

PUBLIC SUMMARY REPORT

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

Goodhope Asia Holdings Ltd

2025

Contact

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

Company Name:	Goodhope Asia Holdings Ltd [PT Agro Harapan Lestari],
Business Address:	Menara Global, 5th Floor, Jalan Jend. Gatot Subroto Kav.27, Jakarta 12950 Indonesia
Contact Person:	Carl Dagenhart
Office Telephone:	+603 2082 6200
E-Mail:	carl.dagenhart@goodhope.co
Web Site:	www.goodhopeholdings.com

1.2 Assessment Details

Dates Of This verification:	05 th – 09 th May 2025
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1.3 Assessment Type

Third party verification to assess and validate compliance, performance and/or action taken by Goodhope Asia Holdings Ltd. in relation to its commitment by evaluating the information provided by Goodhope towards SPOTT concerning the latest SPOTT Palm Oil Indicator Framework 2025 that requires external verification.

1.4 General Description of Goodhope Holdings Pte Ltd.

Goodhope Asia Holdings Ltd. (hereafter referring to GH) operates in the oil palm plantation and processing industry and supports sustainable production and trade. The Group manages oil palm plantations in Indonesia with a total landbank of more than 100,000 ha (69,549 hectares planted including PLASMA) across four provinces in Indonesia (Central Kalimantan, East Kalimantan, West Kalimantan and Papua).

GH operates 01 refinery based in Malaysia, 02 KCPs based in Indonesia and 08 palm oil mills based in Indonesia. Total processing capacity of the mills is 500 tons of FFB per hour for CPO and PK production.

GH's Sustainability Policy applies to all operations of GH, including all their mills, refineries and plantations, with clauses extending to their associates and third-party suppliers. Since the launch of the policy in May 2017, GH has been working towards its full implementation, including a fully transparent and traceable supply chain to the mill and plantation for all levels, subsidiaries, associates and third-party buyers and suppliers (including smallholders).

GH has established a Sustainability Policy Implementation Plan (SPIP) to fulfill the commitment outlined in the Sustainability Policy.

- The first SPIP was published alongside their Sustainability Policy on 5th May 2017. This initial plan defined key aims and objectives for policy compliance and provided a framework for more detailed action plans to guide their activities.
- The second SPIP was published in their Sustainability Policy Implementation Report June 2018. The aims and objectives were defined according to the terms of their policy statements and progress towards meeting the aims set out in the first implementation plan.

As for the commitment to NDPE, GH is using NDPE IRF protocol as a reference to identify the Deforestation and Peat Conversion level of their suppliers. Satellite monitoring is used to monitor the land use change of their suppliers, and this monitoring is done by their Responsible Sourcing team. Other than that, ongoing engagement with their suppliers help GH to brief their NDPE commitment, Sustainability Policy, Traceability requirement and other information.

Risk assessment tools including spatial data and remote sensing information are being increasingly used to determine the risk of each third-party palm oil mill in their supply chain and GH continue to step up the engagement process with suppliers to encourage compliance with the policy requirements.

As of the assessment day, GH is also a member of RSPO and the compliance towards RSPO P&C requirement is independently verified.

1.5 Operational Units under scope

GH operates 01 refinery based in Malaysia, 02 KCPs based in Indonesia and 08 palm oil mills based in Indonesia. Total processing capacity of the mills is 500 tons of FFB per hour for CPO and PK production. Details as below:

Operations	Facilities	Location	Coordinate
Premium Vegetable Oils Sdn. Bhd./ Premium Fats Sdn. Bhd.	Refinery	PLO 66, Jalan Timah Dua, Pasir Gudang Industrial Estate, 81707, Pasir Gudang, Johor, Malaysia.	1.447485, 103.913308
Sungai Binti KCP	KCP	Kecamatan Mentaya Hilir Utara, Kabupaten Kotawaringin Timur, Central Kalimantan, Indonesia.	-2.562250, 112.768067
Nabire Matoa KCP	KCP	Desa Wami, Kecamatan Yaur, Kabupaten Nabire, Papua, Indonesia.	-3.461500, 135.256344
Sungai Purun POM	Mill	Desa Terawan, Kecamatan Danau Sembuluh, Kabupaten Seruyan, Central Kalimantan, Indonesia.	-2.524252, 112.416800
Terawan POM	Mill	Desa Terawan, Kecamatan Danau Sembuluh, Kabupaten Seruyan, Central Kalimantan, Indonesia.	-2.559957, 112.373600
Sungai Binti POM	Mill	Kecamatan Mentaya Hilir Utara, Kabupaten Kotawaringin Timur, Central Kalimantan, Indonesia.	-2.562250, 112.768067
Bukit Santuai POM	Mill	Kecamatan Bukit Santuai, Kabupaten Kotawaringin Timur, Central Kalimantan, Indonesia.	-1.862500, 112.395833
Bumi Jaya POM	Mill	Kecamatan Sepaku, Kabupaten Penajam Paser Utara, East Kalimantan, Indonesia	-1.014824, 116.689541
Nabire Matoa POM	Mill	Desa Wami, Kecamatan Yaur, Kabupaten Nabire, Papua, Indonesia.	-3.461500, 135.256344
Batu Mas Sejahtera POM	Mill	Kecamatan Sungai Laur, Kabupaten Ketapang, West Kalimantan, Indonesia.	-1.013413, 110.531620
Sumber Hasil Prima POM	Mill	Kecamatan Serawai dan Ambalau, Kabupaten Sintang, West Kalimantan, Indonesia.	-0.297767, 112.437275

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-shop solutions 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, third party verification 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, CU serves the clients by performing sustainability strategy checks, gap analysis and independent assurance. CU 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:	Jasmandy Syahrul
Verifier:	Zulkarnain Ishak

2.2.1 Qualifications of the Assessors

Name	Qualifications
Jasmandy Syahrul (Lead Verifier)	<ul style="list-style-type: none"> Graduated in B. Sc. in Plantation Technology and Management from Universiti Teknologi Mara 9 years' working experience in oil palm plantation; operation and sustainability department. More than 5 years' working experience as a Lead Auditor in different certification bodies. Successfully completed Lead Auditor training for RSPO P&C, MSPO (OPMC & SCCS), ISO9001, ISO14001, ISO45001, ISO14064, ISO 14065, ISO14067, Verified Carbon Standard (VCS), SA8000, SMETA, GHG Methodologies, UER Training, HCV/HCS Training, EUDR, etc. Qualified for RSPO P&C, MSPO (OPMC & SCCS), ISO14064-1, ISO14064-2, VCS, Unilever, Nestle, PepsiCo, AAK, etc., NDPE-IRF, Traceability [TTM, TTP], EUDR Readiness Assessment, etc.
Zulkarnain Ishak (Verifier)	<ul style="list-style-type: none"> He serves as a Manager for Control Union, Currently as Manager Sustainability Assurance – Asia Region Central of Excellence, Control Union Malaysia Sdn. Bhd. since 2018 which drives Control Union Malaysia's activities on GRI Assurance and other sustainability projects under the portfolio of Assurance Services. Zul Successful attended the Global Report Initiative (GRI) Standards Certified Training (Singapore) April 2018 Prior to joining Control Union, he has almost 16 years' experience which in Palm Oil Industry, doing audit, consultation, coach and involve in the taskforce working group for MSPO Biomass related to Sustainability, Environmental, Safety & Health, management system, operation and 4 years of experience as Environmental Consultant. A senior auditor with international auditing experience in Global Report Initiative (GRI) Standards Assurance, NDPE IRF, Traceability Assurance (TTP, TTM), Protocol Verifier (Nestle, Mondelez, PepsiCo and Unilever), RSPO, RSPO SCC, MSPO, ISCC, ISCC ISH, ISCC Waste and Residue, ISCC GHG Expert, Low iLUC, SPOTT, QMS ISO 9001, EMS ISO 14001, RSB, GGL, SGLS, FSC-COC, HACCP, SHO, CepSWaM, etc.

2.3 Methodology

2.3.1 General Overview

Assurance method included,

- Inquiring and interviewing management, including senior management at executive and functional levels, and of relevant management responsible for the day-to-day management of sustainability.
- Observing and reviewing the management practices and evidence gathering across the organization on a sample basis.
- Evaluating the documentary evidence and management representations that support adherence to the principles.
- Data source validation.
- Carrying out analytical procedures (e.g., trend analysis).

All concerned SPOTT indicators 2024: **36, 37, 65, 70, 95, 111, 116, 118, 120, 145, 174, 176, 179, 181, 184, 185** will be subject to comprehensive external verification to achieve full marks under SPOTT scoring system.

2.3.2 Sampling

For non-traceability related SPOTT Indicators

Where sampling is required for the verification assessment, the sampling design was based on a minimum sample of facilities, **where x = (Vy)**, where y is the number of facilities under each processing scope. The result always to be rounded “up” to the next whole integer.

Traceability related SPOTT Indicators

Verification scope is limited to **one** refinery, **two** KCPs and **three** mills provided for verification which has been mentioned in table 2.3.3 above. All sites will be evaluated according to the latest SPOTT indicators.

2.3.3 Sampled operational units for the evaluation

Refineries	Kernel Crushing Plants	Palm Oil Mills
Premium Vegetable Oils Sdn. Bhd./ Premium Fats Sdn. Bhd.	1. Sungai Binti KCP 2. Nabire Matoa KCP	1. Bumi Jaya 2. Nabire Matoa 3. Batu Mas Sejahtera

2.3.3 Explanation of the sample selection

Sampling was derived to represent all types of GH's facilities:

Facilities	Total Unit	Sample Selected for Verification
Total No. of Refineries	1	1
Total No. of KCPs	2	2
Total No. of Palm Oil Mills	8	3

PART 3 ASSESSMENT FINDINGS

3.1 Summary of the findings

GH manages oil palm plantations in Indonesia with a total landbank of more than 100,000 ha (69,549 hectares planted including PLASMA) across four provinces in Indonesia (Central Kalimantan, East Kalimantan, West Kalimantan and Papua).

The SPOTT assessment covers 16 indicators (**36, 37, 65, 70, 95, 111, 116, 118, 120, 145, 174, 176, 179, 181, 184, 185**). Total refinery, KCP and mills included in the 2025's assessment are 1, 2 and 3 respectively.

The assessment is resulting in 'Comprehensive with Externally Verified' and 'Comprehensive, Self-Reported'.

Details of assessment and scoring for each indicator are outlined below.

Summary of Findings for criteria:	Scope and Scoring
<p>Publishes traceability data at refinery level (Indicator 36)</p> <p>GH has reaffirmed its commitment to maintaining a traceable and transparent palm oil supply chain, ensuring that all suppliers adhere to its No Deforestation, No Peat, No Exploitation (NDPE) commitments. To uphold these responsible sourcing standards, Goodhope has implemented a comprehensive system comprising policies, guidelines, procedures, and tools that cover both upstream and downstream operations.</p> <p>For downstream operations, the company prioritizes the following:</p> <ul style="list-style-type: none"> • Tracing the origin of palm-based materials back to the plantation level. • Assessing the risk profiles of both existing and potential suppliers. • Identifying and managing instances of NDPE non-compliance among suppliers. <p>These efforts are guided by the Downstream Traceability Procedure (Ref: RSSOP/DT/01, Revision No. 1, issued on 01.03.2022). Through this framework, GH is committed to sourcing and processing traceable materials that are produced sustainably. GH aims to progressively extend NDPE compliance across its entire supply chain.</p> <p>Traceability Approach</p> <p>For our products and materials to be considered traceable, we require the following information:</p> <div data-bbox="219 1364 1208 1701" style="display: flex; justify-content: space-around;"> <div data-bbox="219 1364 536 1701">  <p>Palm Oil Mill</p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Group name <input checked="" type="checkbox"/> Mill name <input checked="" type="checkbox"/> Mill GPS coordinates <input checked="" type="checkbox"/> Product to be supplied </div> <div data-bbox="552 1364 870 1701">  <p>Company-owned Plantation, Direct 3rd Party Plantation, Direct Smallholder</p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Plantation/ smallholder name <input checked="" type="checkbox"/> GPS coordinates <input checked="" type="checkbox"/> Planted area hectareage <input checked="" type="checkbox"/> Volume supplied to the mill </div> <div data-bbox="886 1364 1208 1701">  <p>Dealer/ Collection Centre</p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Dealer/ collection center name <input checked="" type="checkbox"/> GPS coordinates <input checked="" type="checkbox"/> Volume supplied to the mill <input checked="" type="checkbox"/> Name of sourcing sub-district/ village </div> </div> <p>The traceability approach, based on Traceability to Mill (TTM) and Traceability to Plantation (TTP), encompasses the following supply chain actors:</p> <ul style="list-style-type: none"> • Palm Oil Mills • Company-Owned Plantations, Direct Third-Party Plantations, and Direct Smallholders • Dealers and Collection Centers 	Comprehensive, externally verified

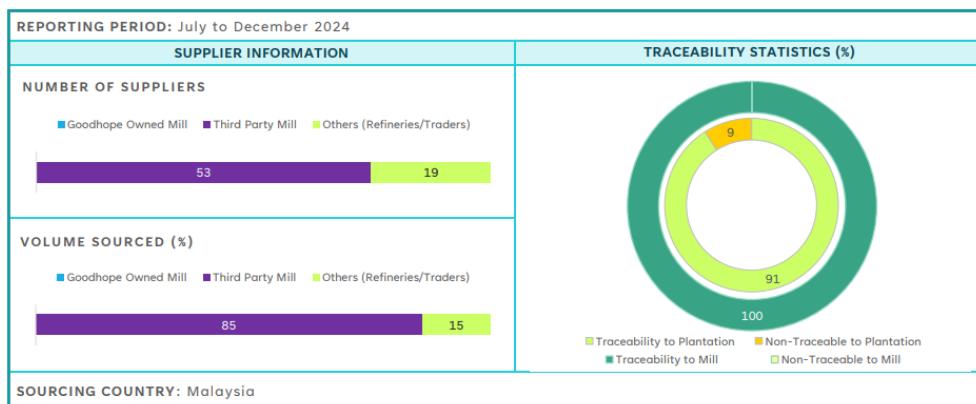
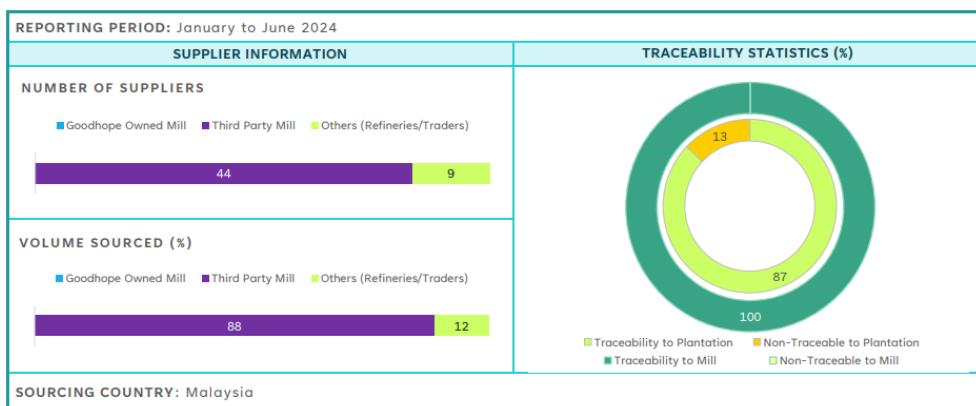
It is important to note that if any component of the traceability requirements outlined above is incomplete, the associated volume will be classified as non-traceable.

Traceability Declarations include detailed lists of suppliers and outline the efforts undertaken to trace palm-based products back to their source. It has been verified that the refineries Premium Vegetable Oils Sdn. Bhd. & Premium Fats Sdn. Bhd., located in the Pasir Gudang Industrial Estate, Johor, Malaysia, are part of this traceability initiative.

According to the declarations:

- For H1 2024, the traceability data includes 44 palm oil mills and 9 refineries.
- For H2 2024, the scope expands to 53 palm oil mills and 19 facilities, including refineries and kernel crushing plants (KCPs).

These lists are publicly accessible and available on GH's website, reinforcing transparency and accountability in the supply chain. <https://goodhopeholdings.com/wp-content/uploads/Traceability-Declaration PVO 2H2024.pdf>



Sample suppliers available on the supplier list (Mills and Refinery/KCP) to the refinery are:

H1 2024

List of Supplying Mills								
No.	Parent Company	Palm Oil Mill	Country	UML ID	Latitude	Longitude	RSPO Certified	Material Sourced
1	Achi Jaya Plantations Sdn Bhd	Johor Labis POM	Malaysia	PO1000003713	2.251472	103.051306	N	PK
2	Bell Group	Bell Palm Industries POM	Malaysia	PO1000003724	1.916778	102.891750	N	PK
3	Bell Group	Syarikat Perusahaan Kelapa Sawit POM	Malaysia	PO1000003721	2.166967	103.058453	N	PK
4	Victory Enghoe Plantations Sdn Bhd	Southern Malay POM	Malaysia	PO1000003953	1.791003	103.362557	N	PK
5	Classic Palm Oil Mill Sdn Bhd	Classic POM	Malaysia	PO1000003743	2.600889	102.624639	N	PK
6	Classic Palm Oil Mill Sdn Bhd	Classic Segamat POM	Malaysia	PO1000003739	2.666300	102.807000	N	PK
7	RISDA Estates Sdn Bhd	RISDA Durian Mas POM	Malaysia	PO1000006353	4.595091	103.202805	N	PK
8	Far East Holdings Berhad	Endau POM	Malaysia	PO1000003869	2.679944	103.505361	N	PK
9	FELCRA Berhad	Felcra Sungai Melikai POM	Malaysia	PO1000003757	2.388242	103.801396	N	PK
10	Jeng Huat (Bahau) Realty Sdn Bhd	Kahang POM	Malaysia	PO1000003805	2.342278	103.438400	N	PK

List of Supplying Refineries								
No.	Parent Company	Refinery	Country	Latitude	Longitude	RSPO Certified	Material Sourced	
1	JC Chang (Pte) Ltd	Carotino Sdn Bhd	Malaysia	1.450356	103.902854	Y	RPO	
2	Keck Seng (Malaysia) Berhad	Keck Seng (Malaysia) Berhad	Malaysia	1.540185	103.964509	Y	RPO, RPS, RPL	
3	Kuala Lumpur Kepong Berhad	KL Kepong Edible Oils Sdn Bhd	Malaysia	1.446080	103.903210	Y	RPO, RPS, RPL	
4	Mewah Group	Mewaholeo Industries Sdn Bhd	Malaysia	1.452820	103.903280	Y	CPKL, RPS, RPL	
5	Musim Mas Group	Musim Mastika Oils & Fats (M)	Malaysia	1.457231	103.986735	Y	RPO, RPS, RPL	
6	Wilmar International Ltd	PGEQ Edible Oils Sdn Bhd	Malaysia	1.450426	103.897164	Y	RPS, RPL	
7	Sime Darby Plantation Berhad	Sime Darby Oils Port Klang	Malaysia	3.044079	101.370659	Y	RPS	
8	Bunge Limited	Bunge Loders Croklaan Pasir Gudang	Malaysia	1.449368	103.908608	Y	RPO, RPS, RPL	
9	Fuji Oil Group	Palmaju Edible Oil Sdn Bhd	Malaysia	1.444667	103.898611	Y	RPL	

H2 2024

List of Supplying Mills								
No.	Parent Company	Palm Oil Mill	Country	UML ID	Latitude	Longitude	RSPO Certified	Material Sourced
1	Achi Jaya Plantations Sdn Bhd	Johor Labis POM	Malaysia	PO1000003713	2.251472	103.051306	N	PK
2	Bell Group	Bell Palm Industries POM	Malaysia	PO1000003724	1.916778	102.891750	N	PK
3	Bell Group	Syarikat Perusahaan Kelapa Sawit POM	Malaysia	PO1000003721	2.166967	103.058453	N	PK
4	Victory Enghoe Plantations Sdn Bhd	Southern Malay POM	Malaysia	PO1000003953	1.791003	103.362557	N	PK
5	Classic Palm Oil Mill Sdn Bhd	Classic POM	Malaysia	PO1000003743	2.600889	102.624639	N	PK
6	Classic Palm Oil Mill Sdn Bhd	Classic Segamat POM	Malaysia	PO1000003739	2.666300	102.807000	N	PK
7	RISDA Estates Sdn Bhd	RISDA Durian Mas POM	Malaysia	PO1000006353	4.595091	103.202805	N	PK
8	Far East Holdings Berhad	Endau POM	Malaysia	PO1000003869	2.679944	103.505361	N	PK
9	FELCRA Berhad	Felcra Sungai Melikai POM	Malaysia	PO1000003757	2.388242	103.801396	N	PK
10	Jeng Huat (Bahau) Realty Sdn Bhd	Kahang POM	Malaysia	PO1000003805	2.342278	103.438400	N	PK

List of Supplying Refineries/ Kernel Crushing Plants								
No.	Parent Company	Refinery	Country	Latitude	Longitude	RSPO Certified	Material Sourced	
1	JC Chang (Pte) Ltd	Carotino Sdn Bhd	Malaysia	1.450356	103.902854	Y	RPO	
2	Keck Seng (Malaysia) Berhad	Keck Seng (Malaysia) Berhad	Malaysia	1.540185	103.964509	Y	RPO, RPS, RPL, RPKS	
3	Kuala Lumpur Kepong Berhad	KL Kepong Edible Oils Sdn Bhd	Malaysia	1.446080	103.903210	Y	RPO, RPS, RPL	
4	Mewah Group	Mewaholeo Industries Sdn Bhd	Malaysia	1.452820	103.903280	Y	RPS	
5	Musim Mas Group	Musim Mastika Oils & Fats (M)	Malaysia	1.457231	103.986735	Y	RPO, RPS, RPL	
6	Wilmar International Ltd	PGEQ Edible Oils Sdn Bhd	Malaysia	1.450426	103.897164	Y	RPO, RPS, RPL	
7	Wilmar International Ltd	Wilmar Kuantan Edible Oil Sdn Bhd	Malaysia	3.975624	103.39166	Y	CPKO	
8	SD Guthrie International	Sime Darby Oils Port Klang	Malaysia	3.044079	101.370659	Y	RPS	
9	Bunge Limited	Bunge Loders Croklaan Pasir Gudang	Malaysia	1.449368	103.908608	Y	RPS, RPL	
10	Hup Lee Oil Mill Sdn Bhd	Hup Lee Oil Mill Sdn Bhd	Malaysia	3.088034	101.412060	Y	CPKO	

Noted that the traceability Declarations include lists of the suppliers and provide information on the efforts to trace palm-based products to source:

Sample Premium Vegetable Oils Sdn Bhd

Mill	Total Volume (MT)		Total (MT)
	H1	H2	
KS Muar Mill	6,051.75	5,478.34	11,530.09
Achi Jaya – Labis POM	2165	2,026.91	4,191.91
Kilang Isi Sawit Sin Huat Hin Sdn Bhd	-	546.30	546.30
Wilmar Kuantan Edible POM	-	1,303.84	1,303.84
KL Kepong Edible Oil Sdn Bhd POM	1,225.27	1,824.82	3,050.09

Volume to Premium Vegetable Oils Sdn Bhd 104,485.14 MT for H1 and 104,858.24MT for H2 and total is 209,343.38MT

Sample weighbridge ticket for mill and refinery.

Supplier Palm Kernel	Transaction Date	Ticket Number	Product	Vol. (MT)
KS Muar Mill	09.07.2024	124008495	PK	43.49
Achi Jaya – Labis POM	06.09.2024	124011093	PK	40.54
Kilang Isi Sawit Sin Huat Hin Sdn Bhd	25.12.2024	124009891	CPKO	46.17
Wilmar Kuantan Edible POM	07.11.2024	124010561	CPKO	39.97
KL Kepong Edible Oil Sdn Bhd POM	02.09.2024	124009507	RPO	41.78

Traceability Declarations

GH commits to demonstrating that its palm oil supply chains are fully transparent and traceable. The Traceability Declarations include lists of the suppliers and provide information on efforts to trace palm-based products to the source. The traceability TTM is 100% and the TTP 91%. Detail as table below.

Link: https://goodhopeholdings.com/wp-content/uploads/Traceability-Declaration_PVO_2H2024.pdf

PVO's List of Supplying Mills (H2-2024)

Palm Oil Mill	TTP%
Ace Oil Mill	100.00
Johor Labis POM	100.00
Bell Keratong Palm Industries POM	100.00
Bell Palm Industries POM	100.00
Bell-KSL POM	88.44
Syarikat Perusahaan Kelapa Sawit POM	99.50
Southern Malay POM	99.87
Cenderawasih POM	78.68
Keratong POM	100.00
Classic POM	97.73
Classic Segamat POM	99.11
Coronation POM	96.33
RISDA Durian Mas POM	100.00
Endau POM	99.86
Felcra Sungai Melikai POM	92.55
Kahang POM	99.25
Ulu Sebol POM	100.00
Paloh POM	100.00
RISDA Ulu Keratong POM	100.00
Kosfarm POM	99.87
FELCRA Bukit Kepong POM	100.00
RISDA Sg. Ambat POM	95.67
United Bell POM	99.93

Kim Loong POM	99.34		
Muar POM	99.95		
Kuantan Trading Oil Mill	99.53		
Sedenak POM	99.55		
Tereh POM	100.00		
Sindora POM	100.00		
Ledang Mas POM	100.00		
Bintang POM	96.52		
PPNJ Bukit Bujang POM	100.00		
PPNJ Kahang POM	97.77		
Prosper POM	90.35		
Ladang Siang POM	100.00		
Hadapan (Sou 24) POM	96.16		
Ulu Remis (Sou 23) POM	100.00		
Kempas (Sou 17) POM	100.00		
Bukit Benut (Sou 22) POM	100.00		
Gunung Mas (Sou 21) POM	100.00		
Bukit Berembun POM	89.77		
Sri Jelutung POM	97.52		
Sungai Kachur POM	100.00		
Sungei Kahang POM	100.00		
Wujud Wawasan POM	99.29		
Tian Siang Pahang POM	100.00		
Sawira Makmur POM	97.66		
Merchong POM	100.00		
Ladang Padang POM	82.97		
Sri Ganda POM	100.00		
Bukit Lawiang POM	100.00		
Kota Bahagia POM	98.35		
YYPH POM	100.00		
Publishes traceability data at crusher level (<i>Indicator 37</i>)			
<p>GH is committed to demonstrating full transparency and traceability across its palm oil supply chains. Its Traceability Declarations include comprehensive supplier lists and outline the company's ongoing efforts to trace palm-based products back to their source.</p> <p>As part of its downstream operations, GH operates two Kernel Crushing Plants (KCPs):</p> <ul style="list-style-type: none"> • Sungai Binti Kernel Crushing Plant • Nabire Matoa Kernel Crushing Plant <p>These operations are governed by the Downstream Traceability Procedure (Ref: RSSOP/KCP/01, Revision No. 1, issued on 01.03.2022). Through this framework, GH reinforces its commitment to sourcing and processing traceable materials that are produced sustainably. The company aims to progressively ensure that NDPE (No Deforestation, No Peat, No Exploitation) compliance is upheld throughout its entire supply chain.</p>			
<p>Comprehensive, externally verified</p>			

Traceability Approach

For our products and materials to be considered traceable, we require the following information:



Palm Oil Mill

- Group name
- Mill name
- Mill GPS coordinates
- Product to be supplied



Company-owned Plantation, Direct 3rd Party Plantation, Direct Smallholder

- Plantation/ smallholder name
- GPS coordinates
- Planted area hectareage
- Volume supplied to the mill



Dealer/ Collection Centre

- Dealer/ collection center name
- GPS coordinates
- Volume supplied to the mill
- Name of sourcing sub-district/ village

GH has established the Master List of Suppliers (KCP)

List of Supplying Mills

No.	Company Name	Palm Oil Mill	Country	UML ID	Latitude	Longitude	RSPO Certified	Material Sourced
1.	PT Agro Indomas	Sungai Purun POM	Indonesia	PO1000002676	-2.524252	112.416800	Yes	PK
2.	PT Agro Indomas	Terawan POM	Indonesia	PO1000002677	-2.559957	112.373600	Yes	PK
3.	PT Agro Bukit	Sungai Binti POM	Indonesia	PO1000003333	-2.562250	112.768067	Yes	PK
4.	PT Agro Wana Lestari	Bukit Santuji POM	Indonesia	PO1000003927	-1.858458	112.396565	Yes	PK
5.	Triputra Agro Persada	Gawi Bahandep Sawit Mekar POM	Indonesia	PO1000001618	-2.951233	112.347033	Yes	PK
6.	Sinar Citra Cemerlang	Cempaka Sakti POM	Indonesia	PO1000007621	-2.133000	112.906000	No	PK
7.	TSH Resources	Sarana Prima Multi Niaga POM	Indonesia	PO1000003976	-1.996730	112.926493	Yes	PK
8.	Karya Makmur Bahagia	Bukit Makmur POM	Indonesia	PO1000005302	-1.567778	112.721110	Yes	PK
9.	Eagle High Plantations	Adhyaksa Dharma Satya POM	Indonesia	PO1000004102	-1.588931	112.861883	No	PK
10.	Nusantara Sawit Persada	Persada POM	Indonesia	PO1000008184	-2.106833	112.794167	No	PK
11.	Eagle High Plantations	Bumi Hutani Lestari POM	Indonesia	PO1000004865	-1.677517	112.936183	Yes	PK
12.	Borneo Sawit Perdana	Jemaras POM	Indonesia	-	-2.211750	113.010389	No	PK

Sample Sungai Binti KCP (Received and Process)

Mill	Total Volume H1		Total Volume H2		Total	
	Receive	Process	Receive	Process	Receive	Process
Adhyaksa Dharma Satya POM	672.66	523.77	593.96	668.64	1,266.62	1,192.41
Cempaka Sakti POM	863.86	653.50	374.32	302.73	1,059.82	956.23
Sarana Prima Multi Niaga POM	1,221.84	1,097.06	1,441.83	1,407.97	2,663.67	2,505.03

Volume to Sungai Binti KCP 35,246.39MT MT for H1 and 42, 025.20 MT for H2 and total is 77,289.58 MT

Mill supplier to PT Nabire Baru

Mill (PK)	Total Volume H1	Total Volume H2	Total (MT)
Nabire Matoa POM	3,392.91	3,265.1	6,658.01

Noted that Nabire Matoa POM supplies KCP Nabire Baru.

Sample weighbridge ticket for mill suppliers to Sungai Binti KCP.

Supplier Palm Kernel	Transaction Date	Ticket Number	Product	Vol. (MT)
Adhyaksa Dharma Satya POM	13.01.2024	000994868	PK	8.34
Cempaka Sakti POM	02.10.2024	001073253	PK	8.6
Sarana Prima Multi Niaga POM	19.07.2024	001049341	PK	3.92

The production data from the Sungai Binti Mill RSPO Report for January 2024 has been verified by the Person in Charge (PIC) of the Sungai Binti Kernel Crushing Plant, Ms. Henny Sembiring.

Traceability Declarations

GH commits to demonstrating that its palm oil supply chains are fully transparent and traceable. The Traceability Declarations include lists of the suppliers and provide information on the efforts to trace palm-based products to the source.

https://goodhopeholdings.com/wp-content/uploads/Summary_Traceability-Declarations_KCP_2H2024.pdf

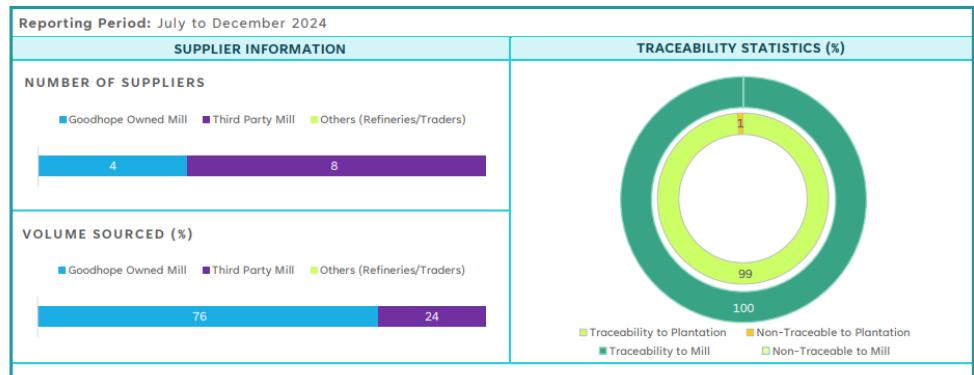
Sungai Binti KCP's List of Supplying Mills (H2-2024) is 99% TTP.

Palm Oil Mill	TPP%
Sungai Purun	100.00
Terawan	100.00
Sungai Binti	100.00
Bukit Santuai	100.00
Cempaka Sakti	84.74
Gawi Bahandep Sawit Mekar	99.06
Sarana Prima Multi Niaga	100.00
Bukit Makmur	0.00
Adhyaksa Dharma Satya	100.00
Persada	100.00
Bumi Hutani Lestari	76.12
Jemaras	100.00



TRACEABILITY DECLARATION – KERNEL CRUSHING PLANT

Company Name	Facility Name	Address	Latitude	Longitude	RSPO Certified
PT Agro Bukit	Sungai Binti Kernel Crushing Plant	Kecamatan Mentaya Hilir Utara, Kabupaten Kotawaringin Timur, Central Kalimantan, Indonesia	-2.562250	112.768067	Yes – MB





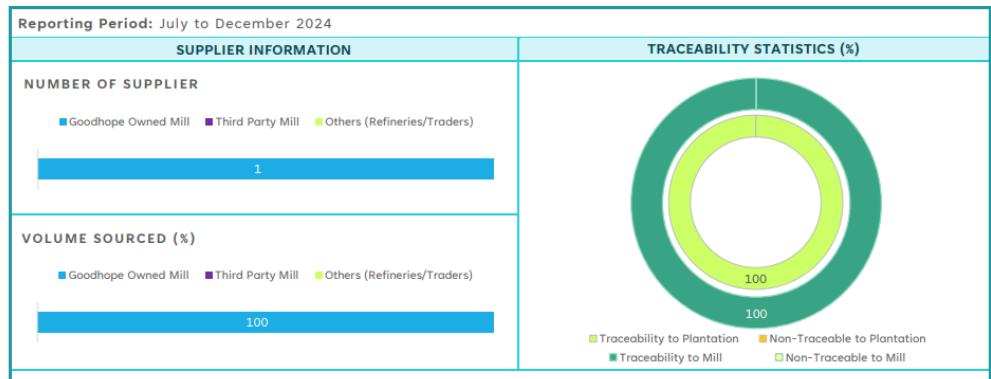
Nabire Matoa KCP's List of Supplying Mills (H2-2024) is 100% TTP.

Palm Oil Mill	TPP%
Nabire Matoa	100.00



TRACEABILITY DECLARATION – KERNEL CRUSHING PLANT

Company Name	Facility Name	Address	Latitude	Longitude	RSPO Certified
PT Nabire Baru	Nabire Matoa Kernel Crushing Plant	Desa Wami, Kecamatan Yaur, Kabupaten Nabire, Papua, Indonesia	-3.461500	135.256344	No



Evidence of monitoring deforestation and/or ecosystem conversion in supplier operations (Indicator 65)

GH has established the conservation and sustainability policy document that mentioned GH will not conduct any new development on High Carbon Stock (HCS) Forest, High Conservation Value (HCV) Areas or peatland of any depth and is working to eliminate deforestation and conversion of other natural ecosystems from its supply chains. Land-use planning for the

Comprehensive, externally verified

development of oil palm plantations or associated infrastructure follows the RSPO Procedures for New Plantings (NPP) to determine appropriate areas for development. GH is committed to maintain and protect important values including carbon storage, biodiversity, sources of water, and other resources that are important for sustaining the wellbeing of indigenous peoples and local communities. The policy is applied to GH's operations, subsidiaries, and suppliers are expected to adhere to the following requirements:

No deforestation and no conversion of natural ecosystems

- Work towards ensuring that the materials produced or purchased do not originate from deforested areas or converted natural ecosystems, including HCV areas, HCS forests, and peatland.
- Comply with the cut-off date of 5th May 2017 for GH's own operations and 4th May 2019 for its suppliers, after which, management units associated with deforestation or conversion are deemed non-compliant

DMA-Responsible-Sourcing-2024.pdf

GH has the procedure for new suppliers where all new suppliers must go through the due diligence processes. They are required to submit the following document for review prior entering into agreement or contract.

- Signed SCOC (Supplier Code of Conduct).
- Completed the SAT (Self-Assessment Tool).
- Complete the TTP Excel Declaration.

The traceability data will be checked on completeness and validated upon receipt and traceability is a minimum requirement for supplier qualification. Supplier code of conduct includes legal compliance, social aspect, environmental aspect and supplier declaration by supplier/ mill manager. Sample due diligence includes basic information, data collection and results approval from the management. While the Self-Assessment Tool (SAT) is a set of questionnaires used to assess the supplier's operation performance towards relevant NDPE commitments. All suppliers are expected to fill up and submit the SAT annually. The SAT consists of 5 sections, namely NDPE policy, environmental aspects, social aspects, company-owned plantation and third-party supply related.

To monitor deforestation risks in both existing and prospective supply base areas, GH utilizes Radar Alerts for Detecting Deforestation (RADD), a publicly available forest disturbance alert system. This monitoring begins with RADD data, which is overlaid with geolocation data collected during traceability exercises and mapped against integrated conservation areas. When an alert is triggered, GH conducts image verification using Planet imagery via the Global Forest Watch (GFW) platform. If land cover change is detected, GH initiates field verification and engages with the relevant supplier to investigate and gather supporting evidence. Any confirmed violations by existing suppliers are addressed through GH's grievance mechanism.

To enhance its monitoring capabilities, GH is actively building internal capacity to utilize GFW's deforestation monitoring tools more effectively, with training and technical support provided by World Resources Institute (WRI) Indonesia. As of the latest reporting period, no non-compliant deforestation or land conversion has been detected within GH's own operations since the inception of its Sustainability Policy. For supplier operations, any confirmed cases of illegal or non-compliant deforestation are recorded in the GH's Palm Oil Grievance List. [Palm-Oil-Grievance-List-2.pdf](#)

Implementing a landscape or jurisdictional level approach (*Indicator 70*)

GH continues to be an active member of the Roundtable on Sustainable Palm Oil (RSPO) and remains committed to engaging in dialogue and collaboration with a wide range of stakeholders. These efforts aim to promote the sustainable development of the palm oil sector in a more impactful and inclusive manner.

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GH supports landscape and jurisdictional approaches as part of its sustainability strategy and actively participates in collaborative programs that address key social and environmental challenges within its operational landscapes.

Two notable initiatives under this approach include:

- Nabire Landscape Conservation Program – focused on landscape conservation and biodiversity protection.
- Farmer Field School (FFS) – a smallholder support program designed to enhance sustainable agricultural practices and improve livelihoods.

Landscape Conservation and Biodiversity Protection

GH commitments to protect biodiversity are as follows:

- Encourage the long-term protection of all identified HCVs, HCS forest and peatland conservation areas while recognizing the rights of local communities.
- Encourage the conservation of natural ecosystems in areas adjacent to the concession and in the wider landscape.
- Take action to protect biodiversity both within and beyond concessions and set-aside conservation areas (HCV/HCS areas).
- Take action to protect native animals and plants, especially Rare, Threatened or Endangered (RTE) species, i.e. those species classified in the IUCN Red List as Vulnerable, Endangered and Critically Endangered at a global or regional level, or whose trade is regulated under international agreements (e.g. CITES), as well as nationally protected species

Nabire Landscape Conservation Program

GH has established a long-term partnership with PILI Green Network (Pusat Informasi Lingkungan Indonesia) to support the protection of natural ecosystems in Nabire Regency, Papua, Indonesia. This collaboration aims to identify and conserve ecologically significant areas outside of existing protected zones that are vital for biodiversity and local community well-being. Through stakeholder engagement and coordination with government agencies, PILI has helped designate 107,582 hectares as an Essential Ecosystem Area (Kawasan Ekosistem Esensial – KEE). This area spans nine districts in Nabire and includes critical habitats for endemic and endangered species.

Key components of the program include:

- Government engagement to support KEE management across the broader landscape.
- Establishment of a KEE Management Unit (Badan Pengelola KEE) through a series of Focus Group Discussions (FGDs) to facilitate collaborative governance.
- Ongoing advocacy by PILI Green Network to integrate KEE management into Nabire's low-carbon development strategy.

This initiative reflects GH's commitment to landscape-level conservation and sustainable development in partnership with local stakeholders.



Participatory mapping for conservation management.

Nabire Landscape Conservation Program

Goodhope has established a long-term partnership with PILI Green Network (Pusat Informasi Lingkungan Indonesia) to promote the protection of natural ecosystems in Nabire Regency of Papua, Indonesia. Our project partner, PILI, has engaged with local stakeholders and government agencies to identify areas in the landscape that are outside of existing protected areas but that have ecologically important values that support biodiversity and the welfare of local communities. A total of 107,582 Ha has been designated as essential ecosystem area 'Kawasan Ecosystem Essential' (KEE). The area spans nine districts in the Nabire region of Papua and includes habitat for endemic and endangered species.

PILI Green Network is working on the ground in partnership with Goodhope to help community groups to protect the forest in the landscape with support from local governments. Conservation management and monitoring activities focus on areas of forest within and in the vicinity of Goodhope's concessions, including 4,475 Ha area outside of company boundaries.

Two Indigenous Community Groups, Yerisian Gua and Wate Asiaina, are integral to the program. We have provided opportunities for the local communities to learn about the program and are working to build the capacity of local teams for active participation in conservation management and monitoring. A Community Conservation Agreement has been negotiated and a community patrol team has been established in each village. We are working with the two community patrol teams and supporting them to implement Spatial Monitoring and Reporting Tool (SMART).

Our program contributes to the protection of KEE across



Women's Farmer Group learning about good agricultural practices for vegetable farming.

Farmer Field School (FFS) Program

The Farmer Field School (FFS) program was developed in collaboration with Daemeter Consulting and Widya Erti Indonesia to support independent smallholders in improving their agricultural productivity and profitability through sustainable agronomic practices. The program also aims to reduce the environmental impact of farming by promoting improved land and resource management techniques.

In 2024, more than 7,000 independent smallholders supplied Fresh Fruit Bunches (FFB) to Goodhope's palm oil mills. To support their livelihoods, GH actively engages with these smallholders to implement Good Agricultural Practices (GAP) and enhance both yield and income.

Dedicated field teams work directly with smallholders to:

- Promote the benefits of sustainable land management.
- Communicate supplier requirements aligned with the Goodhope Sustainability Policy.
- Collect data through surveys to assess current practices, identify needs, and uncover opportunities for improvement.

As of December 2024, Goodhope successfully achieved its target of engaging 100% of independent smallholders within its supply chain.

In 2025, the Farmer Field School program was expanded to support independent smallholders supplying Fresh Fruit Bunches (FFB) to the Agro Bukit (ABCK) mill in Central Kalimantan

This 8-week training module ran from January to March and was delivered by a Senior Trainer in collaboration with Widya Erti Indonesia (WEI). Participants had the opportunity to share experiences, observe, and learn through both theoretical and practical sessions with the Senior Trainer.



Implementation of commitment to no planting on peat of any depth (Indicator 95)

GH adopts international standards across the Group's operations and is committed to applying the principles of No Deforestation, No Peatland development, and No Exploitation (NDPE) across its supply chain. The Sustainability Policy applies to all operations of GH, including all owned mills, refineries and plantations, with clauses extending to GH associates and third-party suppliers. Since the launch of the policy in May 2017, GH has been working towards its full implementation, including a fully transparent and traceable supply chain to the mill and plantation for all levels, subsidiaries, associates and third-party buyers and suppliers (including smallholders).

GH manages three sites with areas of peatland identified within the concessions:

- PT Agro Bukit in Central Kalimantan
- PT Rim Capital in Central Kalimantan
- PT Nabire Baru and PT Sariwana Adi Perkasa in Papua.

GH manages 8,037 ha of oil palm on peat, planted before the GH's no development on peat policy. GH is working to prevent the degradation of peat soil and associated carbon loss in existing planted areas by the implementation of water and soil management and monitoring systems following the RSPO Manual on Best Management Practices for Existing Oil Palm Cultivation on Peat. This includes a monitoring program to measure water levels and peat subsidence rates. GH does not conduct any new plantings on peatlands, regardless of depth.

Noted that the inventory peat hectarage verified during verification in sustainability compilation data as below:

Estate/ Year	2024
PT Agro Bukit	7,086
PT Rim Capital	335
PT Nabire Baru and PT Sariwana Adi Perkasa	615
Total	8,037

Comprehensive, externally verified

As of 2024, GH's landbank on peat is 8,037 ha referred to file "Sustainability Data Compilation" under the peatland section. The peat area/hectarage has been the same since 2020. The disclosure also refers to Sustainability Brief: LANDSCAPE CONSERVATION AND BIODIVERSITY PROTECTION 2023/24.

<https://goodhopeholdings.com/wp-content/uploads/Sustainability-Brief-Landscape-Conservation-and-Biodiversity-Protection-FY2324.pdf>

GH also has the Conservation and Sustainable Land Use Policy committed to No Development on Peat. The commitment is:

- Map peat soils prior to new land clearing and prohibit any new development on peatland of any depth (peat is defined according to the country-specific classifications).
- Protect areas of unplanted peatlands in the concession as peatland conservation areas.

The other commitments stated no development on peat under Responsible Sourcing and Supply Chain Management Policy Document Code GAHL.SP.0122 dated 28.07.2022 stated that the supplier requirements to demonstrate that the materials they supply are produced in compliance with the GH's Sustainability Policy, including No Deforestation, No Development on Peat, and No Exploitation (NDPE). These expectations are communicated during supplier engagement processes.

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

GH is committed to mitigate greenhouse gas (GHG) emissions by identifying key emission sources across its plantations and mills. GH calculates estimated emissions from land cover conversion and palm oil production using the RSPO GHG Assessment Procedure for New Plantings and the latest 'RSPO Palm Oil GHG Calculator' guidelines.

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To support global climate change mitigation efforts, GH has set clear targets for reducing net GHG emissions. GH continues to explore and implement viable strategies for emissions reduction, including:

- Reducing the use of inorganic fertilizers
- Lowering fuel consumption
- Enhancing carbon sequestration
- Minimizing waste and promoting recycling
- Implementing methane capture initiatives

As a result of these efforts, GH has achieved a 10% reduction in net GHG emissions compared to 2018. GH remains committed to further reducing its carbon footprint and contributing to the global fight against climate change.

https://goodhopeholdings.com/wp-content/uploads/Sustainability_Policy_Implementation_Report_2020.pdf

Upstream Emission

Noted that the GHG emission intensity decreased from 3.3 MT CO₂eq per MT CPO in 2018 to 2.8 MT CO₂eq per MT CPO in 2023. This reflects a 16% reduction compared to 2018 and 2019. With these results, GH have exceeded the target: 'By 2022, reduce the 2019 GHG emissions intensity per MT of CPO produced by 10%'.

**GHG EMISSION INTENSITY FROM PALM OIL PRODUCTION
(MT CO₂eq/ MT CPO)**

Downstream Emission

For downstream, compared to 2018, downstream GHG emissions have reduced by 19%, from 0.27 to 0.22 MT CO₂eq per MT product. The result GHG Intensity is as table below from 2018 to 2023.

Year	MT CO ₂ eq		MT CO ₂ eq/ MT Product
	Scope 1	Scope 2	
2018	26,279	22,860	0.27
2019	24,502	24,869	0.24
2020	19,162	21,712	0.23
2021	20,033	23,342	0.22
2022	21,491	22,897	0.23
2023	24,713	26,256	0.22

GH has implemented a comprehensive strategy to reduce GHG emissions across its operations. Key components of this strategy include:

- **Commitment to Zero Deforestation**
Preventing emissions from land-use change by halting deforestation activities.
- **Ongoing Protection of High Conservation Value (HCV) and High Carbon Stock (HCS) Areas**
Preserving ecologically important landscapes that act as carbon sinks.
- **Adoption of Best Management Practices for Peatland Management**
Minimizing emissions from peatland degradation through responsible water and land management.
- **Participation in the Nabire Landscape Conservation Program**
Supporting landscape-level conservation efforts that contribute to climate resilience.
- **Installation of Methane Capture Facilities**
Reducing methane emissions from palm oil mill effluent (POME) through biogas recovery systems.

- **Enhancing Supplier Engagement on No Deforestation Commitments**

Promoting emissions reduction throughout the supply chain by aligning supplier practices with GH's sustainability standards.

In 2023, land use change emissions from all third-party FFB smallholder suppliers (Scope 3) were calculated at 230,388 MT CO₂eq, based on previous land cover analysis and the RSPO PalmGHG Calculator methodology.

Progress towards commitment on water use intensity (*Indicator 116*)

GH is committed to reducing water usage, sustainably managing water resources, and ensuring their long-term availability for future generations. To achieve this, GH has implemented time-bound management and monitoring plans aimed at reducing water consumption and improving water quality. Progress is tracked through regular monitoring, with results measured against defined targets.

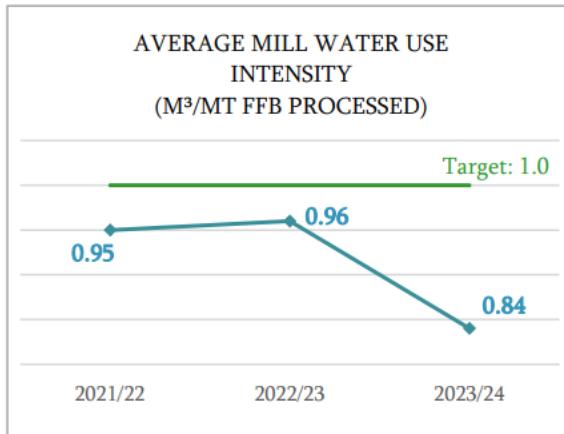
At all palm oil mills, turbine cooling water is recycled, and condensate is used in place of dilution water whenever available. Fresh water is only used when condensate is insufficient. Additionally, by the end of 2020, all mills incorporated the recycling of vacuum drier sealing water.

Through these water efficiency measures, GH has achieved its target of maintaining water use intensity below 1.0 m³/ton of Fresh Fruit Bunches (FFB) processed. GH remains committed to maintaining this efficiency and progressively reducing water use intensity in palm oil processing operations.

In FY 2023/24, the palm oil mills used 1,585,712 m³ of water for the processing of fresh fruit bunches (FFB). The average water usage intensity for palm oil mills was 0.84 m³/MT of FFB processed. Result Waster Use Intensity from FY 2021/22 to FY 2023/24:

Water Use/FY	2021/22	2022/23	2023/24
Water use	1,566,691 m ³	2,035,147 m ³	1,585,712 m ³
Water Use Intensity	0.95	0.96	0.84

The graph of water used intensity showed GH achieved the annual target of keeping the water usage intensity below 1.0 m³ of water per MT of FFB processed.



During the verification process, it was noted that the sustainability team has systematically compiled water usage data across all unit operations. This data is maintained in an EHS

Report (Excel format) and provides detailed records of water consumption across various categories, including:

- Mill Process/ Upkeep
- Boiler Operations
- Domestic Use
- Office Use
- Other Uses (Etc.)

This comprehensive tracking supports GH's commitment to water efficiency and enables effective monitoring of water use intensity across its operations.

Water usage as per sample Mill water used as below:

Mills	Water Use FY 2023/24
Bumijaya POM	185,790 m ³
Nabire Matoa POM	221,180 m ³
Batu Mas Sejahtera POM	156,592 m ³

Progress towards commitment on water quality (BOD and COD) (Indicator 118)

GH is firmly committed to implementing mitigation plans aimed at progressively reducing the environmental impact of its operations. To support this, GH maintains a comprehensive system for monitoring and evaluating environmental performance. As part of this commitment, key environmental measurements are regularly conducted by independent third-party assessors, ensuring objective data collection to guide performance evaluation and the implementation of mitigation strategies.

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Routine environmental monitoring activities include:

- Air emission measurements
- Ambient noise level assessments
- Water sampling, including river water, groundwater, and treated water

In line with regulatory compliance and environmental stewardship, the Biological Oxygen Demand (BOD) of treated Palm Oil Mill Effluent (POME) is maintained well below the Indonesian legal limit of 5,000 mg/L for land application, avoiding discharge into waterways. To further strengthen wastewater management, GH has implemented a POME Pond Management Program, which includes the desilting works and Construction of new ponds. These efforts aim to reverse any upward trends in BOD and Chemical Oxygen Demand (COD) levels.

The results are average BOD and COD as table below:

	2021/22	2022/23	2023/24
Average BOD (mg/L)	878	1,039	620
Average COD (mg/L)	2,354	3,058	2,182
Average pH	7.8	7.7	7.8

Verified that the result Water sampling as sampled Palm Oil Mill for BOD, COD and pH as below:

Biological Oxygen Demand (BOD)

Sample Mills/ Months	Jun 2023	Oct 2023	Feb 2024
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Bumijaya POM	572	314	952
Nabire Matoa POM	174	221	169
Batu Mas Sejahtera POM	365	233	695

** land application (5000 mg/L) in Indonesia as per Ministry of Environment (KEPMENLH) No. 28 Tahun 2003.

Chemical Oxygen Demand (COD)

Sample Mills/ Months	Jun 2023	Oct 2023	Feb 2024
Bumijaya POM	2,579	5,047	2,644
Nabire Matoa POM	499	614	497
Batu Mas Sejahtera POM	911	581	1,737

pH

Sample Mills/ Months	Jun 2023	Oct 2023	Feb 2024
Bumijaya POM	8.2	8.0	8.3
Nabire Matoa POM	8.0	8.0	8.0
Batu Mas Sejahtera POM	8.0	7.0	8.0

Water quality monitoring is carried out monthly, and the resulting data is reported per financial year. All sampling is performed by KAN-accredited laboratories, specifically PT Unilab Perdana (LP-195-IDN) and Balai Standardisasi dan Pelayanan Jasa Industri Samarinda (LP-060-IDN).

Treatment of palm oil refinery effluent (PORE) (*Indicator 120*)

As mentioned in indicator 118, GH is firmly committed to implementing mitigation plans aimed at progressively reducing the environmental impact of its operations. To support this, GH maintains a comprehensive system for monitoring and evaluating environmental performance. As part of this commitment, key environmental measurements are regularly conducted by independent third-party assessors, ensuring objective data collection to guide performance evaluation and the implementation of mitigation strategies.

Routine environmental monitoring activities include:

- Air emission measurements
- Ambient noise level assessments
- Water sampling, including river water, groundwater, and treated water

The treatment of PORE process begins in the Aeration Tank, where organic matter is biologically broken down. Here, air is added to enable microorganisms to aerobically digest the organic compounds, significantly lowering both BOD and COD levels. Next, the wastewater flows into the Clarifier Tank, allowing solid particles to settle and form sludge. To further dewater the sludge, a Filter Press is used. The resulting treated water is then either repurposed for cleaning or safely released into the environment.

Sample result sampling record with the Prima Lab accredited laboratory test.

Results Monthly	Jun 2023	Oct 2023	Feb 2024	Standard B (Dept of Environment)
Refinery BOD	13	13	25	50
COD	50	57	90	200
pH	7.3	8.1	7.7	5.5-9.0

Comprehensive,
externally
verified

Noted that sample taken and verified did not exceed the parameter limit as per Standard B (Department of Environmental) for parameter BOD, COD and pH. The quality monitoring by PRISMA Laboratory accredited by Standard Malaysia SAMM 794.

Examples of local stakeholder engagement to prevent conflicts (*Indicator 145*)

GH has established a 'Sustainability Policy' [GAHL.SP.0122] dated 28.07.2022 that emphasized a commitment to engage with their stakeholders as example below. The policy is available on GH's website, [Goodhope Sustainability Policy](#). Moreover, the policy applies to all GH's operations and subsidiaries, including their palm oil mills, refineries, plantations, and includes provisions for their associates, contractors, and third-party suppliers.

Comprehensive, externally verified

1. Respect for Human Rights

2. Conservation and Sustainable Land Use

3. Community Relations

GH is dedicated to fostering positive relationships with communities near its operations. GH strives to enhance access to essential needs, including food security, income stability, healthcare, and education. It actively supports local welfare and sustainable development, promoting long-term social and economic growth. Additionally, all of GH's subsidiaries, operations, and suppliers must adhere to its Community Relations Policy to ensure responsible engagement with local communities

4. Smallholder Support

GH is committed to supporting independent smallholders by integrating them into the supply chain and encouraging sustainable, profitable agricultural practices. The company provides organized scheme smallholder (PLASMA) plantations to help enhance local communities' income and living standards, particularly around its oil palm plantations.

5. Stakeholder Feedback

GH promotes stakeholder participation in business planning and decision-making. It ensures stakeholders have opportunities to share their views, and their feedback is incorporated into continuous improvement efforts. All concerns and inquiries are addressed promptly, transparently, and honestly.

6. Collaborations and Memberships

7. Grievance Handling

GH prioritizes responsible and amicable resolution of complaints, grievances, and disputes to prevent conflicts from escalating. GH has systems in place to enable stakeholders to lodge complaints, ensure mutually agreed remedies, and track resolution progress. It also requires thorough documentation of the negotiation process and final settlement agreements.

Based on document review, stakeholders' engagement has been initiated by GH as sighted in 'Preventing and Resolving Conflicts with Local Communities' and 'Sustainability Brief: Managing Community Relations' updated in 2023. Case Description: Resolution of conflict between Yerisiam Gua Indigenous community and PT Nabire Baru / PT Sariwana Adi Perkasa

Preventing and Resolving Conflicts with Local Communities [[Preventing-and-Resolving-Conflicts-with-Local-Communities_2023.pdf](#)]

GH adopted RSPO's FPIC procedure as a main channel to communicate and resolve any conflict that may arise between their stakeholders. Among engagement channels used by GH to engage with their stakeholders as example below.

Approach	Explanation	
Focus Group Discussion (FGD)	A qualitative research method and data collection technique in which a selected group of people discusses a given topic or issue in-depth, facilitated by a professional, external moderator.	
Participatory Mapping	The collection of spatial social data in a participatory and inclusive manner with affected communities and other local stakeholders to record and represent the perceptions of local stakeholders. It helps to explore and assess the situation prior to development.	
Participatory Rural Appraisal (PRA)	Method to study the conditions and rural life of, with, and by the local communities. It allows village people to share their knowledge of village conditions and life, so that the company can analyze, make plans, take action and drive improvements. It is used to assess social impacts in a participatory manner with local communities	
Individual Interviews	May be conducted face-to-face, or by telephone / online when direct access is not possible.	
Consultation	Stakeholder consultations are conducted as a means to verify information gathered, collect new information, assess the validity or credibility of claims, seek opportunities to reduce conflicts from management decision making and gather inputs from various stakeholders for management and monitoring. Effective community consultation is a participatory process that enables communities to articulate their own concerns and identify the appropriate responses and solutions to problems that affect them.	
Community Communication Forums	Community communication forums aim to create a healthy relationship between stakeholders through regular dialogue. They are a place where: <ul style="list-style-type: none"> The company can inform local stakeholders about company development plans, CSR implementation, and any other matter that directly or indirectly concerns the local stakeholders Local stakeholders can express themselves, share concerns or grievances Feedback received by the local stakeholders can be used for long-term company sustainability and CSR strategies and to resolve any ongoing issue related to Goodhope's operations.	
Community Requests	Verbal and written requests from local communities are recorded in a book of communications and are addressed in a timely manner. In instances where a complaint is made, the case is addressed by the company grievance mechanism	
Negotiation	The process of negotiation includes: <ol style="list-style-type: none"> Setting the stage Providing space for stakeholder statements Finding common ground Expanding options; and Assessing options and building consensus. A mediator may be used to help build trust among stakeholders throughout all stages of the process and to prepare people for the negotiations, familiarize the stakeholders with negotiation procedures, help participants to have realistic expectations clarify interests. Agreements are built on common goals and shared interests rather than individual interests. Successful negotiations lead to agreements among the various stakeholders	
Sustainability Brief: Managing Community Relations [PowerPoint Presentation]		

Among activities performed by GH that resulted from stakeholder engagement are as follows:

- Developed Bumi Nabire Field School as a system to provide build capacity among local communities in Nabire, Papua
- Two community tree nurseries were constructed and plots for vegetable farming established
- Two Farmer Groups established among indigenous communities in Papua and trained in nursery management.
- 34 community clinics supported, in addition to operating 16 of own clinics
- 30 community schools supported, in addition to 13 own schools.
- 7,587 hectares of oil palm developed as cooperative-owned scheme smallholder plantations (PLASMA).
- 11,551 members supported in smallholder schemes (PLASMA), in total of 29 cooperatives.

In addition, GH has organized an activity namely Nabire Landscape Conservation Program [[Sustainability-Journey-2023-Nabire-Landscape-Conservation-Program.pdf](#)] where engagement approaches such as FGD, Participatory Mapping and Individual Interview were implemented.

Since 2020, GH has been implementing the RaCP system developed by RSPO that focuses on environmental and social remediation efforts. This includes restoring 693 hectares of riparian and peatland areas, rehabilitating 17 hectares of sago and mixed forests, and providing compensation through services benefiting the environment and affected communities. The compensation covers 4,475 hectares within Kawasan Ekosistem Esensial (KEE) or other effective conservation zones (OECM).

The compensation plan, as part of the GH's conservation participation, involves managing 4,475 hectares within the customary territories of Yerisiam Gua in Kampung Sima, Yaur District, and Wate Asiaina in Kampung Wanggar Pantai, Yaro District, which are adjacent to the concessions of Nabire Baru and Sariwana Adi Perkasa.

Since 2020, an initiative has been launched to establish community groups in two indigenous villages: Sima in the Yaur District and Wanggar Pantai in the Yaro District, to enhance the capacity and to promote the long-term well-being of indigenous people. Initially, only groups related to forest conservation were formed. Subsequently, acknowledging that indigenous people in Nabire also rely on the sea for their livelihood, community groups in the field of fisheries were established in 2023, such as capture fisheries collective business group and fish processing and marketing group.

To this end, community-based patrol teams have been established to enhance participation in protecting forest and land areas, ensuring that their protective, conservation, and production functions are optimally sustained. The patrol team in Sima was formed on 01.12.2021, while the team in Wanggar Pantai was established on 08.12.2021.

The Forest Farmer Group [FFG] in Sima Village is named "Wagi Lestari" and consists of 14 members, while the Forest Farmer Group in Wanggar Pantai Village is named "Ohire Jaya" with 13 members. Each group manages a nursery. Members collaborate to care for seedlings, ensuring their propagation and readiness for planting in the natural environment. These seedlings are obtained from the surrounding forest or with assistance from other parties. The production seedlings from these farmer groups are planted in the RaCP restoration area, with some also planted in the remediation areas within the companies' cultivation rights.

Women Farmer Group [KWT]. The initiative to establish KWT began in June 2021 to create alternative sources of income and enhance family food security. Three indigenous women's

groups were formed to support conservation programs. Two in Sima Village named "Manawari Rarei Sima" and "Manawari Rarei Wagi," and another in Wanggar Pantai Village named "Jura Laut."

Currently, KWT Manawari Rarei Sima has 20 members and manages a food security garden with various crops such as pumpkins, basil, peanuts, chili, and tomatoes. In addition to tending to food crops, Manawari Rarei Sima women also look after floral plants that they refer to as their "Butterfly Garden" in an effort to organically discourage pest populations. KWT Manawari Rarei Wagi, with 13 members, manages two food security gardens. One is located near the main road, thus called the 'roadside garden,' while the other is near the transmigrant settlement, referred to as the 'Palu settlement garden.' Members collectively decided to plant longterm crops like gnetums, betel nuts and cassava in the 'roadside garden,' while the 'Palu settlement garden' is cultivated with vegetables and crops such as corn and long beans. Under the name "Jura Laut", the women's farmer group in Wanggar Pantai received official legal status in June 2023. Currently, they are preparing their garden for corn cultivation.

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

Informed by GH's personnel, their FFB sources come from own estate, PLASMA, 3rd party estate and dealer and there is no independent smallholder supplying directly to GH's mill. All independent smallholders are sending their FFB to dealer before dealer sent to GH's mill.

Despite that, GH has initiated the engagement program to the independent smallholder through Traceability Team to promote the benefits of sustainable land management and socialize supplier requirements for compliance with GH's Sustainability Policy. The engagement was done during an onsite visit to the smallholder's field. As of 2024, there are 7,185 independent smallholders identified and engaged by GH. In December 2024, GH reached their target to 100% engage with the independent smallholders in their supply chain. The following is the progress of the engagement process done by GH.

Year	No. of independent smallholder	%
2024	1,185	17
2023	1,089	15
2019 - 2022	4,911	68
Total	7,185	100

During the onsite visit, some of the information were captured and maintained in the 'Goodhope Traceability Data Visualization Platform' by Sustainability Team. Among the information obtained during the visit as below:

- Smallholders profile
- Geolocation of the oil palm plots
- Planted area
- Planting year
- Land ownership
- Soil type
- Type of oil palm variety

In addition, there is Farmer Field School (FFS) program initiated by GH to their independent smallholders as detailed below.

Farmer Field School (FFS) [[6.0 FFS](#)]

Comprehensive, externally verified

GH has developed a Farmer Field School (FFS) program in partnership with Daemeter Consulting and Widya Erti Indonesia. The initiative provides tools and knowledge to help independent smallholders improve their productivity and profitability. It also strengthens relationships with smallholders, promotes sustainable agronomic practices, and minimizes environmental impacts through better management strategies.

The program was launched in 2019 where from 2019 to Jan 2020, there are 269 independent smallholders benefited from the training provided by GH. After Covid-19 hit the nation, the program resumed in 2022 which includes 97 independent smallholders engaged. In 2023, another 101 smallholders participated in the training program. Furthermore, in 2025, there is 45 smallholders joining the program and the total number of farmers involved in the training program is 512. A summary of FFS program that has been conducted by GH is tabulated below.

Year	Total smallholders	Remark
2019 - 2020	269	The first batch was held in PT Agro Indomas located in East Kalimantan to support FFB suppliers that send their crop to Bumi Jaya POM. The second batch was held in Agro Wana Lestari (AWL) which involve 3 villages located in Central Kalimantan; Batu Agung, Tribuana and Bukit Indah.
2022	97	Lanpasa Farmer Group join the program in Central Kalimantan
2023	101	Partner with Widya Erti Indonesia and the program held in Ketapang region, West Kalimantan.
2025	45	Partner with Widya Erti Indonesia and join by FFB suppliers that send the crop to Agro Bukit POM located in Central Kalimantan.

Among information shared during the training or engagement program are as below:

- Soil health
- Nursery management
- Plantation upkeep
- Fertilizers
- Techniques on how to identify and fight infection
- Pest management
- Adoption of proper harvesting methods
- Importance of NDPE

The following is the map that indicates the FFS program initiated by GH.

<p>1. East Kalimantan</p> <ul style="list-style-type: none"> Period: 2019 - 2020 Mill: PT Agro Indomas EK Partner: Daemeter Consulting <p>2. Central Kalimantan</p> <ul style="list-style-type: none"> Period: 2019 - 2020 Mill: PT Agro Wana Lestari Partner: Daemeter Consulting  <p>3. Central Kalimantan</p> <ul style="list-style-type: none"> Period: 2022 Mill: PT Agro Indomas & PT Agro Bukit Partner: Daemeter Consulting Period: 2025 Mill: PT Agro Bukit Partner: Widya Erti Indonesia <p>4. West Kalimantan</p> <ul style="list-style-type: none"> Period: 2023 Mill: PT Batu Mas Sejahtera Partner: Widya Erti Indonesia 																								
<p>Number or percentage of non-smallholder suppliers assessed and/or engaged on compliance with company's policy and/or legal requirements (<i>Indicator 176</i>)</p> <p>Informed by GH's personnel, their FFB sources come from own estate, PLASMA, 3rd party estate and dealer. All suppliers need to comply with GH's sustainability policy before they are qualified as a GH' suppliers. GH engaged their suppliers based on their category. The following are the total of FFB suppliers for the sampled mills.</p> <table border="1" data-bbox="214 1544 1103 1753"> <thead> <tr> <th rowspan="2">Type of supplier</th><th colspan="3">No. of supplier</th></tr> <tr> <th>Bumi Jaya POM</th><th>Nabire Matoa</th><th>Batu Mas Sejahtera</th></tr> </thead> <tbody> <tr> <td>Own Estate</td><td>4</td><td>4</td><td>3</td></tr> <tr> <td>PLASMA</td><td>1</td><td>3</td><td>5</td></tr> <tr> <td>Dealer</td><td>4</td><td>-</td><td>11</td></tr> <tr> <td>Total</td><td>9</td><td>7</td><td>19</td></tr> </tbody> </table> <p><i>Remark: There is no supply coming from third-party estate for the sampled mills.</i></p> <p>The following are examples of engagement evidence verified during the audit.</p> <p>a. Own estate</p>	Type of supplier	No. of supplier			Bumi Jaya POM	Nabire Matoa	Batu Mas Sejahtera	Own Estate	4	4	3	PLASMA	1	3	5	Dealer	4	-	11	Total	9	7	19	<p>Comprehensive, externally verified</p>
Type of supplier		No. of supplier																						
	Bumi Jaya POM	Nabire Matoa	Batu Mas Sejahtera																					
Own Estate	4	4	3																					
PLASMA	1	3	5																					
Dealer	4	-	11																					
Total	9	7	19																					

Besides a routine briefing on GH's Sustainability Policy conducted by each unit on an annual basis, the Sustainable Team has also sent a webinar video that explained the following. The latest webinar video is sent on 31.01.2025:

1. Conservation and Sustainable Land Use Policy
2. Environmental and Occupational Health and Safety Policy
3. Human Right Policy
4. Ethical Conduct and Employment Standards Policy
5. Responsible Sourcing and Supply Chain Management Policy.

The following is the name of the estate that supplies FFB to the sampled mill.

Mill	Estate/ supplier
Bumi Jaya	Bumi Jaya, Bumi Lestari, Sukaraja, Loa Haur
Nabire Matoa	Sungai Wami, Bukit Nugho Jaje, Kalibambu, Sungai Sima
Batu Mas Sejahtera	Batu Mas Sejahtera, Agra Jaya Baktitama, Sawit Makmur Sejahtera

b. PLASMA

The PLASMA program is operated by GH. GH has developed 7,700 ha of oil palms to support sustainable development among the local communities. Currently GH has more than 11,000 members in its PLASMA scheme, in a total of 29 cooperatives. Among the support provided to the PLASMA is training, financial awareness and planning skills. The engagement program is conducted continuously as the PLASMA is operated by GH. The following is the example of PLASMA of sampled mill operated by GH.

Mill	PLASMA
Bumi Jaya	Mitra Sawit Lestari
Nabire Matoa	KPMA Wate Asiaina, KPMA Waoha, KPMA Sarakwari & Koroba
Batu Mas Sejahtera	Koperasi Lanjut Jaya Makmur Sejahtera, Koperasi Sari Jokak Lestari, Koperasi Tuah raya Santang Baronang, Koperasi Paras Daya, Koperasi Sumber Sejahtera

c. FFB Dealer

All dealers need to request if they wish to supply FFB by completing the 'Form 01. Formulir Permohonan Pemasok TBS' form and send to GH's mill for evaluation. Name, address, phone number, type of supplier and company name are examples of information available in the form.

Also, a form of 'Formulir 03. Sosialisasi Kepada Calon Pemasok' is provided to the dealer which includes information on GH's Sustainability Policy. They need to acknowledge and return the form to GH if they agree to comply with the policy. Later, GH's Traceability Team will conduct a verification through desktop review and site visit. Evidence of engagement processes such as minute meeting and photo of engagement are well maintained by GH. Below is the example of engagement evidence verified during the assessment.

Mill	Date	Location	Supplier
Bumi Jaya	01-04.04.2024	Penajam and Balikpapan	Abdul Mutaqien, CV. Semoi Athena Agro Lestari, Satria Agro Mandiri and PT. Sinar Maiwa Sejahtera
Sungai Binti	29-30.05.2024	Central Kalimantan	CV. Sawit Pambelum Itah, CV. Sinar Mentari, Benny W. Damanik.

Generally, GH achieved 100% of the suppliers' engagement. A routine engagement is conducted on an annual basis to ensure all suppliers comply with GH's policy.

Proportion of supply from suppliers that is verified as deforestation- and/or conversion-free (DCF)? (Indicator 179)

GH established 'Sustainability Policy' document number GAHL.SP.0122 dated 28.07.2022 which includes a commitment on NDPE since May 2017. According to the policy, GH will not develop on HCS and HCV area or peatlands at any depth. GH is committed to maintain and protect the important values including carbon storage, biodiversity, source of water, etc.

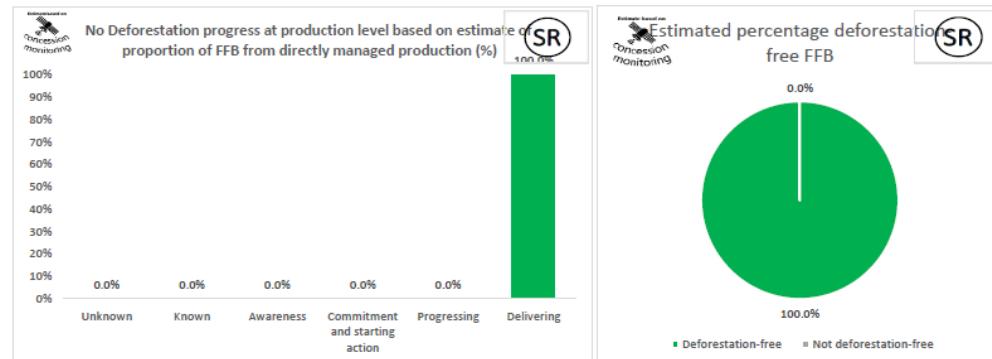
As for the NDPE monitoring, GH is using satellite monitoring (i.e RADD [Radar Alert for Detecting Deforestation] and GFW Pro [Global Forest Watch Pro]). The monitoring is handled by the Responsible Sourcing team, under the Sustainability Team.

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.

Noted that, GH established their NDPE profiles as per NDPE IRF protocol. The profiles belong to Nabire Matoa KCP, PVO [Premium Vegetable Oils] and Sungai Binti KCP. All suppliers need to fulfill the NDPE IRF requirement [such as *commitment on NDPE, peatland existence, grievance, HCV and HCS management and collaboration with stakeholders*] before they are considered as No-Deforestation and No-Peat Conversion suppliers. Details of profiles for 2024 are as below.

Nabire Matoa KCP

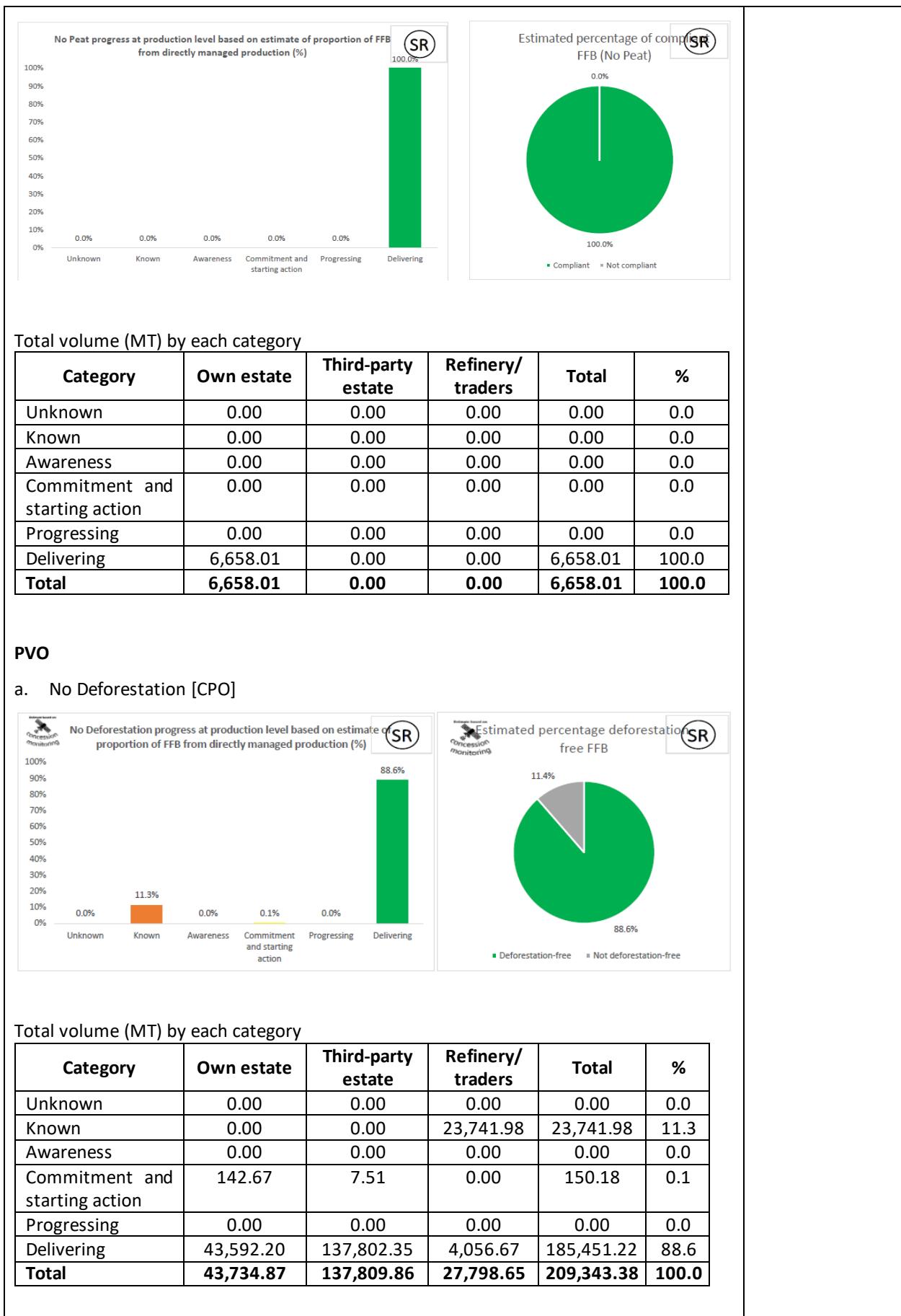
a. No-Deforestation

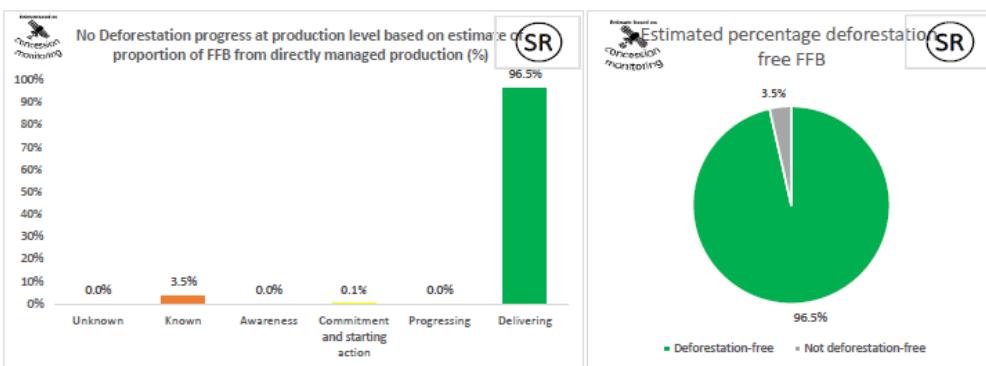


Total volume (MT) by each category

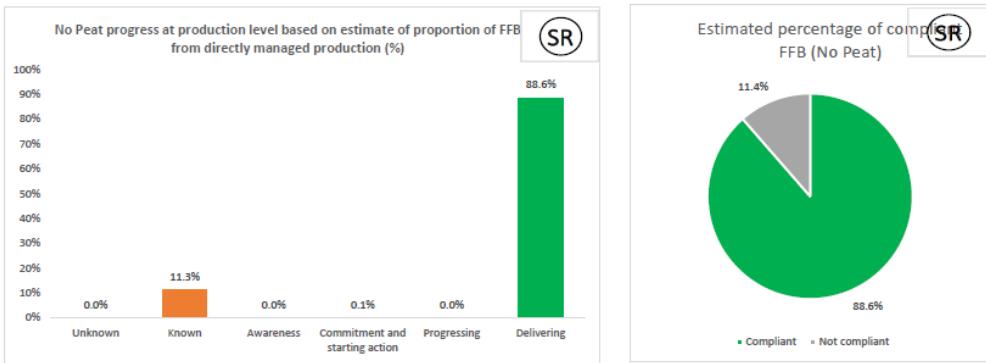
Category	Own estate	Third-party estate	Refinery/traders	Total	%
Unknown	0.00	0.00	0.00	0.00	0.0
Known	0.00	0.00	0.00	0.00	0.0
Awareness	0.00	0.00	0.00	0.00	0.0
Commitment and starting action	0.00	0.00	0.00	0.00	0.0
Progressing	0.00	0.00	0.00	0.00	0.0
Delivering	6,658.01	0.00	0.00	6,658.01	100.0
Total	6,658.01	0.00	0.00	6,658.01	100.0

b. No Peat



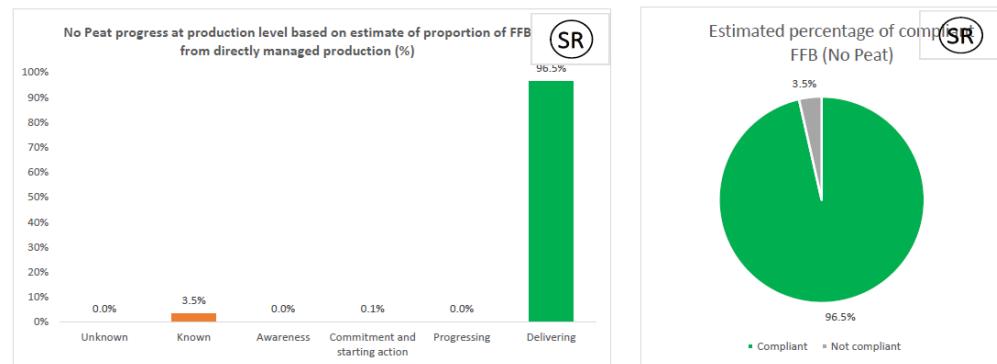
b. No-Deforestation [PK]

Total volume (MT) by each category

Category	Own estate	Third-party estate	Refinery/traders	Total	%
Unknown	0.00	0.00	0.00	0.00	0.0
Known	0.00	0.00	6,564.66	6,564.66	3.5
Awareness	0.00	0.00	0.00	0.00	0.0
Commitment and starting action	142.67	7.51	0.00	150.18	0.1
Progressing	0.00	0.00	0.00	0.00	0.0
Delivering	43,592.20	137,802.35	1,816.11	183,210.66	96.5
Total	43,734.87	137,809.86	8,380.77	189,925.50	100.0

c. No Peat [CPO]

Total volume (MT) by each category

Category	Own estate	Third-party estate	Refinery/traders	Total	%
Unknown	0.00	0.00	0.00	0.00	0.0
Known	0.00	0.00	23,741.98	23,741.98	11.3
Awareness	0.00	0.00	0.00	0.00	0.0
Commitment and starting action	142.67	7.51	0.00	150.18	0.1
Progressing	0.00	0.00	0.00	0.00	0.0
Delivering	43,592.20	137,802.35	4,056.67	185,451.22	88.6
Total	43,734.87	137,809.86	27,798.65	209,343.38	100.0

d. No Peat [PK]

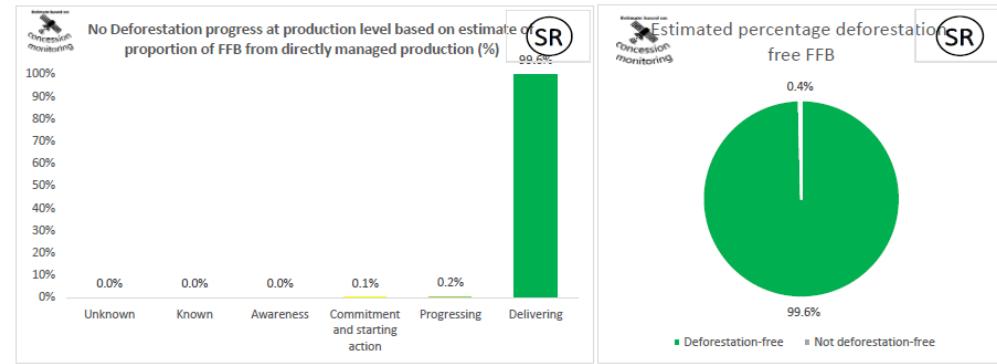


Total volume (MT) by each category

Category	Own estate	Third-party estate	Refinery/traders	Total	%
Unknown	0.00	0.00	0.00	0.00	0.0
Known	0.00	0.00	6,564.66	6,564.66	3.5
Awareness	0.00	0.00	0.00	0.00	0.0
Commitment and starting action	142.67	7.51	0.00	150.18	0.1
Progressing	0.00	0.00	0.00	0.00	0.0
Delivering	43,592.20	137,802.35	1,816.11	183,210.66	96.5
Total	43,734.87	137,809.86	8,380.77	189,925.50	100.0

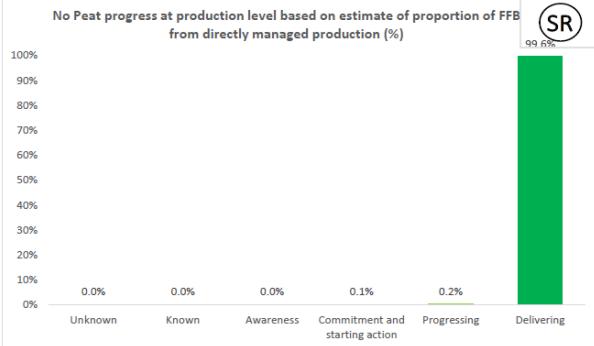
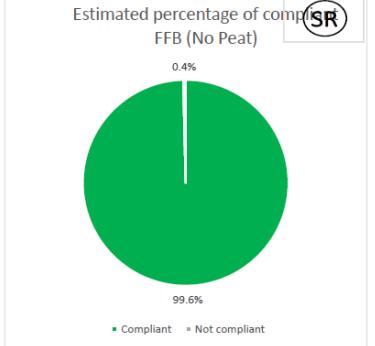
Sungai Binti KCP

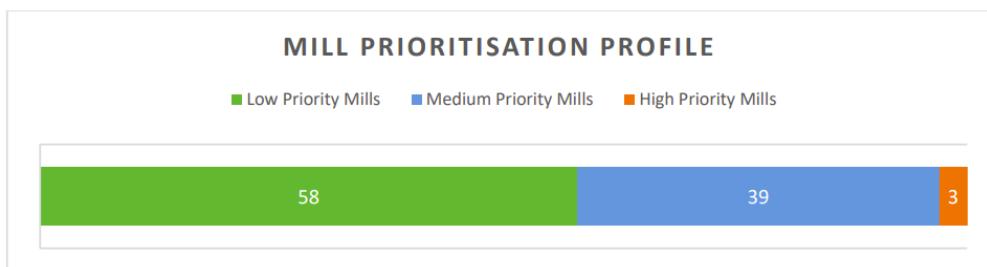
a. No Deforestation



Total volume (MT) by each category

Category	Own estate	Third-party estate	Refinery/traders	Total	%
Unknown	0.00	0.00	0.00	0.00	0.0
Known	0.00	0.00	0.00	0.00	0.0
Awareness	0.00	0.00	0.00	0.00	0.0
Commitment and starting action	0.00	109.46	0.00	109.46	0.1
Progressing	0.00	176.18	0.00	176.18	0.2
Delivering	74,272.99	2,730.96	0.00	77,003.95	99.6

	Total	74,272.99	3,016.60	0.00	77,289.59	100.0																																																																	
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Programme to support high-risk mills to become compliant with sourcing policies (Indicator 181)																																																																							
<p>GH conduct a risk assessment on an annual basis for all their suppliers within their supply chain. Geospatial, Traceability and SAT [Social element] information will determine the risk level of each supplier. Based on that information, GH will classify their supplier based on three categories, High, Medium and Low risk. Noted that, any supplier that did not fulfill or submit the traceability information will be automatically deemed as a High-risk mill.</p>							Comprehensive, externally verified																																																																
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<p>¹ Geospatial risk assessment conducted using PALM Risk Tool by Global Forest Watch (GFW) Pro Notes: RSPO IP mill will be automatically categorized as "Low Priority"; whereas supplying mill which did not submit TTP data will be categorized as "High Priority".</p>																																																																							
<p>As of Dec 2024, only 3% of GH's suppliers were classified as High Priority mill as sighted in the 'Mill Prioritisation Profile', DMA-Responsible-Sourcing-2024.pdf.</p>																																																																							



The engagement on the High Priority mill has been done in 2024. During the engagement, GH's Sustainability Policy, NDPE IRF requirement, GH's traceability procedure, GAP and other legal requirement were briefed. This engagement is done by the Sustainability team. Example as below.

Mill	Date	Location	Supplier
Bumi Jaya	01-04.04.2024	Penajam and Balikpapan	Abdul Mutaqien, CV. Semoi Athena Agro Lestari, Satria Agro Mandiri and PT. Sinar Maiwa Sejahtera
Sungai Binti	29-30.05.2024	Central Kalimantan	CV. Sawit Pambelum Itah, CV. Sinar Mentari, Benny W. Damanik.

In addition, there is a 'Responsible Sourcing Program' carried out by GH for upstream and downstream suppliers to ensure all suppliers comply to the GH' supply chain requirement. Based on the program, all suppliers are assessed based on 4 categories which are Policy, Guidelines, Procedures and Tools. Through this program also, GH able to identify their risk level of each supplier and develop an appropriate engagement program on their suppliers.

Through this program, NDPE awareness, Traceability requirements, Risk assessment, Deforestation Risk Monitoring, Review and Field Verification, SAT, support for Independent Smallholders are included and briefed to the suppliers.

PROGRAM COMPONENT	UPSTREAM (Palm Oil Mills)	DOWNTREAM (Refinery and Manufacturing)
POLICY	<ul style="list-style-type: none"> ■ Responsible Sourcing and Supply Chain Management Policy ■ Group Sustainability Policy 	
GUIDELINES	<ul style="list-style-type: none"> ■ FFB Supply Chain and Traceability Manual 	<ul style="list-style-type: none"> ■ Responsible Sourcing Guidelines
PROCEDURES	<ul style="list-style-type: none"> ■ FFB Responsible Sourcing SOP ■ Smallholder Data Collection and Mapping SOP ■ Group Grievance Approach Implementation SOP ■ Managing Grievances Against Third Party Suppliers 	<ul style="list-style-type: none"> ■ Supplier Engagement SOP ■ Traceability SOP
TOOLS	<ul style="list-style-type: none"> ■ New Supplier Due Diligence Assessment ■ Supplier Application and Profile Form ■ NDPE Socialization/ Commitment Form ■ Sustainable Plantation Management Questionnaires 	<ul style="list-style-type: none"> ■ New Supplier Due Diligence Assessment ■ TTP Excel Declaration Template ■ Supplier Code of Conduct ■ Self-Assessment Tool

GH has set a target to be achieved in 2024, and the status of the program is outlined in the 'Responsible Source Program 2024' report which is available on GH's website, [DMA-Responsible-Sourcing-2024.pdf](#).

(A) Upstream- Palm Oil Mills

Objective	Target	Status as of Y2024
Engagement with First Tier Suppliers		
▪ Socialise NDPE commitments ▪ Supplier survey and mapping	100% traceable to First Tier Suppliers by end of 2021.	Achieved
Engagement with Second Tier Suppliers		
▪ Socialise NDPE commitments ▪ Survey and mapping of independent smallholders	100% traceable to plantations by end of 2022.	Achieved
Supplier Risk Assessment		
▪ Supply base spatial risk assessment ▪ Data analysis and prioritisation of suppliers for further engagement and monitoring	Complete spatial risk assessment for all FFB suppliers.	Completed
Data Maintenance and Priority Supplier Engagement		Ongoing

(B) Downstream - Refinery and Manufacturing

Objective	Target	Status as of Y2024
Engagement with First Tier Suppliers		
▪ Conduct supplier webinar ▪ Traceability data collection from existing suppliers ▪ Supplier Self-Assessment Tool (SAT)	▪ 100% traceable to mills by end of 2023. ▪ 100% traceable to plantations for direct supplying mills by end of 2025.	On track; H2-2024 100% traceable to mills; 91% traceable to plantation
Supplier Risk Assessment		
▪ Risk assessment and prioritisation of suppliers for further engagement and monitoring	Risk and priority determined for all direct suppliers from 2022 onwards.	Completed
Monitoring and Verification		
▪ Implementation Reporting Framework (IRF) ▪ Deforestation monitoring ▪ Third party verification of data	Verification of supply chain data by July 2023.	Conducted in 2023 and 2024

Regularly assesses and categorizes the risk level of all own and third-party supplying mills (*Indicator 184*)

GH conduct a risk assessment on an annual basis for all their suppliers within their supply chain. Geospatial, Traceability and SAT [Social element] information will determine the risk level of each supplier. Based on that information, GH will classify their supplier based on three categories, High, Medium and Low risk. Noted that, any supplier that did not fulfill or submit the traceability information will be automatically deemed as a High-risk mill.

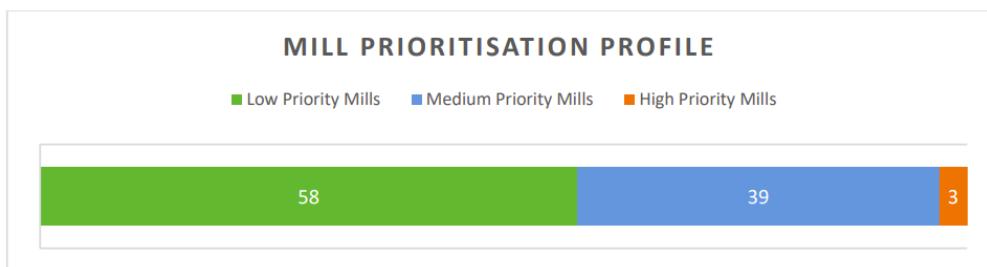
Comprehensive, externally verified

Mill Priority Level ¹ (Geospatial)	Self-Assessment Tool/ SAT (Social Aspects)		
	No question flagged - 1 -	Some questions flagged - 2 -	Not submitted SAT - 3 -
Low - 1 -	Low Priority - 2 -	Low Priority - 3 -	Medium Priority - 4 -
Medium - 2 -	Low Priority - 3 -	Medium Priority - 4 -	High Priority - 5 -
High - 3 -	Medium Priority - 4 -	High Priority - 5 -	High Priority - 6 -

¹ Geospatial risk assessment conducted using PALM Risk Tool by Global Forest Watch (GFW) Pro

Notes: RSPO IP mill will be automatically categorized as "Low Priority"; whereas supplying mill which did not submit TTP data will be categorized as "High Priority".

As of Dec 2024, only 3% of GH's suppliers were classified as High Priority mill as sighted in the 'Mill Prioritisation Profile', [DMA-Responsible-Sourcing-2024.pdf](#).



The engagement on the High Priority mill has been done in 2024. During the engagement, GH's Sustainability Policy, NDPE IRF requirement, GH's traceability procedure, GAP and other legal requirement were briefed. This engagement is done by the Sustainability team. Example as below.

Mill	Date	Location	Supplier
Bumi Jaya	01.04.2024	Penajam and Balikpapan	Abdul Mutaqien, CV. Semoi Athena Agro Lestari, Satria Agro Mandiri and PT. Sinar Maiwa Sejahtera
Sungai Binti	29-30.05.2024	Central Kalimantan	CV. Sawit Pambelum Itah, CV. Sinar Mentari, Benny W. Damanik.

In addition, there is a 'Responsible Source Program' carried out by GH for upstream and downstream suppliers to ensure all suppliers comply to the GH' supply chain requirement. Based on the program, all suppliers are assessed based on 4 categories which are Policy, Guidelines, Procedures and Tools. Through this program also, GH able to identify their risk level of each supplier and develop an appropriate engagement program on their suppliers.

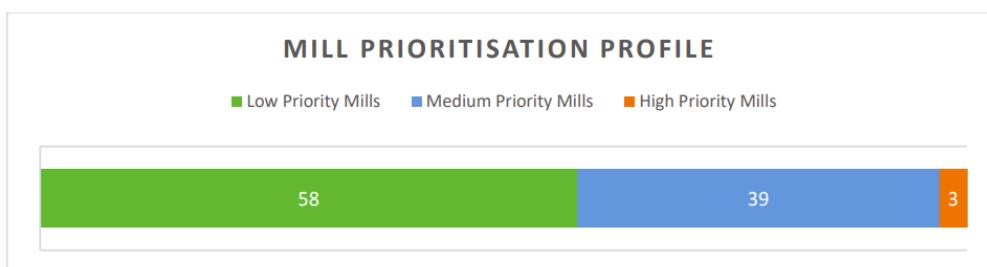
Through this program, NDPE awareness, Traceability requirements, Risk assessment, Deforestation Risk Monitoring, Review and Field Verification, SAT, support for Independent Smallholders are included and briefed to the suppliers.

GH has set a target to be achieved in 2024, and the status of the program is outlined in the 'Responsible Source Program 2024' report which is available on GH's website, [DMA-Responsible-Sourcing-2024.pdf](#).

Regularly reports the risk level of all own and third party supplying mills identified in its supply chain (*Indicator 185*)

GH established a 'Responsible Sourcing 2024' report which include an information on a summary of risk level of their suppliers. The report is also available on GH's website under 'Responsible Source Program 2024', [DMA-Responsible-Sourcing-2024.pdf](#) and accessible by interested parties. This report will be updated on an annual basis by the Sustainability Team.

Comprehensive, externally verified



Besides risk information, the following information is included in the report:

- Responsible Sourcing Program components
- Responsible Sourcing and Traceability Roadmap

<ul style="list-style-type: none">• NDPE IRF profiles• Deforestation Risk Monitoring, Review & Field Verification• Self-Assessment Tool (SAT)	
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3.2 Signing by the Client

I am 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.
- During the closing meeting all the agenda items were covered by the Lead Verifier.

Acknowledged by:

Name:	Carl Dagenhart
Position:	Group Head of Sustainability
Date:	03.06.2025



Signature

3.3 Signing by the Lead Assessor

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:	Jasmandy Syahrul
Position:	Lead Verifier
Date:	28.05.2025



Signature

3.4 Signing by the Certifier

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:	Ebnu Holdoon Shawal
Position:	Reviewer
Date:	09-06-2025



Signature