

PUBLIC SUMMARY REPORT

External Verification of Sustainability Policy Transparency Toolkit (SPOTT) Palm Oil Assessment

PT Dharma Satya Nusantara Tbk.
2025

Contact

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PART 1: SCOPE OF THE CERTIFICATION ASSESSMENT AUDIT
1.1 Company and Contact Details

Company Name:	PT Dharma Satya Nusantara Tbk.
Business Address:	GRHA DSN Kawasan Industri Pulogadung Jalan Pulo Ayang Kav. OR, RW.3, Jatinegara, Kec. Cakung , Jakarta Timur, DKI Jakarta 13930, Indonesia
Contact Person:	Ms. Berlian Pratiwi
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Web Site:	www.dsn.co.id

1.2 Assessment Details

Dates of This verification:	23 rd – 25 th June 2025
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1.3 Assessment Type

External verification to assess and validate compliance, performance and/or action taken by PT DSN in relation to its commitment by evaluating the information provided by PT DSN towards SPOTT concerning the latest SPOTT Palm Oil Indicator Framework 2025 that requires external verification.

1.4 General Description of DSN Group
1.5

Established on September 29, 1980, PT Dharma Satya Nusantara Tbk (DSN) initially focused on the timber industry, obtaining Forest Concession Rights (HPH) from the Government. Over the past 40 years, the company have leveraged on extensive industry experience and strong partnerships with the customers, suppliers and local farmers to ensure traceable, responsibly sourced, and inclusive wood materials. Collaborating with approximately 4,000 farmers in Indonesia, which DSN proudly source sustainable wood to produce high-quality wood products.

Recognizing the growing demand for palm oil and its derivatives in the global edible oil market, DSN has expanded into the palm oil industry. This strategic move has allowed us to establish ourselves as a prominent player in the sustainable palm oil industry. Today, the palm oil business segment contributes over 87% of company total revenue.

1.6 Operational Units under scope

DSN operates processing units including **12 Palm Oil Mills, 1 Kernel Crushing Plants, and 37 Estates** based in Indonesia. Details of the processing operations are as below:

Operations	Facilities	Palm Oil Mills	Estates	Location	Certification
PT. Swakarsa Sinarsentosa (PT SWA)	POM, Plantation	1. PKS 1 2. PKS 4	1. Jabdan 1 2. Jabdan 2 3. Long Jenew 1 4. Long Jenew 2	Kutai Timur, East Kalimantan, Indonesia	RSPO, ISPO, ISCC
PT Dharma Agrotama Nusantara	POM, Plantation	3. PKS 2	5. Puhus 1 6. Puhus 2 7. Puhus 3	Kutai Timur, East Kalimantan, Indonesia	RSPO & ISPO
PT Dewata Sawit Nusantara	POM, Plantation	4. PKS 6	8. Melenyu 1 9. Melenyu 2 10. Melenyu 3 11. Melenyu 4	Kutai Timur, East Kalimantan, Indonesia	RSPO & ISPO
PT Karya Prima Agro Sejahtera	POM, Plantation	5. PKS 7	12. Long Teman Estate 13. Sungai Wahau Estate	Kutai Timur, East Kalimantan, Indonesia	RSPO & ISPO

PT Dharma Intisawit Nugraha	POM, Plantation	6. PKS 11 7. PKS 3	14. Long Kejiak 1 15. Long Kejiak 2 16. Long Kejiak 3	Kutai Timur, East Kalimantan, Indonesia	RSPO & ISPO
PT Pilar Wanapersada	POM, Plantation	8. PKS 5 9. PKS 12	17. Bukit Pendulangan 1 18. Bukit Pendulangan 2 19. Bukit Pendulangan 3	Lamandau, Central Kalimantan	RSPO & ISPO
PT Agro Andalan	POM, Plantation	10. PKS 8	20. Setawar 1 21. Setawar 2	Sekadau, West Kalimantan	ISPO
PT Bima Palma Nugraha	POM, Plantation	11. PKS 9	22. Tepian Langsung 1 23. Danau Padang 1 24. Sungai Mangkupa 1 25. Sungai Mangkupa 2	Kutai Timur, East Kalimantan, Indonesia	RSPO & ISPO
PT Bima Agri Sawit	POM, Plantation	12. PKS 10	26. Baay 1 27. Muara Bulan 1	Kutai Timur, East Kalimantan, Indonesia	RSPO & ISPO
PT. Dharma Intisawit Lestari	Plantation	-	28. Metun Sajau Estate 29.	Bulungan, North Kalimantan, Indonesia	RSPO & ISPO
PT. Putra Utama Lestari	Plantation	-	30. Beribo 1 31. Beribo 2	Mahakam Ulu, East Kalimantan, Indonesia	-
PT. Dharma Persada Sejahtera	Plantation	-	32. Sei Bangun 1	Sintang, West Kalimantan, Indonesia	-
PT. Prima Sawit Andalan	Plantation	-	33. Jelimpo 1 34. Jelimpo 2 35. Jelimpo 3	Sintang, West Kalimantan, Indonesia	-
PT. Kencana Alam Permai	Plantation	-	36. Tempunak 1	Sintang, West Kalimantan, Indonesia	ISPO
PT. Mitra Nusa Sarana	Plantation	-	37. Peturau 1 38. Peturau 2	Sintang, West Kalimantan, Indonesia	-
PT Dharma Satya Nusantara	KCP	1	-	Kutai Timur, East Kalimantan, Indonesia	RSPO SCCS
	Bulking	5	-	East, Central, West Kalimantan, Indonesia	RSPO SCCS

PART 2: VERIFICATION PROCESS

2.1 About the Verification Body

Control Union (CU) is an independent, international assurance and certification body. Founded in 1920 in the Netherlands, CU has office in more than 80 countries. CU offer one-stop-solution for sustainability reporting and assurance services. CU has more than 6,000 employees working across the globe.

Control Union Certification (CUC) is a part of Control Union – an international inspection and certification body. CUC performs assessments and certification across many sectors including biomass, biofuels, forestry, agriculture, food & feed, fats & oils, minerals, energy and tourism.

In the field of sustainability reporting, we serve our clients by performing sustainability strategy checks, gap analysis and independent assurance. Control Union is also a registered assurance provider for the AA1000 assurance standard.

Control Union (Malaysia) Sdn Bhd is accredited for RSPO (ASI-ACC-069) for the scope of P&C (Single Site & Group) and SCC worldwide and accredited by the Department of Standard Malaysia (DSM) for ISO 17021, ISO 17065, ISO 17020, ISO 9001, ISO 14001, MTCS - FMC, FSMS and MSPO. When requested, a copy of the accredited certificates can be obtained from CUC. Control Union also approved in providing verification for POIG verification indicators.

2.2 Verification Team

Lead verifier	Ebnu Holdoon Shawal
Verifier 1	Rizky Fatulloh
Verifier 2	Panggading Nainggolan

2.2.1 Qualifications of the Assessors

Name	Qualifications
Ebnu Holdoon Shawal (Lead verifier)	- Project Manager Sustainability, focusing on GRI Assurance, Assurance Statement AA1000As, SPOTT Verification, Traceability and other sustainability projects under the department of Control Union Assurance Services - Graduated with a Bachelor of Civil Engineering from University Tenaga Nasional. Successfully attended Global Report Initiative (GRI) Standards Training (C38370) by Tembusu Asia Singapore, Completed Lead Auditor Course for RSPO Principle and Criteria, RSPO Supply Chain, qualified auditor for MSPO Oil Palm Management Criteria and Supply Chain. - Has more than 7 years' experience in Palm Oil Industry conducting audit in various country, managing the programs for Global and Local Palm Oil Sustainability scheme (RSPO and MSPO), part of technical working group for MSPO implementations together with Standard Malaysia and various stakeholders.
Rizky Fatulloh (Verifier)	- Serve as Scheme Coordinator (Scheme Manager) Palm Oil in Control Union Indonesia, - Graduate in Bachelor of Law, with more than 7 years' experience in TIC (Testing, Inspection and Certification) industry. - Involved in ISPO certification since 2022. Possesses expertise in legality. - Has attended and passed training for ISPO Auditor, ISO 14001:2015, ISO 45001:2018, ISO 19011:2018, SNI ISO/IEC 17065:2012, SNI ISO/IEC 17025:2017, ISO 31000:2009; ISO 37001:2016, TKDN (Tingkat Komponen Dalam Negeri) Training, Inspection for Textile Brand Training, Mechanical Electrical, Laboratory personnel for Electrical Product and Manufacture of domestic appliances; and Cleanliness Health Safety and Environmental Sustainability (CHSE) Certification Auditor Training in the Tourism and Creative Economy
Panggading H. Nainggolan (Co-Verifier)	Bachelor of Social Sciences with more than 10 years of work experience. Involved in RSPO certification since 2012. He has expertise in social and supply chain. Qualified as Lead Auditor of RSPO P&C, Lead Auditor of RSPO SCCS and ISPO Auditor. Has attended the training of RSPO P&C Lead Auditor, RSPO SCCS Lead Auditor, ISPO Auditor, SA 8000 Auditor, ISO 9001 Lead Auditor, and ISO 19011:2018.

- Native in Bahasa and fluent in English

2.3 Methodology

2.3.1 General Overview

Verification Methodology

The following methodologies were adopted during the verification process:

- 1. Assessment Planning**
An assessment plan was shared in advance of the verification date to ensure transparency and preparedness.
- 2. Reference Frameworks**
The verification was guided by the **SPOTT Palm Oil Indicator Framework 2025** and the company's internal procedures to assess each requirement.
- 3. Sampling Approach**
A sampling methodology was applied to select representative facilities for detailed verification.
- 4. Evidence Review**
Various documents and records were verified to confirm alignment with SPOTT requirements, including:
 - Traceability Procedures (Traceability to the Mill – TTM, and Traceability to the Plantation – TTP)
 - Traceability data (TTM and TTP)
 - Samples of transaction records
 - Supplier engagement reports and records
 - NDPE Implementation Reporting Framework
 - Risk assessment documentation
 - Membership and affiliations
 - Certification documents (e.g., RSPO, ISPO)
 - Relevant social compliance data
 - Environmental management records
- 5. Interviews with Key Personnel**
Inquiries and interviews were conducted with senior management, functional leads, and personnel responsible for day-to-day sustainability operations to assess implementation effectiveness.
- 6. Evidence Evaluation**
All supporting evidence was reviewed and assessed to verify compliance with applicable protocols.

Scope of Indicator Verification

All selected **SPOTT 2025 indicators** were subjected to **comprehensive external verification** to ensure full compliance and eligibility for maximum scoring. The indicators verified include:

"7, 11, 35, 37, 64, 65, 92, 110, 111, 171, 172, 173, 174, 176, 179"

2.3.2 Sampling

Sampling Approach for Non-Traceability SPOTT Indicators

For non-traceability-related SPOTT indicators, where sampling is required for verification, the sampling design follows the formula:

$$x = \sqrt{y}$$

where **x** is the minimum number of facilities to be sampled and **y** is the total number of facilities under each processing scope. The result is always rounded **up** to the nearest whole number to ensure adequate representation.

Facility Overview and Sampling Outcome

The total number of facilities considered includes:

- **4 Palm Oil Mills**
- **1 Kernel Crushing Plants**

- **7 Estates**

Based on the sampling calculation and facility distribution, the audit sample comprises:

Facility Type	Facility Name
Mills	1. PKS 4
	2. PKS 3
	3. PKS 5
	4. PKS 9
Estates	1. Jabdan 1
	2. Puhus 1
	3. Long Teman Estate
	4. Long Kejiak 3
	5. Bukit Pendulangan 2
	6. Tepian Langsung 1
	7. Baay 1
Kernel Crushing Plant	8. PT Dharma Satya Nusantara (KCP)
Plasma (sampling as part of the estates)	9. Kemitraan Min Sun Lekut
	10. Kemitraan Min Bea Glang Mandiri
	11. Kemitraan Gerdabang Agri Center
	12. Kemitraan Sawitan Surya
	13. Kemitraan Sawit Usaha Tani Sejahtera
	14. Kemitraan Seleq Sejahtera Bersama
	15. Kemitraan Karya Sejahtera
	16. Kemitraan Harapan Baru

This sampling ensures representative coverage across different facility types for the purpose of verifying non-traceability SPOTT indicators.

PART 3 ASSESSMENT FINDINGS

3.1 Summary of the findings

Overview of DSN and Verification Scope

PT Dharma Satya Nusantara Tbk (DSNG) is a prominent Indonesian company with a focus on the palm oil and wood product industries. Here's a closer look at their operations including Palm Oil Business which include planting and production. DSNG is involved in the cultivation of palm oil plantations and the production of palm oil products. The company produce crude palm oil (CPO), palm kernel, and palm kernel oil.

Verification Scope and SPOTT Indicator Coverage

The verification process was guided by selected **SPOTT indicators** relevant to DSN's operations. These included indicators **7, 11, 35, 37, 64, 65, 92, 110, 111, 171, 172, 173, 174, 176, and 179**, covering both group-level information and specific operational sites

Summary of Findings and Assurance Level

A summary of the evaluated indicators, key findings, and the corresponding recommendation for the scope is presented in the table below.

Summary of Findings "7, 11, 35, 37, 64, 65, 92, 110, 111, 171, 172, 173, 174, 176, and 179"	Scope and Scoring
Member of multiple industry schemes or other external initiatives to reduce negative environmental or social outcomes associated with palm oil production (<i>Indicator 07</i>)	
DSNG's Commitment to Ethical Agriculture and Human Rights 1) Membership in PAACLA Indonesia Following verification, PT Dharma Satya Nusantara Tbk (DSNG) is confirmed as a member of PAACLA Indonesia—a national partnership committed to building child-friendly agricultural systems in rural Indonesia. This membership reflects DSNG's proactive stance against child labor and its dedication to sustainable rural development. PAACLA (Partnership for Action Against Child Labor in Agriculture) is a long-term multi-stakeholder initiative working across plantation, forestry, food crops, livestock, and fisheries sectors. It aligns its goals with the Sustainable Development Goals (SDGs) to eliminate child labor. PAACLA's Vision: <i>"Together realizing sustainable agriculture free from child labor."</i> PAACLA's Mission Includes: • Building collaborations between government, businesses, and civil society to eliminate child labor in agriculture. • Promoting the development of <i>Desa Layak Anak</i> (Child-Friendly Villages) in agricultural areas. • Aligning action plans with SDGs and national goals for a child-labor-free Indonesia. As a member, DSNG: • Receives support, information, and capacity-building assistance. • Participates actively in PAACLA programs and organizational development. • Is committed to contributing resources and data to further PAACLA's goals. • Upholds PAACLA's principles of integrity, transparency, and inclusive partnership. This affiliation underscores DSNG's commitment to preventing child labor and building inclusive, safe agricultural systems. 2) Member of the Tropical Forest Alliance (TFA) DSNG is also a confirmed member of the Tropical Forest Alliance (TFA), a global public-private partnership platform hosted by the World Economic Forum. The TFA brings together key stakeholders to reduce deforestation from commodity supply chains. • On 27 September 2021, DSNG submitted its official TFA membership application. • A formal confirmation letter dated 3 July 2025 was issued by the Sustainable Commodities Specialist from TFA, affirming DSNG's full membership. Through this alliance, DSNG contributes to collective industry efforts to reduce deforestation and build more sustainable commodity supply chains.	Comprehensive, Externally Verified

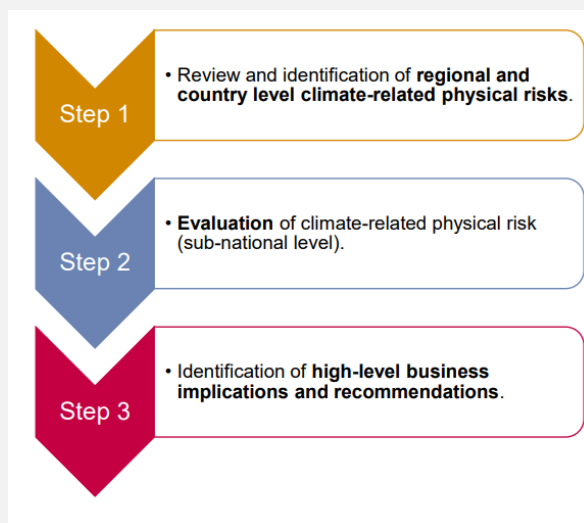
DSNG's verified affiliations with PAACLA Indonesia and the Tropical Forest Alliance strongly support its stated commitments to ethical, inclusive, and sustainable agricultural practices. Through a suite of human rights-aligned policies and on-the-ground programs, DSNG demonstrates industry leadership in responsible business conduct—particularly in preventing child labor, supporting women, and respecting indigenous and rural community rights	
Climate risks assessment available (<i>Indicator 11</i>)	
Climate Risk Assessment & Resilience Strategy DSNG's Climate Risk Assessment (CRA) In 2022, PT Dharma Satya Nusantara Tbk (DSNG) developed a comprehensive Climate Risk Assessment (CRA) in collaboration with Asia Biogas and Environmental Resources Management (ERM) and has been verified during the assesment period. This initiative is part of DSNG's long-term commitment to managing climate-related risks and aligning its disclosures with global frameworks. The Climate risk assessment has been published in DSN Sustainability Report 2024: https://dsn.co.id/esg/sustainability-report/. The Climate Risk Assessment identifies a wide spectrum of climate-related risks across medium- and long-term timeframes, including: • Current Regulatory Risks • Emerging Policy Risks • Technological Risks • Legal and Liability Risks • Market and Supply Chain Risks • Reputation Risks • Acute Physical Risks (e.g., extreme weather events) • Chronic Physical Risks (e.g., long-term changes in temperature or precipitation) The full Climate Risk Assessment report is publicly accessible and forms the foundation for DSNG's climate adaptation and mitigation strategy. The report can be accessed through the links :https://dsn.co.id/wp-content/uploads/2022/03/DSNG-Climate-Approach-Methods-Impacts-Risks-Opportunities.pdf. Based on verification, DSNG's CRA and climate-related disclosures are aligned with the Task Force on Climate-related Financial Disclosures (TCFD) framework as of March 2022. The TCFD-aligned report outlines DSNG's climate approach, scenario analysis, impacts, risks, and opportunities. Key components of the assessment include: 1) Physical Climate Risk Assessment A screening-level physical risk assessment was conducted for DSN Group operations across Indonesia. The study considered: • Two climate change scenarios • Two time horizons: 2030 and 2050 • Five key climate-related natural hazards relevant to DSNG's operations and Indonesia: 1. Water availability 2. Riverine flooding 3. Extreme heat 4. Landslides 5. Cyclonic winds	Comprehensive, Externally Verified

This enables DSNG to assess climate vulnerability across estates, mills, and surrounding communities.

2) Environmental & Social Risk Management

Environmental and climate risks, including those identified in the CRA, are monitored under DSNG's corporate risk management framework and reported through the Audit Committee. DSNG has also adopted the Environmental and Social Management System (ESMS) in line with the IFC Performance Standards (PS 1–8).

The ESMS framework is applied comprehensively across all Strategic Business Units (SBUs), ensuring a unified and robust approach to risk mitigation, impact management, and sustainable development.



At PT Dharma Satya Nusantara Tbk (DSNG), risk management is an integral part of corporate governance and sustainability implementation. The company adopts a structured and proactive approach to identify, assess, and manage risks across all business operations. The Audit Committee plays a central role in overseeing corporate risk management. It is responsible for:

- Evaluating the effectiveness of risk management policies.
- Ensuring accountability and transparency in the implementation of risk strategies by the Board of Directors.
- Approving transactions and strategic decisions that require the oversight of the Board of Commissioners.

Board of Commissioners

Monitors the execution of the Risk Management Strategy as carried out by the Board of Directors. The Board provides strategic direction and ensures alignment with the company's long-term goals. DSNG applies the Enterprise Risk Management (ERM) methodology to regularly identify and monitor risks that may affect corporate performance. This includes financial, operational, reputational, legal, and compliance risks.

- Risk identification and evaluation are embedded in key decision-making processes.
- Insights from the ERM process feed into strategic planning and resource allocation.

- Further details on ERM structure and outcomes can be found in the 2024 Annual Report.

The system is implemented across all Strategic Business Units (SBUs) and covers:

- Environmental impact assessment and mitigation
- Social risk management, including labor, community, and indigenous rights
- Governance controls and compliance mechanisms
- Emergency response planning and grievance handling
- Continuous monitoring, reporting, and stakeholder engagement



As identified in the Climate Risk Assessment conducted by DSNG in collaboration with Asia Biogas and ERM (2022), the following climate-related natural hazards pose significant risks to plantation operations. These have been evaluated for both medium- (2030) and long-term (2050) scenarios and inform DSNG's mitigation strategies under the ESMS and TCFD-aligned framework.

Climate-Related Hazard Risk Matrix

Hazard Type	Key Implications	Risk Management Techniques
Water Availability	- Disruption to operations - Reduced irrigation and plant growth - Strain on domestic water needs - Reputational risk during drought periods	- Conduct water risk assessments - Implement rainwater harvesting at site and catchment levels - Adopt water-saving technologies - Reuse/recycle wastewater (on-site or from communities) - Construct embankments/reservoirs - Prepare strategic reserves for dry seasons and DSNG field staff

Flooding	- Infrastructure and equipment damage - Disruption of access (e.g., flooded roads) - Soil erosion and nutrient loss - Waterlogging impacts on plants - Increased insurance and operational costs - Threats to employee safety and local communities	- Conduct flood risk assessments for all critical assets - Install/upgrade drainage and pumping systems - Build flood barriers where appropriate - Integrate flooding into emergency response plans - Review stormwater/spill management plans - Ensure field staff safety and supply emergency gear	
Extreme Heat	- Higher irrigation needs (due to evapotranspiration) - Reduced crop yields (1–4°C rise may cut yield by 10–40%) - Employee health and productivity risks - Equipment overheating and breakdowns	- Include heat scenarios in emergency planning - Train staff on heat stress symptoms and first aid - Reassess equipment operating thresholds vs. future projections	
Landslides	- Damage to infrastructure and tools - Temporary Road access disruption - Safety risks to employees - Costs for asset replacement/repair - Potential damage to hillside plantations	- Identify landslide-prone zones - Avoid deep/steep terrain cuts - Implement site-specific landslide mitigation measures	
Wind & Cyclones	- Infrastructure and building damage - Safety hazards to employees - Operational disruptions and revenue loss - Higher insurance costs	- Design structures to meet national/international wind-load standards - Coordinate with meteorological agencies for early warnings - Develop pre-cyclone response protocols (e.g., planned shutdowns) - Include wind/cyclone risks in site emergency response plans	
Percentage of supply from third-party mills traceable to plantation level (<i>Indicator 35</i>)			
Traceability Procedure for FFB Suppliers to Palm Oil Mills of PT Dharma Satya Nusantara Tbk (DSNG) SOP No.: SOP-AGR-093-R00 Effective Date: 1 July 2021 Approved by: Managing Director, SBU Palm Oil Objective: This traceability procedure supports DSNG's commitment to:			Partial, Externally Verified with 96.2% TTP

- NDPE (No Deforestation, No Peat, No Exploitation) policy compliance
- Supply chain transparency and accountability
- Legal, environmental, and social due diligence in sourcing practices

DSNG has established a robust and standardized traceability procedure to ensure transparency and accountability in sourcing Fresh Fruit Bunches (FFB) from third-party suppliers to its palm oil mills. The procedure, governed under SOP-AGR-093-R00, outlines clear steps for the registration, verification, and validation of all external FFB suppliers.

Supplier Categories Covered

The traceability system applies to the following supplier types delivering FFB to DSNG's mills:

- IPC – Independent Plantation Companies (non-DSNG owned)
- SAPR – Plasma and independent smallholders under formal partnership cooperatives
- ECOOP – External independent cooperatives
- AGENT – Intermediaries who collect and sell FFB from smallholders
- ISH – Independent Smallholders (individual growers not directly under cooperatives)

Traceability Procedure Steps

A. Identification of Unregistered Suppliers

- Mill Head initiates identification when external FFB supply is needed.
- Supplier name and address are checked against the supplier database.
- New or unregistered suppliers are flagged and reported to the Traceability Team.

B. Supplier Survey & Verification

The Traceability Team conducts on-site verification which includes:

1. Initial screening for overlap with HCS/HCV, peatlands, or conservation areas.
2. Verification of land legality and documentation.
3. Estimation of plantation productivity and FFB supply potential.

C. Registration Form Completion

Suppliers complete digital registration forms in the Supplier Registration App, with specific forms for each supplier category:

- IPC (Annex 2.1)
- ECOOP (Annex 2.2)
- SAPR (Annex 2.3)
- AGENT (Annex 2.4)
- ISH (Annex 2.5.1 – Owner Data, 2.5.2 – Plantation Data)

D. GPS Mapping

- GPS coordinates are recorded on-site by the Traceability Team.
- This data supports geospatial traceability and environmental due diligence.

E. Verification of Registration Data

The Traceability Team reviews submitted forms and verifies:

- Completeness of required fields.
- Accuracy of documentation (KTP, NPWP, land titles, MoUs, RSPO/ISPO certs, etc.)
- Land legality (e.g., SHM, HGU, SKT, SKGR, UKL/UPL, AMDAL).

F. Supplier Evaluation Report

- A formal Evaluation Report is generated via the Supplier Registration App.
- Contains recommendations on the supplier's eligibility.
- Sent to Mill Head for review and decision-making.

G. Evaluation Review by Mill Head

- The Mill Head assesses the evaluation and either:
 - Approves the supplier, prompting notification to Management System Dept.
 - Rejects the supplier, prompting corrective action by the Traceability Team.

H. Database Entry

- Upon approval, the Management System Dept uploads the registration form into the Supplier Database via the Supplier Registration App.
- Suppliers are automatically assigned a unique registration number.

I. Supplier Declaration

- A supplier declaration is generated by Management System Dept.
- Supplier status is updated in the database to (acknowledged).
- Notification sent to Mill Head to confirm registration status.

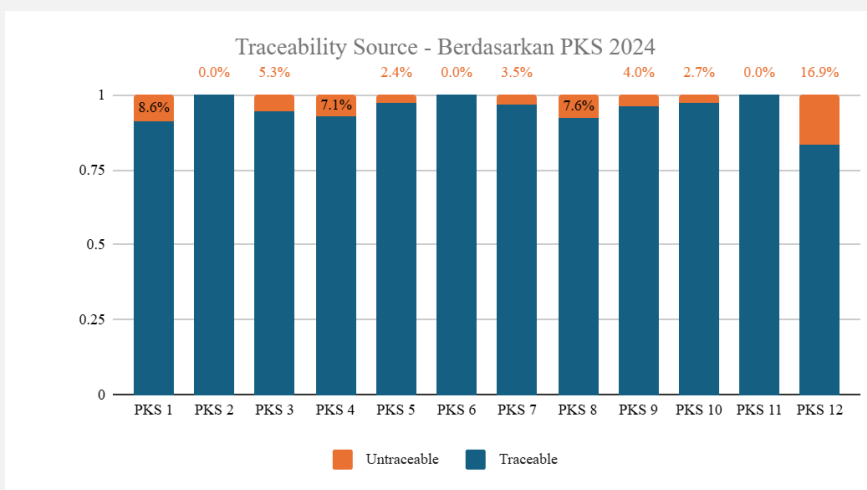
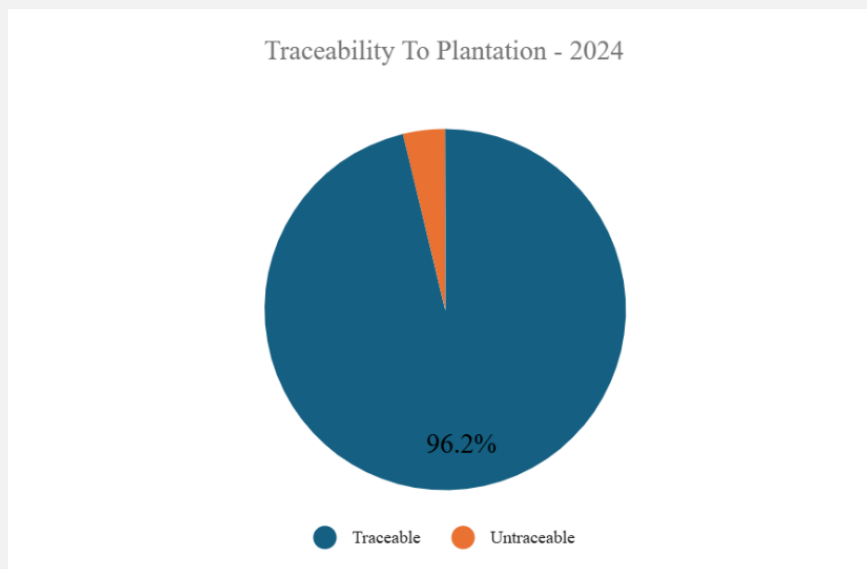
The traceability has been calculated based on the SAP Data for period 2024 (January – December) covering all the suppliers as follows:

SUMMARY OF TRACEABILITY DATA TTP for Year 2024						
Subsidiary	Mill	FFB Supply (Ton)				Total TBS (Ton)
		Traceable	%	Untraceable	%	
PT SWA	PKS 1	146.31	91.4%	13.82	8.6%	160.13
	PKS 4	276,057.37	92.9%	21,080.27	7.1%	297,137.63
PT DAN	PKS 2	269,426.36	100.0%	-	0.0%	269,426.36
PT DIN	PKS 3	96,431.55	94.7%	5,396.85	5.3%	101,828.41
	PKS 11	313,513.74	100.0%	-	0.0%	313,513.74
PT DWT	PKS 6	294,136.43	100.0%	-	0.0%	294,136.43
PT KPAS	PKS 7	303,205.23	96.5%	11,087.03	3.5%	314,292.26
PT BPN	PKS 9	255,664.63	96.0%	10,734.45	4.0%	266,399.08
PT BAS	PKS 10	124,393.32	97.3%	3,429.87	2.7%	127,823.19
PT PWP	PKS 5	189,258.27	97.6%	4,708.99	2.4%	193,967.25
	PKS 12	117,584.99	83.1%	23,860.74	16.9%	141,445.73
PT AAN	PKS 8	180,088.70	92.4%	14,821.32	7.6%	194,910.03
TOTAL		2,419,906.89	96.2%	95,133.34	3.8%	2,515,040.00

Traceability to Plantation – Mill-Level Performance

PT Dharma Satya Nusantara Tbk (DSNG) monitors traceability from mill to plantation to ensure the transparency and integrity of its Fresh Fruit Bunch (FFB) supply chain. The traceability rate reflects the proportion of FFB volume that can be linked to known plantation sources—both company-owned and verified third-party suppliers.

100% Traceability has been achieved by PKS 2, PKS 6, and PKS 11, demonstrating full plantation-to-mill linkage. Overall traceability rate stands at 96.2%, reflecting DSNG's strong performance in supply chain transparency. PKS 12 has the highest untraceable rate (16.9%) and represents an area of improvement under the traceability program.



Publishes traceability data at crusher level (*Indicator 37*)

As an RSPO member, DSNG has conducted RSPO certification for palm oil mill units and nucleus plantations. Starting from RSPO certification of POM 1 unit with PT Swakarsa Sinarsentosa plantation in 2013, until July 2024 it has increased to 9 POM units with 9 plantations (PT SWA, PT DAN, PT DIN, PT BPN, PT BAS, PT PWP, PT KPS, PT DIL, and PT DWT) as its suppliers. The total area of RSPO-certified plantations has grown from 77,204.89 hectares to 82,404.84 hectares (total 77.49% certified). The number of RSPO-certified POM units has risen to 9, accounting for 81.82% of the company's mills. In addition, 10 partnership plantations

Comprehensive,
externally verified

(smallholder schemes) have also achieved RSPO certification. PT DSN had published the traceability information has been published in PT DSN website as per following link: https://dsn.co.id/wp-content/uploads/2025/05/NDPE-Progress-Report-DSNG-2024_Final_10062025_ENG.pdf

DSN Group is gradually conducting ISPO certification for all its supplying mills and plantations. Until 2024, there have been 11 mills and 11 plantations (PT SWA, PT DAN, PT DIN, PT DWT, PT PWP, PT BPN, PT KPS, PT KAP, PT AAN, PT DIL, and PT BAS) that have received ISPO certificates. in addition, 7 partnership plantations (scheme smallholders) have also obtained ISPO certificates.

Mill Name	Certificate Details	Validity	Type
POM 1 (PT Swakarsa Sinar Sentosa)	Certificate Register No. : 82450217068	10 th January 2023 – 9 th January 2028	Mass Balance
POM 2 (PT Dharma Agrotama Nusantara) – single mill	Cert No: 824 502 24192	05-06-2025 until 04-06-2030	Identity Preserved
POM 3 (PT Dharma Intisawit Nugraha) and POM 11 Multimill	Certificate no: 824 502 24206	28-12-2022 until 27-12-2027	Identity Preserved – POM 3&11 Mass Balance – POM 3 & 11
POM 4 (PT Dharma Satya Nusantara)	Certificate No: BVC-RSPO-2020060-1	01-09-2025	Mass Balance
POM 5 (PT Pilar Wanapersada))	GGC-PTPWP-RSPO-ER1-2024	Validity from: 28-03-2024 until 27-03-2029	Mass Balance
POM 6 (PT Dharma Satya Nusantara)	Cert No: 824 502 19113	18-12-2024 until 17-12-2029	Identity Preserved
PKS 7 (PT Dharma Satya Nusantara)	INTERTEK-RSPO-0175593	Validity from: 2 nd July 2021 – 1 st July 2026	Mass Balance
PKS 9 (PT Bima Palma Nugraha)	Certificate Number: 824 502 24171	27-06-2024 until 26-06-2029	Mass Balance
PKS 10 (PT Bima Agri Sawit)	Certificate Number: 824 502 23167	23-07-2024 until 22-07-2029	Mass Balance
KCP – RSPO Certificate			
PT Dharma Satya Nusantara TBk (Kernel Crushing Plant)	Cert No.: INTERTEK-RSPO-0210696	Certification Validity: 13 th April 2025 – 12 th April 2030	Mass Balance

Based on the verification made, it was confirmed that the kernel crushing plant was receiving only from its own mill. The company had shown the physical information system which displayed the input and output from accounting bases and selling quantity. In addition to

having 12 palm oil mills, DSNG also has a Kernel Crushing Plant (KCP) that produces Palm Kernel Oil (PKO). The KCP is located near POM 3 and ISPO-RSPO certified. The kernel supply to KCP is sourced from several DSNG mills as shown in the following table:

Kernel Crushing Plant (Dharma Satya Nusantara KCP)			
Mills supplying	Volume (MT)	Percentage supplying of mill to KCP	Percentage of POM Traceability (%)
PKS 1	109.4	100%	91.4
PKS 2	11,811.6	100%	100
PKS 3	4631.3	100%	94.7
PKS 4	12,824.3	100%	92.9
PKS 6	15,418.4	100%	100
PKS 7	13,560.9	100%	96.5
PKS 9	11,376.1	100%	96.0
PKS 10	5,567.7	100%	97.3
PKS 11	14,802.8	100%	100.0
Total	90,102.7	100%	97.5%

In 2024, the total processed kernels entering KCP amounted to 90,102.7 tons. Meanwhile, the volume of traceable kernels is 87,857.3 tons. This traceable volume is obtained from multiplying the processed kernels by the traceability percentage of each mill. Thus, the percentage of Traceability to Plantation KCP reached **97.5% of** the total processed kernels entering the mill.

Evidence of monitoring deforestation and/or ecosystem conversion (*Indicator 64*)

The Landscape Monitoring Procedure, outlined in SOP-AAGR-097-R00 and effective since 1 January 2022, was approved by the Managing Director of SBU Palm Oil. This procedure is established to guide the implementation and management of a systematic landscape monitoring program that supports DSNG's commitment to its No Deforestation, No Peat, No Exploitation (NDPE) Policy.

The procedure encompasses a comprehensive scope of activities, beginning with the registration on the Global Forest Watch Pro (GFW Pro) platform, followed by the uploading of concession boundary maps and the analysis of land cover changes. It also includes the downloading and processing of deforestation alerts, converting these alerts into polygons for targeted field verification, and verifying actual land cover change on-site. Upon confirmation of any findings, the process outlines steps for mitigating deforestation, developing corrective action plans, and preparing routine reports on the condition and monitoring of the landscape.

The successful implementation of the landscape monitoring system relies on the clear division of roles and responsibilities among several key teams and departments within DSNG as follows:

- **Survey & Verification Team:** Sends deforestation alerts (with maps and coordinates), conducts field verifications within DSN Group concessions, reviews supplier-submitted results, and prepares reports for the Plantation Head.
- **GIS HO (R&A Department):** Manages technical aspects of monitoring, including GFW Pro user registration, map preparation, deforestation alert processing, report generation, and uploading data to the Sustainability Dashboard.
- **Operations Management:** Implements mitigation actions in the field and reports results to the Plantation Head to maintain transparency.
- **Plantation Head:** Reviews verification and mitigation reports, assigns Operations Management for internal mitigation, and instructs the Audit Team to coordinate with suppliers responsible for deforestation.

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- **Human Capital Development & System:** Develops and delivers training modules, ensuring the Survey & Verification Team is properly trained to carry out landscape monitoring procedures.

The landscape monitoring procedure is further strengthened through the integration of Satelligence, a remote sensing technology provider that utilizes a sensor-independent system combining both optical and radar satellite data. Satelligence delivers near real-time, high-accuracy deforestation alerts—up to 97% accuracy in Southeast Asia—at a spatial resolution of 10 meters, with historical monitoring capabilities dating back to 1984. It enhances monitoring precision by incorporating supply chain asset data such as concession boundaries, ownership structures, and supplier linkages.

When compared to the GLAD system used within the Global Forest Watch Pro (GFW Pro) platform, Satelligence proves to be significantly more reliable, especially under the persistent cloud and haze conditions commonly found in regions like Kalimantan and Sumatra. For example, in a case study in Sumatra, GLAD recorded an accuracy of approximately 80%, while Satelligence achieved 97%. Unlike GLAD, which relies solely on Landsat optical imagery and may under-detect changes, Satelligence is specifically designed to distinguish between general tree cover loss and true deforestation, providing actionable insights for targeted responses.

Supporting Documentation and Tools

Implementation of this monitoring framework is supported by a suite of documents and tools, including the SOP-AAGR-097-R00, access credentials and a user guide for GFW Pro, GIS software for alert analysis, the Sustainability Dashboard for performance tracking, and integration tools for visualizing and analyzing Satelligence data effectively.

Methodology

For both the forest baseline and change detection algorithm, satellite imagery needs to be preprocessed.

There are two main types of imagery that we use: optical and radar. Both have different characteristics and need to be preprocessed in a different way. The images are preprocessed in a cloud computing environment. Optical images (Landsat, Sentinel-2) are preprocessed using FORCE, while radar images (Sentinel-1) are preprocessed using SNAP.

Satelligence deforestation

According to FAO, deforestation is the conversion of forest to other land use or the long-term (>10 years) reduction of tree canopy cover below the 10% threshold. At Satelligence, deforestation is defined as the conversion of forested areas (i.e. any pixel within three forest classes: primary, disturbed, regrowth) to non-forest land use, such as arable land, urban use, logging, or wasteland.

The regrowth class may include some mixed rubber forest, mixed coconut forest and other perennial crops and agroforests with high natural tree cover density, which are not captured in the company timber and perennial crop monocultures layers. The disturbed class may include an old jungle rubber. Events flagged in this class are labeled as lower risk.

Field Verification Report – Sample 1

Verification Report No. 004/BA-DF/PT AAN/IV was issued on 29 May 2024, based on satellite information provided by Satelligence in April 2024. The verification focused on an area showing indications of deforestation in Desa Setawar, Tapang Perodah, and Sungai Sambang. Coordinates were available and verified. Field verification found that no deforestation had occurred at the specified location. It was confirmed that the indicated deforestation point lies

outside the HGU (Right to Cultivate) boundary of PT Agro Andalan. However, land clearing activities were observed at Locations 2 and 3, which were conducted by PT BSL. The verification was carried out by the Supplier Engagement Team and CSR Crew, and the findings were confirmed by the Sustainability Section Head. Field Verification Report – Sample 2 Based on satellite imagery provided by Satelligence in September 2024, a field verification was conducted, and the report was issued on Thursday, 7 November 2024. The location of interest lies within the HGU area, with coordinates verified accordingly. However, no land clearing was observed at the site, as the area was inaccessible due to the absence of road access. The verification minutes were formally approved by the Department Head of ESG Area Kaltim 1. The monitoring system used is Satelligence, a near real-time satellite-based deforestation detection platform. This system is designed to deliver accurate and timely alerts on land cover changes, allowing DSNG to respond quickly to potential deforestation activities. With an accuracy rate of up to 97% in Southeast Asia, Satelligence is particularly effective in challenging environments such as Kalimantan and Sumatra, where cloud cover and haze often limit optical satellite performance. By leveraging this high-resolution data, DSNG is able to conduct prompt field verifications and take corrective actions in alignment with its No Deforestation, No Peat, No Exploitation (NDPE) policy.	
Evidence of monitoring deforestation and/or ecosystem conversion in supplier operations (<i>Indicator 65</i>)	
Satelligence Partnership in 2024 In 2024, DSNG Group has continued to strengthen its landscape monitoring and conservation efforts through an active partnership with Satelligence as part of a broader, technology-driven environmental stewardship strategy. This collaboration supports the commitment to NDPE (No Deforestation, No Peat, No Exploitation) compliance across both of the company own operations and DSNG supply chain, as well as the sustainability partnerships with &Green Fund and the Asian Development Bank (ADB). DSNG’s monitoring framework integrates remote sensing tools such as Satelligence and Global Forest Watch Pro (GFW Pro) to track deforestation in real-time across concession areas and supplier regions. DSNG employs a comprehensive suite of monitoring techniques: • Remote sensing via satellite imagery and aerial photography to detect land-use changes and forest health; • GIS technology to identify high conservation value (HCV) and high carbon stock (HCS) areas, supporting informed decision-making in land-use planning. • Ground surveys, conducted monthly by trained field teams to monitor flora, fauna, and habitat integrity; • And community engagement, fostering collaboration with local communities for sustainable forest management. The Area of Interest (AoI) for DSNG’s landscape monitoring includes nucleus and plasma plantations, independent smallholders within the supplier network, and community-managed conservation areas outside concession boundaries. With the integration of Satelligence and other cutting-edge tools, DSNG reaffirms its commitment to proactive, science-based environmental governance that protects biodiversity and secures the resilience of Indonesia’s forest landscapes. The following is a list of Deforestation Grievance Reports from the Buyer (2020-2024)	Comprehensive, externally verified

DSNG provides attention and ensures follow-up on Grievances given to the Company. The following is a list of Deforestation inside and outside DSNG Concession from the buyer such as:

Between September 2020 and January 2025, a series of deforestation-related complaints were reported across multiple plantation locations associated with Golden Agri-Resources (GAR) and SMART Tbk. A total of 13 cases were recorded, covering both in-concession areas (5.8 ha) and significantly larger outside-concession areas (349.97 ha).

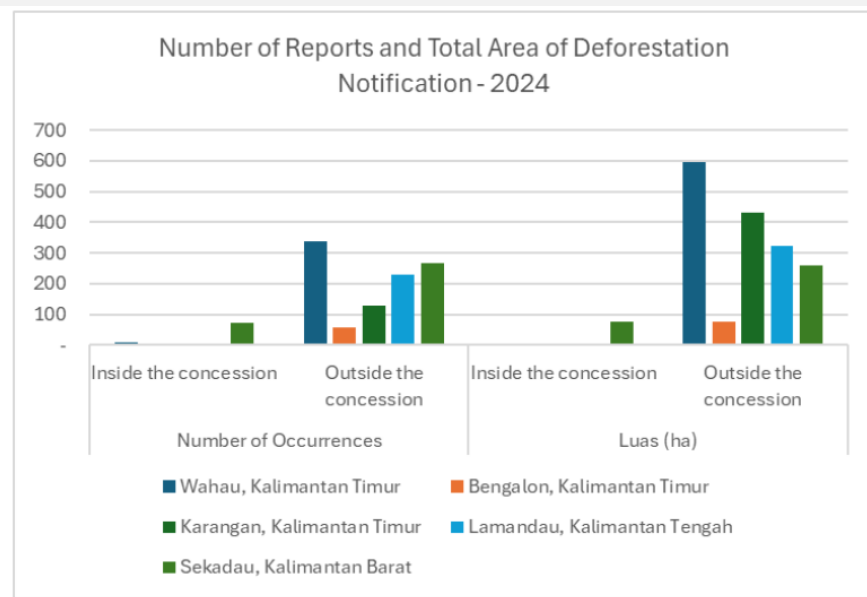
Each case underwent thorough verification and clarification, involving ground-truthing, document reviews, and stakeholder engagement. The findings revealed that:

- Several cases occurred within the concession but involved land controlled or cleared by local communities (e.g., PT PWP and PT DWT).
- In some instances, areas were being released from HGU boundaries or under customary land agreements, such as in Bukit Lajah Manah.
- Other cases involved former suppliers no longer associated with the companies, such as PT BPN and PT KPS.
- One major case (226 ha) was linked to a supplier (PT KPS) no longer part of the supply chain since 2022.
- All grievances were addressed and closed, with final actions including clarification letters, field verification reports, and HCV reassessments.

All cases listed have been marked as “Finish”, with verification or clarification completed between 2020 and January 2025. The proactive steps taken reflect the companies’ commitment to NDPE compliance, transparency, and responsible sourcing.

The 2024 deforestation notification data highlights that deforestation activities predominantly occurred outside concession areas across five monitored locations in Kalimantan. Among these, Wahau, East Kalimantan, recorded the highest number of deforestation reports, with over 320 occurrences, followed by Sekadau, West Kalimantan, and Lamandau, Central Kalimantan, each reporting between 250 to 275 cases. Karangan, East Kalimantan, saw around 150 occurrences, while Bengalon had the lowest at approximately 50.

In terms of total deforested area, a similar pattern is observed. Wahau reported the largest affected area at nearly 600 hectares, with Karangan & Lamandau following at over 400 hectares and around 300 hectares, respectively. Sekadau recorded about 250 hectares, and Bengalon had the smallest impact at roughly 75 hectares. Notably, all locations reported minimal deforestation within concession boundaries, both in the number of occurrences and the total area affected, suggesting that concession-managed areas may have better deforestation control mechanisms in place.



Based on the verification, the company has conducted the monitoring inside the concession and all supplier outside the concession which include all the region within DSN operations. The areas included in the monitoring scope (Area of Interest (AOI)) are nucleus plantation areas, plasma plantations, DSNG supplier independent smallholder plantations, and conservation areas outside concessions managed with communities.

The graph titled above stated "Number of Reports and Total Area of Deforestation Notification – 2024" shows data for different locations in Kalimantan, which include:

1. Number of Occurrences
2. Areal Hectarage

Each measure is further divided into inside the concession and outside the concession. The colours represent overall locations including :

- Dark blue – Wahau, East Kalimantan, Indonesia
- Orange – Bengalon, East Kalimantan , Indonesia
- Light green – Karangan, East Kalimantan, Indonesia
- Light blue – Lamandau, Central Kalimantan, Indonesia
- Dark green – Sekadau, West Kalimantan, Indonesia

Commitment to no planting on peat of any depth (*Indicator 92*)

DSN Group has established a No Deforestation, No Peat, No Exploitation (NDPE) policy, formally approved by management on 3 March 2020, as part of its long-term sustainability commitment. This policy outlines a clear prohibition against land clearing and planting activities in peatland areas, regardless of depth. A key excerpt from the policy states:

“Ensure no new planting on peatland regardless of depth, and protection of peatlands through water management and fire prevention; in case of acquisition of existing plantations on peat, DSNG commits to implement appropriate management using Best Management Practices, as defined in the RSPO P&C and the RSPO manual on Best Management Practices for existing oil palm cultivation on peat.”

In support of this policy, DSNG has demonstrated management-level accountability through public disclosures, including the Sustainability Report 2024, which confirms that no new planting has taken place on peat areas within DSN Group’s operational coverage. This public

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commitment is also accessible through the DSN Group website, reinforcing transparency and traceability in peatland protection. A sample of this commitment is illustrated in the figure below.

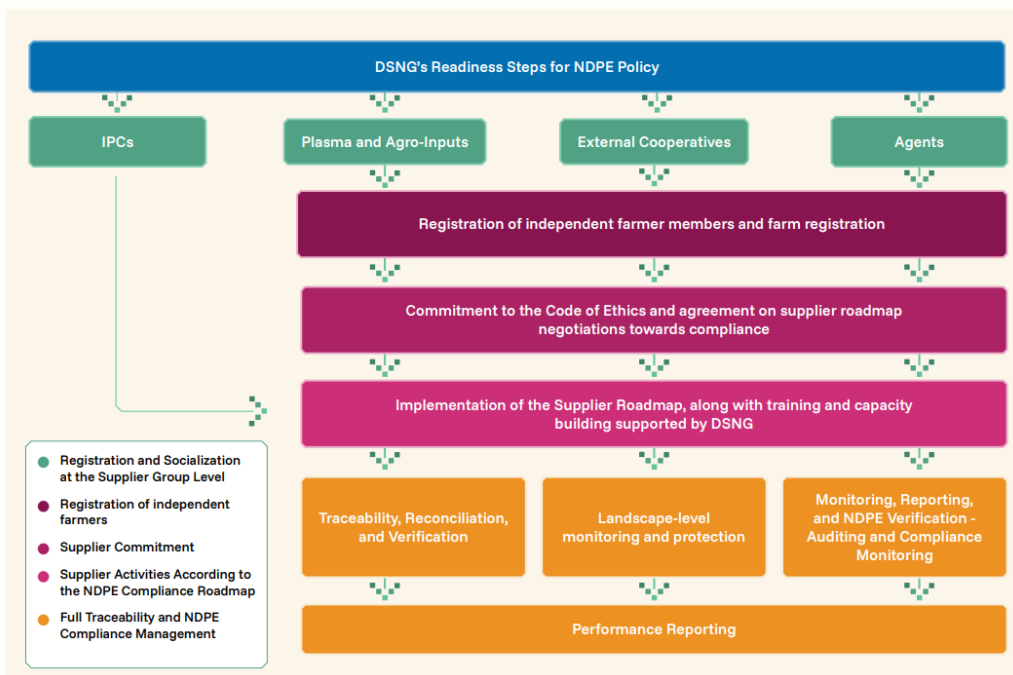
DSN Group has implemented a robust NDPE (No Deforestation, No Peat, No Exploitation) Policy, approved by management on 3 March 2020, which outlines clear commitments related to all new plantings, acquisitions, and developments involving both DSNG and its third-party suppliers. The policy strictly prohibits any deforestation of High Carbon Stock (HCS) forests and High Conservation Value (HCV) areas. It also ensures no new planting on peatland regardless of depth, and emphasizes the protection of peatlands through effective water management and fire prevention measures. In cases where DSNG acquires existing plantations situated on peat, the company commits to applying Best Management Practices (BMPs) in accordance with the RSPO Principles & Criteria (P&C) and the RSPO BMP manual for oil palm cultivation on peat.

Further, DSNG mandates the implementation of RSPO-compliant New Planting Procedures (NPP) before any new planting occurs. The policy also prohibits burning for land clearing, replanting, or development, and upholds the land tenure rights of indigenous peoples and local communities. This is done through adherence to the Free, Prior and Informed Consent (FPIC) process. In cases of grievances or disputes, particularly involving indigenous groups, DSNG is committed to pursuing a responsible and amicable resolution in collaboration with all relevant stakeholders.

The form of this commitment has also been publicly communicated through platforms such as the DSNG Group website and in the Sustainability Report 2024, which confirms that no planting activities have been carried out in peat areas within DSNG's operational landscape. A sample excerpt from this policy is shown in the figure above.

2. NDPE Implementation Strategy

NDPE Implementation Approach Flow



Based on document verification SR report and DSN Group website, it stated that there is no planting Based on verification of SR report documents and DSN Group's website [ESG - PT Dharma Satya Nusantara Tbk \(DSNG:IJ\)](#), it is stated that there are no operational activities or oil palm planting on peatlands.

Progress towards commitment to reduce absolute GHG emissions (Indicator 110)

DSN Group has maintained comprehensive records of its greenhouse gas (GHG) emissions, tracking year-on-year performance to support its climate action commitments. A comparison

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between 2023 and 2024 emissions data highlights a mixed trend across various operational sites. Several mills experienced a Decrease in emissions, notably Mill 3 (from 62,829 to 59,855 tons CO₂e) and Mill 5 from 74,067 to 61,520 tons CO₂e., However, Mill 4 (29,318 to 46,792 tons CO₂e), and Mill 9 (64,037 to 74,117 tons CO₂e) shown increment in the emission, reflecting operational scale-up or processing volume changes.

In estate operations, Jabdan 1, Long Teman Estate, Long Kejiak 3, and Baay 1 recorded increased emissions in 2024, with Long Teman Estate and Long Kejiak 3 shifting from negative emissions in 2023 to net positive figures in 2024, indicating a change in sequestration or emissions balance. However, Bukit Pendulangan 2, Tepian Langsat 1, and Puhus 1 continued to maintain net negative emissions, signifying carbon sequestration efforts, though Tepian Langsat 1 and Puhus 1 saw slight reductions in sequestration capacity.

Overall, while some areas reflected an increase in carbon output, the data also illustrates DSN Group's ongoing efforts in monitoring and managing emissions, with certain sites demonstrating improved performance through reductions or sustained sequestration. This emissions tracking framework is a critical component of DSNG's broader climate and sustainability strategy.

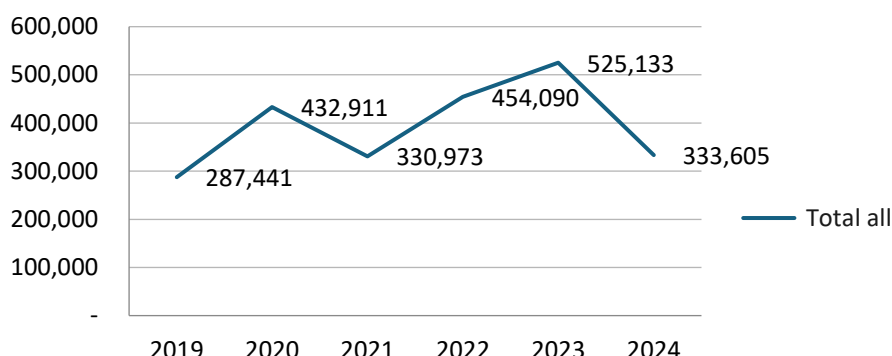
Unit	2023 (ton CO ₂ e)	2024 (ton CO ₂ e)	Remarks
Mill 3	62829	59855	Decreased
Mill 4	29,318	46792	Increased
Mill 5	74067	61520	Decreased
Mill 9	64037	74117	Increased
Jabdan 1	2088	5838	Increased
Long Teman Estate	-4075	1497	Increased
Long Kejiak 3	-1410	65	Increased
Bukit Pendulangan 2	-13016	-15986	Decreased
Tepian Langsat 1	-11159	-9954	Increased
Baay 1	-467	267	Increased
Puhus 1	-8117	-7010	Decreased

Summary emissions GHG Absolute period 2023 vs 2024

Unit	2023 (ton CO ₂ e)	2024 (ton CO ₂ e)	Remarks
All Mill	525,133	333,605	Decreased

**The calculation refer to RSPO GHG calculator v4 for scope 1 and 2*

All RSPO Certified Mill



2024 marks the first year of implementing the Climate Action Plan (CAP) 2030, with all projects transitioning from the planning phase to execution. Several key initiatives have been realized under CAP 2024. These include the launch of a Zero Landfill Waste Processing Facility (TPST) in Muara Wahau, East Kalimantan—a pilot project with a capacity of 4 tons/day, initiated on June 26, 2024, and commissioned on December 19, 2024. Additionally, the Independent Energy Roadmap was advanced through the utilization of methane gas from Palm Oil Mill Effluent (POME) into biogas and bio-CNG at two processing plants, contributing to a potential emissions reduction of 136,991 tCO₂e. Furthermore, the utilization of organic waste was enhanced through the application of empty fruit bunches (EFB) up to 36 tons per hectare annually, and POME with BOD <5,000 up to 215 tons per hectare.

Based on the comparative analysis of the 2023 and 2024 emissions data, it can be concluded that DSNG's commitment to reducing absolute greenhouse gas (GHG) emissions has been successfully implemented. Based on the verification made, it was confirmed that the overall facilities under the PT DSN Tbk had shown a decrease in GHG absolute data compared to the year 2023 from **525,133 into 333,605 tCO₂e**. This reflects DSNG's ongoing efforts to monitor, manage, and lower its carbon footprint in alignment with its sustainability and climate action commitments.

Progress towards commitment to reduce GHG emissions intensity (*Indicator 111*)

DSNG collaborates with independent institutions to calculate emissions every three years. The next group level emission calculation is scheduled for 2025. Meanwhile, in 2024, GHG emissions for DSNG's palm oil business unit were calculated using the RSPO's PalmGHG Calculator. A reduction in emission intensity was achieved in palm oil mill operations, driven by the operation of two Methane Capture Units, Bio-CNG Plants, and increased fuel efficiency. These initiatives successfully lowered emissions from Palm Oil Mill Effluent (POME) while reducing reliance on fossil fuels by utilizing biogas and Bio-CNG for electricity generation, transport trucks, and heavy equipment.

The GHG data has been verified during the SPOTT assessment period, and the verification process was conducted accordingly. For mills that are RSPO certified, their certification status has been confirmed, and the associated PalmGHG data has been reviewed and validated. DSN Group team has conducted GHG calculation activities as a way of monitoring the Company's operational activities, the results of which can be seen in the table below:

Summary emissions GHG Intensity 2023 vs 2024 conducted by Internal DSNG

Unit	2023 (ton CO ₂ e)	2024 (ton CO ₂ e)	Remarks
Mill 3	0.81	0.93	Increased
Mill 4	-0.10	0.19	Increased

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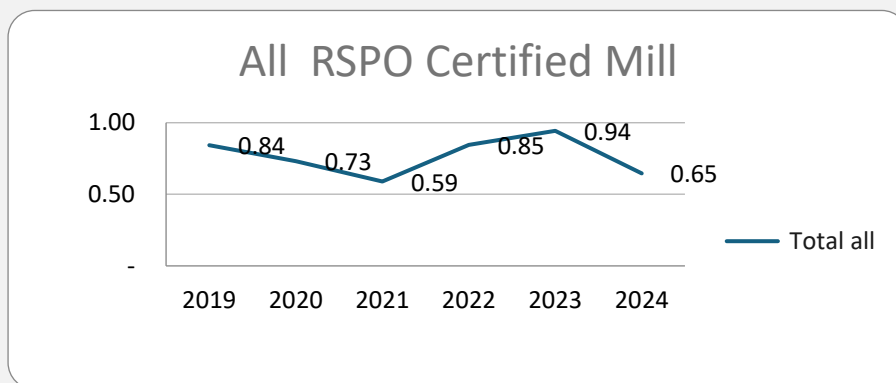
Mill 5	0.65	0.09	Decreased
Mill 9	0.32	0.05	Decreased
Jabdan 1	0.03	0.08	Increased
Long Teman Estate	-0.32	0.11	Increased
Long Kejiak 3	-0.02	0.00	Increased
Bukit Pendulangan 2	-0.19	-0.23	Decreased
Tepian Langsung 1	-0.29	-0.19	Increased
Baay 1	-0.01	0.01	Increased
Puhus 1	-0.09	-0.08	Increased

Source: internal calculation using RSPO GHG calculator v4 for scope 1 and 2

Summary overall unit of emissions GHG Intensity period **2023 vs 2024 for total emission per ton of product.**

Unit	2023 (ton CO2e)	2024 (ton CO2e)	Difference (%)	Remarks
All Mill	0.94	0.65	30	Decreased

Source : calculation refer to RSPO GHG calculator v4



Based on the analysis of the table above, the comparison between 2023 and 2024 demonstrates that **DSNG has successfully implemented its commitment to reduce greenhouse gas (GHG) emission intensity.** Despite some increases in absolute emissions at specific sites due to operational variations, the overall reduction in emission intensity indicates improved efficiency and a strengthened approach to sustainable production practices. This achievement reflects DSNG's dedication to lowering its environmental impact in line with its climate and sustainability goals.

Programme to support scheme smallholders (*Indicator 171*)

PT Dharma Satya Nusantara Tbk (DSN) has reaffirmed its commitment to responsible sourcing through the publication of its NDPE Progress Report 2024. To ensure the full implementation of its No Deforestation, No Peat, No Exploitation (NDPE) Policy, DSN first established the policy in March 2020, applying it not only within its internal operations but also across its entire supply chain, particularly to Fresh Fruit Bunch (FFB) suppliers supplying to DSN's palm oil mills. Since the policy's adoption, all FFB suppliers are required to adhere to NDPE principles, reinforcing DSN's sustainability standards and traceability efforts.

As of 2024, DSN operates a total of 12 Palm Oil Mills (POM)—locally known as PKS (Pabrik Kelapa Sawit)—with one mill temporarily out of service due to major maintenance as of early January 2024. Of the remaining operational mills, 3 mills exclusively receive FFB from Nucleus (Inti) and Plasma (Kemitraan) plantations, while the other 9 mills receive FFB from a combination of Nucleus, Plasma, and External suppliers. These external suppliers include a mix of Independent Plantation Companies (IPC), Cooperatives, and Agents, all of whom are subject to DSN's NDPE

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compliance framework. The detailed breakdown of DSN's external supplier network is presented in the table below:

Table 1 DSN External Supplier in 2024

LANDSCAPE	DIRECT SUPPLIERS			INDIRECT SUPPLIERS (FARMERS)				
	IPC	COOPERATIVE	AGENT	IPC	COOPERATIVE		AGENT	
				Area (ha)	Number of Farmers	Area (ha)	Number of Farmers	Area (ha)
Wahau	1	18	9	3,532	2,561	7,393	1,100	6,073
Bengalon	-	-	7	-	-	-	979	3,229
Karangan	2	-	20	3,378	-	-	383	1,807
Lamandau	-	1	12	-	45	248	1,398	6,289
Sekadau	1	5	3	1,252	1,361	3,031	296	1,671
Total	4	24	51	8,163	3,967	10,672	4,156	19,069

PT Dharma Satya Nusantara Tbk (DSN) demonstrates a strong commitment to community engagement, collaboration, and social inclusion, as embedded within its overarching Sustainability Policy. One of DSN's key initiatives to promote inclusive growth is the integration and empowerment of independent smallholders, cooperatives, and other local stakeholders through its Smallholders Sustainability Initiative.

More details on these efforts can be accessed via DSN's official ESG platform: [DSN – Scheme Smallholder Engagement](#).

- **Scheme of organizing smallholder cooperatives.**

DSN Group actively facilitates a village-based smallholder organization scheme by supporting the establishment of farmer cooperatives in collaboration with the local Cooperative Office, while ensuring full compliance with national and regional legal frameworks. This initiative aims to formalize and strengthen smallholder participation in the sustainable palm oil supply chain. In line with its commitment to capacity building, DSN has also launched various training and socialization programs to enhance supplier performance and promote sustainability standards. A key component of this effort is the empowerment of smallholders to obtain RSPO (Roundtable on Sustainable Palm Oil) and ISPO (Indonesian Sustainable Palm Oil) certifications. As of 2024, a total of 2,951 Plasma partnership farmers have been certified. These initiatives reflect DSN's broader commitment to inclusive supply chain development and long-term rural economic resilience. Further details can be found on DSN's official ESG platform.

<https://dsn.co.id/esg/proper/certifications-rspo-ispo-iscs/>

- **Plantation operations and development.**

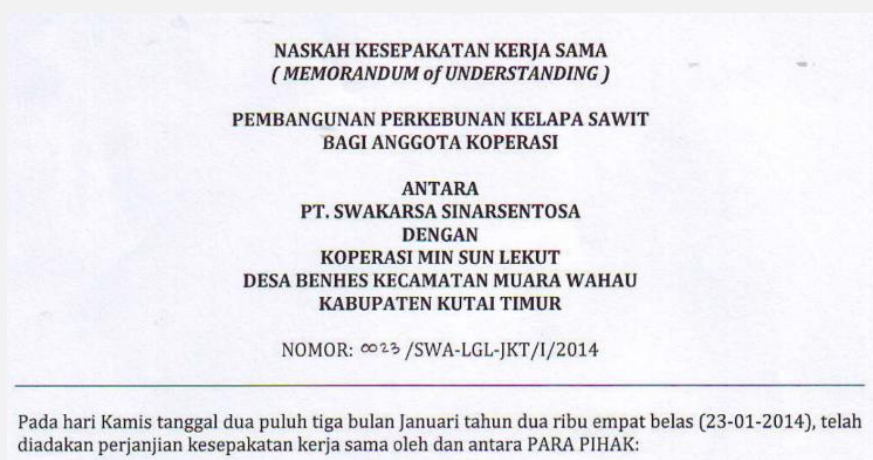
Based on the plantation management agreement between DSN Group and scheme smallholders, DSN Group has fully implemented the scheme smallholder plantation since the beginning of plantation development. The plantation operations follow DSN Group operating standards and procedures or apply similar standards to core plantations.

The project agreement and report have been made available to the verifier for verification. With sample selected is kemitraan "Koperasi Min Sun Lekut" and "Koperasi Min Bea Glang" for on increasing yields by using sustainable management practices with evidence of collaboration showed Surat perjanjian kerjasama/ agreement between PT SWA with Koperasi Min Sun Lekut, Dabeq village (KM1), consist of some steps:

a. No SWA/-LGL- Based on the plantation management agreement between DSN Group and its scheme smallholders, DSN has fully implemented the plasma/scheme smallholder plantation model from the outset of plantation development. These plantations are operated in accordance with DSN Group's standard operating procedures, or equivalent standards

aligned with those applied to the Group's core (nucleus) plantations. To ensure transparency and compliance, all relevant project agreements and documentation have been made available for verification purposes. As part of the verification sample, the "Koperasi Min Sun Lekut" and "Koperasi Min Bea Glang" were selected to demonstrate the implementation of sustainable management practices aimed at improving yields. Evidence of this collaboration is reflected in formal cooperation agreements (Surat Perjanjian Kerjasama) between PT SWA and Koperasi Min Sun Lekut, located in Dabeq Village (KM1). The agreements include the following documents:

- Agreement No. SWA/-LGL-JKT/III/2015, dated 19 March 2015, covering an area of approximately 217 hectares
- Agreement No. SWA/-LGL-JKT/III/2015, dated 19 May 2015, covering $\pm$ 658 hectares
- Agreement No. 0023/SWA/-LGL-JKT/I/2014, dated 19 May 2015, for an area of $\pm$ 542 hectares



- **Securing fresh fruit bunch markets for the scheme smallholders.**

DSN Group manages some mills that invite fresh fruit bunch supply of scheme smallholders through the scheme smallholder cooperatives. To ensure the security and price stability of fresh fruit bunches of scheme smallholders, DSN Group follows the fresh fruit bunch unit price which is officially set by the Provincial Plantation Office.

Verifier have checked reports and monitoring that have been made available for sample verification that consist of:

1. Socialization of NDPE Policy & Supply Chain sampling Koperasi Karya Sejahtera dated 22/04/2024 with 11 attendees consist of Member and DSN Representative by door to door which follow to Training Supply Chain and Document Sampling dated 15/04/2024.
2. Socialication of NDPE Policy, Supply Chain & Good Agricultural Practices sampling Koperasi Karya Sejahtera dated 02/12/2024 in Coperation Office with attendees consist of member and DSN representative.
3. Socialication of NDPE Policy, Good Agricultural Practices, LB3 (Toxic and Hazardous Waste), HCV (High Conservation Value), application of paraquat and Fertilizer & ISPO/RSPO, Replanting Procedure from "Koperasi Usaha Tani Sejahtera" dated 17/09/2024-20/09/2024 by Field School Program with attendee 94 people that consist of Member and DSN Representative.



- **Securing land ownership and legal business permits.**

DSN Group has implemented a structured approach to regulate its scheme smallholders through the establishment of scheme smallholder cooperatives, ensuring legal compliance and operational accountability. As part of this effort, land rights certificates—granted by the National Land Agency (BPN)—have been facilitated by DSN beginning in June 2019. In addition, DSN supports cooperatives in obtaining legal business registration, including assistance in securing a Business Identification Number (NIB) under Indonesia’s Online Single Submission (OSS) system. These initiatives help smallholder cooperatives meet national regulatory requirements and align with certification standards.

As part of the verification process, the verifier reviewed supporting documents and monitoring reports made available by DSN. These included:

1. Certification and Legal Assistance provided to Koperasi Makarti on 13–14 August 2024 for obtaining the NIB, which contributed to compliance with national regulations and the closure of a non-conformity (NC) identified during a previous certification process.
2. Public Consultation, Certification, and Legal Support activities conducted for Koperasi Sawit Usaha Tani Sejahtera on 26 October 2024, aimed at enhancing legal compliance and readiness for certification.

These actions demonstrate DSN Group’s ongoing commitment to empowering smallholder cooperatives through legal recognition, capacity building, and alignment with sustainability certification standards.



- **Improving cooperative management.**

DSN Group actively supports the transparency and accountability of its scheme smallholder cooperatives by promoting the Annual Meeting of Members (RAT) and organizing benchmarking visits to enhance cooperative governance. To strengthen financial discipline and operational compliance, DSN also provides training and financial management consultations, along with assistance in fulfilling employee social insurance and health security obligations in alignment

with the national Social Security Administrator for Health (BPJS Kesehatan) and annual tax reporting regulations applicable to taxable entrepreneurs (PKP).

As part of the verification process, the verifier reviewed relevant reports and monitoring documents that confirm the effectiveness of DSN's facilitation efforts. These included:

- Counseling provided to 51 cooperatives regarding LB3 (Toxic and Hazardous Waste) Pertek requirements, including a recommendation issued for Koperasi Makarti by the Ministry of Environment's Environment Department, dated 17 April 2024.
- Verification for TPS (Temporary Waste Storage) license readiness and Surveillance Audit, conducted for Koperasi Makarti by the Environment Department, dated 15 April 2024.
- Assistance with rebuttal processes and permit issuance for Koperasi Makarti, with the final handover of documentation completed on 5 August 2024.

These efforts reflect DSN Group's ongoing commitment to building institutional capacity, legal compliance, and environmental stewardship among its partnered smallholder cooperatives



Percentage of scheme smallholders involved in programme (*Indicator 172*)

As part of DSN Group's baseline sustainability commitment, the company aligns with three key principles and policies—Forest, Climate, and Community—and integrates them into its Group Sustainability Strategy, which includes the pillars of Environmental and Social Management System (ESMS), NDPE (No Deforestation, No Peat, No Exploitation), Conservation, and Circularity. A central goal under this strategy is to support scheme smallholders in obtaining RSPO certification, contributing to more inclusive and sustainable palm oil production.

To ensure robust implementation and effective monitoring, DSN has incorporated relevant progress and outcomes into its Sustainability Report and Monitoring Documentation, both of which have been reviewed and verified. As part of the verification process, samples of the following program areas were assessed:

- Scheme of organizing smallholder cooperatives.
- Plantation operations and development.
- Securing fresh fruit bunch markets for the scheme smallholders.
- Securing land ownership and legal business permits.
- Improving cooperative management.

NDPE (No Deforestation, No Peat, No Exploitation), GAP (Good Agricultural Practices), K3L (Keselamatan, Kesehatan Kerja dan Lingkungan), serta SA/RM (Social Assessment & Risk Management)

No	Dated	Cooperative or Agent	Total Participant	Location of Socialization	Type of Socialization

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1	12-Jan-24	Kop. KBK	60	Balai Adat Ds. NLB	Pestisida Terbatas, NDPE & GAP
2	19-Feb-24	Kop. SR	51	Sekolah Lapang SR	NDPE, GAP & K3L
3	20-Feb-24	Kop. KI	51	Sekolah Lapang KI	NDPE, GAP & K3L
4	20-Feb-24	Kop. SR	33	Sekolah Lapang SR	NDPE, GAP & K3L
5	21-Feb-24	Kop. KI	53	Sekolah Lapang KI	NDPE, GAP & K3L
6	21-Feb-24	Kop. SR	37	Sekolah Lapang SR	NDPE, GAP & K3L
7	22-Feb-24	Kop. SR	33	Sekolah Lapang SR	NDPE, GAP & K3L
8	23-Feb-24	Kop. KI	6	Sekolah Lapang KI	NDPE & Pengenalan
9	26-Feb-24	Kop. SR	47	Sekolah Lapang SR	NDPE, GAP & K3L
10	28-Feb-24	Kop. KI	46	Sekolah Lapang KI	NDPE, GAP(Perawatan) & K3L
11	29-Feb-24	Kop. KI	51	Sekolah Lapang KI	NDPE, GAP (Peraeatan) & K3L
12	6-Mar-24	Kop. SR	21	Sekolah Lapang SR	NDPE & K3L
13	6-Mar-24	Kop. Muara Wahau	2	Rumah Ketua	NDPE & Rantai pasok
14	22-Mar-24	Kop. KS	11	Rumah kerumah petani	NDPE & Rantai pasok
15	2-Apr-24	All Agen Koperasi	20	Lokas VB	Sharing dan Sosialisasi NDPE
16	17-Apr-24	Kop. Makarti	20	Kantor Koperasi Makarti	NDPE, Persiapan Surveillance Audit RSPO & ISPO
17	20-Apr-24	Kop. Makarti	23	Sekolah Lapang	NDPE, Karhutla, Persiapan Audit RSPO & ISPO
18	23-Apr-24	Kop. Makarti	31	Sekolah Lapang	NDPE, Karhutla, Persiapan Audit RSPO & ISPO
19	24-Apr-24	Kop. Makarti	24	Sekolah Lapang	NDPE, Karhutla, Persiapan Audit RSPO & ISPO
20	29-Apr-24	Kop. MSL	40	Kantor Koperasi	NDPE & Rantai pasok
21	8-May-24	Kop. SUTS	33	Kantor Koperasi SUTS	Modul 1,2,3,4,5 , NDPE, Keluhan
22	8-May-24	Kop. MSL	8	Kantor Koperasi	NDPE & Rante Pasok
23	6 s/d 11 May 20234	Kop. Makarti	10	Lapangan Kebun masing Petani	RSPO, NDPE & Sertifikasi

24	15-May-24	Kop. KS	40	Dor To Dor	Rantai Pasok & pengambilan Dokumen Lapangan
25	16-May-24	Kop. SUTS	40	Sekolah Lapang kebun Pak Landung	Modul 6,7,8,9,10, NDPE, Keluhan & ISPO/RSPO
26	23-May-24	Kop.MBGM	30	Kantor Koperasi	Hama Penyakit Tanaman (GAP), & NDPE
27	23-May-24	Kop. Makarti	20	Kantor Koperasi	Persiapan Surveillance ISPO/RSPO, Hasil Internal Audit, LB3 & NDPE
28	28-May-24	Kop. SUTS	35	Sekolah Lapang	Modul 11,12,13,14,15 , NDPE, Damkar
29	29-May-24	Kop. MSL	31	Dor To Dor	NDPE & Rantai pasok
30	30-May-24	Kop. SUTS	29	Sekolah Lapang	Modul 16,17,18,19,20, NDPE, Damkar, dll
31	31-May-24	Kop. SUTS	30	Sekolah Lapang	Modul 21, 22 & NDPE
32	10-Jun-24	Kop. SUTS	40	Kantor Koperasi	Rantai Pasok, NDPE & K3L
33	28-Jun-24	Kop.MBGM	31	Kantor Koperasi	NDPE. Rantai Pasok & K3L
34	9-Jul-24	SUTS	30	Kantor & Lapangan	Pengambilan Sampling Tanah SSU & LSU
35	11-Jul-24	SUTS	15	Timbangan & Dot to dor	NDPE & MRV Petani
36	20-Jul-24	Klompok Tani Miau (KS)	40	Rumah Petani & Kebun Sawit	GAP & NDPE
37	25-Jul-24	Kop. Karya Indah	17	Kantor Koperasi	GAP & NDPE
38	14-Aug-24	PT. TP	2	Kantor TP	GAP & NDPE
39	19-Aug-24	Kop. SSB	4	Rumah Ketua	NDPE, Rantai Pasok & Rencana Sosialisasi
40	20-Aug-24	Kop. Makarti	15	Kantor Koperasi	Pendampingan Temuan RSPO & ISPO
41	21-Aug-24	Kop. Makarti	36	Kantor Koperasi	Sosialisasi NDPE, GAP, LB3, HCV & Parakuat
42	9-Sep-24	Kop SR	120	Sekolah Lapang	Sosialisasi NDPE, GAP, LB3, HCV,Parakuat & ISPO/RSPO
43	11-Sep-24	Kop SR	111	Sekolah Lapang	Sosialisasi NDPE, GAP, LB3,

					HCV,Parakuat & ISPO/RSPO	
44	12-Sep-24	Kop SR	99	Sekolah Lapang	Sosialisasi NDPE, GAP, LB3, HCV,Parakuat & ISPO/RSPO	
45	17-Sep-24	Kop UTS	26	Sekolah Lapang	Sosialisasi NDPE, GAP, LB3, HCV,Parakuat & ISPO/RSPO, Riplanting	
46	18-Sep-24	Kop UTS	12	Sekolah Lapang	Sosialisasi NDPE, GAP, LB3, HCV,Parakuat & ISPO/RSPO, Riplanting	
47	19-Sep-24	Kop UTS	23	Sekolah Lapang	Sosialisasi NDPE, GAP, LB3, HCV,Parakuat & ISPO/RSPO, Riplanting	
48	20-Sep-24	Kop UTS	33	Sekolah Lapang	Sosialisasi NDPE, GAP, LB3, HCV,Parakuat & ISPO/RSPO, Riplanting	
49	26-Sep-24	Kop. KI	57	Sekolah Lapang	Sosialisasi NDPE, GAP, LB3, HCV,Parakuat & ISPO/RSPO, Riplanting	
50	28-Sep-24	Kop. KI	33	Sekolah Lapang	Sosialisasi NDPE, GAP, LB3, HCV,Parakuat & ISPO/RSPO, Riplanting	
51	28-Sep-24	Kop. SSB	24	Dor To Dor	NDPE, Rantai Pasok & GAP	
52	10-Oct-24	Kop. SUTS	12	Kantor TP	Sosialisasi NDPE, MRV	
53	11-Oct-24	Kop. HB	20	Kantor Koperasi HB	Sosialisasi NDPE, MRV	
54	19-Oct-24	Kop. SUTS	10	Rumah Petani	Sosialisasi NDPE, MRV	
55	21-Oct-24	Muara Wahau	10	Rumah Kelompok Tani	Sosialisasi NDPE, MRV	
56	29-Oct-24	All Koperasi	60	Gedung Kecamatan	Sosialisai Kebun Sawit Berkelanjutan Untuk Koperasi	
57	13-Nov-24	Kop. SUTS	25	Kantor SUTS	Sosialisasi K3L, NDPE & Simulasi TKTD	
58	13-Nov-24	SMA 2 Muara Wahau	50	Mushola SMA	Sosialisasi Pengelolaan sampah & NDPE ke SMA	

59	2-Dec-24	Kop. KS	60	Kantor Koperasi KS	Sosialisasi NDPE & GAP
60	3-Dec-24	Kop. SR	12	Kantor Kop. SR	Pelatihan Internal Audit & Sos NDPE
61	9-Dec-24	Kop. SR	40	Gedung Kecamatan	Sosialisai Kebun Sawit Berkelanjutan Untuk Agen
62	19-Dec-24	Kop. KS	30	Kantor Koperasi	Pelatihan & Sosialisasi GAP, NDPE & Keluhan
63	Nov - Des	Kop. KS	55	Kantor Koperasi	Sosialisasi NDPE & Registrasi
64	Nov - Des	Dor to Dor (KI,MKT,SUT S,UTS)	90	Dor To Dor	Sosialisasi NDPE & GAP
65	Nov - Des	Kop (KS, SUTS & KBK)	60	Dor To Dor	Sosialisasi NDPE & Registrasi
66	21-Dec-24	Kop. Muara Wahau	7	Rumah Pengurus	Sosialisasi NDPE & Registrasi
67	Des	Kop. Makarti	5	Dor To Dor	Sosialisasi NDPE & Registrasi
68	Nov - Des	Kop. MBGM	50	Dor To Dor	Sosialisasi NDPE & Registrasi
69	Nov - Des	Kop. KS, SSB, KI	60	Dor To Dor	Sosialisasi NDPE & Registrasi
70	Nov - Des	Kop. MSL	60	Dor To Dor	Sosialisasi NDPE & Registrasi
Total			2,450		

In 2024, a total of 2,951 farmers were targeted for certification under the program. Out of this, 2,450 farmers successfully achieved certification, representing a fulfillment rate **of 83.02%**. This demonstrates significant progress in supporting farmer compliance with certification standards.

In 2024, the program achieved certification engagement with 2,951 cooperative farmers, representing 83.02% engagement for the year. Out of a total of 12,569 plasma (scheme smallholders), 19.5% were engaged in MRV-NDPE and related sustainability initiatives

Fulfilment of Program – 2024

Farmers Certification (Total Cooperative):	2,951 farmers - Kemitraan / Plasma / Scheme: 47 - Program: 2,450
Percentage Engagement for Year 2024:	83.02%
Total Number of Plasma (Scheme Smallholders):	12,569
Percentage of Overall Engagement:	19.5% of all scheme smallholders

Programme to support independent smallholders (Indicator 173)

DSN Group also implements programs aimed at helping farmers better understand and adopt NDPE (No Deforestation, No Peat, No Exploitation) principles within their operations. One of the key initiatives is the “Sekolah Lapang” (Field School) program, developed and facilitated by the Sustainability Operations Team. As part of this program, DSN produced a Farmer NDPE Guidebook, which serves as a practical reference for farmers, particularly third-party suppliers. The guidebook, written in the local language, was distributed during the NDPE socialization sessions and contains accessible, general information on NDPE implementation, tailored to the context of local farming practices. This initiative demonstrates DSN's commitment to capacity building and inclusive sustainability across its supply chain.

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Figure 9 NDPE Guidebook for Farmers

DSN also have other program for Independent Smallholder in their website : with this link <https://dsn.co.id/esg/community-engagement-collaboration/social-inclusion/supplier-engagement/independent-smallholder/>

1. Securing FFB market for the independent smallholders.

DSN manages some mills that serve smallholders, inviting fresh fruit bunch supply of independent smallholders through the independent smallholder cooperatives. In all DSN operating areas in Kalimantan, the unit price for fresh fruit bunches of independent smallholders follows the local market unit price. Generally, the unit price is higher than what is officially set by the Provincial Plantation Office

2. Securing land ownership and legal business permits.

DSN organized independent smallholders through the independent smallholder cooperatives to prepare land rights certificates issued by the National Land Agency (BPN) starting in June 2019. DSN Group facilitates cooperatives for official business registration of a single business number.

In the 2024 period, they also exceeded 100% target from 1,248 achieved 1,262 and for agent targeted 2.594 and achieved 3.090, verifier has confirmed this based on document Q4 NDPE Progress Report

3. Improving cooperative management.

DSN facilitates the improvement of cooperative transparency and accountability practices by driving the implementation of the Annual Meeting of Members and benchmarking visits. DSN also provides training and financial management consultations, facilitates compliance of employee's social insurance and health related to social security administrator for health and annual tax reporting by referring to taxable entrepreneurs regulations.

4. Developing database and traceability documentation.

DSN are in collaboration with various suppliers including independent smallholder cooperatives. DSN has developed a database of independent smallholders or farmers simultaneously with traceability documentation since 2019, covering operational areas in East Kalimantan, Central Kalimantan, and West Kalimantan.

5. Providing agronomic consultation

DSN always makes regular efforts to provide consultation on agronomic aspects such as pest control, oil palm tree maintenance, and fertilizer use. Capacity building is carried out in a series of Field Schools (in Indonesian: Sekolah Lapang/SL) with various materials ranging from understanding NDPE and its important aspects, oil palm plantation best practices, Occupational Safety and Health (OHS), to institutional improvement. In the 2024 period, Field Schools were conducted with the participation of **3,142 farmers**, showing a significant increase from **1,236 participants in 2023**.

Percentage of independent smallholders/outgrowers involved in programme (Indicator 174)

As of the 2024 DSN Sustainability Report, a total of 3,142 independent smallholders—representing **38.7% of the total 8,123 independent smallholders** and approximately 14.4% of all farmers supplying Fresh Fruit Bunches (FFB) to DSN—have participated in DSN's sustainability programs. These efforts are aligned with DSN Group's commitment to its three key sustainability principles, which include achieving 100% supplier compliance with the NDPE (No Deforestation, No Peat, No Exploitation) Policy and ensuring full supply chain traceability.

Indicator	Number	Percentage
Independent smallholders in DSN sustainability programs	3,142	38.7% of all independent smallholders
Total independent smallholders	8,123	100%
Proportion of program participants to all farmers supplying FFB to DSN	3,142	14.4% of all 21,805 farmers
Total farmers supplying FFB to DSN	21,805	100%

To support this target, DSN conducted productivity enhancement and best practice training programs through its "Sekolah Lapang" (Field School) initiative. These field-based trainings aim to build the capacity of independent farmers in sustainable agricultural practices. The program benefited 3,142 smallholders, comprising 2,672 male and 470 female participants, equipping them with knowledge on sustainable land management, NDPE implementation, and good agricultural practices. This initiative underscores DSN's inclusive approach to supplier engagement and its ongoing efforts to strengthen sustainability across all levels of its supply chain.

For 2024, NDPE socialization in DSN was targeted to reach 4,272 farmers, including independent farmers, cooperative suppliers and agents. The realization of NDPE socialization has reached

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5,567 farmers, meaning that overall, it has exceeded the target by 130.33%. This means that more DSN indirect suppliers (independent smallholders) have received information and understanding on the implementation NDPE.

It also can be found in NDPE Progress Report 2024 that can be accessed in bellow link <https://dsn.co.id/esg/ndpe-report/>

Number or percentage of non-smallholder suppliers assessed and/or engaged on compliance with company's policy and/or legal requirements (*Indicator 176*)

Informed by DSN's personnel, their FFB sources come from own estate, PLASMA, 3rd party estate and Agent. All suppliers need to comply with DSN's sustainability policy before they are qualified as DSN' suppliers. DSN engaged their suppliers based on their category. The following are the total of FFB suppliers for the sampled mills.

In 2024, DSN operated 12 palm oil mills (POM; in Indonesian: PKS) with one mill undergoing major maintenance and ceased operations in early January 2024. Only 3 mills receive FFB from Nucleus plantation (Inti) and Plasma plantation (Kemitraan) and the remaining 9 mills receive FFB from Nucleus, Plasma, and External suppliers. External suppliers consist of an Independent Plantation Company (IPC), Cooperatives, and Agents. The details of DSN external suppliers are shown on the table below.

Table 1 DSN External Supplier in 2024

LANDSCAPE	DIRECT SUPPLIERS			INDIRECT SUPPLIERS (FARMERS)				
	IPC	COOPERATIVE	AGENT	IPC	COOPERATIVE		AGENT	
				Area (ha)	Number of Farmers	Area (ha)	Number of Farmers	Area (ha)
Wahau	1	18	9	3,532	2,561	7,393	1,100	6,073
Bengalon	-	-	7	-	-	-	979	3,229
Karangan	2	-	20	3,378	-	-	383	1,807
Lamandau	-	1	12	-	45	248	1,398	6,289
Sekadau	1	5	3	1,252	1,361	3,031	296	1,671
Total	4	24	51	8,163	3,967	10,672	4,156	19,069

The DSN Group Sustainability Policy (Kebijakan Keberlanjutan DSN Group) has been formally authorized since July 8, 2021, under document number 001/DSN/CSO/VII/2021. To support implementation and monitor compliance, DSN utilizes a Self-Assessment Tool (SAT)—a structured questionnaire designed to collect detailed information from suppliers. This includes aspects such as the presence of an NDPE policy, environmental and social practices, the nature of supplies (owned or third-party), and overall alignment with DSN's sustainability standards.

As part of the verification sample, a SAT form was completed by Rizal Umar, a representative of Koperasi Sawit Usaha Tani Sejahtera. Supporting documents include a signed "Supplier Commitment to the Code of Ethics and NDPE" (Komitmen Pemasok Terhadap Kode Etik dan NDPE), dated 26 September 2022, and the "NDPE Policy Socialization Attendance Record" (Berita Acara Sosialisasi Kebijakan NDPE), dated 14 September 2022.

The Supplier Code of Ethics outlined in these documents includes the following key commitments:

1. No burning for land clearing (Zero Burning)
2. No deforestation (No-Deforestation)
3. No development on peatlands (No-Peat)
4. Protection of areas with High Carbon Stock (HCS)
5. Protection of areas with High Conservation Value (HCV)

These components reflect DSN's rigorous approach to ethical sourcing and responsible supplier engagement in line with its NDPE commitments.

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To make sure the implementation of the Commitment and Code of Conduct regarding NDPE, DSN established their own NDPE profiles with name NDPE MRV (Monitoring, Reporting Verification). The profiles belong to DSN with reference to Supplier Compliance MRV SOP Number SOP-AGR-095-R00. This method is performed by Sustainable Operation Team with reference ISO 19011 Management System Audit sample calculation standard.

Table 8 NDPE Status of DSNG External Suppliers 2024 per Landscape

No.	Supplier Type	Target		Status					
				Registered		Controlled		Compliant	
				Total	%	Total	%	Total	%
IPC									
1	Muara Wahau	1	unit	1	100%	1	100%	1	100%
2	Karangan	2	unit	2	100%	2	100%	2	100%
3	Sekadau-Sintang	1	unit	1	100%	1	100%	1	100%
Cooperative									
1	Muara Wahau	2561	farmers	2561	100%	2561	100%	2557	99.8%
2	Lamandau	45	farmers	45	100%	45	100%	45	100.0%
3	Sekadau-Sintang	1361	farmers	1361	100%	1361	100%	1361	100.0%
Agent									
1	Muara Wahau	1636	farmers	1100	67%	926	57%	924	56%
2	Bengalon	979	farmers	979	100%	979	100%	979	100%
3	Karangan	385	farmers	383	99%	253	66%	247	64%
4	Lamandau	1610	farmers	1398	87%	1009	63%	1009	63%
5	Sekadau-Sintang	296	farmers	296	100%	296	100%	296	100%

REGISTERED status is the status of external suppliers who have been registered in the DSN supplier database system as stipulated in the Third-Party Supplier Registration SOP Number SOP-AGR-093-R00.

CONTROLLED status is only granted to external suppliers who have met two conditions, namely:

1. Complete the DSN supplier registration process and commit to implementing the DSN NDPE Policy by signing the Supplier Code of Conduct Declaration
2. Has been included in the Compliance Roadmap program as stipulated in the Third-Party Compliance Roadmap SOP Number SOP-AGR-094-R00

COMPLIANT status is the status of external suppliers that have been registered in DSN supplier database system and have met the compliance requirements based on MRV Criteria and Indicators.

NDPE MRV Progress

Based on the verification made, it was confirmed that the suppliers has been divided into 3 categories which are Independent Plantation Company (IPC), Cooperative and agents. The details below has been confirmed for all external suppliers

TOTAL SUPPLIERS	
Independent Plantation Company (IPC)	Name of Company
1	PT Sabhantara Rawi Sentosa

2	PT Kalimantan Agro Nusantara
3	PT Warga Rimba
5	PT Tridaya Hutan Lestari
6	PT Kalimantan Sawit Plantation
Total No.	5

Independent Cooperation	Name of Cooperative
1) Wahau	
1	Kop. Sumber Rejeki
2	Kop. Karya Indah
3	Kop. Usaha Tani Sejahtera
4	Kop. SSWJ Muara Wahau
5	Kop. SSWJ Diak Lay
6	Kop. Makarti
7	Kop. Jasa Daun Hijau
8	Kop. Karya Prima Wehea Sejahtera
9	KSU Min Sun Lekut
10	KSU Min Bea Glang Mandiri
11	KSU Harapan Baru
12	KSU Gerdabang Agri Center
13	Kop Sawit Usaha Tani Sejahtera
14	KSU Kel'ean Blom Kejah
15	KSU Seleq Sejahtera Bersama
16	Kop. Nehas Liah Bing
17	Kop Mawar
18	Kop. Karya Sejahtera
2) Lamandau	
1	Kop. Petani Sukses Bersama
3) Sekadau	
1	Kop. Tirta Makmur Sejahtera
2	Kop. Piansak Mandiri Setawar
3	Kop. Keling Kumang
4	Kop. Usaha Bersama
5	Kop. Sungai Raya Mandiri
Total Nos.	24

AGENT	Name of Agents
1) Wahau	
1	PT Wejas Immanuel
2	CV Nitirotha Perintis
3	CV Setia Sawit Telen
4	PT. Tepian Borneo Sejahtera
5	CV Three Putra
6	CV Taruna
7	CV Arta Najwa Bersaudara
8	CV Samuel Mandiri Perkasa
9	CV Jovan Barra Energy
10	PT Borneo Berdaya Lestari
2) Bengalon	
1	CV. Bumi Indah Borneo
2	PT. Etam Karunia Abadi
3	CV. EI 79
4	PT Wejas Imanuel
5	CV. Farhan Salsabila

6	CV. Berkah Hizriah
3) Karangan	
1	KSU Permata Jaya
2	Hambali Simamora
3	Iskandar G
4	Maria Fransisca S
5	Muhamad Arafik
6	Nursam
7	Nurul Suprapti
8	Rachman
9	Sairaji
10	Tedianus Fandy
11	Julkiply Samuel
12	Solehah
13	H. Passamula
14	Karto
15	Ayi Mulyanto
16	M Erwin
17	M Imam
18	Hamka
19	Decky
4) Lamandau	
1	CV. Bukit Sawa Makmur
2	CV. Tandan Es Sega
3	CV. Sawit Mas
4	CV. Citra Sukses Kamijaya
5	CV. Karya Dua Anak Negeri
6	CV. Sampit Jaya
7	CV. Arut Permai
8	CV. Sawit Inti Sarana
9	CV. Berkat Sawit Mandiri
10	CV. Sawit Putra Borneo
11	BUMDES Bukit Jaya Sejahtera
12	CV. Citra Sarana
13	CV. Sawit Sumber Berlian
5) Sekadau	
1	CV Cahaya Sawit
2	CV Agro Jaya Lestari
3	CV Sekadau Membangun
Total Nos.	51
Total Overall Suppliers	80

Description	MRV-NDPE Progress			Total Number of suppliers (external)	Total Act	
	2022	2023	2024		Total YTD Engaged Suppliers	Percentage Engagement
IPC	1	2	1	5	4	80%
Cooperative	2	14	7	24	23	96%
Agent	2	8	19	51	29	57%

Total No. of suppliers and Percentage		80	56	70%
Based on the percentage data, engagement with external suppliers on MRV-NDPE has been ongoing since 2022 through 2024, with confirmed progress each year. The engagement program will be continued in year 2025				
Proportion of supply from suppliers that is verified as deforestation- and/or conversion-free (DCF) : (Indicator 179)				
DSN established 'Sustainability Policy' document number 001/DSN/CSO/VII/2021 dated 08.07.2021 which includes a commitment on NDPE since July 2021. According to the policy, DSN will not develop on HCS and HCV area or peatlands at any depth. DSN is committed to maintain and protect the important values including carbon storage, biodiversity, source of water, with baseline adhering to three key principles and policies (Forest, Climate, & Community) with Group Sustainability Strategy is ESMS, NDPE, Conservation, Circularity) and can be accessed in link bellow DSNG-Sustainability-Policy.pdf. DSN had also published the NDPE Report which can be access form the link: https://dsn.co.id/esg/ndpe-report/ For the purpose of NDPE (No Deforestation, No Peat, No Exploitation) monitoring, DSN Group utilizes a robust satellite-based monitoring system, combining tools such as Satelligence, Global Forest Watch Pro (GFW Pro)—as outlined in SOP-AGR-097-R00—and more recently, Nusantara Atlas for self-assessment based on deforestation alert notifications. The monitoring process is managed by the GIS Head Office (HO) under the Riset & Agronomy Department, operating in coordination with the Sustainability Operations Team. This integrated monitoring framework is designed to ensure that no deforestation has occurred since the NDPE policy cut-off date of March 2020, supporting DSN's commitment to environmental integrity and responsible sourcing across its supply chain. In addition, there is SAT [Self-Assessment Tool] form, a set of questionnaires used to assess the supplier's information such as availability of NDPE policy, environmental, social and type of supplies, own or third-party. SOP MRV for Third Party Supplier PT DSN suppliers are subject to the company Monitoring, Review and Verification (MRV) process. This process involves MRV Audits of third-party suppliers that are already registered as compliant suppliers and committed to NDPE policies. Audits are carried out periodically by the team or at any time to monitor supplier compliance if there is an alert from DSNG compliance process or perhaps from an external source received from the grievance process. The Company is committed to implementing the NDPE Program, where each supplier registers and signs the Ethical and NDPE Commitment. As of 2024, 100% of suppliers have engaged and signed the agreement to implement this Code of Ethics and NDPE. These suppliers include 4 IPC suppliers, 24 cooperatives, and 51 agents. To ensure NDPE compliance for each supplier, the Company conducts Monitoring, Reporting, and Verification (MRV). The Company has dedicated Supplier Engagement staff at each supply chain location to support the implementation of NDPE for external suppliers. Currently, the Company has 7 Supplier Engagement staff, coordinated by 3 Sustainability Operations Managers, each located in different regions. Implementation verification is conducted by Supplier Audit staff to ensure the achievement of the three stages of NDPE implementation: Registered, Controlled, and Compliant. From the MRV activities conducted, the NDPE implementation results among suppliers reached 100% for IPCs, 99.9% for independent cooperatives, and 70.4% for agents. By the end of 2024, DSNG's overall FFB supply (from nucleus, plasma and external) that has been traceable is 96.2% or equivalent to 2,419,907 tons of FFB. The remaining 3.8% (95,133 Tons) of incoming FFB that are untraceable are all from external suppliers. This year's Traceability achievement has increased compared to 2023, where the previous TTP percentage was 91.8% of FFB that could be traced as following table:				Comprehensive, externally verified
	Mill	FFB Supply (Ton)		

Subsidiary		Traceable	%	Untraceable	%	Total FFB (Ton)	
PT SWA	PKS 1	146.31	91.4%	13.82	8.6%	160.13	
	PKS 4	276,057.37	92.9%	21,080.27	7.1%	297,137.63	
PT DAN	PKS 2	269,426.36	100.0%	-	0.0%	269,426.36	
PT DIN	PKS 3	96,431.55	94.7%	5,396.85	5.3%	101,828.41	
	PKS 11	313,513.74	100.0%	-	0.0%	313,513.74	
PT DWT	PKS 6	294,136.43	100.0%	-	0.0%	294,136.43	
PT KPAS	PKS 7	303,205.23	96.5%	11,087.03	3.5%	314,292.26	
PT BPN	PKS 9	255,664.63	96.0%	10,734.45	4.0%	266,399.08	
PT BAS	PKS 10	124,393.32	97.3%	3,429.87	2.7%	127,823.19	
PT PWP	PKS 5	189,258.27	97.6%	4,708.99	2.4%	193,967.25	
	PKS 12	117,584.99	83.1%	23,860.74	16.9%	141,445.73	
PT AAN	PKS 8	180,088.70	92.4%	14,821.32	7.6%	194,910.03	
TOTAL		2,419,907 MT	96.2%	95,133 MT	3.8%	2,515,040	

3.2 Signing by the Client

I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents and audit findings as presented in this document.

I also confirm:

- Acceptance of liability in execution of the instructions given.
- That this company was made aware that the findings of the audit team are tentative; pending review and decision making by the duly designated representatives of Control Union Certifications.
- That during the closing meeting all agenda items was covered by the Lead Verifier.

Acknowledged by:

Name:	Teguh Triono
Position:	Management System and Sustainability Engagement Division Head
Date:	25.07.2025



Signature

3.3 Signing by the Lead Verifier

I the undersigned, being the Lead verifier, confirm that this report is an accurate record of the findings and of the closing meeting. I further confirm that the summary of the findings as presented in this report are a true representation of the actual findings of the audit team.

Acknowledged by:

Name:	Ebnu Holdoon Shawal
Position:	Lead Verifier
Date:	17.06.2025



Signature

3.4 Signing by the Reviewer

I the undersigned, being the Certifier, confirm that the information and conclusions included in this report have been prepared in good faith and that the certification decision has been based upon this information.

Acknowledged by:

Name:	Jasmandy Syahrul
Position:	Certifier
Date:	24.07.2025



Signature