPulpwood concessionNot reportingPT PUTRA LIKA PERKASAPulpwood concessionArsyad Lis, Kendrik Ali, Rusmin Ali, Yansen AliPT PUTRA RIAU PERKASAPulpwood concessionStefanus NajoanPT RAMANG AGRO LESTARIPulpwood concessionBedjo SantosoPT RAMBA ARYA CITRAPulpwood concessionPhinarto BasriePT RENCONG PULP & PAPER INDUSTRYPulpwood concessionNot found	PT PURBA MARGANA LESTARI	Pulpwood concession	Denny Suriadinata
PT PUTRA LIKA PERKASAPulpwood concessionArsyad Lis, Kendrik Ali, Rusmin Ali, Yansen AliPT PUTRA RIAU PERKASAPulpwood concessionStefanus NajoanPT RAMANG AGRO LESTARIPulpwood concessionBedjo SantosoPT RAMBA ARYA CITRAPulpwood concessionPhinarto BasriePT RENCONG PULP & PAPER INDUSTRYPulpwood concessionNot found	PT PURWA PERMAI	Pulpwood concession	Hasanudin Latief
PT PUTRA RIAU PERKASAPulpwood concessionStefanus NajoanPT RAMANG AGRO LESTARIPulpwood concessionBedjo SantosoPT RAMBA ARYA CITRAPulpwood concessionPhinarto BasriePT RENCONG PULP & PAPER INDUSTRYPulpwood concessionNot found	PT PUSPAWARNA CEMERLANG	Pulpwood concession	Not reporting
PT RAMANG AGRO LESTARIPulpwood concessionBedjo SantosoPT RAMBA ARYA CITRAPulpwood concessionPhinarto BasriePT RENCONG PULP & PAPER INDUSTRYPulpwood concessionNot found	PT PUTRA LIKA PERKASA	Pulpwood concession	Arsyad Lis, Kendrik Ali, Rusmin Ali, Yansen Ali
PT RAMBA ARYA CITRAPulpwood concessionPhinarto BasriePT RENCONG PULP & PAPERPulpwood concessionNot foundINDUSTRYPulpwood concessionNot found	PT PUTRA RIAU PERKASA	Pulpwood concession	Stefanus Najoan
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
PT RIMBA MANDAU LESTARI   Pulpwood concession   Jelian Anak Kasim     PT RIMBA MUTIARA PERMAI   Pulpwood concession   Muharno Ngadimin     PT RIMBA PENYANGGA UTAMA   Pulpwood concession   Not reporting     PT RIMBA PERNAPI NDAH   Pulpwood concession   Gunawan Wijaya, Pramono     PT RIMBA RAYA LESTARI   Pulpwood concession   Not reporting     PT RIMBA TANAMAN INDUSTRI   Pulpwood concession   Not reporting     PT RIMBA TANAMAN INDUSTRI   Pulpwood concession   Not reporting     PT RIMBA TANAMAN INDUSTRI   Pulpwood concession   Not reporting     PT RIMBA WAXASAN PERMAI   Pulpwood concession   Not reporting     PT RIMBA UTAMA ARIFNUSA   Pulpwood concession   Stefanus Najoan     PT SADHANA ARIFNUSA   Pulpwood concession   Stefanus Najoan     PT SAMPE WALI   Pulpwood concession   Not reporting     PT SANTAN BORNEO ABADI   Pulpwood concession   Not reporting     PT SANU HASTRA MITRA   Pulpwood concession   Viroj Tangietanaporn     PT SARI HIJAU MUTIARA   Pulpwood concession   Not reporting     PT SARI PEKASA AGUNG   Pulpwood concession   Not reporting     PT SERAMGUN BUMI ANDALAS   Pulpwood conces	PT RIMBA HUTANI MAS	Pulpwood concession	Lioe Tha Nen
PT RIMBA MUTIARA PERMAI   Pulpwood concession   Muharno Ngadimin     PT RIMBA PENYANGGA UTAMA   Pulpwood concession   Not reporting     PT RIMBA PENYANGGA UTAMA   Pulpwood concession   Wikendy     PT RIMBA PENANAP INDAH   Pulpwood concession   Gunawan Wijaya, Pramono     PT RIMBA TANAMAN 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   Not reporting     PT RIMBA UTAMA JAYA   Pulpwood concession   Stefanus Najoan     PT SADHANA ARIFNUSA   Pulpwood concession   Stefanus Najoan     PT SANHUTANI   Pulpwood concession   Not reporting     PT SANHAN BORNEO ABADI   Pulpwood concession   Not reporting     PT SANU HASTRA MITRA   Pulpwood concession   Delia Yunia Moeprapto     BERSAMA   Pulpwood concession   Delia Yunia Moeprapto     PT SARI PERKASA AGUNG   Pulpwood concession   Not reporting     PT SEGAH BANGUN PERSADA   Pulpwood concession   Not reporting     PT SARI HIJAU MUTIARA   Pulpwood concession   Not	PT RIMBA LAZUARDI	Pulpwood concession	Wikendy
PT RIMBA PENYANGGA UTAMA   Pulpwood concession   Not reporting     PT RIMBA PERANAP INDAH   Pulpwood concession   Gunawan Wijaya, Pramono     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 WAWASAN PERMAI   Pulpwood concession   Not reporting     PT RIMBUN SERUYAN   Pulpwood concession   Not reporting     PT RUAS UTAMA JAYA   Pulpwood concession   Stefanus Najoan     PT SADHANA ARIFNUSA   Pulpwood concession   Sumarjo Sampoerna     PT SAMAN BORNEO ABADI   Pulpwood concession   Not reporting     PT SANTAN BUMI ANDALAS   Pulpwood concession   Not reporting     PT SATRIA PERKASA AGUNG   Pulpwood concession   Not reporting     PT SATRIA PERKASA AGUNG   Pulpwood concession   Mulyadi Gani     PT SEEANGUN PERSADA   Pulpwood concession <td< td=""><td>PT RIMBA MANDAU LESTARI</td><td>Pulpwood concession</td><td>Jelian Anak Kasim</td></td<>	PT RIMBA MANDAU LESTARI	Pulpwood concession	Jelian Anak Kasim
PT RIMBA PERANAP INDAH   Pulpwood concession   Wikendy     PT RIMBA RAYA LESTARI   Pulpwood concession   Gunawan Wijaya, Pramono     PT RIMBA TANAMAN INDUSTRI   Pulpwood concession   Abdi Tunggal     PT RIMBA TIMUR SENTOSA   Pulpwood concession   Not reporting     PT RIMBA WAWASAN PERMAI   Pulpwood concession   Not reporting     PT RIMBUN SERUYAN   Pulpwood concession   Not reporting     PT RUAS UTAMA JAYA   Pulpwood concession   Stefanus Najoan     PT SADHANA ARIFNUSA   Pulpwood concession   Stefanus Najoan     PT SADHANA ARIFNUSA   Pulpwood concession   Stefanus Najoan     PT SAMPE WALI   Pulpwood concession   Not reporting     PT SANTAN BORNEO ABADI   Pulpwood concession   Not reporting     PT SARI HIJAU MUTIARA   Pulpwood concession   Not reporting     PT SARI HIJAU MUTIARA   Pulpwood concession   Not reporting     PT SEARAS ABAGUN PERSADA   Pulpwood concession   Not reporting	PT RIMBA MUTIARA PERMAI	Pulpwood concession	Muharno Ngadimin
PT RIMBA RAYA LESTARI   Pulpwood concession   Gunawan Wijaya, Pramono     PT RIMBA TANAMAN INDUSTRI   Pulpwood concession   Not reporting     PT RIMBA TIMUR SENTOSA   Pulpwood concession   Abdi Tunggal     PT RIMBA WAWASAN PERMAI   Pulpwood concession   Not reporting     PT RIMBUN SERUYAN   Pulpwood concession   Not reporting     PT RUAS UTAMA JAYA   Pulpwood concession   Stefanus Najoan     PT SADHANA ARIFNUSA   Pulpwood concession   Stafanus Najoan     PT SAMHUTANI   Pulpwood concession   Stafanus Najoan     PT SANTAN BORNEO ABADI   Pulpwood concession   Not reporting     PT SANUR HASTRA MITRA   Pulpwood concession   Not reporting     PT SANUR HASTRA MUTRA   Pulpwood concession   Delia Yunia Moeprapto     BERSAMA   Pulpwood concession   Not reporting     PT SANIHA MUTIARA   Pulpwood concession   Not reporting     PT SARI HIJAU MUTIARA   Pulpwood concession   Not reporting     PT SARI HIJAU MUTIARA   Pulpwood concession   Not reporting     PT SARI HJUAU MUTIARA   Pulpwood concession   Not reporting     PT SEARAS AGUNG   Pulpwood concession   Nulyadi Gani <t< td=""><td>PT RIMBA PENYANGGA UTAMA</td><td>Pulpwood concession</td><td>Not reporting</td></t<>	PT RIMBA PENYANGGA UTAMA	Pulpwood concession	Not reporting
PT RIMBA TANAMAN INDUSTRI   Pulpwood concession   Not reporting     PT RIMBA TIMUR SENTOSA   Pulpwood concession   Abdi Tunggal     PT RIMBA WAWASAN PERMAI   Pulpwood concession   Not reporting     PT RIMBUN SERUYAN   Pulpwood concession   PT GEO MINERAL TRADING, PT MITRA RIAU PRATAMA, PT ROYAL GLOBAL DIGITAL     PT RUAS UTAMA JAYA   Pulpwood concession   Stefanus Najoan     PT SADHANA ARIFNUSA   Pulpwood concession   Stefanus Najoan     PT SAMHANA ARIFNUSA   Pulpwood concession   Not reporting     PT SAMHA ARIFNUSA   Pulpwood concession   Not reporting     PT SANTAN BORNEO ABADI   Pulpwood concession   Not reporting     PT SATRIA PERKASA AGUNG   Pulpwood concession   Not reporting     PT SEATANA PERKASA AGUNG	PT RIMBA PERANAP INDAH	Pulpwood concession	Wikendy
PT RIMBA TIMUR SENTOSA   Pulpwood concession   Abdi Tunggal     PT RIMBA WAWASAN PERMAI   Pulpwood concession   Not reporting     PT RIMBUN SERUYAN   Pulpwood concession   PT GEO MINERAL TRADING, PT MITRA RIAU PRATAMA, PT ROYAL GLOBAL DIGITAL     PT RUAS UTAMA JAYA   Pulpwood concession   Stefanus Najoan     PT SADHANA ARIFNUSA   Pulpwood concession   Sunarjo Sampoerna     PT SAMHUTANI   Pulpwood concession   Not reporting     PT SANTAN BORNEO ABADI   Pulpwood concession   Not reporting     PT SANTAN BORNEO ABADI   Pulpwood concession   Not reporting     PT SANTAN BORNEO ABADI   Pulpwood concession   Delia Yunia Moeprapto     BERSAMA   Pulpwood concession   Not reporting     PT SARTIA PERKASA AGUNG   Pulpwood concession   Not reporting     PT SEARIN HUAU MUTIARA   Pulpwood concession   Not reporting     PT SEARAMA   Pulpwood concession   Not reporting     PT SEARIA PERKASA AGUNG   Pulpwood concession   Not reporting     PT SEARANGUN PERSADA   Pulpwood concession   Not reporting     PT SEARANGUN PERSADA   Pulpwood concession   Not reporting     PT SELARAS BABADI UTAMA   Pulpwood concession<	PT RIMBA RAYA LESTARI	Pulpwood concession	Gunawan Wijaya, Pramono
PT RIMBA WAWASAN PERMAIPulpwood concessionNot reportingPT RIMBUN SERUYANPulpwood concessionPT GEO MINERAL TRADING, PT MITRA RIAU PRATAMA, PT ROYAL GLOBAL DIGITALPT RUAS UTAMA JAYAPulpwood concessionStefanus NajoanPT SADHANA ARIFNUSAPulpwood concessionSunarjo SampoernaPT SAMHUTANIPulpwood concessionPT SARANA AGRORAKSA MANDIRIPT SAMPE WALIPulpwood concessionNot reportingPT SANUR HASTRA MITRAPulpwood concessionViroj TangjetanapornPT SANUR HASTRA MITRAPulpwood concessionDelia Yunia MoepraptoBERSAMAPulpwood concessionNot reportingPT SARI HIJAU MUTIARAPulpwood concessionNot reportingPT SARI HIJAU MUTIARAPulpwood concessionOei Tjie GoanPT SEBANGUN BUMI ANDALASPulpwood concessionMulyadi GaniWOOD INDUSTRIESPulpwood concessionMulyadi GaniPT SELARAS ABADI UTAMAPulpwood concessionMulyadi GaniPT SELARAS BADI UTAMAPulpwood concessionMulyadi GaniPT SELARAS INTI SEMESTAPulpwood concessionHam Eddy TampiPT SENDAWAR ADHI KARYAPulpwood concessionKemas Haji Abdul Halim AliPT SENTOSA BAHAGIA BERSAMAPulpwood concessionKamas Haji Abdul Halim AliPT SILVA INHUTANI LAMPUNGPulpwood concessionHardyanto, Leo Gunawan Siemon, Setiawan Siemon, Yohanes Haryadi SiemonPT SILVA RIMBA LESTARIPulpwood concessionDjunaidi NurPT SILVA RIMBA LESTARIPulpwood concessionPinati Andyanto, Leo Gunawan Siemon, Se	PT RIMBA TANAMAN INDUSTRI	Pulpwood concession	Not reporting
PT RIMBUN SERUYANPulpwood concessionPT GEO MINERAL TRADING, PT MITRA RIAU PRATAMA, PT ROYAL GLOBAL DIGITALPT RUAS UTAMA JAYAPulpwood concessionStefanus NajoanPT SADHANA ARIFNUSAPulpwood concessionSunarjo SampoernaPT SAMHUTANIPulpwood concessionPT SARANA AGRORAKSA MANDIRIPT SAMPE WALIPulpwood concessionNot reportingPT SANDE WALIPulpwood concessionNot reportingPT SANDR HASTRA MITRAPulpwood concessionDelia Yunia MoepraptoBERSAMAPulpwood concessionDelia Yunia MoepraptoPT SARI HJAU MUTIARAPulpwood concessionNot reportingPT SATRIA PERKASA AGUNGPulpwood concessionOei Tjie GoanPT SEANGUN BUMI ANDALASPulpwood concessionMulyadi GaniWOOD INDUSTRIESPulpwood concessionMulyadi GaniPT SELARAS ABADI UTAMAPulpwood concessionMulyadi GaniPT SELARAS BADI UTAMAPulpwood concessionMulyadi GaniPT SELARAS AGINPulpwood concessionMulyadi GaniPT SELARAS INTI SEMESTAPulpwood concessionHam Eddy TampiPT SENDAWAR ADHI KARYAPulpwood concessionKemas Haji Abdul Halim AliPT SENDAWAR AGRIPulpwood concessionKamas Haji Abdul Halim AliPT SENDAWAR ADHI KARYAPulpwood concessionKemas Haji Abdul Halim AliPT SENDAWAR ADHI KARYAPulpwood concessionKemas Haji Abdul Halim AliPT SENAWA SUMBER LESTARIPulpwood concessionKemas Haji Abdul Halim AliPT SILVA INHUTANI LAMPUNGPulpwood concession <td>PT RIMBA TIMUR SENTOSA</td> <td>Pulpwood concession</td> <td>Abdi Tunggal</td>	PT RIMBA TIMUR SENTOSA	Pulpwood concession	Abdi Tunggal
PRATAMA, PT ROYAL GLOBAL DIGITALPT RUAS UTAMA JAYAPulpwood concessionStefanus NajoanPT SADHANA ARIFNUSAPulpwood concessionSunarjo SampoernaPT SAMHUTANIPulpwood concessionPT SARANA AGRORAKSA MANDIRIPT SAMPE WALIPulpwood concessionNot reportingPT SANTAN BORNEO ABADIPulpwood concessionViroj TangjetanapornPT SANUR HASTRA MITRAPulpwood concessionDelia Yunia MoepraptoBERSAMAPT SARI HUJAU MUTIARAPulpwood concessionNot reportingPT SARIA PERKASA AGUNGPulpwood concessionOei Tjie GoanPT SEBANGUN BUMI ANDALASPulpwood concessionMulyadi GaniWOOD INDUSTRIESPulpwood concessionMulyadi GaniPT SELARAS ABADI UTAMAPulpwood concessionMulyadi GaniPT SELARAS ARATI PUlpwood concessionMulyadi GaniPT SELARAS ABADI UTAMAPulpwood concessionYaser Raimi PanigoroPT SELARAS ABADI UTAMAPulpwood concessionYaser Raimi PanigoroPT SELARAS ABAI INT SEMESTAPulpwood concessionKemas Haji Abdul Halim AliPT SENTOSA BAHAGIA BERSAMAPulpwood concessionKemas Haji Abdul Halim AliPT SENTOSA BAHAGIA BERSAMAPulpwood concessionKemas Haji Abdul Halim AliPT SELVA INHUTANI LAMPUNGPulpwood concessionKemas Haji Abdul Halim AliPT SILVA INHUTANI LAMPUNGPulpwood concessionFandiyanto, Leo Gunawan Siemon, Setiawan Siemon, Yohanes Haryadi SiemonPT SILVA RIMBA LESTARIPulpwood concessionLee Mon LunPT SILVA RIMBA LESTARIPulp	PT RIMBA WAWASAN PERMAI	Pulpwood concession	Not reporting
T SADHANA ARIFNUSAPulpwood concessionSunarjo SampoernaPT SAMHUTANIPulpwood concessionPT SARANA AGRORAKSA MANDIRIPT SAMPE WALIPulpwood concessionNot reportingPT SANTAN BORNEO ABADIPulpwood concessionViroj TangjetanapornPT SANUR HASTRA MITRAPulpwood concessionDelia Yunia MoepraptoBERSAMAPulpwood concessionNot reportingPT SARI HIJAU MUTIARAPulpwood concessionOei Tjie GoanPT SEBANGUN BUMI ANDALASPulpwood concessionMulyadi GaniWOOD INDUSTRIESPulpwood concessionNot reportingPT SELARAS ABADI UTAMAPulpwood concessionNot reportingPT SELARAS ABADI UTAMAPulpwood concessionMulyadi GaniPT SELARAS ABADI UTAMAPulpwood concessionHam Eddy TampiPT SENTOSA BAHAGIA BERSAMAPulpwood concessionKemas Haji Abdul Halim AliPT SENTOSA BAHAGIA BERSAMAPulpwood concessionKemas 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 RIMBUN SERUYAN	Pulpwood concession	
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PT SANTAN BORNEO ABADIPulpwood concessionViroj TangjetanapornPT SANUR HASTRA MITRAPulpwood concessionDelia Yunia MoepraptoBERSAMAPulpwood concessionNot reportingPT SARI HIJAU MUTIARAPulpwood concessionNot reportingPT SARI HIJAU MUTIARAPulpwood concessionOei Tjie GoanPT SARIA PERKASA AGUNGPulpwood concessionOei Tjie GoanPT SEBANGUN BUMI ANDALASPulpwood concessionMulyadi GaniWOOD INDUSTRIESPulpwood concessionMulyadi GaniPT SEGAH BANGUN PERSADAPulpwood concessionMulyadi GaniPT SELARAS ABADI UTAMAPulpwood concessionAbdi TunggalPT SELARAS ARADI ITAMAPulpwood concessionYaser Raimi PanigoroPT SELARAS AGRIPulpwood concessionHam Eddy TampiPT SENDAWAR ADHI KARYAPulpwood concessionKemas Haji Abdul Halim AliPT SERAYA SUMBER LESTARIPulpwood concessionKemas Haji Abdul Halim AliPT SILVA INHUTANI LAMPUNGPulpwood concessionDjunaidi NurPT SILVA SELARAS UTAMAPulpwood concessionFandi UtomoPT SILVA SELARAS UTAMAPulpwood concessionFandi UtomoPT SILVA SELARAS UTAMAPulpwood concessionAbdi Tunggal	PT SAMHUTANI	Pulpwood concession	PT SARANA AGRORAKSA MANDIRI
PT SANUR HASTRA MITRA BERSAMAPulpwood concession Pulpwood concessionDelia Yunia MoepraptoPT SARI HIJAU MUTIARA PT SARI HIJAU MUTIARAPulpwood concession Pulpwood concessionNot reportingPT SARIA PERKASA AGUNG PT SEBANGUN BUMI ANDALAS WOOD INDUSTRIESPulpwood concession Pulpwood concessionMulyadi GaniPT SEGAH BANGUN PERSADA PT SELARAS ABADI UTAMAPulpwood concession Pulpwood concessionNot reportingPT SELARAS ABADI UTAMA PT SELARAS INTI SEMESTA PT SENDAWAR ADHI KARYAPulpwood concession Pulpwood concessionAbdi TunggalPT SENTOSA BAHAGIA BERSAMA PT SELARAS SUMBER LESTARI PT SENTOSA BAHAGIA BERSAMAPulpwood concession Pulpwood concessionKemas Haji Abdul Halim AliPT SILVA INHUTANI LAMPUNG PT SILVA SELARAS UTAMAPulpwood concession Pulpwood concessionJunaidi NurPT SILVA SELARAS UTAMAPulpwood concession PUlpwood concessionDelia Yunia MoepraptoPT SILVA SELARAS UTAMAPulpwood concession PUlpwood concessionPulauidianto NgadiminPT SILVA SELARAS UTAMAPulpwood concession Pulpwood concessionDelia Yunia MiPT SILVA SELARAS UTAMAPulpwood concession Pulpwood concessionPanetaryadi SiemonPT SILVA SELARAS UTAMAPulpwood concession Pulpwood concessionLee Mon LunPT SILVA SELARAS UTAMAPulpwood concession Pulpwood concessionFandi UtomoPT SILVA SELARAS UTAMAPulpwood concessionAbdi Tunggal	PT SAMPE WALI	Pulpwood concession	Not reporting
BERSAMAPT SARI HIJAU MUTIARAPulpwood concessionNot reportingPT SARI HIJAU MUTIARAPulpwood concessionOei Tjie GoanPT SETARIA PERKASA AGUNGPulpwood concessionMulyadi GaniPT SEBANGUN BUMI ANDALASPulpwood concessionMulyadi GaniWOOD INDUSTRIESPulpwood concessionNot reportingPT SEGAH BANGUN PERSADAPulpwood concessionMulyadi GaniPT SEKATO PRATAMA MAKMURPulpwood concessionMulyadi GaniPT SELARAS ABADI UTAMAPulpwood concessionAbdi TunggalPT SELARAS INTI SEMESTAPulpwood concessionYaser Raimi PanigoroPT SEL RAYA AGRIPulpwood concessionHam Eddy TampiPT SENDAWAR ADHI KARYAPulpwood concessionCharliePT SENTOSA BAHAGIA BERSAMAPulpwood concessionKemas Haji Abdul Halim AliPT SIEMON AGROPulpwood concessionHardyanto, Leo Gunawan Siemon, Setiawan Siemon, Yohanes Haryadi SiemonPT SILVA INHUTANI LAMPUNGPulpwood concessionLee Mon LunPT SILVA SUARA LESTARIPulpwood concessionFandi UtomoPT SILVA SELARAS UTAMAPulpwood concessionFandi Uto	PT SANTAN BORNEO ABADI	Pulpwood concession	Viroj Tangjetanaporn
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PT SEBANGUN BUMI ANDALAS WOOD INDUSTRIESPulpwood concessionMulyadi GaniPT SEGAH BANGUN PERSADAPulpwood concessionNot reportingPT SEGAH BANGUN PERSADAPulpwood concessionMulyadi GaniPT SEKATO PRATAMA MAKMURPulpwood concessionMulyadi GaniPT SELARAS ABADI UTAMAPulpwood concessionAbdi TunggalPT SELARAS INTI SEMESTAPulpwood concessionYaser Raimi PanigoroPT SELE RAYA AGRIPulpwood concessionHam Eddy TampiPT SENDAWAR ADHI KARYAPulpwood concessionCharliePT SENTOSA BAHAGIA BERSAMAPulpwood concessionKemas Haji Abdul Halim AliPT SERAYA SUMBER LESTARIPulpwood concessionWidianto NgadiminPT SILVA INHUTANI LAMPUNGPulpwood concessionHardyanto, Leo Gunawan Siemon, Setiawan Siemon, Yohanes Haryadi SiemonPT SILVA SELARAS UTAMAPulpwood concessionLee Mon LunPT SILVA SELARAS UTAMAPulpwood concessionFandi UtomoPT SILVA SELARAS UTAMAPulpwood concessionAbdi Tunggal	PT SARI HIJAU MUTIARA	Pulpwood concession	Not reporting
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PT SELARAS ABADI UTAMAPulpwood concessionAbdi TunggalPT SELARAS INTI SEMESTAPulpwood concessionYaser Raimi PanigoroPT SELE RAYA AGRIPulpwood concessionHam Eddy TampiPT SENDAWAR ADHI KARYAPulpwood concessionCharliePT SENTOSA BAHAGIA BERSAMAPulpwood concessionKemas Haji Abdul Halim AliPT SENAYA SUMBER LESTARIPulpwood concessionWidianto NgadiminPT SIEMON AGROPulpwood concessionHardyanto, Leo Gunawan Siemon, Setiawan Siemon, Yohanes Haryadi SiemonPT SILVA INHUTANI LAMPUNGPulpwood concessionDjunaidi NurPT SILVA RIMBA LESTARIPulpwood concessionLee Mon LunPT SILVA SELARAS UTAMAPulpwood concessionFandi UtomoPT SILVA BELANTARA INDAHPulpwood concessionAbdi Tunggal	PT SEGAH BANGUN PERSADA	Pulpwood concession	Not reporting
PT SELARAS INTI SEMESTAPulpwood concessionYaser Raimi PanigoroPT SELE RAYA AGRIPulpwood concessionHam Eddy TampiPT SENDAWAR ADHI KARYAPulpwood concessionCharliePT SENTOSA BAHAGIA BERSAMAPulpwood concessionKemas Haji Abdul Halim AliPT SENTOSA BAHAGIA BERSAMAPulpwood concessionWidianto NgadiminPT SERAYA SUMBER LESTARIPulpwood concessionWidianto NgadiminPT SIEMON AGROPulpwood concessionHardyanto, Leo Gunawan Siemon, Setiawan Siemon, Yohanes Haryadi SiemonPT SILVA INHUTANI LAMPUNGPulpwood concessionDjunaidi NurPT SILVA RIMBA LESTARIPulpwood concessionLee Mon LunPT SILVA SELARAS UTAMAPulpwood concessionFandi UtomoPT SINAR BELANTARA INDAHPulpwood concessionAbdi Tunggal	PT SEKATO PRATAMA MAKMUR	Pulpwood concession	Mulyadi Gani
PT SELE RAYA AGRIPulpwood concessionHam Eddy TampiPT SENDAWAR ADHI KARYAPulpwood concessionCharliePT SENTOSA BAHAGIA BERSAMAPulpwood concessionKemas Haji Abdul Halim AliPT SERAYA SUMBER LESTARIPulpwood concessionWidianto NgadiminPT SIEMON AGROPulpwood concessionHardyanto, Leo Gunawan Siemon, Setiawan Siemon, Yohanes Haryadi SiemonPT SILVA INHUTANI LAMPUNGPulpwood concessionDjunaidi NurPT SILVA RIMBA LESTARIPulpwood concessionLee Mon LunPT SILVA SELARAS UTAMAPulpwood concessionFandi UtomoPT SINAR BELANTARA INDAHPulpwood concessionAbdi Tunggal	PT SELARAS ABADI UTAMA	Pulpwood concession	Abdi Tunggal
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PT SENTOSA BAHAGIA BERSAMAPulpwood concessionKemas Haji Abdul Halim AliPT SERAYA SUMBER LESTARIPulpwood concessionWidianto NgadiminPT SIEMON AGROPulpwood concessionHardyanto, Leo Gunawan Siemon, Setiawan Siemon, Yohanes Haryadi SiemonPT SILVA INHUTANI LAMPUNGPulpwood concessionDjunaidi NurPT SILVA RIMBA LESTARIPulpwood concessionLee Mon LunPT SILVA SELARAS UTAMAPulpwood concessionFandi UtomoPT SINAR BELANTARA INDAHPulpwood concessionAbdi Tunggal	PT SELE RAYA AGRI	Pulpwood concession	Ham Eddy Tampi
PT SERAYA SUMBER LESTARIPulpwood concessionWidianto NgadiminPT SIEMON AGROPulpwood concessionHardyanto, Leo Gunawan Siemon, Setiawan Siemon, Yohanes Haryadi SiemonPT SILVA INHUTANI LAMPUNGPulpwood concessionDjunaidi NurPT SILVA RIMBA LESTARIPulpwood concessionLee Mon LunPT SILVA SELARAS UTAMAPulpwood concessionFandi UtomoPT SINAR BELANTARA INDAHPulpwood concessionAbdi Tunggal	PT SENDAWAR ADHI KARYA	Pulpwood concession	Charlie
PT SIEMON AGROPulpwood concessionHardyanto, Leo Gunawan Siemon, Setiawan Siemon, Yohanes Haryadi SiemonPT SILVA INHUTANI LAMPUNGPulpwood concessionDjunaidi NurPT SILVA RIMBA LESTARIPulpwood concessionLee Mon LunPT SILVA SELARAS UTAMAPulpwood concessionFandi UtomoPT SINAR BELANTARA INDAHPulpwood concessionAbdi Tunggal	PT SENTOSA BAHAGIA BERSAMA	Pulpwood concession	Kemas Haji Abdul Halim Ali
Siemon, Yohanes Haryadi SiemonPT SILVA INHUTANI LAMPUNGPulpwood concessionDjunaidi NurPT SILVA RIMBA LESTARIPulpwood concessionLee Mon LunPT SILVA SELARAS UTAMAPulpwood concessionFandi UtomoPT SINAR BELANTARA INDAHPulpwood concessionAbdi Tunggal	PT SERAYA SUMBER LESTARI	Pulpwood concession	Widianto Ngadimin
PT SILVA RIMBA LESTARIPulpwood concessionLee Mon LunPT SILVA SELARAS UTAMAPulpwood concessionFandi UtomoPT SINAR BELANTARA INDAHPulpwood concessionAbdi Tunggal	PT SIEMON AGRO	Pulpwood concession	
PT SILVA SELARAS UTAMAPulpwood concessionFandi UtomoPT SINAR BELANTARA INDAHPulpwood concessionAbdi Tunggal	PT SILVA INHUTANI LAMPUNG	Pulpwood concession	Djunaidi Nur
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
TBKPT SUMALINDO HUTANI JAYA I & IIPulpwood concessionOei Tjie GoanPT SUMATERA ALAM ANUGERAHPulpwood concessionSugeng SantosoPT SUMATERA SILVA LESTARIPulpwood concessionHarris DharsonoPT SUMATERA ALAM PERTIWIPulpwood concessionAhdi Taufik PataraiPT SUMBER HUJAU PERMAIPulpwood concessionMulyadi GaniPT SUNATRA GAJAPATIPulpwood concessionSunartaPT SURARA GAJAPATIPulpwood concessionSunartaPT SURARA GAJAPATIPulpwood concessionSunartaPT SURARA MUTANI JAYAPulpwood concessionEddy SanusiPT SVADAYA PERKASAPulpwood concessionNot foundPT SURYA HUTANI JAYAPulpwood concessionNot foundPT SURYA HUTANI JAYAPulpwood concessionNot reportingPTTANAMAN DAULAT WANANUSAPulpwood concessionNot reportingPTTANAMAN INDUSTRI LESTARIPulpwood concessionNot reportingPTTANAMAN INDUSTRI LESTARIPulpwood concessionNot reportingPTTANUNG REDEB HUTANIPulpwood concessionStefanus Najoan, PT TEBO HUTAMA CIPTAPT TANAMAN AULASAPulpwood concessionStefanus Najoan, PT TEBO HUTAMA CIPTAPT TEBO MULTI AGROPulpwood concessionStefanus Najoan, PT TEBO HUTAMA CIPTAPT TIBISCO CAHAYA PERTIWIPulpwood concessionStefanus Najoan, PT TEBO HUTAMA CIPTAPT TIBA MAHAKAM RESOURCESPulpwood concessionAligi HermawanPT TIBI AGROPulpwood concessionAligi HermawanPT TIBI AGROPulpwood concession <t< td=""><td>PT SUKSES JAYA WOOD</td><td>Pulpwood concession</td><td>Ali Suyanto</td></t<>	PT SUKSES JAYA WOOD	Pulpwood concession	Ali Suyanto
PT SUMATERA ALAM ANUGERAHPulpwood concessionSugeng SantosoPT SUMATERA RIANG LESTARIPulpwood concessionAbdi TunggalPT SUMATERA SILVA LESTARIPulpwood concessionAndi Taufik PataraiPT SUMBER ALAM PERTIWIPulpwood concessionAndi Taufik PataraiPT SUMBER HIJAU PERMAIPulpwood concessionMulyadi GaniPT SUMRAT HIJAU PERMAIPulpwood concessionSunartaPT SURYA HUTANI JAYAPulpwood concessionStefanus NajoanPT SVLADUTA CORPORATIONPulpwood concessionNot foundPT TAIYOUNG ENGREENPulpwood concessionNot foundPT TANADANA DAULAT WANANUSAPulpwood concessionNot reportingPT TANADANA INDUSTRI LESTARIPulpwood concessionNot reportingPT TANJUNG ENIM LESTARIPulpwood concessionNot reportingPT TANJUNG RIME LESTARIPulpwood concessionNot reportingPT TANJUNG RIME LESTARI PULPPulp millMARUBENI CORPORATION/ Mutsumi Ishizuki, SUMATRA PULP CORPORATION/ Kazuhiko UenoPT TEND MULTI AGROPulpwood concessionAfia farawanPT TIESICO CAHAYA PERTIWIPulpwood concessionAligi HermawanPT TIESICO CAHAYA PERTIWIPulpwood concessionAligi BerawanPT TIESI MULTARAPulpwood concessio	PT SUMALINDO ALAM LESTARI	Pulpwood concession	•
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PT SUMATERA SILVA LESTARI   Pulpwood concession   Harris Dharsono     PT SUMBER ALAM PERTIWI   Pulpwood concession   Andi Taufik Patarai     PT SUMBER ALAM PERTIWI   Pulpwood concession   Mulyadi Gani     PT SUMTARA GAJAPATI   Pulpwood concession   Sunarta     PT SURYA HUTANI JAYA   Pulpwood concession   Stefanus Najoan     PT SUXADYA PERKASA   Pulpwood concession   Not found     PT SYLVADUTA CORPORATION   Pulpwood concession   Not found     PT TANUOKG ENGREEN   Pulpwood concession   Not reporting     PT TANUNG ROBEREN   Pulpwood concession   Not reporting     PT TANJUNG REDEB HUTANI   Pulpwood concession   Not reporting     PT TANJUNG REDEB HUTANI   Pulpwood concession   Aris Marsudiyanto     PT TANJUNG REDEB HUTANI   Pulpwood concession   Aris Marsudiyanto     PT TANJUNG REDEB HUTANI   Pulpwood concession   Stefanus Najoan, PT TEBO HUTAMA CIPTA     PT TEBO MULTI AGRO   Pulpwood concession   Stefanus Najoan, PT TEBO HUTAMA CIPTA     PT TRADA MAHAKAM RESOURCES   Pulpwood concession   Alip Hermawan     PT TRIKORINDOTAMA WANAKARYA   Pulpwood concession   Agus Santoso Atmadja     PT TRIKORINDOTAMA WANAKAR	PT SUMATERA ALAM ANUGERAH	Pulpwood concession	Sugeng Santoso
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PT USAHA TANI LESTARI (NTT)Pulpwood concessionNot reportingPT USAHATANI LESTARI-CARBON POSITIVEPulpwood concessionNot foundPT WAENIBE WOOD INDUSTRIESPulpwood concessionFerry TanayaPT WAHANA AGRO MULIAPulpwood concessionKusumo Agus WinotoPT WAHANA LESTARI MAKMUR SUKSESPulpwood concessionHeffy Hartono	PT TUSAM HUTANI LESTARI	Pulpwood concession	Prasetyo Hadi
PT USAHATANI LESTARI-CARBON POSITIVEPulpwood concessionNot foundPT WAENIBE WOOD INDUSTRIESPulpwood concessionFerry TanayaPT WAHANA AGRO MULIAPulpwood concessionKusumo Agus WinotoPT WAHANA LESTARI MAKMUR SUKSESPulpwood concessionHeffy Hartono	PT UNGGUL KARYA INTI JAYA	Pulpwood concession	Widarto
POSITIVE     PT WAENIBE WOOD INDUSTRIES   Pulpwood concession   Ferry Tanaya     PT WAHANA AGRO MULIA   Pulpwood concession   Kusumo Agus Winoto     PT WAHANA LESTARI MAKMUR   Pulpwood concession   Heffy Hartono     SUKSES   Pulpwood concession   Heffy Hartono	PT USAHA TANI LESTARI (NTT)	Pulpwood concession	Not reporting
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	<b>PT. RGE Indonesia</b> 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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