FIRST RESOURCES LIMITED
(Incorporated in Singapore)
(Company Registration No. 200415931M)

RESPONSE TO QUERIES FROM SGX REGCO RELATING TO FOREST AND PEATLAND FIRES IN INDONESIA

The following questions were received from the SGX RegCo on 28 October 2026 in relation to the forest and peatland fires in Indonesia. Accordingly, please find below the responses from First Resources Limited (the "**Company**", and together with its subsidiaries, the "**Group**").

1. **The Company has stated that it has adopted a Sustainability Policy incorporating its (i) No Deforestation, No Peat and No Exploitation policy, (ii) a Zero Burning Policy and (iii) an Integrated Fire Management initiative. For each policy or initiative, please elaborate on:**

   (a) the procedures and processes in place to monitor compliance with these policies and commitments within the Group and its contractors (where relevant);

   The Company's Response:

   The Company monitors compliance with its No Deforestation, No Peat and No Exploitation (NDPE) Policy, Zero Burning Policy and Integrated Fire Management (IFM) initiative through a combination of satellite-based monitoring, Geographic Information System (GIS) analysis, field verification and external certification audits.

   Key monitoring measures include maintaining annually updated fire-prone maps, running a Fire Danger Index (FDI), conducting satellite-based hotspot monitoring, and deploying on-the-ground verification teams. The Group also conducts periodic monitoring of conservation areas through GIS analysis and ground patrols to track operational activities and community actions within designated no-go zones.

   These measures are supplemented by internal reviews, as well as external audits and verification processes conducted under the mandatory Indonesian Sustainable Palm Oil (ISPO) and voluntary Roundtable on Sustainable Palm Oil (RSPO) certification frameworks.

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

   The Company's Response:

   Compliance reviews and audits are conducted regularly through internal review processes, mandatory statutory requirements and third-party certification frameworks.

   The Group carries out periodic internal reviews to assess compliance with its Standard Operating Procedures (SOPs) and to verify the operational readiness of its fire prevention and management systems. These reviews help ensure the effective implementation of the Group's policies and procedures and support operational preparedness ahead of external assessments and certification audits.

   Compliance with the Group's NDPE commitments, Zero Burning Policy and fire management practices is audited annually under the ISPO certification scheme, which is mandatory. The Group is also subject to periodic third-party surveillance and re-certification audits under the voluntary RSPO certification framework.

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

The Company's Response:

Oversight of compliance with the Group's NDPE Policy, Zero Burning Policy and Integrated Fire Management (IFM) initiative is embedded within the Group's sustainability governance framework.

The Board of Directors is responsible for overseeing sustainability matters and the Group's key sustainability-related risks and opportunities. The Board regularly reviews material sustainability topics facing the Group and considers them in its strategic decision-making. It also provides oversight to ensure these topics are appropriately managed and monitored.

The Chief Executive Officer (CEO) is responsible for the overall management of sustainability-related matters and is supported by the Head of Sustainability, who oversees the implementation of the Group's sustainability commitments, policies and strategies and reports directly to the CEO.

The relevant departmental and regional heads are responsible for facilitating, implementing and monitoring compliance with the Group's sustainability commitments, policies and strategies within their respective areas of responsibility.

Accountability for compliance is further reinforced through the inclusion of key performance indicators (KPIs) relating to the implementation of, and compliance with the Group's NDPE Policy, Zero Burning Policy and IFM initiative in the performance evaluation of relevant executives, including sustainability metrics relating to the prevention of deforestation, peat development and fire incidents.

(d) the actions taken by the Company in the event of non-compliance by employees, contractors or suppliers; and

The Company's Response:

First Resources' Sustainability Policy has been in effect since 1 July 2015 and applies across all First Resources' operations, including those of our subsidiaries and third-party suppliers.

Compliance with the Group's NDPE Policy and Integrated Fire Management (IFM) initiative is reinforced through the assessment of relevant key performance indicators (KPIs), and any fire incident or non-compliance will affect the performance ratings of the relevant executives and operational-level employees.

First Resources observes a strict Zero Burning policy for all land clearing, land preparation and replanting activities. This policy is communicated to employees and incorporated into the relevant agreements with contractors. Any breach of the policy can result in termination of employment or contracts, as applicable.

The Group also monitors supplier compliance through its supplier monitoring and grievance management process, including the use of internal monitoring platforms and alerts from third-party systems. Any verified breach triggers a corrective action plan that the supplier is required to implement within a set timeframe. If the supplier fails to cooperate, provides insufficient evidence, or does not satisfactorily implement corrective actions, the Group may take appropriate commercial actions, including suspension. A suspended supplier may only be reinstated upon meeting our strict re-entry criteria and demonstrating compliance with the Group's sustainability commitments.

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

The Company's Response:

The Group's Zero Burning Policy, Integrated Fire Management (IFM) initiative and fire prevention, monitoring and firefighting practices are subject to external verification and oversight through certification audits, independent monitoring systems and government inspections.

RSPO Certification

As an RSPO member, our subsidiaries undergo independent audits conducted by RSPO-accredited Certification Bodies (CBs). The RSPO Principles and Criteria prohibit the use of fire for land preparation and require the implementation of fire prevention procedures to mitigate fire risks.

Compliance is assessed through annual surveillance audits, with a full recertification audit every five years. These assessments include reviews of policies and procedures, on-site inspections of relevant facilities and plantation areas, and consultations with relevant internal and external stakeholders. Auditors also assess the adequacy of firefighting personnel, equipment and infrastructure against applicable regulatory requirements, as well as the implementation of annual training for fire prevention and control personnel. In addition, auditors review records of fire incidents and the corresponding investigation and response measures, including compliance with applicable incident reporting requirements and the submission of reports to relevant government authorities.

RSPO Hotspot Monitoring

Besides the Group's internal monitoring, the concessions are also independently monitored through the RSPO Hotspot Monitoring System, which provides external alerts on potential fire incidents detected through satellite-based monitoring. Upon receiving an alert, the Group conducts ground verification to investigate the reported hotspot and determine the appropriate follow-up actions. This process complements the Group's internal fire monitoring and response mechanisms and provides an additional layer of external oversight.

ISPO Certification

The Indonesian Sustainable Palm Oil (ISPO) certification is mandatory for all oil palm plantation companies operating in Indonesia.

Under the ISPO framework, companies are required to implement zero-burning practices for land clearing and plantation operations, and to comply with applicable environmental and fire management requirements. Compliance is assessed through annual audits conducted by accredited independent certification bodies. These audits evaluate the Group's environmental management systems to ensure that its sustainability policies, fire prevention protocols, and operational practices comply with applicable laws and regulations.

Government Inspections

The Group is committed to complying with applicable Indonesian laws and regulations governing plantation fire prevention and control, including Minister of Agriculture Regulation No. 5 of 2018, as amended by Regulation No. 6 of 2025, concerning land clearing without burning.

These regulations establish requirements for fire prevention and management, firefighting personnel, adequate firefighting equipment and infrastructure, early-warning and hotspot-monitoring systems, and emergency response procedures. Compliance is subject to oversight by the relevant government authorities through inspections and assessments of fire-management systems and operational readiness.

Latest Findings

Based on available information and the Group's review to date, including its most recent RSPO and ISPO audits, as well as government inspections and assessments, no non-conformities relating to the use of fire for land preparation were identified. The audits and assessments also did not identify any material non-conformities relating to the implementation of the Group's fire prevention and management measures.

2. The Company has stated that it has implemented an Integrated Fire Management initiative comprising prevention, preparedness, response and recovery measures. Please:

(a) explain how the Company assesses whether such measures are effective and adequate; and

The Company's Response:

The effectiveness and adequacy of the Group's Integrated Fire Management (IFM) measures are assessed through ongoing monitoring, management review and external verification processes.

Hotspots detected within the Group's concessions are followed up through ground verification to determine whether an actual fire has occurred. Confirmed fires are responded to by firefighting teams and subsequently investigated to determine their origin and cause, with police reports lodged to facilitate further investigation into the cause of the incident. The implementation of these measures, together with the adequacy of firefighting equipment and facilities against operational requirements, is documented internally and reviewed regularly by senior management.

In addition, the Roundtable on Sustainable Palm Oil (RSPO) Fire Monitoring System actively monitors hotspots within RSPO members' concessions, providing an additional layer of monitoring and oversight that complements the Group's internal monitoring and response mechanisms.

As discussed in Question 1(e) above, the Group's fire prevention procedures and control measures are assessed through RSPO and ISPO certification audits and government inspections. The Group also regularly reviews the adequacy and operational readiness of its firefighting equipment and personnel across its plantation operations in accordance with applicable regulatory requirements in Indonesia.

Relevant fire prevention and management activities, as well as data on hotspots and fire incidents, are disclosed annually in the Group's Sustainability Report, providing transparency and supporting stakeholder oversight.

Taken together, these monitoring, review, verification and disclosure mechanisms provide the basis for assessing the implementation, effectiveness and adequacy of the Group's IFM initiative.

(b) provide the basis for the Company's assessment that these measures are adequate to manage fire risks during the current dry season.

The Company's Response:

During dry seasons, fire prevention and response measures continue to be implemented across the Group in accordance with its Integrated Fire Management (IFM) framework. The framework incorporates risk-based prevention, preparedness, response and recovery measures, with monitoring intensity and patrol deployment scaled according to prevailing fire-risk conditions.

The Group uses a Fire Danger Index (FDI) to assess fire-risk levels, categorised as Low, Medium, High and Extreme, based on factors such as humidity, rainfall and fuel conditions. During periods of elevated fire risk, fire-risk levels are displayed in fire-prone areas to reinforce awareness and vigilance. Patrol frequency, resource deployment and firefighting preparedness are adjusted according to the prevailing FDI level, with enhanced measures implemented during periods of heightened fire risk.

In preparation for the prolonged dry season in 2026, the Company conducted fire-prevention awareness programmes for local communities and provided firefighting equipment to strengthen community preparedness and support local fire prevention and response efforts. As part of this initiative, the Group distributed 17 complete sets of water pump units to several fire-affected villages located around our operating units in West Kalimantan to support local firefighting efforts.

Firefighting teams conduct patrols with increased frequency during periods of elevated fire risk, with shift arrangements in place to support timely responses to fires occurring within or around concession areas. In addition, the Company works closely with the police, Indonesian National Armed Forces (TNI), local communities, village heads and neighbouring companies to strengthen preparedness and coordinate fire prevention and response efforts throughout the dry season.

While no fire management system can eliminate fire risk entirely, particularly during periods of prolonged dry weather associated with El Niño conditions, the Group believes that the enhanced fire prevention, preparedness, response and recovery measures under its risk-based IFM framework provide adequate controls and response capabilities to manage fire risks across its operations.

3. With reference to the Company's announcement dated 16 October 2026, in which the Company stated that it does not expect the reported fires and transboundary haze, including the planted areas affected by fire, to have a material operational or financial impact on the Group, please provide the basis for the Board's assessment that the fires and transboundary haze have not resulted, and are not expected to result in, any material operational and financial impact on the Group. Please also disclose whether there will be a material legal, regulatory or reputational impact on the Group and the bases of the Board's assessment.

The Company's Response:

Save for certain adjustments made for occupational health and safety (OHS) purposes due to reduced visibility and deteriorated air quality in certain areas, the Group's plantations, mills and processing facilities have continued to operate without significant operational disruption as at the date of this response. In addition, the planted areas affected by fires are not material in the context of the Group's overall planted area. Based on information currently available, the Board does not expect the fires or the affected planted areas to have any material operational or financial impact on the Group.

With respect to legal and regulatory matters, please refer to our response to Question 5 below. In line with the Group's longstanding Zero Burning Policy which is strictly enforced across its operations, the Group would like to reiterate that it does not engage in any land clearing by fire, whether directly or indirectly. The Group remains committed to cooperating fully with any inquiries, reviews or investigations conducted by the relevant authorities in Singapore and Indonesia relating to the fires and transboundary haze.

In terms of reputational impact, the Board acknowledges that recent reports relating to fires and transboundary haze may give rise to stakeholder concerns. The Company recognises the importance of maintaining the confidence of its stakeholders and the wider community, and remains committed to engaging with stakeholders and responding to their queries transparently as they arise.

Based on the information currently available, the Board does not expect the situation to have a material adverse legal, regulatory or reputational impact on the Group. The Board will continue to monitor developments on this matter in Singapore and Indonesia, and will make further announcements should any material developments arise.

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

(i) PT Bumi Andalas Permai;
(ii) PT Bumi Mekar Hijau;
(iii) PT Paramitra Mulia Langgeng;
(iv) PT Sumatera Alam Anugerah;
(v) PT SBA Wood Industries;
(vi) PT Hutan Lestari Raya;
(vii) PT Bangkanesia;
(viii) PT Buana Megatama Jaya;
(ix) PT Mananjung Hayak; and
(x) PT Baratama Putra Perkasa.

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

The Company's Response:

The Company confirms that, based on available information and its review to date, the Group does not have any operational, supply-chain or business relationship with any of the above entities.

5. Please confirm whether the Group has received queries or is subject to any investigation, review, enforcement action, notice or other regulatory engagement by any authorities or agencies in Singapore, Indonesia or elsewhere in relation to the recent fires and transboundary haze situation. If so, please identify the relevant authority or agency and describe the nature and scope of the matter.

The Company's Response:

Singapore

As announced by the Company on 24 October 2026, the Company received a notice from the National Environment Agency ("NEA") on 23 October 2026 requiring the Company to provide documents and information under section 10(1) of the Transboundary Haze Pollution Act 2014.

The Company is in the process of collating the requested information and will respond to NEA in accordance with the requirements set out in the notice.

The Company confirms that it intends to cooperate fully with NEA in engaging, at its own cost, an investigations firm and a law firm from the Government's panel of assessors to conduct inquiries into whether the Group has any involvement in, or connection with, the fires in Indonesia that have contributed to the transboundary haze.

Indonesia

In connection with the forest and land fire incidents in West Kalimantan, three of the Company's subsidiaries operating in the area have been cooperating and engaging with the relevant Indonesian authorities in relation to these incidents.

Such engagements included providing information in connection with police investigations, as well as regulatory supervision by the Indonesian environmental law enforcement authorities (Gakkum KLH).

The subsidiaries continue to cooperate with the relevant authorities in accordance with applicable Indonesian laws and regulations, while maintaining their fire prevention, monitoring and response measures.

As of the date of this response, no sanctions or penalties have been imposed on the Company or its subsidiaries in relation to these incidents.

The Company will continue to monitor developments and take appropriate measures in accordance with applicable laws and regulations.

BY ORDER OF THE BOARD
FIRST RESOURCES LIMITED

Lai Kuan Loong, Victor
Company Secretary
30 October 2026