June 2026

Compliance Checker

Company Profile

Olam

Six noncompliance cases potentially linked to Olam Group's cocoa, coffee, palm oil, and black pepper operations in Brazil, Côte d'Ivoire, and Indonesia

aid environment

Executive summary

This Compliance Checker sustainability risk profile of Olam links the company to global palm oil, cocoa, coffee, soy, rubber, and wood supply chains in the context of anti-deforestation and human rights legislation, such as the EU Regulation on Deforestation-free products (EUDR) and the EU Corporate Due Diligence Directive (CSDDD). The analysis maps Olam's sourcing areas, links to deforestation hotspots, trade data on exports and imports, location of assets and infrastructure (particularly those linked to exports to the European market), and upstream supplier actors. A key element of the report are six case studies potentially linked to Olam on the basis of supply chain relations with cocoa-, coffee-, palm oil and black pepper-producing farms or concessions. The case studies include potential forest clearing from the EUDR cut-off date or social issues that may indicate noncompliance with the requirements of the regulation(s). Black pepper is not a commodity in scope of the EUDR, but a case study linked to it was nonetheless included in this report due to the relevance of the issues presented, also for producer country laws. The case studies have been shared with Olam International, Ofi and Olam Agri for further engagement in May 2026, and the company's responses are integrated into the report.

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Olam Business segments and corporate structure

Established in 1989, the Olam Group is a multinational agribusiness corporation, headquartered in Singapore. Their operations, spanning over 60 countries, consist of sourcing, trading, processing, manufacturing, and distributing agricultural commodities, among others, to international markets. Olam ranks among the top 30 largest primary listed companies on the Singapore Exchange, having reported, in the fiscal year of 2024, a revenue of approximately SGD 56 billion.

In 2020, Olam Group Limited (OGL) restructured the company into three pillars – Olam Food Ingredients (Ofi), Olam Agri, and the remaining Olam Group. Only of two of these focus on the agricultural sector:

1) Olam Agri: focuses on downstream/raw agricultural commodities linked to food, feed, and fiber, such as grains, oilseeds, wheat milling and pasta, edible oils, speciality grains and seeds, integrated feed and protein, cotton, wood products, rubber, freight, sugar and bioenergy.

2) Olam Food Ingredients (Ofi): focuses on downstream/processed food and beverage ingredients and on the raw materials that go into these, such as cocoa, coffee, dairy, nuts, and spices.

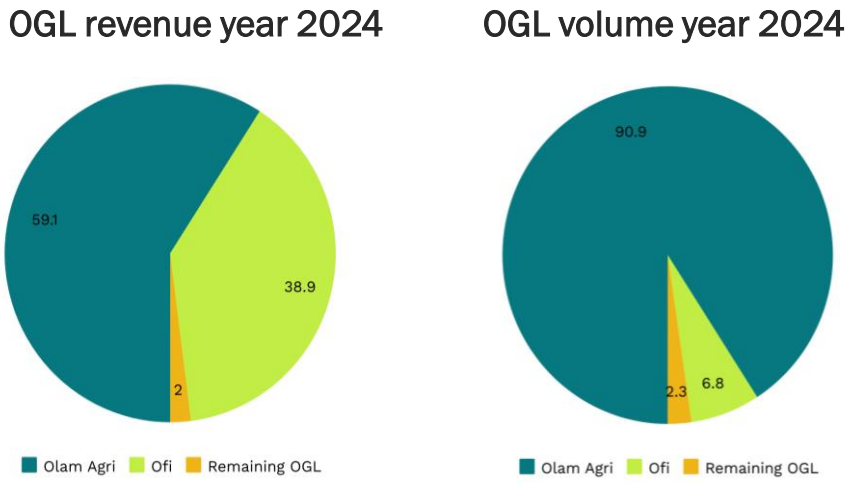


Fig. 1 – Revenue distribution per OGL structured company. Source: AidEnvironment, based on Olam's 2024 Annual report

According to OGL's 2024 annual report, the majority of their revenue originates from Olam Agri, followed by Ofi (**Fig. 1**). However, in 2022, OGL sold 35.4% stake in Olam Agri to the Saudi Agricultural & Livestock Investment Company (SALIC), a state-owned investment company, with the deal price implying a total company value of about USD 3.5 billion. OGL has proposed selling its 64.6% stakes in Olam Agri to SALIC in two tranches, the first of which – representing 44.6% - was formally agreed in February 2025. Once this transaction is completed, SALIC will own about 80% of Olam Agri and will have the option to acquire the remaining 20% from OGL within the following three years. Additionally, OGL plans to pursue a listing of Ofi on a public stock exchange through an initial public offering (IPO) as part of its broader strategy to its unlock value.

Relevant sustainability policies and existing gaps

According to the Annual Report 2024, Olam does not present a unified, group-wide no-deforestation commitment covering all forest-risk commodities. Instead, Olam relies on a patchwork of commodity- and region-specific policies, strategies, and programs, each with their own commitments (e.g., Supporting the 1.5°C Agri Sector Roadmap (linked to soy and palm oil), Sustainable Palm Oil Policy, Coffee Lens 2.0 Strategy, Environmental Policy for Olam Agri's Wood Business, Cocoa and Forests Initiative, Cocoa Compass). Olam takes a risk-based approach to traceability, implemented at business-unit level, where the strongest efforts are made in higher-risk geographies and commodities, such as cocoa, coffee, palm oil, and wood products. The group indicates that it "*has farm-level traceability for 4.8 million MT of procured volumes*", of which approximately 1.6 million MT are certified. Olam considers itself to be well-placed to meet EUDR requirements, based on its sourcing policies, traceability solutions, and additional monitoring in smallholder supply chains.

Olam's main commodity is cocoa, which accounted for 31–40% of the company's revenue through Ofi in 2024. Olam has been running the Cocoa Compass program since 2019 which focuses on the direct supply chain of cocoa, stating that, since 2021, they have conducted "*100% deforestation monitoring back to farms or the cocoa communities that we source directly to make sure cocoa is not sourced from any protected areas, reserves, or national parks".* While these efforts focus on the direct supply chain, one-third of Olam's cocoa exports to the EU in 2021 originated from their indirect supply stream. The company is conducting some efforts to extend commitments to its cocoa indirect supply chain, planning, in 2025, the extension of its Agri Supplier Code (ASC) to indirect suppliers. However, even though this code sets expectations on not sourcing or delivering products to Ofi that resulted from the destruction of important natural habitats including forests, it does not explicitly include traceability. Olam states also, in its deforestation action plan, that "*All verified cases of deforestation after 2020, or confirmed illegal presence inside protected areas, are excluded from supply chain for the European market."* Nevertheless, in 2024, Mighty Earth has reported on forest disturbances in the Krokosua Forest Reserve, within a 20 km radius of Olam (Ofi), ECOM, Cargill, and Touton buying warehouses in Asempenaye, Ghana.

Olam's sustainability pledges in relation to coffee are not as robust as those for cocoa, even though both cocoa and coffee are recognized by Ofi as drivers of indirect emissions from historical deforestation (LUC). Whereas, with cocoa, Ofi is strongly committed to reaching and maintaining 100% commodity traceability in its direct supply chain, for coffee there are no detailed targets. Olam's pledges for coffee are outlined in the Livelihoods, Empowerment, and Nature at Scale (LENS) program, which, among others, focuses on increasing farmers' living income. However, the number of coffee farmer households receiving livelihood support declined from 115,800 in 2023 to 98,560 in 2024, a reduction of approximately 17,240 households. While the company does not directly attribute this decline to EUDR preparations, the period coincided with significant investments in traceability and compliance systems linked to the regulation. Furthermore, there is no specific attention given to millions of smallholder farmers not associated with cooperatives who may face exclusion or shift their supply to markets with looser regulations.

In palm oil, Olam highlights the high traceability of its direct supply chain in Gabon (144,000 MT CSPO). Their joint venture with the Gabonese Government include assets such as processing plants, refineries and processing facilities. Also here, Olam's supply chain is dominated by indirect supply from third-party mills (>80% of volume in 2024) (**Fig. 2**). Olam publishes a list of third-party palm oil mill suppliers, which must comply with Olam's Code of Conduct and Sustainable Palm Oil Policy. However, these only emphasize traceability to the mill and not to the plantation (unlike in their direct supply chains).

Deforestation-risk commodities linked to Olam

CDP's Corporate Questionnaire 2024 highlights the key agricultural commodities associated with Olam, identifying **cocoa, coffee, soy, palm oil, rubber, and wood** as relevant forest-risk commodities (FRCs). These are also acknowledged as FRCs at EU level, having been included within the scope of the EU regulation on deforestation-free products (EUDR).

Olam does not disclose detailed volumes for its cocoa and coffee production or sourcing. However, these commodities account for nearly 70% of the company's revenue, primarily through processing, trading, and manufacturing. Olam exports cocoa mainly as bulk cocoa to the EU through Ofi, along with significant volumes of cocoa paste, butter, and powder. Ofi claims 100% traceability of its cocoa, but the company does not disclose origin-specific volumes.

Through Olam Agri, the company traded approximately 623,883 tons of palm oil in 2024, covering a range of products from fresh fruit bunches (FFB) to refined palm oil. While this contributes less significantly than cocoa and coffee to the company's revenues, accounting for under 1% of its total revenue, palm oil plays a key role in Olam's specialty fats business. Olam states that 100% of its palm oil originated from RSPO-certified sources under a segregated supply chain system. However, in addition to its direct palm oil supply chain in Gabon, Olam has also indirect supply chains or third-party supply chains, which have a heightened risk of being risk to deforestation.

While this report provides a general overview of Olam's practices and commodity portfolio, it focuses specifically on cocoa, coffee, and palm oil operations. These commodities are prioritized due to their significant exposure to deforestation and carbon emission risks, their inclusion within the scope of the EUDR, and the availability of relevant data. In addition, pepper is included given its importance in Olam's operations in Brazil, despite not currently being covered by the EUDR. The case studies presented in this report cover specifically cocoa, coffee, palm oil, and (black) pepper.

The numbers reported by Olam in **the CDP 2024 disclosures** show that:

Olam spent **31-40%** of its total revenue on procurement of cocoa in 2024. The company does not disclose its total sourced volumes on cocoa.

Olam spent **21-30%** of its total revenue on procurement of coffee products in 2024. The company does not disclose its total sourced volumes on coffee.

Olam spent **1-10%** of its total revenue on procurement of soy products in 2024. Reported total sourced volume in 2024 through direct soy sourcing: 12.24 MMt.

Olam spent less than **1%** of its total revenue on procurement of palm oil products in 2024. Reported total sourced volume in 2024: 0.62 MMt.

Olam spent less than **1%** of its total revenue on the procurement of wood products in 2024. Reported total sourced volume in 2024: 0.29 MMt.

Olam spent less than **1-10%** of its total revenue on the procurement of rubber products in 2024. Reported total sourced volume in 2024: 0.40 MMt.

Cocoa sourcing from high-risk geographies

Olam Group has been described as a leading global cocoa supplier. It is the world's third-largest cocoa processor, with approximately 950,000 tonnes annual sourcing capacity in 2017 (about 20% of the total global production), a processing capacity of around 700,000 metric tons (MT), distributed globally across eight factories. In 2023, their export value, through Ofi, was estimated at USD 4.2 billion, making it the world's leading cocoa supplier company, ahead of competitors like Cargill and Barry Callebaut.

This places cocoa as an essential raw material for Ofi's operating business. The company does not publicly disclose specific procurement volumes nor a complete list of sourcing origins. However, its Cocoa Compass Impact Reports and Cocoa & Forest Initiative disclosures show that the procurement of cocoa beans and semi-processed products from various origins, particularly Côte d'Ivoire and Ghana that account for more than 70% of global cocoa production, form the core of Ofi's direct supply chain. According to its sustainability programme, Ofi has mobilized efforts to map cocoa farms in their supply base and, as of 2024, it had mapped 121,280 farms in Côte d'Ivoire as well as 56,668 in Ghana. The same year, Ofi sourced from nine countries (Brazil, Cameroon, Côte d'Ivoire, Ecuador, Ghana, Indonesia, Nigeria, PNG, Uganda), where it runs sustainability programs aiming at farmers achieving a living income to help reduce child labour and deforestation risk.

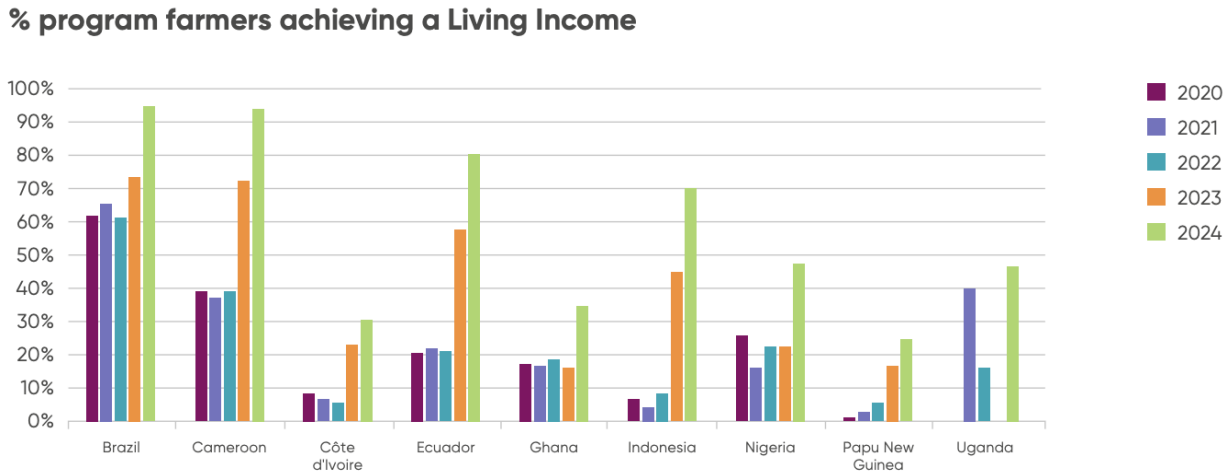


Fig. 2 – Percentage of program cocoa farmers achieving a living income between 2020 and 2024. Source: Olam's 2024 Cocoa Compass

While in four countries the living income target established by Ofi in 2019 has already been achieved, in Côte d'Ivoire, Ghana, Nigeria, Papua New Guinea, and Uganda – which include the West African countries that represent a dominant operational region for Ofi -, the lowest percentage of farmers achieving living income percentages can be found (Fig. 2). These are also regions with high potential deforestation risk linked to cocoa.

In 2020, Olam announced it had achieved *"100% traceability of directly sourced cocoa across its global supply chain"*, being therefore able to track approximately 12% of the world's cocoa beans to the farm or community at the time. In its 2024 CDP reporting states, the company indicates that its cocoa supply is traceable up to Tier 4+ with 76–99% coverage. However, the company does not disclose the total cocoa volume covered, nor does it provide a breakdown by sourcing country. Additionally, Olam has stopped publishing detailed lists of cocoa suppliers after 2021. In Côte d'Ivoire and Ghana, the cocoa industry has historically sourced from areas overlapping with national parks and protected forests, leading to depleted landscapes and declining yields, while Cameroon is increasingly viewed as the next deforestation frontier for cocoa expansion.

Coffee sourcing from high-risk geographies

Olam Group, specifically through Ofi, does not disclose its coffee origin and its volume. According to official documents such as the 2024 Coffee LENS Impact Report and the 2024 Annual Report, Ofi is actively scaling traceability in coffee which – as stated by the company's Head of Sustainability Engagement for Coffee - has increased in the 18 countries of origin from where Ofi sources. This increase has been mediated by digital systems and tools such as AtSource and Ofi Direct through which Ofi connects directly with local farmers. At the same time, the group's reporting consistently frames traceability as an area of ongoing expansion and system-building, never demonstrating full traceability across the entire coffee portfolio while also not disclosing concrete percentages of traceability.

Ofi currently sources green coffee from approximately 40,000 farmers spread across 18 coffee origin countries where the company has an ongoing presence. However, Ofi reports having 224,600 farmers registered in its direct sourcing network. This difference may be due to a distinction between active suppliers and a broader traceability pool. The ~40,000 figure likely reflects the farmers who are actually supplying coffee to Ofi in a given period (a year or cycle) while the larger number includes not only current suppliers but also farmers who supply intermittently, are connected through intermediaries, or are part of ofi's wider traceability and sustainability efforts. This indicates that Ofi has visibility over a larger indirect and potential supply base than it actively sources from, but this does not ensure that all coffee volumes are traceable to specific farms and plots of land, as required under the EUDR.

Moreover, none of Ofi's publicly available documents provide a comprehensive breakdown of total farmers by origin across its full sourcing base. The company also does not explicitly list its coffee origin regions. Nevertheless, its on-the-ground sustainability programs and references to "origin teams" suggest sourcing from key coffee-producing regions in Latin America, Africa, and Asia. Specifically, the countries mentioned include, in Latin America, Brazil, Colombia, Peru, Honduras, Nicaragua, and Mexico; in Africa, Côte d'Ivoire, Uganda, Tanzania, Zambia, and DRC; and in Asia, Indonesia, Vietnam, India, Papua New Guinea, Laos, and East Timor (Fig. xx below)

Fig. 3 – Ofi's coffee-linked sustainability programs on the ground in 2024.

In the coffee sector, Olam has also made commitments on traceability and deforestation risk management, though disclosures remain partial. In its 2024 CDP Forests reporting, the company indicates that its coffee supply chain is traceable to at least Tier 3–4 with coverage typically in the range of 70–90%, but, as with cocoa, it does not disclose the total volume covered or provide a country-level breakdown. Company disclosures further suggest that deforestation remains an active issue within its sourcing base: Ofi acknowledges the need to "*identify and remediate deforestation risks*" across coffee landscapes and reports that over 176,000 coffee plots have been assessed and are subject to remediation measures while also highlighting the need to reduce deforestation risks in third-party supply chains. This aligns with broader evidence, including the 2023 Coffee Barometer, which estimates that around 130,000 hectares of forest are lost annually to coffee expansion, as well as recent analyses pointing to continued deforestation in major producing regions such as Brazil.

Palm oil sourcing from high-risk geographies

In the palm oil sector, Olam's sourcing footprint combines **owned plantation operations with extensive third-party supplier networks**, primarily concentrated in Southeast Asia and parts of Africa. The company explicitly identifies Indonesia and Malaysia as its main sourcing origins for third-party palm oil. Conversely, in Gabon, Olam has vertically integrated operations through Olam Palm Gabon. According to its disclosures, Olam's palm oil supply chain encompasses a large and complex network of approximately 1,400 mills globally. The company distinguishes between direct sourcing, where it maintains closer engagement with mills, and indirect sourcing through intermediaries, for which traceability and oversight are more limited. While Olam publishes a global mill list and applies a "No Deforestation, No Peat, No Exploitation" (NDPE) policy across its supply base, it does not provide a comprehensive list of sourcing countries, nor does it disclose the relative volumes of direct versus indirect sourcing or country-level breakdowns of its supply chain.

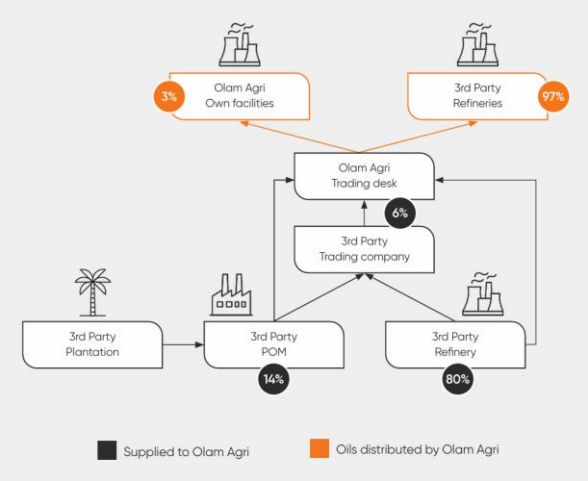


Fig. 4 – Olam Agri's palm oil mill supply chain in 2024 by volume. The overview includes direct and indirect sourcing as part of the global palm oil supply chain

In terms of traceability, Olam reports comparatively advanced coverage relative to other commodities, claiming 100% traceability to mill (TTM) and approximately 90% traceability to plantation (TTP) level (Figure 5 below), with full traceability achieved for its direct sourcing in Indonesia. These claims are supported by the use of satellite monitoring tools and risk screening systems applied across its supplier base. Olam Agri's traceability initiatives also seem to be highly concentrated in Indonesia and Malaysia, which account for the majority of the company's third-party supply (indirect supply). However, Olam's disclosures suggest that traceability remains weaker beyond direct suppliers, and that managing deforestation risks in third-party supply chains is an ongoing challenge. In the case of indirect supply, often originating from traders and aggregators, Olam tends to rely on mill-level traceability, having more limited visibility over the plantation level and more difficulties to monitor it. This is particularly significant given the broader environmental context of palm oil production.

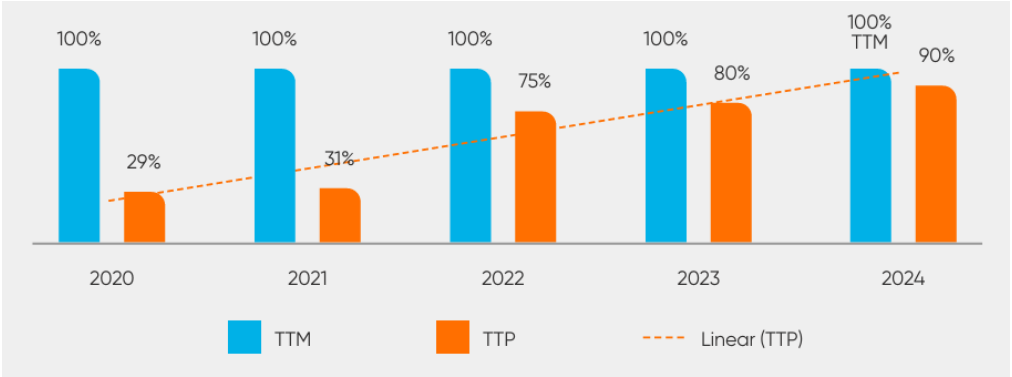


Fig. 5 – Olam Agri's traceability progress for the company's global volumes of palm oil since 2020.

Indonesia and Malaysia remain central to global palm oil production, and have historically experienced extensive deforestation linked to plantation expansion, including in carbon-rich and biodiverse landscapes. Recent investigations by organisations such as Chain Reaction Research and Mighty Earth continue to highlight ongoing deforestation, peatland clearance, and social conflicts within parts of the sector, especially where sourcing happens through indirect suppliers, aggregators, or fragmented smallholder networks with weaker plantation-level visibility. These challenges, namely the limited integration of smallholders and unregulated mini-mills into traceability systems, have also been recognised by the World Economic Forum. Olam's NDPE commitments, supplier engagement, and smallholder support are relevant mitigation measures and reflect an effort to address structural risks. However, the scale of its third-party sourcing base and incomplete plantation-level visibility across parts of its indirect supply chain, indicate that deforestation risk remains a significant due diligence concern within its palm oil supply chains.

Olam's exports of key commodities

Coffee, cocoa, palm oil, rubber, soy, and wood are relevant to Olam Group and fall within the scope of the EUDR. The broader set of EUDR-covered commodities has been retained in the trade data overview to reflect the full extent of the Group's exposure to regulated commodity flows and to help define the wider commercial universe in which it operates, namely the scale and geographic reach of its sourcing and trading activities (see fig. 6 on page 11). However, while all the commodities listed above are relevant, the following sections of this report focus exclusively on coffee, cocoa, and palm oil. Rubber, soy, and wood are therefore not examined in further detail.

Black pepper, while not currently among the commodities covered by the EUDR, has been added given its relevance to one of the case studies and its strategic importance within Olam Group's ingredients portfolio. Olam has long held a leading position in the global pepper trade and has made significant investments across sourcing, processing, and value-added spice operations, including ownership of one of the world's largest pepper plantations in Vietnam, and a sister estate in Brazil, while also being recognized as the world's largest vertically integrated pepper supplier.

Shipment data was used to identify the main countries of export for key commodities traded by Olam Group, as well as their main destination countries. The data collected and analysed covered only raw and minimally processed products (identified by the relevant HS codes) and it was assumed that these originated from the countries of export listed in the shipping records. As a disclaimer, shipment data provides only a snapshot of export and import records, and therefore of the countries of origin for the product groups concerned. The most recent available data was analysed, although this varies per country. In the case of Brazil, the latest available year was 2023, which has been taken into account in the analysis of the trade flows of relevant raw materials from that origin.

Coffee exports
Jan 2023 – Nov 2023

Main origin countries	Main destination countries
Colombia	United States
Vietnam	Singapore
Brazil	Turkey
India	South Korea
Uganda	Germany

HS Code: 0901 (coffee beans)

Cocoa exports
Jan 2025 – Dec 2025

Main origin countries	Main destination countries
Ecuador	Indonesia
Cote d'Ivoire	Netherlands
Cameroon	Brazil
Kenya	Malaysia
Uganda	United States

HS Code: 1801 (cocoa beans)

Palm oil exports
Jan 2025 – Dec 2025

Main origin countries	Main destination countries
Indonesia	Bangladesh
Gabon	Cameroon
Malaysia	India
Mozambique	Philippines
	Malawi

HS Code: 1511 (crude palm oil; palm oil and its fractions).

Black pepper exports
Jan 2025 – Dec 2025

Main origin countries	Main destination countries
Vietnam	United States
Brazil	Germany
Indonesia	South Korea
Cambodia	Netherlands
Malaysia	United Kingdom

HS Codes: 09041100 (black pepper whole) & 09041120 (

Fig. 6 – Top-5 production and destination countries of Olam's main commodities. Source: AidEnvironment based on shipment data. The most recently available data was analysed and EU Member States were highlighted.

Rubber exports
Jan 2025 – Dec 2025

Main origin countries	Main destination countries
Côte d'Ivoire	India
Indonesia	Vietnam
Vietnam	Pakistan
Gabon	Malaysia
Thailand	Brazil

HS Code: 4001 (natural rubber)

Soy exports
Jan 2023 – Nov 2023

Main origin countries	Main destination countries
Brazil	Mexico
United States	Bangladesh
Argentina	Turkey
	Pakistan
	Cameroon

HS Code: 1201 (soybeans)

Wood exports
Jan 2025 – Dec 2025

Main origin countries	Main destination countries
Republic of Congo	Vietnam
Vietnam	India

HS Codes: All considered minimally processed wood – 4401, 4403, 4404, 4405, 4406, 4407, and 4408

Fig. 6 (cont.) - Top-5 production and destination countries of Olam's main commodities. Source: AidEnvironment based on shipment data. The most recently available data was analyzed and EU Member States were highlighted.

The findings indicate that two of Olam's flagship commodities - coffee and cocoa - are primarily exported to the EU via Germany and the Netherlands. These have also been identified as important destinations for the company's black pepper exports (see fig. 6 on page 10).

By contrast, the EU has not been a prominent destination of Olam's palm oil exports in 2025. In this period, it went primarily to countries that have a high refining capacity, and which process products for the food manufacturing and consumer goods sectors. India and Bangladesh are the main examples of this, with India being among the world's largest palm oil importing and processing countries, with major refining capacity in key oil palm production areas such as Gujarat, Maharashtra, and Andhra Pradesh. Cameroon, despite producing palm oil domestically, has struggled with fully meeting downstream demand through local supply. Olam operates large integrated plantations and mills in neighbouring Gabon, making it a commercially logical regional source of palm oil supply for Cameroon.

Olam's trade in commodities such as natural rubber, soybeans and wood similarly points toward a pattern of supplying processing-oriented markets rather than final consumer destinations. For natural rubber, the main countries of destination of Olam's exports in 2025 are important rubber-consuming and manufacturing regions (fig. 6 on this page, first table), with established downstream industries, such as tires and industrial goods production. The same holds for soybeans where most of Olam's exports in 2023 went to countries with significant oilseed crushing and edible oil refining capacity to produce vegetable oils and animal feed.

Olam's supply of wood originates mostly from resource-rich countries such as Republic of the Congo, where Olam has industrial logging concessions of tropical hardwood. In 2025 (fig. 5), Olam's wood exports were mostly directed toward Vietnam and India, both recognized as major timber processing hubs for products such as plywood, furniture, construction materials, and other higher-value products for export. Possible intra-country flows (e.g. Vietnam to Vietnam) might reflect internal supply-chain movements within an integrated processing system. Although in this snapshot it was not prominent, Olam's wood products are also sold in the EU market, for which Olam stated that they "*originate from our 2.1 million* [hectares] *of FSC-certified natural forest concessions in the Republic of Congo*", adding that the region has low deforestation rates. However, the company does not disclose the location of its concessions nor any concrete evidence on deforestation-free controls.

Olam operations linked to relevant commodities

As mentioned, Olam Group operates as a globally integrated agribusiness. Across its portfolio, the company combines upstream sourcing with midstream processing and, in some cases, downstream manufacturing. This means its supply chain structure spans from smallholder farmers to industrial processing facilities. This model is reflected in its operational footprint, which includes a mix of owned assets, such as plantations, farms, and processing plants, as well as extensive origination networks supported by local subsidiaries.

Yet, the distribution of Olam's assets is uneven across commodities and geographies. While the group maintains vertically integrated operations in certain contexts, in other commodity sectors, the company relies more heavily on sourcing and logistics infrastructure rather than owned production assets. For instance, for coffee, Olam's operations include industrial processing facilities in Brazil and sourcing-based operations in Indonesia and Côte d'Ivoire. A similar pattern is found in palm oil activities in Indonesia and Cameroon, where there is limited evidence of owned plantations or processing infrastructure. Conversely, in cocoa, the company owns processing plants in Brazil and Côte d'Ivoire, plantation and processing assets in Indonesia, and in Cameroon its role is concentrated at the origination level. The following section provides a detailed breakdown of these assets, distinguishing between plantations, processing facilities, and subsidiaries, across selected commodities and countries.

Olam cocoa suppliers and assets in Côte d'Ivoire

Imports breakdown per cocoa product show that cocoa beans, cocoa paste, and cocoa butter are the most relevant cocoa-based products imported into the EU market, with these three dominating EU27 imports of this commodity in 2025 (**Fig. 7**). In terms of EU imports of cocoa beans (HS 1801) in 2025 – by far, the largest imported product, comprising 62% of the total volumes of cocoa products covered under the EUDR in that year. The Netherlands features as the primary export destination from Côte d'Ivoire, followed by Belgium, Germany, Spain, and France (**Fig. 8**).

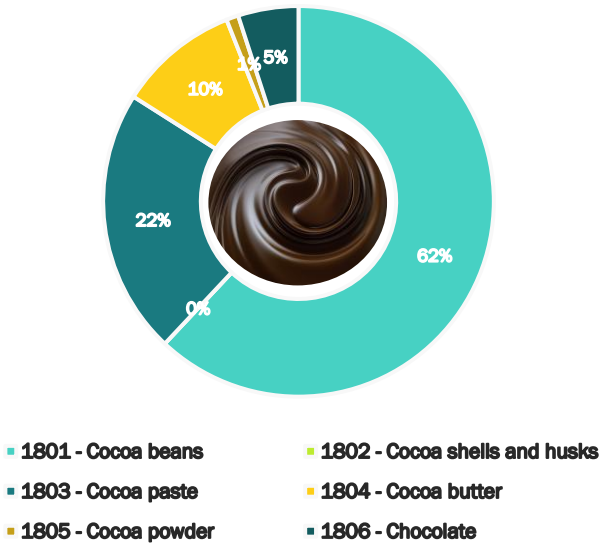


Fig. 7 - Most imported EUDR-related cocoa products in the EU27 from Côte d'Ivoire in 2025. Source: AidEnvironment, based on EU trade statistics, accessible through Access2markets. The relative percentage refers to the total quantities (in kg) of these products imported during the period analyzed.

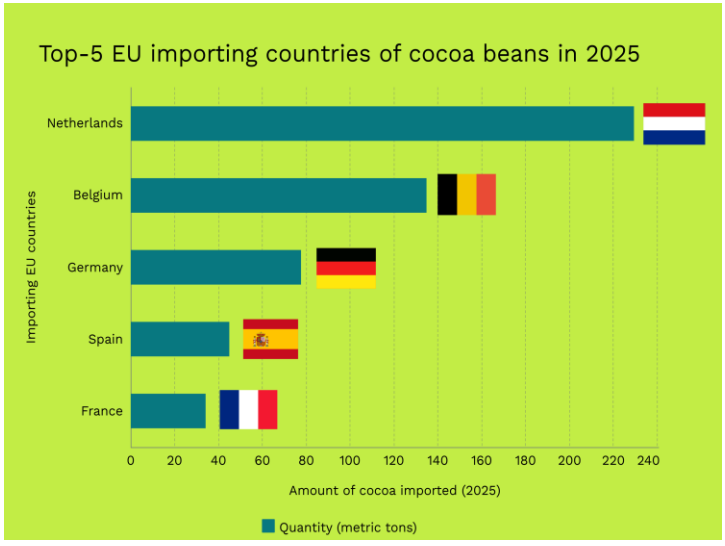


Fig. 8 - Top-5 EU27 cocoa importing counties from Côte d'Ivoire and top-5 buyers in each country. Source: AidEnvironment, based on a representative sample of Ivorian export data, including all cocoa-related HS codes (1801 till 1806), between 31 May 2025 and 31 August 2025, filtered for EU27 countries only.

It has been reported that Ofi has 29 facilities in Europe focused on trading and processing bulk cocoa mostly. Often, this type of facilities are located near relevant ports which is confirmed in the case of Olam. The company has publicly listed cocoa processing and ingredient facilities in Koog aan de Zaan and Mannheim, which are strategically close to the ports of Amsterdam and Hamburg, respectively.

Olam operations linked to relevant commodities

Through shipment data analysis, covering the months of May to August 2025, it was possible to identify Olam's direct suppliers (tier-1) of Ivorian cocoa (Fig. 9). Barry Callebaut, ECOM, and Olam itself were the main direct suppliers of cocoa to Olam's operations in consumer markets. Therefore, in 2025, Olam ranked among the top-5 cocoa buyers (importers) from Côte d'Ivoire, underscoring its market dominance and strategic positioning in origin-country sourcing.

Nearly all cocoa products included in the analysis that were exported during this period were purchased by Olam's subsidiary in Singapore. A company's subsidiary acting as the buyer for commercial transaction management, while physical shipments flow from Côte d'Ivoire to diverse global markets, is common practice in this type of transactions led by multinational agribusinesses.

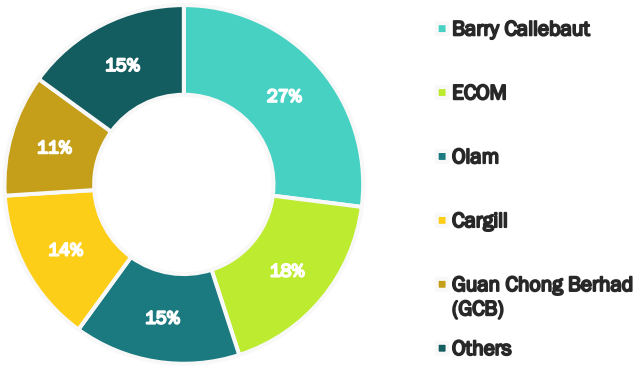


Fig. 9 - Top-5 global cocoa buyers from Côte d'Ivoire Source: AidEnvironment, based on shipment data from May to August 2025. Only EUDR-relevant cocoa products (HS codes 1801 to 1806) were included. Together, the five companies represented comprised 84% of the respective cocoa products imported in the sample analyzed.

Asset/Operation	Location	Main activity
Olam Ivoire SA	Abidjan	Sourcing, processing, packaging and merchandising of agricultural products and inputs
Outspan Ivoire SA	Abidjan	
OCP SA	San Pedro	
Primary processing plant	Abidjan/Vridi	

Table 1 - Most imported EUDR-related cocoa products in the EU27 from Côte d'Ivoire in 2025. Source: AidEnvironment, based on EU trade statistics, accessible through Access2markets. The relative percentage refers to the total quantities (in kg) of these products imported during the period analyzed.

In our sample, Côte d'Ivoire is featured as Olam's second-largest origin country for cocoa (Fig. 6, p. 10), with the EU as one of the main destination markets of Olam's exports of this product. Olam has significant assets in Côte d'Ivoire, including sourcing and trading subsidiaries, as well as processing plants and warehouses (table 1). Among others, Olam owns a modern greenfield cocoa processing plant in Abidjan, with capacity to process 60,000 MT of cocoa beans into liquor, butter and cake, which is complemented by a greenfield primary processing and warehousing facility in the port of San Pedro, which supports the origination and export of 40,000 MT of cocoa beans from the southwest region of Côte d'Ivoire.

Olam has indicated that investing in these new assets was part of the company's strategy of integrating a traceable cocoa supply chain in its existing cocoa bean business in the country.

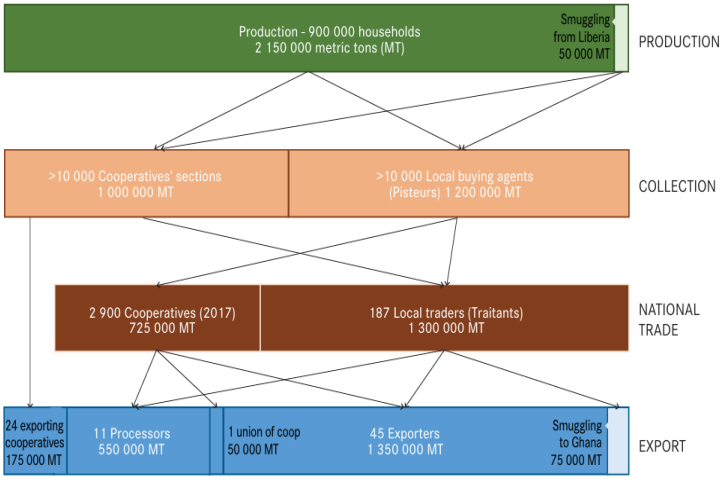


Fig. 10 - Côte d'Ivoire national cocoa supply chain with estimated cocoa bean shares based on 2019/2020 data. Source: Nitidae, as reported in "Traceability and transparency of cocoa supply chains in Côte d'Ivoire and Ghana" (2021)

The cocoa supply chain in Côte d'Ivoire is complex. Farmers sell their cocoa directly to local cooperatives/ wholesalers or, alternatively, to small local traders (pisteurs) and cooperative sections. At the same time, cooperatives and local traders frequently buy from and sell to one another in order to meet quality requirements, secure quicker payments, or access higher certification premiums. Fig. 10 illustrates the interdependence between these segments of the Ivorian cocoa supply chains. Exporters also tend not to rely exclusively on a single sourcing channel. Even the most ambitious companies generally do not source all their cocoa from cooperatives.

Olam operations linked to relevant commodities

As a result of the traceability and certification programs implemented by most cocoa exporting companies during the last decade, cooperatives' market share has grown. In 2021, around 45% of cocoa beans was estimated to have been traded through cooperatives in 2018/19 and 2019/20. Cooperatives can offer certification premiums, at least for part of the farmers' production, which allows them to compete with local traders.

Côte d'Ivoire has approximately 1,800 active cocoa cooperatives nationwide. In preparation to meet the requirements of the EUDR, the Conseil du Café-Cacao (CCC) - the government body responsible for regulating and developing the country's cocoa sector - is implementing a national traceability system based on farmer identification cards, GPS mapping of farms, QR-coded cocoa bags, and digital shipment monitoring. Around 500 cooperatives have already been integrated into this system.

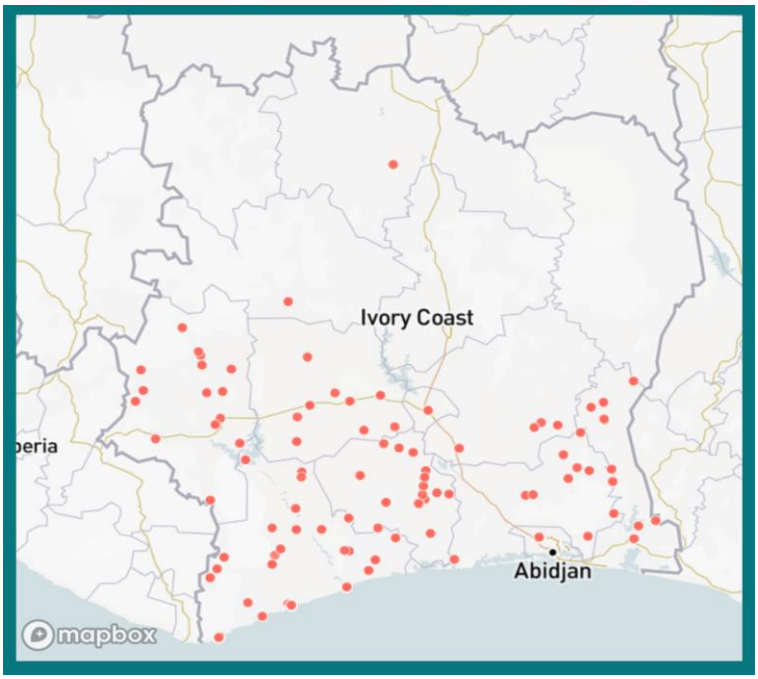


Fig. 11 - Mapped Ivorian cooperatives linked exclusively to Olam as a buyer.
Source: AidEnviroment based on Trase's Facilities Map, accessed on May 2, 2026

In 2020, Olam publicly disclosed having a network of **201 Ivorian cooperative suppliers,** described as "key partners" in its sustainability programs under Cocoa Compass. For the 2019/20 season, Olam stated that it aimed to source more than 170,000 tons of verified or certified sustainable cocoa through these cooperatives. Trase shows the scale of Olam's links with cocoa cooperatives in Côte d'Ivoire between 2010 and 2023 (Fig. 11). Out of a total universe of 26,022 cocoa cooperatives mapped in the country, 891 were identified as being exclusively linked to Olam as their buyer, which shows the extent of the company's direct sourcing relationships within the Ivorian cocoa sector. At the same time, a broader Trase analysis also indicates that cocoa supply chains in Côte d'Ivoire remain highly dependent on indirect sourcing, with 60% or more of the cocoa being procured indirectly and making it harder to determine the origin of the product.

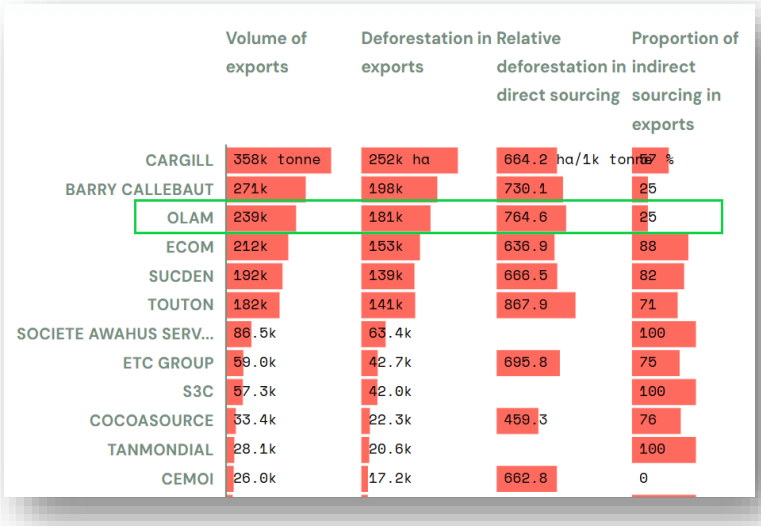


Fig. 12 - Mapped Ivorian cooperatives linked exclusively to Olam as a buyer.
Source: AidEnvironment based on Trase's explainer on Côte d'Ivoire cocoa exports and deforestation, accessed on May 4, 2026.

Indirect supply makes up around half of Olam's total cocoa exports, with estimates suggesting 56% overall. Indirect sources are typically not publicly reported by Olam in detail although bulk cocoa beans are often supplied through indirect suppliers. According to Trase, around 25% of Olam's cocoa exports in 2021 originated from indirect sourcing channels, which brings an increased risk of sourcing cocoa linked to deforestation and complicates traceability efforts. Additionally, Olam has an estimated 181,000 hectares of deforestation exposure in exports and more than 760,000 hectares of deforestation associated with every 1,000 tons of cocoa linked to the company's direct supply (Fig. 12).

Olam palm oil suppliers and assets globally

Olam Group, trough Olam Agri, operates its own oil palm plantation concessions, two palm oil mills, and two kernel crushing units in Gabon under a joint venture with Republic of Gabon. These operations in Gabon produce 70,000 MT crude palm oil (CPO) and 3,800 thousand MT palm kernel oil (PKO) to both domestic and export markets. Beyond its upstream operations, Olam also controls processing plants and downstream facilities in Mozambique, Gabon, Nigeria, and the United Kingdom. Olam's global supply of palm oil was mostly sourced and traded through third parties with approximately 206,000 metric tons of palm oil sourced via these parties and spanning across Indonesia, Malaysia, Gabon, and Nigeria.

Tracing upstream suppliers is necessary to ensure that the company fulfils its commitment to deforestation-free sourcing across its supplier base. Olam Agri reports its palm oil sourcing through two supply chain categories: the Refinery Supply Base and the Traded Volume Supply Base.

The **Refinery Supply Base** includes mills that physically supply refineries linked to Olam's operations, meaning Olam has a clearer line of sight over where the palm oil is coming from and how it moves through the supply chain. Because the connection is more direct, this type of sourcing usually provides better visibility and stronger traceability to specific mills and suppliers.

The **Traded Volume Supply Base** is broader and reflects mills connected to palm oil volumes that Olam purchases or trades through third-party refiners and trading companies. In these cases, Olam may not buy directly from the mill itself, but instead through intermediaries handling mixed volumes from many different sources. This creates a wider view of Olam's commercial exposure across the market, but usually with less direct oversight and a lower level of traceability and supply-chain visibility compared to refinery-linked sourcing.

Based on the analysis of the 2025 palm oil mill list disclosed by Olam, it was possible to identify eight origination countries linked to the two supply chain categories operated by Olam: Indonesia, Malaysia, Nigeria, Côte d'Ivoire, Gabon, Thailand, and Philippines (**Figure XXX**). Although only mill's location is disclosed and not production area, this is still indicative of country of production since oil palm fruit (fresh fruit bunches) is highly perishable and typically needs to be processed within around 24 hours of harvesting to maintain oil quality.

Refinery Supply Base Mills					
Type of sourcing	**No. of mills**	***Countries***			
Direct	*9*	*Nigeria*	*Gabon*	*Côte d'Ivoire*	
		5	3	1	
Indirect	*186*	*Indonesia*	*Malaysia*	*Côte d'Ivoire*	*Liberia*
		105	70	10	1
Traded Volume Supply Base					
Type of sourcing	**No. of mills**	***Countries***			
Direct	*25*	*Thailand*	*Indonesia*	*Philippines*	
		14	9	2	
Indirect	*976*	*Indonesia*	*Malaysia*		
		719	257		

Table 2 - Olam's reported palm oil mills and sourcing countries. Source: AidEnvironment based on Olam Agri's 2025 palm oil mill list of Olam Agri.

Olam operations linked to relevant commodities

There is significant overlap between the refinery and traded volumes supply chain lists, with 98 mills appearing in both categories. This suggests that parts of the supplier network are reached through multiple channels rather than operating as completely separate systems. The overlap also indicates that a core group of strategically important suppliers plays a major role across both supply chain categories. There are 16 overlapping companies or corporate groups, of which one of the most relevant, considering size and scope, is Wilmar International.

Among the internationally significant companies that appear in only one of the two supply chain categories, direct sourcing is concentrated among a relatively small group of suppliers and mills, including companies such as SIFCA, Wilmar International, and Olam Group. In contrast, the indirect sourcing sections, particularly within the traded volume supply chain, include a much broader range of internationally significant traders, such as Royal Golden Eagle, FGV Holdings, and First Resources (Tables 3 and 4). This broader and more fragmented supplier network presents greater challenges for supply chain oversight, increasing potential exposure to traceability gaps and sustainability-related risks.

Presence in direct sourcing		
Top-5 companies	No. of mills	RSPO certified mills
SIFCA	*9*	*0*
Univanich Palm Oil	*5*	*3*
PTPN III	*5*	*3*
Wilmar International	*4*	*1*
Olam Group	*3*	*3*

Presence in indirect sourcing		
Top-5 companies	No. of mills	RSPO certified mills
Royal Golden Eagle	*21*	*8*
FGV Holdings	*19*	*9*
First Resources	*13*	*7*
Wilmar International	*10*	*5*
Triputra Agro Persada	*5*	*2*

Tables 3 and 4 - Olam's main palm oil supplier corporate groups and the respective number of mills present in the company's supplier mill list, as well as RSPO certification status. Source: AidEnvironment based on the 2025 palm oil mill list of Olam Agri.

Although the number of mills associated with each company group does not necessarily reflect the volume sourced from the, since Olam Agri does not disclose supplier-level sourcing volumes, the distribution of mills still provides a useful indication of the relative importance of different groups within Olam's supply network.

RSPO certification is present in a minority of supplier mills (Tables 3 and 4), although certification levels vary between direct and indirect sourcing channels. Approximately 24–26% of the mills disclosed across both supply chain categories (Refinery and Traded Volume) are RSPO certified. Within direct sourcing sections, the share of RSPO-certified mills is substantially higher, at roughly 40–45%, whereas indirect sourcing sections show lower certification coverage, estimated at around 20–22%. This difference reinforces the traceability and sustainability challenges associated with indirect sourcing networks.

Figure 13 provides an overview of all Olam's palm oil business operations and their respective locations. Nonetheless, Olam has stated that their palm oil exports to the EU are not very significant.

Fig. 13 - Assets linked to Olam's Palm Business. Source: Olam Palm Sustainability - Update 2020

Olam coffee suppliers and assets in Brazil

Ofi reports to be the second largest worldwide green coffee supplier. According to a recent shipment data sample (1 January 2025 - 5 December 2025) which does not cover all geographies (e.g. such as key coffee supplier Brazil), Olam mainly sources coffee from **Vietnam, India, Uganda, Indonesia, and Colombia**. Only considering EU27 countries in the sample, **Germany, Italy, Belgium, Spain** and the **Netherlands** are the top destination countries of Olam's global supply in this period.

The company operates a **vertically integrated coffee supply chain**, processing over 90% of the volumes in its own mills. In 2024, a reported 21-30% of the company's procurement is spent on coffee, and a similar percentage of the company's revenue is dependent on coffee. Direct coffee plantation ownership of the company is only disclosed in Laos (2,365 ha), Tanzania (1,929 ha), and Zambia (5,404 ha). In other countries, such as Colombia or Brazil, Ofi mainly sources green coffee from third-party suppliers such as estates, cooperatives, and local/intermediary traders.

A sample of Colombian coffee exports reveals that Olam is the second largest green coffee exporter (13% of all volumes) to the EU and UK between June 2024 – June 2025, right after the Federácion Nacional de Cafeteros de Colombia. In a sample of available Brazilian coffee exports data between 1 January 2021 and 30 November 2023, Olam supplied 258,967 metric tons of green coffee to the EU27, of which **JDE Peet's, Lavazza, Olam, Nestle, Vollers, and Tchibo** are relevant importers.

There are no reports on Ofi managing its own coffee plantations in Brazil. However, the company does operate various coffee warehouses in Brazil (Figure 14 below).

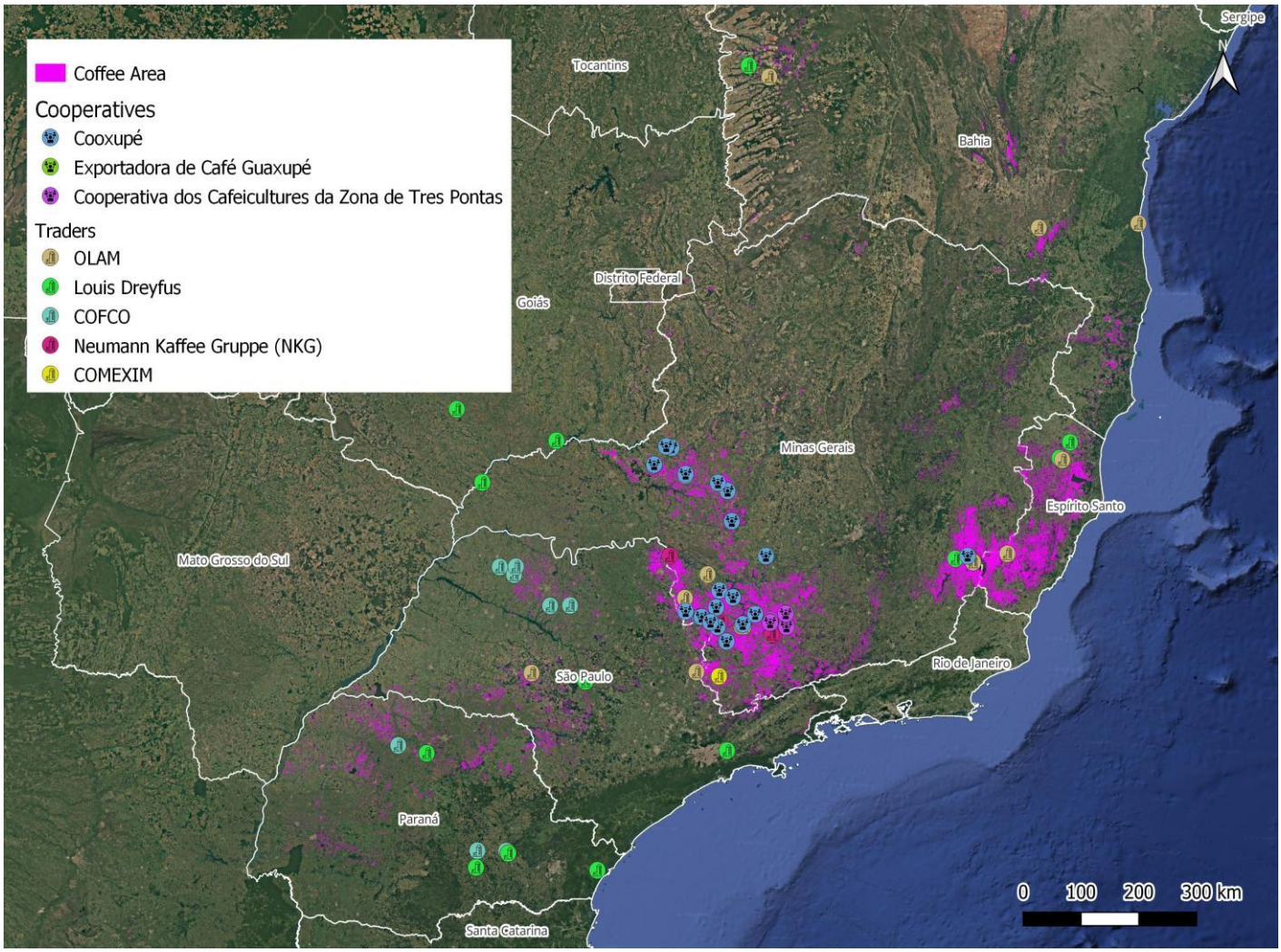


Fig. 14 - Olam warehouses in and near coffee areas in Brazil. Warehouses of the largest commodity traders (e.g. Olam, Cofco, Louis Dreyfus) do not necessarily only store coffee and can also contain other commodities (e.g. soy). However, only warehouses in the largest coffee producing states are included. Source: AidEnvironment, based on warehouse data (SICARM, 2024), Mapbiomas coffee production area (2023)

Potential noncompliance case studies linked to Olam

This section examines **six cases linked to cocoa, coffee, black pepper, and palm oil,** showing forest clearing and/or alleged social violations after the EUDR cut-off date, that are potentially connected to Olam (Figure 15 next page). This could violate EUDR requirements if any produce from these cleared or liability areas enters EU markets upon the regulation's implementation. These cases also deviate from Olam's Cocoa Compass and Forests Initiative (CFI) or NDPE commitments in producing countries. Furthermore, certain palm oil instances within Olam's indirect supply chain may breach the company's Code of Conduct and Sustainable Palm Oil Policy. The case studies were shared with Olam for review in May 2026, with the company's response incorporated into this report.

For the preparation of the **cocoa case** in Côte d'Ivoire, AidEnvironment has developed a 'cocoa-related deforestation risk zone' around a cooperative supplier of Olam, calculated by using deforestation alerts of Hansen Global Forest Change, cooperative locations, satellite imagery from Planet and Sentinel, and the mapped road network, assuming that average distance a cocoa bean travels is 25 km for a small cocoa cooperative (0-800 members), 35 km for a medium cooperative (800-1,000 members) and 45 km for a large cooperative (+1,000 members). Moreover, we have used various datasets on cocoa production, information on protected areas, a dataset on various cocoa farms, cocoa cooperative disclosure data, and the JRC Forest Cover 2020 to determine standing forest as of the EUDR cut-off date.

For the Brazilian **coffee, black pepper, and cocoa cases**, we have relied on AidEnvironment's extensive datasets including national deforestation data (e.g. Prodes, INPE Deter), vegetation types (e.g. Mapbiomas Brazil), rural cadastre datasets (CAR, SIGEF, SNCI, SNCR), data on indigenous territories (Funai), as well as validation with a local Brazilian partner.

For the development of **palm oil cases**, AidEnvironment has relied on its own database of palm oil concessions and company groups, Nusaranta Atlas, media reports, (geo)RSPO, deforestation alerts (Mapbiomas Indonesia, Hansen Global Forest Change, PRODES), and the Indonesian forest vegetation layer (Kementerian Lingkungan Hidup dan Kehutanan - Ministry of Environment and Forestry).

Replies from Olam Group: Ofi and Olam Agri

The report's case studies were shared with Olam Group for review in May 2026. Given Olam's corporate restructure into Ofi and Olam Agri, responses were received separately from each entity according to their respective commodity focus, and are reflected in the relevant case studies.

The cases studies in this report were shared with **Ofi** together with nine other case studies focusing on cocoa farms in Brazil (not included in this report). With this, a total of 10 case studies on cocoa in Brazil were shared with Ofi in the same period, which the company acknowledged but declined to provide farm-specific detail for its cocoa supply chains, citing commercial sensitivity. Nevertheless, Ofi confirmed that seven out of the ten cases linked to Brazilian cocoa farms have never been direct suppliers to Ofi. This indicates that three of the farms were or continue to be suppliers of the company, and it is also reinforced by their statement that "*for the other cocoa cases in Brazil and in Côte d'Ivoire, active suppliers must adhere to ofi's Agri supplier code*". It remains unclear which of the cocoa farms are directly linked to ofi and how ofi assesses and mitigates the potential noncompliance identified. Moreover, indirect supply chain links have not been ruled out.

Replies from Ofi and Olam Agri (cont.)

Additionally, although Ofi describes its policy frameworks and code commitments in its full reply, it does not provide substantive answers to the due diligence questions the cases raise, namely what assessment has been conducted to confirm adherence to said policies and codes, whether the notification of a potential noncompliance linked to active suppliers is going to be checked and further scrutinized, or if indirect supply chain links to any of the flagged cases have been systematically screened.

Olam Agri stated that, even though the volume of its palm oil exports to Europe is negligible, it is still well placed to meet EUDR obligations before they are expected to become enforceable from 30 December 2026 thanks to its sourcing policies, traceability solutions, and additional monitoring actions. It also states that the company has implemented rigorous sourcing requirements for its third-party suppliers and made progress with regards to their commitment towards traceable and sustainable supply chains of third-party suppliers, describing its palm oil traceability as reaching 100% to mill and 90% to plantation level. Olam Agri has provided specific responses to both palm oil cases included in the report, which were incorporated directly on the respective case studies.

Olam case	*Name property*	*Owner*	*Location*	*Page*
 1	Buying zone and cocoa farms around cooperative	Société Coopérative Agricole Adzopé Nord (SOCAAN)	La Mé Region, Adzopé; Lagunes district (Côte d'Ivoire)	19
 2	PT Kayan Plantation	Kayan Patria Pratama (KPP) Group	Bulungan, North Kalimantan (Indonesia)	21
 3	PT Surya Panen Subur	Rachmat / Amara	Aceh, Sumatra (Indonesia)	23
 4	Fazenda Palestina / Monte Pascoal	Nilzon Taqueti Machado	Porto Seguro, Bahia (Brazil)	25
 5	Fazenda Diana	Chaves Agrícola e Pastoril Ltd.	Uruçuca, Bahia (Brazil)	27
 6	Fazenda Grande Leste I, II, III, IV, V (coffee, soy, cotton)	Sibin family (SIGEF) Daniel Franciosi (Inema)	São Desidério, Bahia (Brazil)	29

Fig. 15 - Six noncompliant case studies on palm oil, cocoa, coffee, and black pepper cases potentially linked to Olam.

SOCAAN
(Société Coopérative Agricole Adzopé Nord)

Location: La Mé Region, Adzopé; Lagunes

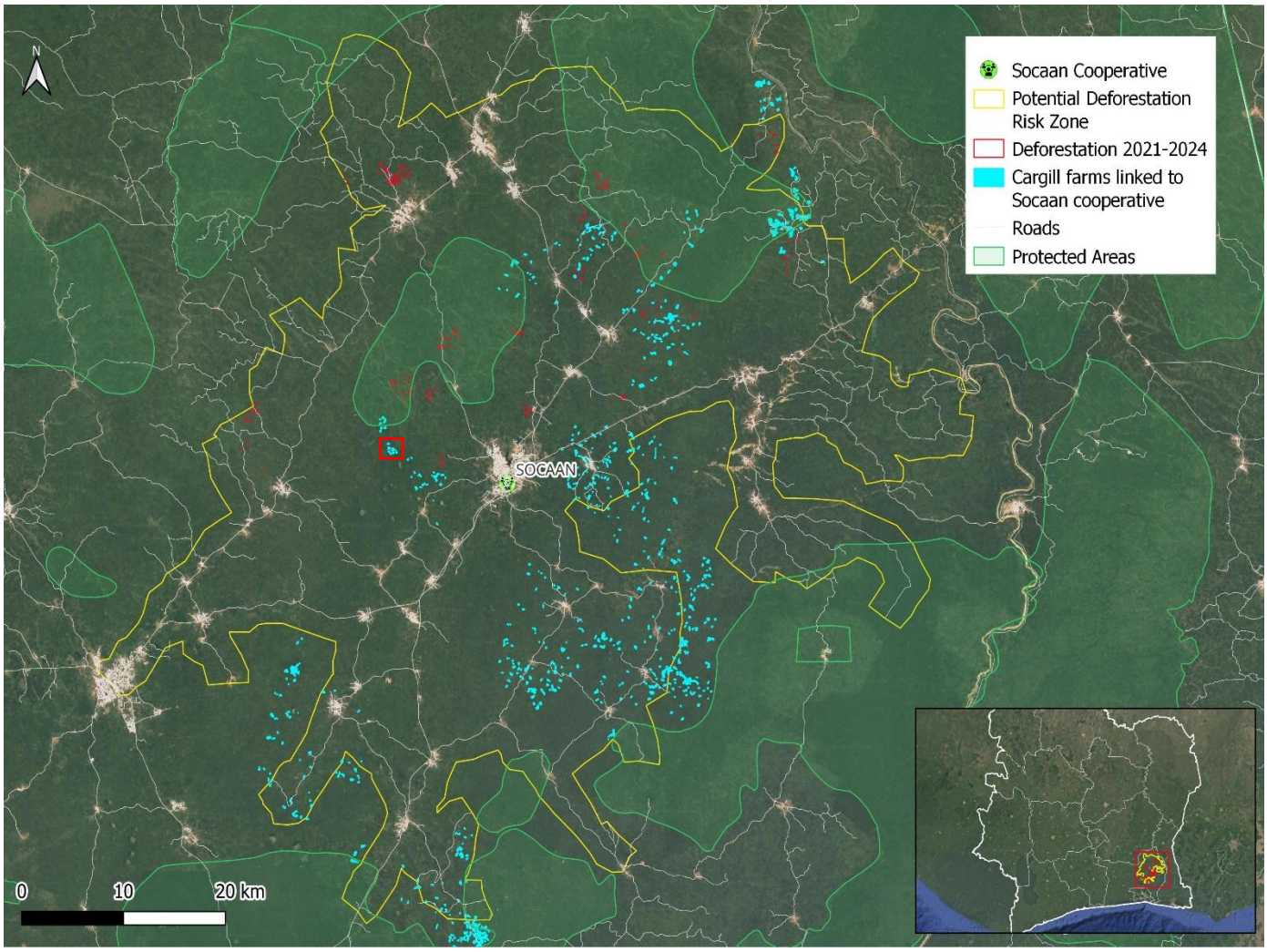
Biome: Tropical & Subtropical Moist Broadleaf Forests (Côte d'Ivoire)

Coordinates cooperative: 6.096; -3.861

Cleared Area

106	hectares	Period clearance: 2021-2024	Type of vegetation: Eastern Guinean Forests

Imagery: Cocoa deforestation risk zone linked to likely Olam supplying cocoa cooperative SOCAAN in La Mé Region, Adzopé; Lagunes district (Côte d'Ivoire)



Source: AidEnvironment, based on publicly available information for Côte d'Ivôire, including deforestation data from January 2021 till December 2024 from Hansen *et al*., 2013. "High-Resolution Global Maps of 21st-Century Forest Cover Change."; OSM Administrative boundaries and roads; Cargill cocoa farms 2019-2020 (undisclosed source); WDPA Protected areas.

Notes: While there is significant native vegetation loss in this whole "deforestation-risk zone" (a total of **9,194 ha**), AidEnvironment has only included in the "deforestation 2021-2024" layer the loss of forest in confirmed cocoa production areas which is classified as forest by the FAO (**106 ha**). The red box represents the location of a cluster of Cargill supplying farms to SOCAAN cooperative. Moreover, this case does not state that the featured cocoa cooperative SOCAAN is directly responsible for the cocoa-related forest loss of 106 ha around the cooperative. Instead, the case highlights deforestation **risk** within the supply chain of the cocoa cooperative.

SOCAAN
(Société Coopérative Agricole Adzopé Nord)

Ownership & Business relationship

SOCAAN

Olam response:

Olam Food Ingredients (Ofi) stated (9 June 2026) that "*seven of the cocoa farms in Brazil* [out of ten, ed.] *have never been a direct supplier to ofi*", to which it added *"For the other cocoa cases in Brazil and in Côte d'Ivoire, active suppliers must adhere to ofi's Agri supplier code".* Besides not identifying to which farms it has or had direct linkages, even though its statement indicates that it exists or existed for a few cases, it also remain unclear the actions undertaken to ensure that "*active suppliers must adhere to ofi's Agri supplier code",* such as adherence assessments conducted, whether suppliers with a linkage to the company for which a noncompliance case has been identified are going to be checked and further scrutinized, or if indirect supply chain links to any of the flagged cases have been systematically screened.

Certification status

SOCAAN Rainforest Alliance certificate (RALI25-038680) is granted for the period till 22 October 2026 (1).

Case description

For trading year 2020/2021, Ofi published a list of its cooperative suppliers in Côte d'Ivoire under its Cocoa Compass ambition, including the Société Coopérative Agricole Adzopé Nord (SOCAAN, or abbreviated as CAAN by Ofi) (2). Trase has listed Ofi as a buyer of this cooperative between 2019 and 2021 (3). Other than Ofi, SOCAAN has a long-standing relationship with Cargill and consistently supplied the company between 2012 and 2023 (later years are undisclosed). In 2021, the estimated supplier base from this cooperative to Cargill and Ofi was 1,441 cocoa farmers (3). Since 2021, Ofi stopped publicly disclosing its cocoa suppliers.

SOCAAN was founded in 2008, and self-reports to have 3,000 members farmers, with a projected production of 12,000 tons of cocoa beans by 2025 of which at least 5,000 tons is destined for export (4), mostly through its key client Cargill (5). SOCAAN cooperative reported 1,364 members (6 women, 1,358 men) to Rainforest Alliance and an estimated production volume of 2,391,691 KG in 2024-2025, of which 77% (1,849,204 KG) was sold as certified cocoa (6). The numbers demonstrate a very limited number of female cocoa producers involved in the cooperative.

While the cooperative is rewarded for sustainable cocoa production and reforestation projects (7), there is significant clearing surrounding the cooperative. AidEnvironment detected 9,194 hectares (ha) of native vegetation (Eastern Guinean Forests) clearing between January 2021 and December 2024 in the deforestation-risk buying zone of the cocoa cooperative SOCAAN, but only 106 ha intersects with confirmed cocoa production area and the FAO/EUDR forest definition (8) (see red polygons in the map of the previous page). This is a very conservative estimation of forest loss as SOCAAN cooperative is located in an exclusively cocoa producing area, with hardly any other crop production. The clearing occurred after the EUDR 31 December 2020 cut-off date and includes clearance within the boundaries of protected areas (Besso and Adzope). The nearest of these protected areas are located within 12 km of the cooperative.

Cacao traders to Europe such as Ofi and Cargill, as well as their downstream buyers, may not be able to achieve negligible deforestation risk in their due diligence efforts under their own company commitments or the EUDR when potentially (indirectly) buying cocoa beans from SOCAAN cooperative. Ofi is a reported Tier-1 cocoa supplier of large chocolate and snack companies such as Mondelēz (9), Starbucks (10), Ferrero (11), and Unilever (12).

1. Rainforest Alliance List of Certificate Holders, online: https://www.rainforest-alliance.org/business/certification/certificate-search-and-public-summaries/, viewed in January 2026.
2. Olam list of cooperative suppliers in Côte d'Ivoire: https://www.Olamgroup.com/content/dam/Olamgroup/news-press-releases/news-bites-pdfs/Sustainable-Programme-Cooperatives-IVC.pdf, viewed in January 2026.
3. Trase facilities map Côte d'Ivoire, online: https://trase.earth/explore/facilities-data/map?facilityTypeId=cote-d-ivoire-cocoa-cooperatives, viewed in January 2026
4. SOCAAN website, online: Presentation – SOCAAN, viewed in January 2026.
5. SOCAAN website, online: Nos partenaires – SOCAAN, viewed in January 2026.
6. Pers. Comm. Rainforest Alliance, 28 November 2025.
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9. Mondelēz cocoa supplier list 2021, online: https://www.mondelezinternational.com/assets/Snacking-Made-Right/Sustainable-Snacking/Sustainable-Ingredients/MDLZ-Cocoa-Life-Tier-1-and-Tier-2-Suppliers.pdf?_ga=2.22549811.925067420.1678184252-421491861.1675066150/, viewed in January 2026.
10. Starbucks cocoa suppliers 2023, online: https://about.starbucks.com/uploads/2024/02/Starbucks-FY23-Cocoa-Suppliers.pdf, viewed in Jan 2026.
11. Ferrero cocoa supplier list 2023-2024, online: https://www.ferrero.com/es/sites/ferrero_es/files/2025-07/cocoa-suppliers-list-23-24.pdf, viewed in Jan 2026.
12. Unilever cocoa supplier list 2023, online: https://www.unilever.com/files/unilever-cocoa-suppliers-2023.pdf, viewed in Jan 2026.

PT Kayan Plantation

Location: Bulungan, North Kalimantan (Indonesia)

Biome: Tropical & Subtropical Moist Broadleaf Forest

Area concession (ha): 15,105 Ha

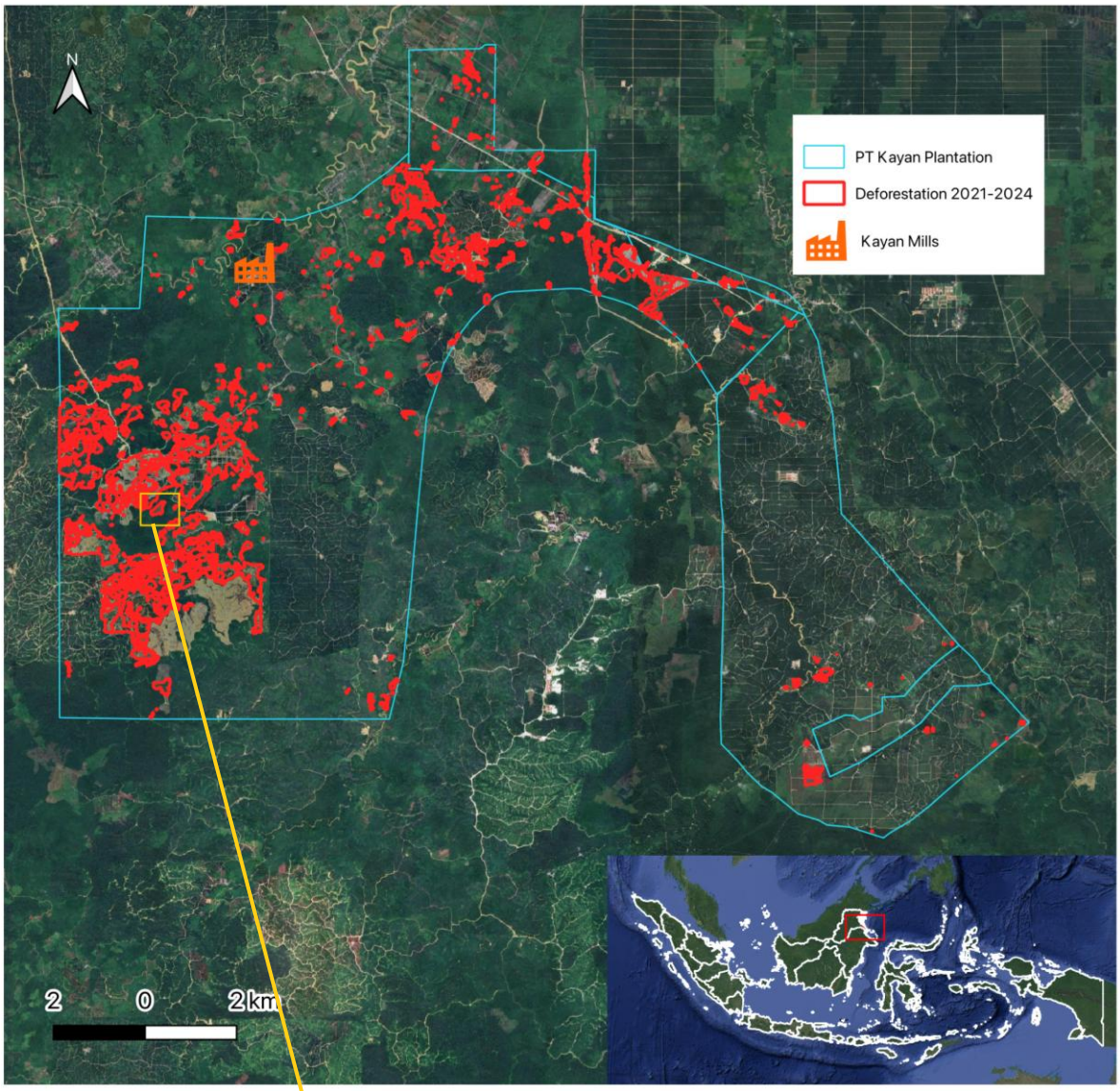
Coordinates: 2.68408, 117.60660

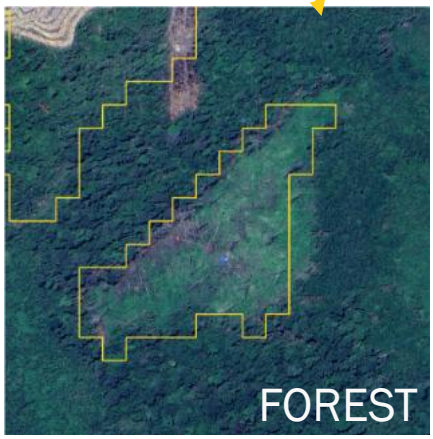
Cleared Area

1,202 hectares

Period clearance:
January 2021 – December 2024

Type of vegetation:
Forest on Mineral Soil





January 2021

September 2025

Above imagery: overview of PT Kayan Plantation concession and its mill in Bulungan, North Kalimantan-Borneo (blue polygons) and cleared area (red polygons). **Left imagery:** Zoom in of clearing of 4.3 ha of primary forest inside the PT Kayan Plantation in 2024. Source: AidEnvironment based on Nusantara Atlas, Hansen *et al*., 2013d, JRC Forest Observatory.

PT Kayan Plantation

Ownership & Business relationship

Owner:	Olam response:
Kayan Patria Pratama (KPP) Group	Olam Agri stated (8 June 2026) that they *"have engaged with them [PT Kayan Plantation, ed.] and they have confirmed that based on the concession map shared by AidEnvironment, the alerts highlighted are located outside of PT Kayan plantation's concession area. The company has completed a HCV-HCS assessment for its concession, and has also undergone peer review with satisfactory result, which is available here"*. Nusantara Atlas reveals a different concession boundary from the one used in our report where deforestation alerts of 48 ha were still detected inside the concession. The boundary discrepancy may reflect the difference between an *izin lokasi* (location permit) and a HGU permit that establishes the legally binding operational boundary. No HGU for PT Kayan Plantation appears on Indonesia's official ATR/BPN spatial planning registry. Although this may be due to the official website not being up to date, the company's claim that the alerts fall outside its concession cannot be verified. Additionally, while the 2022 HCV-HCS assessment may still be relevant, it does not necessarily capture or exclude possible new clearing identified in 2025, and therefore may not be sufficient on its own to address the concern.

Environmental fines, embargoes, and suspensions

Embargoes and environmental fines:	No	-
Suspensions:	No	-

Case description

Kayan Plantation is one of the palm oil concessions and mills operating in North Kalimantan in Indonesia and is recorded in Olam Agri's List of Mills 2024 and 2025H1 as an indirect supplier (1). While volumes supplied by this specific palm oil mill are not disclosed, the 1,343 palm oil mills in the 2024 List together, have supplied 87% of Olam's global palm oil supply. Other than Olam, the Kayan Plantation palm oil mill also appears as a supplier in LDC's Palm Oil Milling List 2025, Cargill's Global Mill List (H1 2025), and Barry Callebaut's palm oil mill list for 2024.

AidEnvironment's satellite imagery and calculations detected 1,202 hectares of deforestation in the Kayan Plantation concession areas in the period between January 2021 and December 2024 (see red polygons in the previous page), intersecting with the FAO/EUDR definition of forest (2). According to the Nusantara Atlas monitoring platform, Kayan Plantation is responsible for an additional clearing of 305 hectares of forest between 12 December 2024 until 24 November 2025 (3). These findings seem to contrast with Olam's strict commitment to abstain from sourcing from suppliers involved in deforestation after 2017 (4) and may point to weaknesses in the company's due diligence processes.

The Kayan plantation oil palm concession operates in Bulungan Regency, North Kalimantan province, a biodiversity-rich region but under significant pressure of agricultural expansion (5). Kayan Plantation is a subsidiary of the Kayan Putra Pratama (KPP) Group, a conglomerate with active business lines in East Kalimantan and North Kalimantan provinces (6). According to a Chain Reaction Research report, the conglomeration encompass coal mining as well, demonstrating the group's extractive industry portfolio. The Kayan mill began its operations in 2021, marking it as a new player in the regional palm oil processing infrastructure (5).

Olam operates a Grievance Monitoring Log and regularly updates its list of complaints related to direct and indirect suppliers. But as of the latest update, there has not been any specific disclosure mentioning PT Kayan Plantation or KPP Group as entities being addressed in their grievance mechanism (7).

(1) Olam Agri List of Mills 2024, online: https://www.Olamagri.com/content/dam/Olam-agri/assets/webp/ps/eo/eo-pdfs/mill-list-2024-volume.pdf, accessed in April 2026.
(2) JRC Forest Cover 2020, online: https://data.jrc.ec.europa.eu/collection/FISE, accessed in April 2026.
(3) Nusantara Atlas, online: https://nusantara-atlas.org/, accessed in December 2025.
(4) Olam Annual Sustainability Report 2020, Online https://www.Olamgroup.com/content/dam/Olamgroup/products-and-services/oil/Olam-palm-gabon/palm-plantations/palm-plantations-pdfs/Olam_annual_sustainability_report_2020.pdf, accessed in April 2026.
(5) Chain Reaction Research, online: https://chainreactionresearch.com/report/indonesian-palm-oil-mining-deforestation/, accessed in April 2026.
(6) CELIOS: Green Industrial Area Infected by Coal Power Plant: Economic Impacts, Conflicts of Interest, and Environmental Threats, online: https://celios.co.id/wp-content/uploads/2023/09/CELIOS-Green-Industrial-Area-Coal-Power-Plant-1.pdf, accessed in April 2026.
(7) Grievance Monitoring Log, online: https://www.Olamagri.com/sustainability/responsible-supply-chains , accessed in April 2026.

PT Surya Panen Subur

Location: Aceh, Sumatra (Indonesia)

Biome: Tropical & Subtropical Moist Broadleaf Forest

Area concession (ha): 31,252 Ha

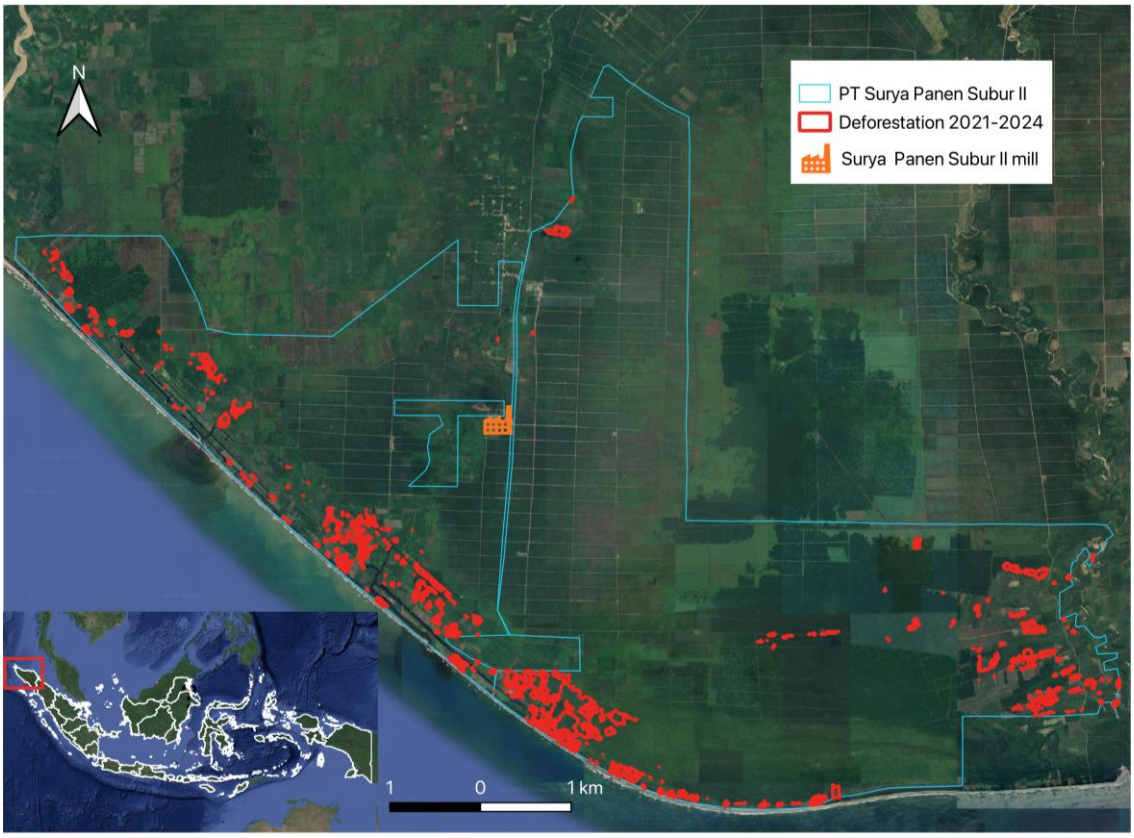
Coordinates: 3.807463, 96.495229

Cleared Area

293 hectares

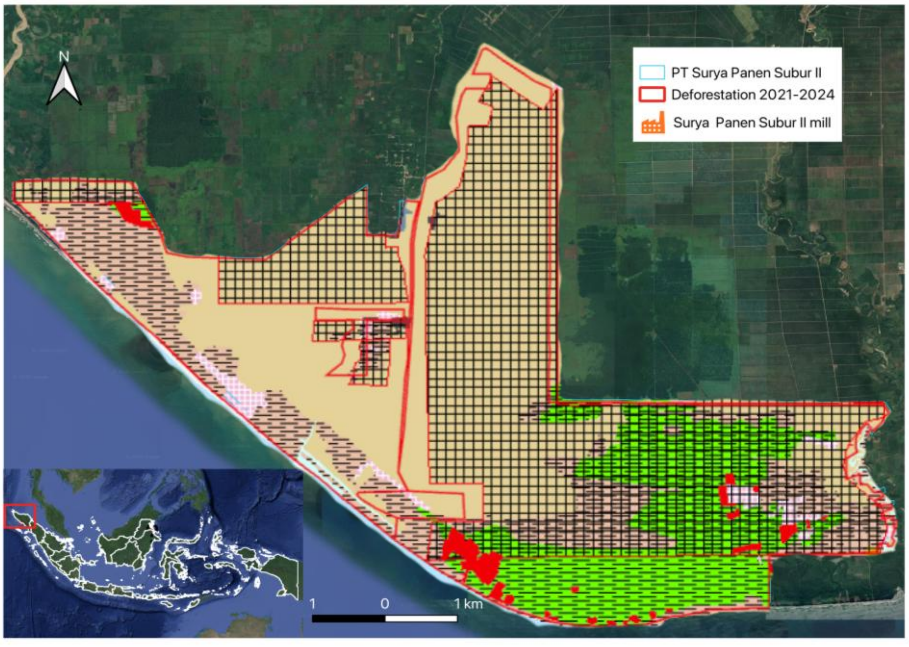
Period clearance:
January 2021 – December 2024

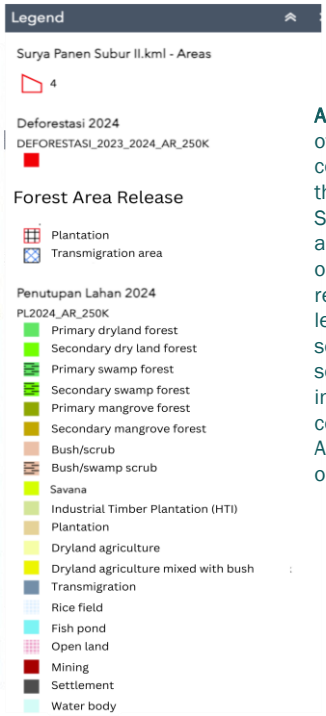
Type of vegetation:
Forest on Mineral Soil



Left top imagery: Overview of PT Surya Panen Subur concession and its mill in Nagan Raya, Aceh (blue polygons) and cleared area (red polygons). **Right top imagery:** Zoom in of clearing of 6.6 ha primary forest inside PT Surya Panen Subur concession in 2024. Source: AidEnvironment based on Nusantara Atlas, Hansen *et al*., 2013d, JRC Forest Observatory.

January 2026





Above imagery: Overview of PT Surya Panen Subur concession according to the official SIGAP KLHK. Some of the concession areas seem to have originated from forest release areas. From the legend, KLHK reckon some forest cover i.e. secondary swamp forest inside the concession. Source: AidEnvironment, based on SIGAP KLHK 2024.

PT Surya Panen Subur

Ownership & Business relationship

Owner:	Olam response:
Amara Plantation (Rachmat family)	Olam Agri stated (8 June 2026) that they identified that supply from "*the Amara Group entered our supply chain indirectly through third party refinery in 2025, but since that time we have ceased all sourcing from SPS* [PT Surya Panen Subur, *ed.*] *and we have instructed suppliers to exclude SPS and other Amara Group subsidiaries from our supply chain, in line with their inclusion on our no-buy list*."

Environmental fines, embargoes, and suspensions

Embargoes and environmental fines:	No	-
Suspensions:	No	-

Case description

In 2017, Rainforest Action Network (RAN) and their allies accused PT Surya Panen Subur, a 32,252-ha oil palm concession in Nagan Raya, Aceh, Sumatra (Indonesia), of clearance in the Leuser Ecosystem, an intact rainforest where critically endangered animals, such as tigers, orangutans, elephants and rhinos, live in its habitat (1). Allegedly, PT Surya Panen Subur burned critical Tripa peatland inside its concession. The clearance happened despite the enactment of a governmental moratorium on forest and peatland-clearing, Government Regulation No.57/2016, that aims to protect peatland in Indonesia. One year later, in September 2018, Olam stated that as a resulting action "*these mills are no longer in Olam's supply chain*" (2).

After that, the Surya Panen Subur palm oil concession continued clearing. AidEnvironment detected and calculated 293 hectares of deforestation inside the concession in the 2021-2024 period, intersecting with the FAO/EUDR definition of forest (3). More recently, Nusantara Atlas detected an additional total of 1,166 ha of forest loss inside the company's concession between 23 April 2025 - 18 April 2026, of which 773 ha (66%) was cleared on peat vegetation. Large proportion of the clearing occurred in January 2026, when 864 ha (74%) of the total amount was cleared (4). Nearly 80 % of that clearing (674 ha) in January 2026 was classified as forest vegetation.

The parent company of PT Surya Panen Subur is Amara Plantation, a company connected to the wealthy Rachmat family by Nusantara Atlas (5). Despite the ongoing clearing, Olam Agri listed the Surya Panen Subur palm oil mill as an indirect supplier in 2024 (6). While the mill seemed to have disappeared from Olam's palm oil mill list of 2025H1, Olam continues sourcing from other plantation companies of the same noncompliant parent group, Amara Plantation, for instance from Kharisma Alam Persada (7).

(1) Rainforest Action Network (2017), online: https://www.ran.org/leuser-watch/pt_surya_panen_subur_ii_forest_loss, accessed in April 2026.
(2) Olam Grievance Log February 2019, online: https://www.Olamgroup.com/content/dam/Olamgroup/products/food-staples/edible-oils/sustainable-palm-oil/sustainable-palm-oil-pdfs/Olam-grievance-monitoring-log-feb-2019.pdf, accessed in April 2026.
(3) JRC Forest Cover 2020, online: https://data.jrc.ec.europa.eu/collection/FISE, accessed in April 2026.
(4) Nusantara Atlas, online: https://nusantara-atlas.org/, accessed in April 2026.
(5) Nusantara Atlas, online: https://nusantara-atlas.org/palm-oil-driven-deforestation-stable-in-indonesia-in-2025-but-doubles-in-papua/, accessed in April 2026.
(6) Olam Agri List of Mills 2024, online: https://www.Olamagri.com/content/dam/Olam-agri/assets/webp/ps/eo/eo-pdfs/mill-list-2024-volume.pdf, accessed in April 2026.
(7) Olam Agri List of Mills 2025H1, online: https://www.Olamagri.com/content/dam/Olam-agri/assets/webp/ps/eo/eo-pdfs/Olam-agri-mill-list.zip, accessed in April 2026.

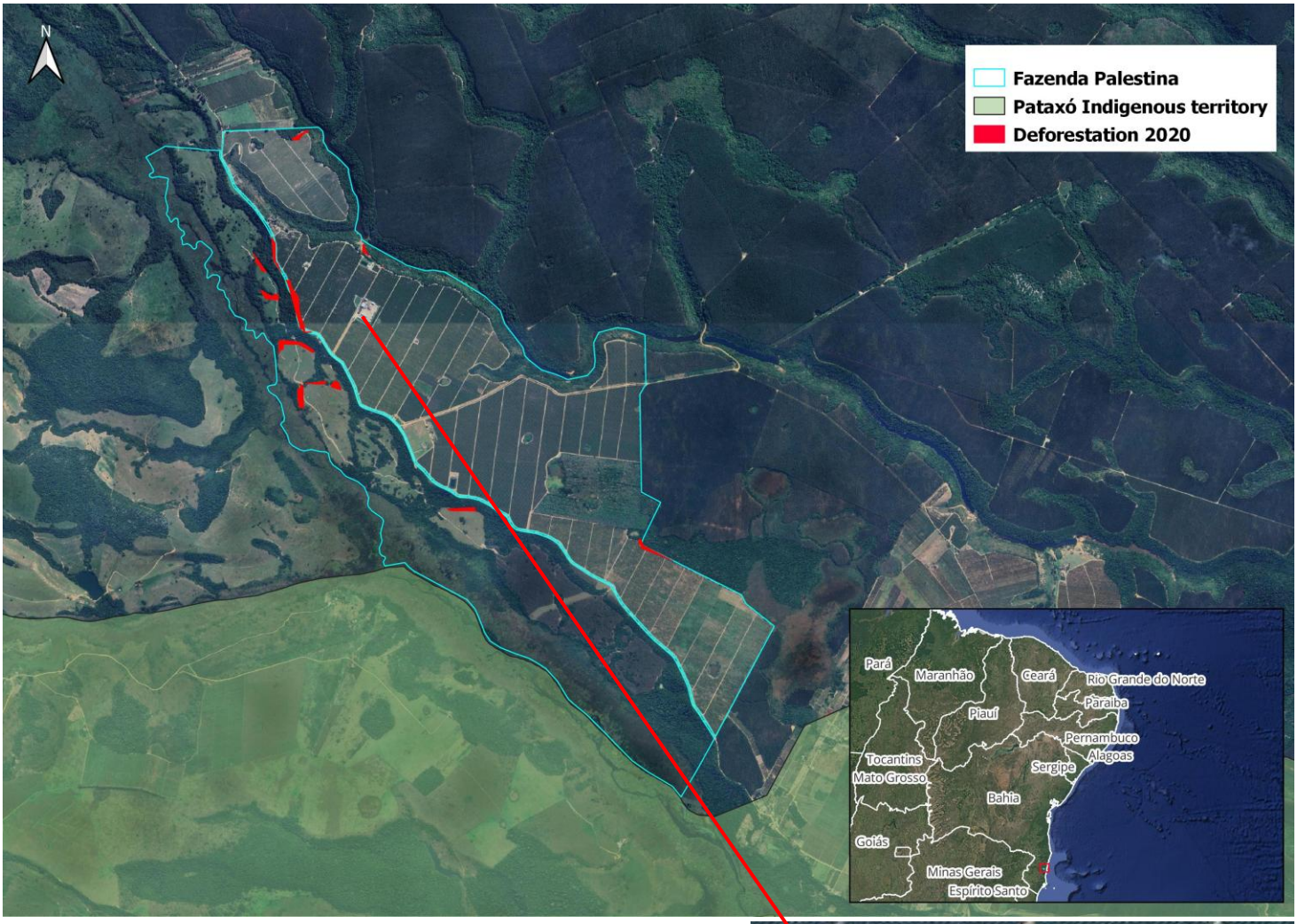
Fazenda Palestina / Monte Pascoal

Location: Porto Seguro, Bahia
Biome: Atlantic Forest (Brazil)
Area property (ha): 828
Coordinates property: -16.80688, -39.31575

Cleared Area

6.4	hectares	**Period clearance:** Between August 2019 – July 2020	**Type of vegetation:** Dense Ombrophylous Forest
1,482	tons of CO_2		

Imagery: Location of Fazenda Palestina/Monte Pascoal farm, bordering the Taquara Pataxó indigenous territory



Imagery on top: Fazenda Palestina / Monte Pascoal (marked with blue line), adjacent to the Taquara Pataxó indigenous community, with small detected deforestation that occurred before the EUDR cut-off date. Source: AidEnvironment, based on various sources, including Funai, SIGEF, PRODES.

Zoom in area. Source: Google maps screenshot with coordinates: -16.7959, -39.3212

Fazenda Palestina / Monte Pascoal

Ownership & Business relationship

CAR numbers: BA-2925303-188F13BA5E1A4C1CB4356176A6D8DC6F and BA-2925303-CDE7C84A4859435BB91370359A7DBB01

Nilzon Taqueti Machado

Olam response:

Ofi stated (9 June 2026) that "*FUNAI formally confirmed that ofi's black pepper estate is not located within an area subject to indigenous land demarcation*." However, FUNAI's filing does not seem to support such clear-cut conclusion. The originally homologated TI Barra Velha lacked the required technical assessment for demarcation (the Relatório Circunstanciado de Identificação e Delimitação or RCID). Once that assessment was carried out, it resulted in a significantly expanded delimitation of the TI – now called TI Barra Velha do Monte Pascoal (52,748 ha, compared to the original 8,627 ha) - approved in 2008, but whose demarcation process remains pending due to legal challenges, overlaps with protected environmental areas, and a suspension by Brazil's Supreme Federal Court related to the Marco Temporal ruling. Ofi's response (1) does not engage with the issue of the expanded delimitation and its pending demarcation (including the possibility that the farm may fall within the new boundaries), nor with the broader land conflict of the Taquara Pataxó community.

Environmental fines, embargoes, and suspensions

Embargoes and environmental fines: Nilzon Taqueti Machado had a small embargo (1.6 ha) for a property in Prado (Bahia) in 2009, for potential pollution or natural resource use linked to construction.

Case description

This case may raise compliance concerns under the EUDR and the CSDDD, as it is linked to an ongoing struggle for the demarcation of indigenous community ancestral lands.

In 2023, Olam Agricola filed a lawsuit against the Taquara Pataxó Indigenous Community and Funai (Brazil's National Indigenous People Foundation) seeking possession of Fazenda Monte Pascoal, which was registered as Fazenda Palestina (2). The farm location in the municipality of Porto Seguro in southern Bahia, where Olam produces black pepper, is marked by intense conflict. For decades, the Taquara Pataxó people in southern Bahia have faced violence linked to territorial disputes with landowners, including allegations of land grabbing, threats, and killings of Indigenous people (3). Fazenda Palestina/Monte Pascoal borders the Barra Velha do Monte Pascoal Indigenous Territory (4) (see map in the previous page), which, according to Funai, has already been delimited and is in the second phase of the demarcation process (5). However, the demarcation process has not yet been completed due to factors such as overlaps with protected environmental areas, annulment lawsuits, and a suspension ordered by Brazil's Supreme Federal Court (STF) under the "general repercussion" mechanism (Extraordinary Appeal 1,017,365) (4). In that case, the Court ruled unconstitutional the so-called Time Frame (Marco Temporal) thesis for the demarcation of Indigenous lands (6). As a result, lawsuits addressing similar issues remain pending until there is a final decision on the adoption or rejection of the Marco Temporal thesis.

In its lawsuit filing, Olam alleges that the area—used under an agricultural partnership—was under threat of invasion by Indigenous people from the Guaxuma village of the Taquara Pataxó people, allegedly carried out by Indigenous leaders in late 2023 (7). In the lawsuit, the company states that it is acting on behalf of Outspan Brasil Importação e Exportação Ltda, which has a partnership agreement with Nilzon Taqueti Machado for the use of the land (7). Outspan Brasil is a wholly-owned subsidiary of Olam in Brazil (8). Brazilian rural cadastre SIGEF confirms Nilzon Taqueti Machado as the registered owner of the land. During the proceedings, the Federal Prosecutor's Office (Ministério Público Federal—MPF) stated that Olam failed to present evidence that it holds possession of the property and that the alleged threat of invasion was based on "rumors" (9). The lawsuit remains pending until there is a final decision on the Marco Temporal thesis (10). A Brazilian export data sample between 2021-2023 reveals that Olam mainly exports Brazilian dried (black) pepper to Vietnam (39%), Singapore (32%), and Spain (21%), predominantly imported by Olam as well (11).

1. Ofi company response, 9 June 2026, online: https://aidenvironment.org/wp-content/uploads/2026/06/Review-of-Olam-Groups-potential-linkage-to-noncompliance-cases.pdf
2. Undisclosed judicial files (available upon request) (judicial process number: 1000096-88.2023.4.01.3310).
3. G1 news Bahia, online: https://g1.globo.com/ba/bahia/noticia/2025/03/11/comunidade-pataxo-denuncia-morte-de-indigena-no-extremo-sul-da-bahia.ghtml, accessed in April 2026.
4. Indigenous territories, online: https://terrasindigenas.org.br/pt-br/terras-indigenas/4942, accessed in April 2026.
5. Funai notes (pages 3-5). Document available upon request.
6. Online: https://noticias.stf.jus.br/postsnoticias/stf-derruba-tese-do-marco-temporal-para-a-demarcacao-de-terras-indigenas, accessed in April 2026; Time Frame (Marco Temporal) thesis, online: https://apiboficial.org/files/2023/09/marcotemporal_panfleto_en_tela.pdf, accessed in April 2026.
7. Undisclosed judicial files, pages 5-9 (available upon request).
8. Olam Investors website, online: https://www.Olamgroup.com/investors/investor-library/sgx/2005/02/incorporation-of-subsidiaries-6.html, accessed in April 2026.
9. File 'manifestação_MPF' (pg. 3) (available upon request).
10. File 'decisao_2023' (available upon request).
11. Brazilian export data of dried pepper (HS code 09041100) between 1 January 2021 and 30 November 2023, filtered for Olam as a shipper.

Fazenda Diana

Location: Uruçuca, Bahia

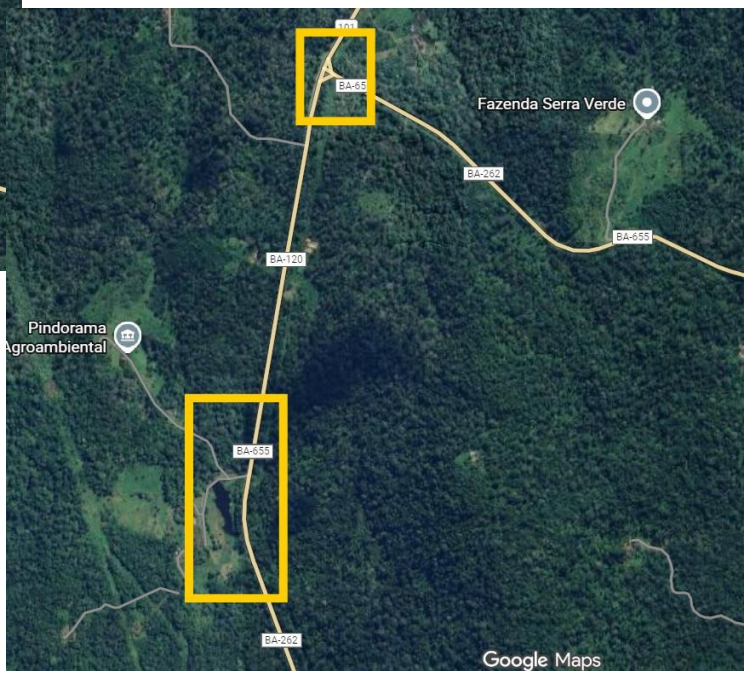
Biome: Atlantic Forest (Brazil)

Cleared Area

N/A	hectares	**Period clearance:** N/A	**Type of vegetation:** N/A

In 2020/2021, the Labor Prosecutor's Office (MPT) sued the three largest cocoa companies in Brazil (Olam, Cargill, and Barry Callebaut) due to finding evidence of slave labor and child labor in the cocoa supply chain of these companies. In the lawsuit, it is mentioned that these problems were identified in the upstream segment of the supply chain, in the states of Pará and Bahia, namely through cocoa sales invoices from the company that owned Fazenda Diana where slave labor was found.

It was not possible to geographic coordinates of the farm, nor was the registered CAR number identified. However, in the inspection report attached to the lawsuit, it is mentioned that the farm is located "*on the road BR-101, near the intersection with road BA-262*" (see images below). Additionally, the inspection report included footage indicating the existence of white building and a dam inside the farm. Based on this information, the probable location of the farm was identified as indicated below.



Imagery: Google maps view of the area in Uruçuca, BA mentioned in the inspection report as the location of Fazenda Diana.

Coordinates: -14.58204, - 39.33933

Fazenda Diana

Ownership & Business relationship

Owner:
Chaves Agrícola e Pastoril Ltd.

Olam response:
Ofi stated (9 June 2026) that "*seven of the cocoa farms in Brazil* [out of ten, ed.] *have never been a direct supplier to ofi*", to which it added *"For the other cocoa cases in Brazil and in Côte d'Ivoire, active suppliers must adhere to ofi's Agri supplier code".* Besides not identifying to which farms it has or had direct linkages, even though its statement indicates that it exists or existed for a few cases, it also remain unclear the actions undertaken to ensure that "*active suppliers must adhere to ofi's Agri supplier code",* such as adherence assessments conducted, whether suppliers with a linkage to the company for which a noncompliance case has been identified are going to be checked and further scrutinized, or if indirect supply chain links to any of the flagged cases have been systematically screened.

Certification status

Existing investigative media reports have found that several properties belonging to the Chaves Group, including Fazenda Diana, received UTZ certification in 2018, already after the slave labor and child labor issues had been identified. However, as of 2020, no property of the Chaves Group had the certification seal anymore. UTZ did not disclose what motivated the loss of certification.

Environmental fines

Chaves Agrícola e Pastorial has received a fine of BRL 4,000 on June 3, 2016, linked to a property in Itabuna (Bahia).

Case description

Olam Agricola Ltda., the Brazilian subsidiary of the multinational Olam Group (1), was sued in 2021 by Brazil's Labor Prosecutor's Office (Ministério Público do Trabalho - MPT), which sought to hold the company accountable for the presence of slave labor and child labor within its cocoa supply chain (2). The MPT requested the company to pay BRL 303 million in collective moral damages through Public Civil Action. Additionally, Olam was requested to comply with measures such as not hiring, retaining, or allowing children and teenagers under the age of 18 to carry out work-related activities at any stage of the cocoa supply chain, and formalizing contracts with all rural producers that they hire directly, as well as with contracted suppliers (3).

According to the lawsuit, MPT identified indications of child labor and slave-like conditions in cocoa-producing hubs in the states of Pará and Bahia, Brazil's main producing cocoa regions (4). The lawsuit argues that these areas are part of Olam's supply chain, since the company is one of the largest purchasers and processors of cocoa in Brazil. The MPT also points out the recurring use of child labor in cocoa production, as well as allegations that producers were coerced into selling exclusively to buyers designated by farm owners, which is a practice that violates Brazil's land tenure legislation. According to the MPT, workers were allegedly subjected to debt bondage systems, degrading living and working conditions, and exhausting workdays (4). These allegations were confirmed during labor inspections carried out on cocoa farms. In one of these inspections, nine workers were rescued from slave-like conditions in September 2017 at Fazenda Diana, in Uruçuca (Bahia) (5). This farm was later confirmed to be a property owned by Chaves Agrícola e Pastoril Ltd., which also owns at least one other farm – Fazenda Guanabara – in Ilhéus (Bahia). Based on access to invoices and the inspection report prepared by labor inspectors, the MPT mapped that the cocoa harvested on the property was sold to Olam's direct suppliers (6).

At first court ruling decision, on June 20, 2023, the company was required to comply with specific obligations under penalty of being fined and obliged to pay BRL 500,000 for collective moral damages (7). In the second decision, on March 12, 2024, the Regional Labor Court (TRT) stated that there was no legal provision that could assign to a given company the responsibility for human-rights violations committed by third parties within its supply chain. With this decision, the court dismissed the Public Civil Action initiated by the MPT (8). As a result, all "do and refrain" obligations imposed on the defendant, as well as the payment of collective moral damages, were removed from the ruling (8).

The case is now awaiting a decision by Brazil's Superior Labor Court (Tribunal Superior do Trabalho - TST), which will review the appeal filed by the MPT seeking to overturn the second court ruling decision that dismissed the Public Civil Action (9).

1. Olam annual report 2024, online: https://www.olamgroup.com/content/dam/olamgroup/investor-relations/ir-library/annual-reports/annual-reports-pdfs/2024/olam_annual_report_2024.pdf, viewed in May 2026.
2. Superior Labor Court's Judicial process No. 0000012-95.2021.5.05.0492, online: https://www.trt5.jus.br/acesso-localizacao-atual, viewed in May 2026.
3. Case file pages 76 and 79 (undisclosed)
4. Case file pages 45-51 (undisclosed)
5. Case file page 49 (undisclosed)
6. Case file page 68 (undisclosed)
7. Case file page 83 (undisclosed)
8. Case file pages 114, 115 (undisclosed)
9. Case file page 129 (undisclosed).

Fazenda Grande Leste I, II, III, IV, V

Location: São Desidério, Bahia
Biome: Cerrado (Brazil)
Area property (ha): 5,292
Coordinates property: -12.7482, -45.2219

Cleared Area			
2,228	hectares	**Period clearance:** March – July 2022	**Type of vegetation:** Forested savanna
286,417	tons of CO_2		

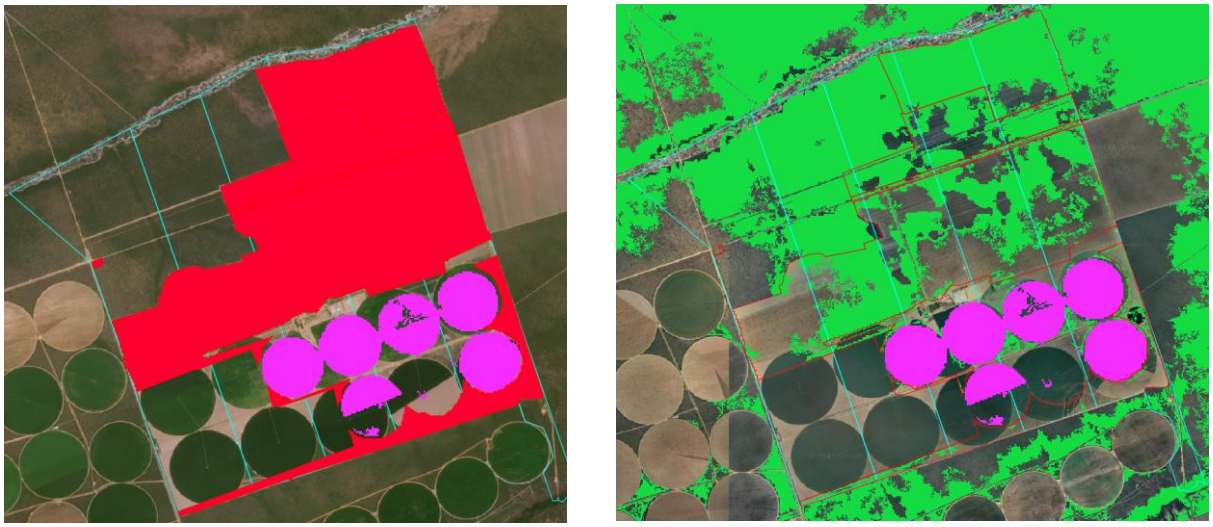


Figure: Fazenda Grande Leste I, II, III, IV, V (marked with blue line). Source: AidEnvironment. In purple the coffee area, in green the EU Forest Observatory classification of forest, and in red the deforested area. From 2002, MapBiomas assessed that coffee was grown in the southern part of the farm, covering the purple circles. Prior to that, these areas were covered with 'other temporary crops". The farm also grows cotton and soy.

Imagery: Fazenda Grande Leste I, II, III, IV, V (marked in blue) before and after clearing. Coordinates of clearance: -12.7205, -45.2163. The last satellite photo, dated in December 2024, points to an expansion of irrigation circles to the cleared areas. Source: AidEnvironment. Imagery ©2024 Planet Labs Inc.

Fazenda Grande Leste I, II, III, IV, V

Ownership & Business relationship

Owners:
Joan Olivio Sibin, José Gilberto Sibin, Luiz Silvestre Sibin, Paulo Roberto Sibin, and Antonio Segio Sibin (SIGEF)

Daniel Franciosi (Inema)

Olam response:

Ofi stated (9 June 2026) that it has no purchase history or commercial relationship with Fazenda Grande Leste in Bahia. Olam Agri stated (8 June 2026) that it has no association with Fazenda Grande Leste in Bahia, Brazil.

Certification status

Environmental fines	Yes, a total of BRL 5,649,100 in fines between 2008-2022 linked to the owners for polluting, for activities in embargoed areas, and for deforestation without authorization.

Case description

Between March-July 2022 Fazenda Grande Leste I, II, III, IV, V cleared 2,228 hectares of forested savanna, of which large part is classified as forest under the EUDR (1). The deforestation occurred in parts of the farm adjacent to the coffee production area. Since at the time of clearing the existing coffee planted area in the farm was nearing 22 years of existence (coffee has been planted since 2002) (2), there might be concern under the EUDR that the deforestation is linked to an expansion of coffee area, for instance to replace the old coffee trees.

Owners of the Fazenda Grande Leste farm parcels, the Sibin family, are originally from São João da Boa Vista (SP) and are active in coffee production in Bahia. Companies linked to the coffee producing family in Bahia include Cafeeira dos Gerais LTDA, Agropecuaria Grande Leste LTDA, and Bahia Trading Coffe Consultoria em Agronegocios E Participacoes LTDA (3). None of these companies can be found in recent shipment data, therefore, it is likely they market coffee through commodity traders such as Olam, via other exporting groups (e.g. Montesanto Tavares Group), or via cooperatives (e.g. Cooxupé). The nearest coffee processing facility of Olam is in Vitoria de Conquista in Bahia, at about 500 KM distance.

While in the official Brazilian land management system (SIGEF, 2019) the farm is registered under ownership of the Sibin Family, official documents from the Bahia environmental state agency (4) link the property to Daniel Franciosi. Associated company Franciosi Agro Group is one of the largest agribusiness companies operating in Matopiba, allegedly producing soy and cotton in 70,000 hectares in Bahia and Piauí states (5). Since Olam also sources both soy and cotton from Brazil, the farm also has a deforestation risk under the EUDR under this ownership.

In March 2022, Fazenda Grande Leste I, II, III, IV and V obtained an authorization (6) for the deforestation of 2,542 hectares valid until March 2024. Nevertheless, forest loss since 31 December 2020, which is considered authorised and legal under Brazilian law, will be illegal under the EUDR, and therefore would be noncompliant with the Law if any coffee or soy of this farm would enter the European market from January 2027.

1. JRC Forest Cover 2020, online: https://data.jrc.ec.europa.eu/collection/FISE, accessed in April 2026.
2. Mapbiomas (2026), online: https://plataforma.brasil.mapbiomas.org/, assessed in February 2025.
3. Various Brazilian websites, including Econodata, online: https://www.econodata.com.br/consulta-empresa/26333494000110-BAHIA-TRADING-COFFE-CONSULTORIA-EM-AGRONEGOCIOS-E-PARTICIPACOES-LTDA, assessed in February 2025.
4. Documents available upon request. Online indications: https://mbusca.sefaz.ba.gov.br/ditri/normas_complementares/resolucoes/legcorr_probahia_resol_2023_162.pdf or https://www.jusbrasil.com.br/diarios/1163887046/doeba-21-01-2022-pg-47, accessed in April 2026.
5. Website Franciosi Agro Group, online: https://www.franciosiagro.com.br/, accessed in April 2026.
6. Available upon request.

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