

APRIL Group Action Plan Summary

Responding to Recommendations of the Independent Investigation

Background

Following an incident in September 2025 involving PT Toba Pulp Lestari (TPL) and members of local communities, APRIL Group publicly committed to commissioning an independent investigation into the facts, root causes, and corrective and preventive measures required. The investigation was completed and submitted to the Forest Stewardship Council (FSC) in February 2026, with APRIL's endorsement. In response to the report, APRIL submitted an action plan to FSC in March 2026.

This document summarises the action plan APRIL has developed in response to the investigation's recommendations, and the steps being taken across our operations in North Sumatra, Riau, and Kalimantan.

Our Commitment

APRIL and TPL fully accept the findings of the independent investigation and remain committed to implementing remedy in line with the FSC Remedy Framework.

In January 2026, the Indonesian Government revoked TPL's concession licenses and ordered the cessation of all TPL operations in the affected areas. This is a regulatory development outside APRIL's control, resulting in TPL not having a legal basis to operate, implement any activity, or to be physically present in its former concession areas.

While this does not change TPL's or APRIL's commitment to delivering on the substance of the remedy process, it significantly limits TPL's direct remedy actions.. Where direct, on-site activities are not possible, APRIL and TPL will continue to explore alternative pathways to meet remedy objectives.

Action Areas

1. Supporting Affected Communities

Although TPL can no longer operate within its former concession areas, APRIL will pursue alternative ways to support affected communities, including those in Lamtoras and Sipolha:

- Exploring the option of establishing an independent community resource that would give affected rights holders access to facilitated mediation.
- A commitment to resume community dialogues, subject to compliance with government regulations

2. Transparency on Findings

- TPL is compiling the key findings of its human rights audit into a summary report for the relevant government officers with a briefing session to be offered as needed.

3. Strengthening Security Practices

- An independent expert review of APRIL's Security Code of Practices and Principles, to ensure a de-escalation-first approach in any interaction with communities.
- Mandatory de-escalation training and briefings on the Security Code of Practices and Principles will be delivered to security personnel across APRIL's operations in Sumatra and Kalimantan, with clear guidance on re-engagement following any confrontation.

4. Strengthening Stakeholder Engagement Systems

- Establishing a Multi-Stakeholder Dialogue Forum for FSC Remedy Process in Riau and Kalimantan, bringing together communities, local government, NGOs, academics, and other stakeholders to address social issues and grievances.
- Developing a Community Engagement Principles and Toolkit, grounded in a rights-based approach and Free, Prior and Informed Consent (FPIC) principles, with input from independent experts and interested stakeholders.
- Refresher training on FPIC for relevant APRIL departments and estate-level personnel.

5. Independent Mediation and Conflict Resolution

- Conducting conflict sensitivity mapping across all APRIL and supplier concessions to maintain an up-to-date picture of land claims and conflict areas, updated periodically.
- Maintaining a moratorium on harvesting or planting in disputed areas while dialogue and independent verification of claims are ongoing.
- Exploring collaboration with, or support for, an independent mediation resource that is trusted by communities, companies, and other stakeholders.

6. Applying Lessons Group-Wide

- Lessons and recommendations from the investigation are being incorporated into APRIL's management systems and practices across its other impact areas in Indonesia.
- The aspirations of the rights holders affected by the September 2025 incident will be formally documented, carried forward into relevant stakeholder engagement processes as APRIL works toward remedy.

Oversight and Verification

Implementation of this action plan, communication on progress and independent verification will be in line with the FSC Remedy Framework requirements.

Looking Ahead

APRIL continues to be committed to implementing the FSC remedy framework, amidst known and unanticipated challenges, to deliver environmental and social outcomes in Indonesia.

We welcome continued dialogue with all stakeholders as this work progresses.