smart
agribusiness and food

Nomor : 085/SMART-IR/X/2025

Jakarta, 10 Oktober 2025

Kepada yang terhormat:
**PT Bursa Efek Indonesia**
Gedung Bursa Efek Indonesia Tower 1 Lantai 6
Jl. Jendral Sudirman Kav 52-53
Jakarta Selatan 12190

**UP : Bapak Adi Pratomo Aryanto,**
**Kepala Divisi Penilaian Perusahaan 2**

**Perihal : Tanggapan terhadap Permintaan Penjelasan atas Pemberitaan Media Massa**

Dengan hormat,

Sehubungan dengan surat dari PT Bursa Efek Indonesia Nomor S-11652/BEI.PP2/10-2025-SMAR tanggal 9 Oktober 2025 kepada PT Sinar Mas Agro Resources and Technology Tbk mengenai Permintaan Penjelasan atas Pemberitaan Media Massa Detiknews tanggal 6 Oktober 2025 dengan judul "Korporasi Sulap Hutan Jadi Lahan Sawit Segera Ditindak", berikut penjelasan yang dapat kami sampaikan:

1. Apakah Perseroan atau entitas dalam grup usaha memiliki lahan kelapa sawit yang berada di dalam kawasan hutan tanpa perizinan yang sah?
2. Jika ya, mohon dijelaskan total luasan lahan (dalam hektar) serta lokasi provinsi tempat lahan tersebut berada.

   Jawaban nomor 1 dan 2:
   PT Sinar Mas Agro Resources and Technology Tbk dan entitas anak ("Perseroan") memiliki perizinan untuk kegiatan operasionalnya dan mematuhi ketentuan dan peraturan perundangan yang berlaku, sesuai dengan komitmen keberlanjutan Perseroan.

   Karena adanya beberapa perubahan dalam hal kawasan hutan di Kementerian Kehutanan dan tata ruang daerah di tingkat propinsi dan kabupaten, sebagian kecil areal Perseroan yang sudah memiliki perizinan lengkap perlu melengkapi permohonan tambahan perizinan sesuai ketentuan Peraturan Pemerintah Nomor 104 Tahun 2015 jo Peraturan Pemerintah Nomor 60 Tahun 2012 dan Undang-Undang Cipta Kerja beserta aturan turunannya.

3. Apakah Perseroan telah menerima surat pemberitahuan, surat tagihan, atau sanksi administratif dari Satgas Penguatan Tata Kelola Hutan (PKH), KLHK, Kejaksaan Agung, atau instansi terkait lainnya?



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Jawaban:
Hingga hari ini, Perseroan belum menerima surat pemberitahuan, surat tagihan, atau sanksi administratif dari instansi terkait.

4. Dalam hal Perseroan memperoleh surat sebagaimana poin 3 di atas, agar dijelaskan estimasi total potensi denda yang dapat dikenakan kepada Perseroan, dengan asumsi denda maksimum Rp 25 juta per hektar per tahun sejak awal penguasaan lahan.

   Jawaban:
   Hingga hari ini, Perseroan belum menerima surat pemberitahuan, surat tagihan, atau sanksi administratif dari instansi terkait.

5. Bagaimana dampak material dari potensi denda tersebut terhadap laporan keuangan Perseroan, khususnya pada pos aset, kewajiban kontijensi, dan laba bersih tahunan?

   Jawaban:
   Hingga hari ini, tidak ada dampak yang material terhadap laporan keuangan Perseroan sesuai dengan penjelasan pada nomor 1 dan 3.

6. Bagaimana rencana Perseroan dalam melakukan penyelesaian pembayaran denda/sanksi administratif tersebut?

   Jawaban:
   Perseroan berkomitmen untuk menyelesaikan pembayaran potensi denda/sanksi administratif sesuai dengan ketentuan yang berlaku, jika terdapat denda yang dikenakan oleh instansi terkait.

7. Apa strategi utama dan langkah konkret yang telah atau akan ditempuh Perseroan untuk menyelesaikan status legalitas lahan yang terindikasi berada dalam kawasan hutan?

   Jawaban:
   Perseroan telah dan akan mengikuti proses yang diperlukan untuk menyelesaikan status legalitas lahan terdampak sesuai dengan ketentuan dan peraturan yang berlaku.

8. Apakah Perseroan telah mengajukan permohonan melalui mekanisme Penyelesaian Penguasaan Tanah dalam Kawasan Hutan (PPTKH) atau sesuai ketentuan dalam Undang-Undang Cipta Kerja (UUCK)?

   Jawaban:
   Sesuai dengan jawaban nomor 1, Perseroan telah melengkapi permohonan tambahan perizinan sesuai ketentuan Peraturan Pemerintah Nomor 104 Tahun 2015 jo Peraturan Pemerintah Nomor 60 Tahun 2012 dan Undang-Undang Cipta Kerja beserta aturan turunannya.



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9. Agar dijelaskan target waktu (*timeline*) penyelesaian legalitas lahan tersebut secara menyeluruh.

   Jawaban:
   Target waktu penyelesaian legalitas lahan akan mengikuti ketentuan dan peraturan yang berlaku.

10. Langkah perbaikan internal apa yang telah dilakukan untuk memastikan seluruh kegiatan operasional perkebunan telah sesuai dengan ketentuan perizinan dan regulasi kawasan hutan?

    Jawaban:
    Perseroan senantiasa mengambil langkah-langkah yang diperlukan untuk memastikan pemenuhan ketentuan tambahan atas perizinan operasional Perseroan. Perseroan senantiasa berkomitmen untuk menjalankan kegiatan operasionalnya sesuai dengan ketentuan dan peraturan perundangan yang berlaku serta sesuai komitmen keberlanjutan Perseroan.

11. Bagaimana strategi Perseroan dalam mengelola risiko atas potensi penyitaan atau pengambilalihan lahan yang tidak dapat diselesaikan legalitasnya?

    Jawaban:
    Perseroan senantiasa menjalankan kegiatan operasionalnya dengan perizinan yang sesuai dengan ketentuan dan peraturan perundangan yang berlaku, sejalan dengan komitmen keberlanjutan Perseroan.

12. Bagaimana Perseroan menilai tingkat materialitas risiko denda dan penertiban lahan terhadap kelangsungan usaha (*going concern*) dan harga saham Perseroan?

    Jawaban:
    Mengacu pada jawaban nomor 1, Perseroan menilai bahwa hal ini tidak akan berdampak secara material terhadap kelangsungan usaha Perseroan.

Lebih lanjut kami sampaikan bahwa hingga saat ini, tidak ada fakta/informasi material/kejadian penting lainnya yang dapat mempengaruhi kelangsungan hidup Perseroan serta dapat mempengaruhi harga saham Perseroan.

Perseroan akan selalu mematuhi peraturan OJK dan Bursa terkait Keterbukaan Informasi terutama jika terdapat fakta/informasi material/kejadian penting terutama yang berdampak pada kelangsungan usaha Perseroan serta dapat mempengaruhi harga saham Perseroan.



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Demikian surat penjelasan ini kami sampaikan, harap dapat diterima dengan baik. Atas perhatian Bapak, kami ucapkan banyak terima kasih.

Hormat kami,

**Jimmy Pramono**
Wakil Direktur Utama

Tembusan Yth:
- Direktur Penilaian Keuangan Perusahaan Sektor Riil, Otoritas Jasa Keuangan



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*Unofficial Translation*

Nomor : 085/SMART-IR/X/2025

Jakarta, 10 October 2025

To:
**Indonesia Stock Exchange**
Indonesia Stock Exchange Building Tower 1 6th Floor
Jl. Jendral Sudirman Kav 52-53
South Jakarta 12190

**UP: Mr Adi Pratomo Aryanto,**
**Kepala Divisi Penilaian Perusahaan 2**

**Re: Response to the Request for Clarification on Media News**

Dear Sir,

In connection with the letter from Indonesia Stock Exchange No. S-11652/BEI.PP2/10-2025-SMAR dated October 9, 2025 to PT Sinar Mas Agro Resources and Technology Tbk regarding the Request for Clarification on the Detiknews media report dated October 6, 2025 entitled "Corporations Turning Forests into Oil Palm Plantations Will Be Sanctioned Soon," we provide the following explanation:

1. Does the Company or its subsidiaries owns oil palm plantations located within forest areas without valid permits?
2. If yes, please explain the total land area (in hectares) and the province where the land is located.

   Response for number 1 and 2:
   PT Sinar Mas Agro Resources and Technology Tbk and its subsidiaries (the "Company") holds relevant licenses for its operations and complies with applicable laws and regulations, aligned with its sustainability commitments.

   Due to changes in the classification of forest areas at the Ministry of Forestry, as well as regional spatial planning at the provincial and regency levels, a small portion of the Company's land areas that already hold complete permits must submit additional permit applications in accordance with the provisions of the Indonesian Government Regulation No 104 of 2015 jo. the Indonesian Government Regulation No 60 of 2012 and the Job Creation Law (Omnibus Law) and their implementing regulations.

3. Has the Company received any notification letters, bills, or administrative sanctions from the Forest Governance Strengthening Task Force (PKH), the Ministry of Environment and Forestry, the Attorney General's Office, or other relevant agencies?



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Response:
To date, the Company has not received any notification letters, bills, or administrative sanctions from any relevant authorities.

4. In the event the Company receives a letter as referred to in point 3 above, please explain the estimated total potential fines that may be imposed on the Company, assuming a maximum fine of IDR 25 million per hectare per year since the start of land ownership.

   Response:
   To date, the Company has not received any notification letter, billing letter, or administrative sanction from the relevant authorities.

5. What is the material impact of these potential fines on the Company's financial statements, particularly on assets, contingent liabilities, and annual net income?

   Response:
   To date, there is no material impact on the Company's financial statements as explained in numbers 1 and 3.

6. What is the Company's plan for settling the payment of such fines/administrative sanction?

   Response:
   The Company is committed to settling the payment of any potential fines/administrative sanctions in accordance with the applicable regulations, should any fine be issued by relevant authorities.

7. What are the Company's main strategy and actions that have been or will be taken to resolve the legality status of land indicated to be within forest areas?

   Response:
   The Company has followed and will continue to follow due processes to resolve the legality status of the affected land in accordance with applicable laws and regulations.

8. Has the Company submitted an application through the mechanism for Settlement of Land Tenure in Forest Areas (PPTKH) or pursuant to the Job Creation Law (Omnibus Law)?

   Response:
   Referring to response number 1, the Company has submitted additional permit applications in accordance with the provisions of the Indonesian Government Regulation No 104 of 2015 jo. the Indonesian Government Regulation No 60 of 2012 and the Job Creation Law (Omnibus Law) along with their implementing regulations.



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9. Please explain the targeted timeline for the overall resolution of the land legality.

   Response:
   The timeline for resolving land legality will follow the applicable laws and regulations.

10. What internal corrective measures have been taken to ensure that all plantation operational activities are in compliance with the licensing requirements and forestry area regulations?

    Response:
    The Company has and continues to take any actions needed to ensure compliance with additional requirements on its operational permits. The Company remains committed to conducting its operations in accordance with applicable laws and regulations and in line with the Company's sustainability commitments.

11. What is the Company's strategy for managing the risk of potential seizure or takeover of land whose legality cannot be resolved?

    Response:
    The Company conducts its operations under licenses that comply with applicable laws and regulations, aligned with its sustainability commitments.

12. How does the Company assess the materiality of the risks of fines and land enforcement to the Company as a going concern and share price?

    Response:
    Referring to response number 1, the Company assesses that this will not have a material impact on the Company as a going concern.

Furthermore, we inform you that, to date, there are no other material facts/information/ significant events that could affect the Company as a going concern or the Company's share price.

The Company will always comply with the Financial Services Authority (OJK) and Stock Exchange regulations regarding Disclosure of Information, especially if there are any material facts/information/significant events that could impact the Company as a going concern and could affect the Company's share price.

We hereby submit this explanatory letter and hope it will be well received. Thank you very much for your kind attention.

Best regards,
**Jimmy Pramono**
Vice President Director

CC to:
- Direktur Penilaian Keuangan Perusahaan Sektor Riil, Otoritas Jasa Keuangan



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