

Investor engagement on palm oil governance

Kariel Stuart | Portfolio writing sample | July 2026

Adapted from a draft prepared during my fellowship at Friends of the Earth U.S. Recipient details, holdings data and the signature block have been omitted. This sample is not an issued letter or evidence that it was sent.

Re: Governance concerns involving Golden Agri-Resources

Dear Investment Team,

I am writing to share an update regarding governance concerns associated with Golden Agri-Resources (GAR) (SGX: E5H), a Singapore-listed palm oil company that is the agribusiness arm of Indonesian conglomerate Sinar Mas. The current concern involves Golden Veroleum Liberia (GVL), a GAR-affiliated palm oil business that operates mainly in Sinoe County, Liberia. GAR holds GVL through the Verdant Fund, a Cayman Islands holding company, and plays an active role in governing GVL's operations, as indicated by commitments made on GVL's behalf.

In April 2026, Liberian civil society organizations filed a formal complaint against Golden Veroleum Liberia with Liberia's Environmental Protection Agency (EPA). The complaint alleges failure to comply with recommendations provided by two international industry bodies, the High Carbon Stock Approach (HCSA) and the Roundtable on Sustainable Palm Oil (RSPO), highlighting HCSA technical findings that GVL deforested 1,000 hectares of globally significant forests, including critically endangered chimpanzee habitat. The complaint states that GVL's operations may violate several Liberian laws, including the Environmental Protection and Management Act, National Forestry Reform Law, Community Rights Law, and Land Rights Act, constituting significant governance risks.

The complaint updates longstanding governance concerns initially verified by a 2018 audit by the Roundtable on Sustainable Palm Oil, which concluded that GVL destroyed communities' sacred sites, forcibly coerced communities to sign agreements with the company, and failed to secure the Free, Prior and Informed Consent (FPIC) of communities to operate on their lands. A subsequent complaint in 2020 alleged that over 75,000 hectares of GAR's Indonesian palm oil concessions, representing over 15% of GAR's total plantation area, may have been subject to unlawful oil palm production.

At a time when material risks related to climate, biodiversity, and governance are leading some asset owners to shift away from asset managers that fail to address such risks, your firm's investments in GAR should be viewed critically. We encourage your firm to engage GAR on the governance risks associated with the current complaint. If GAR fails to take responsible action to address the governance concerns named in the complaint, we would urge your firm to consider excluding GAR and Sinar Mas from its portfolios due to ongoing risks.