

PUBLIC SUMMARY REPORT

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

Goodhope Asia Holdings Ltd 2023

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:	Mr 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:	10 th April 2023 – 14 th April 2023
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1.3 Assessment Type

Third party verification to assess and validate compliance, performance and/or action taken by Goodhope in relation to its commitment by evaluating the information provided by Goodhope towards SPOTT concerning the latest SPOTT Palm Oil Indicator Framework 2023 that requires external verification.

1.4 General Description of Goodhope Holdings Pte Ltd.

Goodhope started as part of Carson Cumberbatch, a Sri Lankan investment and trading house, who originally invested in tea and rubber plantations in Malaysia and Sri Lanka. Recognizing an opportunity for growth, Carsons made a pioneering move to palm oil, expanding to Indonesia in 1996. Goodhope was incorporated in Singapore in 2008 and has two core business segments; Oil Palm Plantations and Edible Oils and Fats. The Group operates a land bank of more than 100,000 hectares in Indonesia, of which approximately 69,000 hectares are planted with oil palm. The Group entered the oils and fats business segment in July 2011 through the acquisition of Premium Group, specializing in edible oil refining and specialty fats production. Goodhope now has a combined refining and specialty fats processing capacity that totals more than 300,000 MT per annum and strong R&D capabilities to co-create various specialty oils and fats products for our customers worldwide. The Group is committed to uphold the highest environmental, social and governance (ESG) standards throughout its operations.

1.5 Operational Units under scope

Goodhope operates processing units of 1 integrated refinery, 2 kernel crushing plants (KCP) and 8 palm oil mills located in Indonesia and Malaysia.

Details of the processing operations are as below:

Operations	Facilities	Location	Coordinate
Sungai Purun POM	Palm Oil Mill	Desa Terawan, Kecamatan Danau Sembuluh, Kabupaten Seruyan, Central Kalimantan, Indonesia.	-2.524252, 112.416800
Terawan POM	Palm Oil Mill	Desa Terawan, Kecamatan Danau Sembuluh, Kabupaten Seruyan, Central Kalimantan, Indonesia.	-2.559957, 112.373600
Sungai Binti POM	Palm Oil Mill	Kecamatan Mentaya Hilir Utara, Kabupaten Kotawaringin Timur, Central Kalimantan, Indonesia.	-2.562250, 112.768067

Bukit Santuai POM	Palm Oil Mill	Kecamatan Bukit Santuai, Kabupaten Kotawaringin Timur, Central Kalimantan, Indonesia.	-1.862500, 112.395833
Bumi Jaya POM	Palm Oil Mill	Kecamatan Sepaku, Kabupaten Penajam Paser Utara, East Kalimantan, Indonesia	-1.014824, 116.689541
Nabire Matoa POM	Palm Oil Mill	Desa Wami, Kecamatan Yaur, Kabupaten Nabire, Papua, Indonesia.	-3.461500, 135.256344
Batu Mas Sejahtera POM	Palm Oil Mill	Kecamatan Sungai Laur, Kabupaten Ketapang, West Kalimantan, Indonesia.	-1.013413, 110.531620
Sumber Hasil Prima POM	Palm Oil Mill	Kecamatan Serawai dan Ambalau, Kabupaten Sintang, West Kalimantan, Indonesia.	-0.346200, 112.524500
Sungai Binti KCP	Kernel Crushing Plant	Kecamatan Mentaya Hilir Utara, Kabupaten Kotawaringin Timur, Central Kalimantan, Indonesia.	-2.562250, 112.768067
Nabire Matoa KCP	Kernel Crushing Plant	Desa Wami, Kecamatan Yaur, Kabupaten Nabire, Papua, Indonesia.	-3.461500, 135.256344
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

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 70 countries. CU offer one-stop-shop solution for sustainability reporting and assurance services. CU has more than 4,000 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 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
Team member 1:	Shi Lie Chan

2.2.1 Qualifications of the Assessors

Name	Qualifications
Ebnu Holdoon Shawal (Lead Assessor)	<p>Graduated in Bachelor of Civil Engineering from University Tenaga Nasional</p> <p>Ebnu serves as Project Manager – Sustainability in Control Union Malaysia’s activities GRI Assurance, Assurance Statement AA1000As, SPOTT Verification, Traceability and other sustainability projects under the department of Control Union Assurance Services.</p> <p>Has successfully attended the 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.</p> <p>Prior to joining Control Union, Ebnu 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.</p>
Chan Shi Lie (Assessor)	<p>Graduated from Universiti Utara Malaysia (UUM) in Bachelor of Media Technology majoring in broadcasting.</p> <p>6 years working experience in plantation company with various departments such as estate administrative and sustainability department.</p> <p>3 years working experience as Lead auditor and Auditor for MSPO OPMC Part 2,3, 4 and Supply Chain. 2 years’ experience as auditor for ISCC Waste and residue, and Chain of Custody.</p> <p>Successfully completed certified Lead Auditor course for RSPO P&C, MSPO OPMC, RSPO SCCS, MSPO SCCS, IMS ISO 9001, 45001 and 14001, SA8000, ISO 14064-3:2019, ISCC CORSIA, ISCC DE/EU and PLUS, ISCC Chain of Custody, ISCC Waste and Residue, and ISCC GHG.</p>

2.3 Methodology

2.3.1 General Overview

Assurance method included,

- Inquiring and interviewing of management, including senior management at executive and functional levels, and of relevant management responsible for the day-to-day management of sustainability.

- Observing and inspecting management practices, process testing and evidence gathering across the organization on a sample basis.
- Evaluating documentary evidence and management representations that support adherence to the principles.
- Data source validation.
- Limited testing of detail on a sample basis (e.g., re-performance of calculations).
- Carrying out analytical procedures (e.g., trend analysis).
- Observing and inspecting on a sample basis management practices, process testing and evidence gathering (from source to aggregation).

All concerned SPOTT indicators 2023: **37, 38, 61, 66, 91, 103, 108, 110, 112, 137, 166, 168, 171, 173, 176, 177** will be subject to comprehensive external verification in order to achieve full scoring marks under SPOTT.

For Data source verification sample of site management will be interviewed by the auditors by virtual means.

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.

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.	Sungai Binti KCP	Sungai Purun POM
	Nabire Matoa KCP	Bumi Jaya POM
		Batu Mas Sejahtera POM

2.3.3 Explanation of the sample selection

Sampling was derived to be representative covering all operational scopes of Goodhope

Total of Refineries = 1, **Sampled = 1**

Total of KCPs = 2, **Sampled = 2**

Total of Palm Oil Mills = 8, **Sampled = 3**

Traceability related SPOTT Indicators

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

PART 3 ASSESSMENT FINDINGS

3.1 Summary of the findings

Goodhope is a company with a land bank of more than 100,000 hectares in Indonesia, of which approximately 69,000 hectares are planted with oil palm (including plasma for local communities). Goodhope operates as a grower, processor and trader and has been monitoring and upholding the commitment of NDPE implementation.

The traceability data provided for verification (related to SPOTT indicators 37, 38, 61, 66, 91, 103, 108, 110, 112, 137, 166, 168, 171, 173, 176, 177) covers 1 refinery, two KCPs and three sampled POMs: Premium Vegetable Oils Sdn. Bhd./ Premium Fats Sdn. Bhd (refinery), Sungai Binti and Nabire Matoa (KCPs) and 3 Palm Oil Mills (Sungai Purun POM, Bumi Jaya POM, Batu Mas Sejahtera POM)

Summary of indicators evaluated, summary of findings and level of assurance are indicated in the table below.

Summary of Findings for criteria :		Scope and Scoring																																																																											
37, 38, 61, 66, 91, 103, 108, 110, 112, 137, 166, 168, 171, 173, 176, 177																																																																													
Publishes traceability data at refinery level (<i>Indicator 37</i>)																																																																													
<p>Goodhope Asia Holdings Ltd. (GAHL) published the company traceability performance on the company's official website under section of "Sustainability Library "and sub section "Sustainability Reports" titled <i>Traceability Declarations</i>. The traceability performance was declared for its refinery, Kernel Crushing Plant (KCP) and palm oil mills.</p> <p>The management explained the traceability data from respective refinery, KCPs and palm oil mills will be collected and finalized by the Sustainability Department prior to being published on company website by Group Communication Manager. Traceability data will be updated and published on company website on an annually basis.</p> <p>Documents and information's verified are as follows:</p> <ul style="list-style-type: none"> Refinery: The declaration made includes the information such as period of reporting, TTP%, TTM%, percentage of volume sourcing from supplier, total number of suppliers and details for list of supplying mills and refineries. https://www.goodhopeholdings.com/images/sustainability/Traceability_Declaration_PVO_2H2022.pdf <p>For the Traceability to Plantations, sighted the data for each mill as per mentioned below for each mill and TTP percentage :</p>		Comprehensive																																																																											
<table border="1"> <thead> <tr> <th>No.</th> <th>Mill Name</th> <th>Percentage TTP %</th> </tr> </thead> <tbody> <tr><td>1</td><td>Johor Labis POM</td><td>100.0</td></tr> <tr><td>2</td><td>Bell Palm Industries POM</td><td>100.0</td></tr> <tr><td>3</td><td>Syarikat Perusahaan Kelapa Sawit POM</td><td>54.2</td></tr> <tr><td>4</td><td>Southern Malay POM</td><td>66.0</td></tr> <tr><td>5</td><td>Classic POM</td><td>99.9</td></tr> <tr><td>6</td><td>Classic Segamat POM</td><td>32.5</td></tr> <tr><td>7</td><td>RISDA Durian Mas POM</td><td>97.9</td></tr> <tr><td>8</td><td>Endau POM</td><td>63.2</td></tr> <tr><td>9</td><td>Felcra Sungai Melikai POM</td><td>72.6</td></tr> <tr><td>10</td><td>Kahang POM</td><td>99.7</td></tr> <tr><td>11</td><td>Ulu Sebol POM</td><td>83.6</td></tr> <tr><td>12</td><td>Paloh POM</td><td>51.0</td></tr> <tr><td>13</td><td>RISDA Ulu Keratong POM</td><td>86.7</td></tr> <tr><td>14</td><td>Kosfarm POM</td><td>94.1</td></tr> <tr><td>15</td><td>FELCRA Bukit Kepong POM</td><td>93.4</td></tr> <tr><td>16</td><td>RISDA Sg.Ambat POM</td><td>97.4</td></tr> <tr><td>17</td><td>Sawira Makmur POM</td><td>88.5</td></tr> <tr><td>18</td><td>United Bell POM</td><td>82.2</td></tr> <tr><td>19</td><td>Kim Loong POM (Kota Tinggi)</td><td>51.3</td></tr> <tr><td>20</td><td>Muar POM</td><td>100.0</td></tr> <tr><td>21</td><td>Sedenak POM</td><td>97.2</td></tr> <tr><td>22</td><td>Merchong POM</td><td>56.8</td></tr> <tr><td>23</td><td>Bintang POM (Perusahaan Minyak Sawit Bintang)</td><td>52.2</td></tr> <tr><td>24</td><td>PPNJ Bukit Bujang POM</td><td>99.1</td></tr> </tbody> </table>			No.	Mill Name	Percentage TTP %	1	Johor Labis POM	100.0	2	Bell Palm Industries POM	100.0	3	Syarikat Perusahaan Kelapa Sawit POM	54.2	4	Southern Malay POM	66.0	5	Classic POM	99.9	6	Classic Segamat POM	32.5	7	RISDA Durian Mas POM	97.9	8	Endau POM	63.2	9	Felcra Sungai Melikai POM	72.6	10	Kahang POM	99.7	11	Ulu Sebol POM	83.6	12	Paloh POM	51.0	13	RISDA Ulu Keratong POM	86.7	14	Kosfarm POM	94.1	15	FELCRA Bukit Kepong POM	93.4	16	RISDA Sg.Ambat POM	97.4	17	Sawira Makmur POM	88.5	18	United Bell POM	82.2	19	Kim Loong POM (Kota Tinggi)	51.3	20	Muar POM	100.0	21	Sedenak POM	97.2	22	Merchong POM	56.8	23	Bintang POM (Perusahaan Minyak Sawit Bintang)	52.2	24	PPNJ Bukit Bujang POM	99.1
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25	PPNJ Kahang POM	91.0
26	Prosper POM	27.0
27	Ladang Siang POM	99.0
28	Sindora POM	100.0
29	Bukit Berembun POM	61.0
30	Sri Jelutung POM	93.5
31	Sungai Kachur POM	100.0
32	Sungei Kahang POM	89.8
33	Tian Siang Pahang POM	100.0
34	Wujud Wawasan POM	99.6
35	Pasir Panjang POM	100.0
36	Kuantan Trading Oil Mill	100.0
37	Coronation POM	92.0
38	Cenderawasih POM	51.0
39	Panji Alam POM	90.7
40	Bell Keratong Palm Industries/ Suburban POM	0.0
41	Bell-KSL (Linggi) POM	58.6
42	Rakyat Ketengah Pewira POM	0.0
43	Ladang Padang POM (Seong Thye)	0.0
44	Bukit Senorang POM	90.9
45	Palong Cocoa POM	100.0
46	Tereh POM	100.0

The Traceability Declaration Summary for Premium Vegetable Oils and Premium Fats has been published and mentioned in the details below :

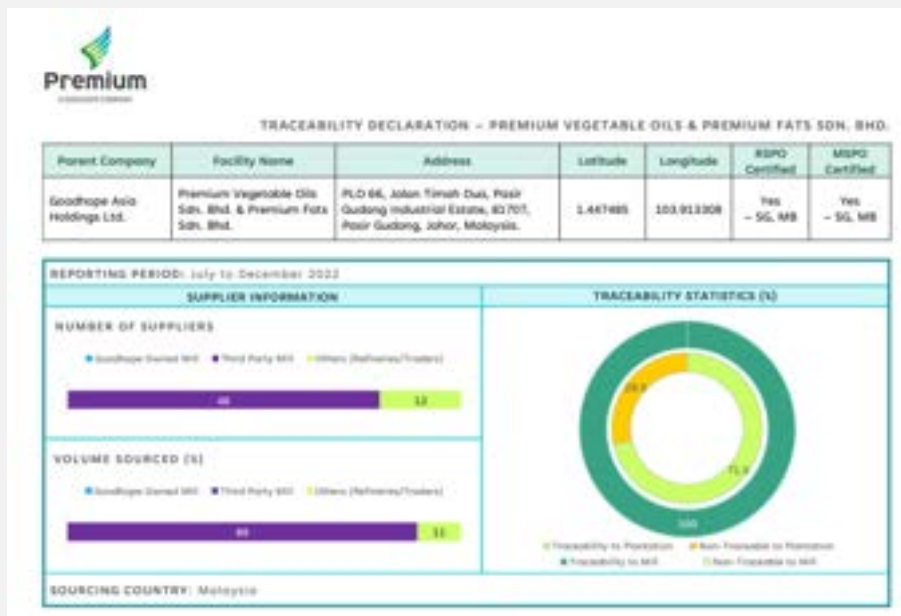
Data traceability declaration for Goodhope : Period: January - June 2022

- i) Traceability to Mill Percentage : 100%
- ii) Traceability to Plantation Percentage : 61.3%
- iii) Non-Traceability to Plantation : 38.7%



Data traceability declaration for Goodhope : Period: July - December 2022

- i) Traceability to Mill Percentage: 100 %
- ii) Traceability to Plantation Percentage : 71.5 %
- iii) Non-Traceability to Plantation : 28.5 %



Based on the data tabulation, sighted the company has published the traceability on 6 month basis as per RSPO SCCS requirement.

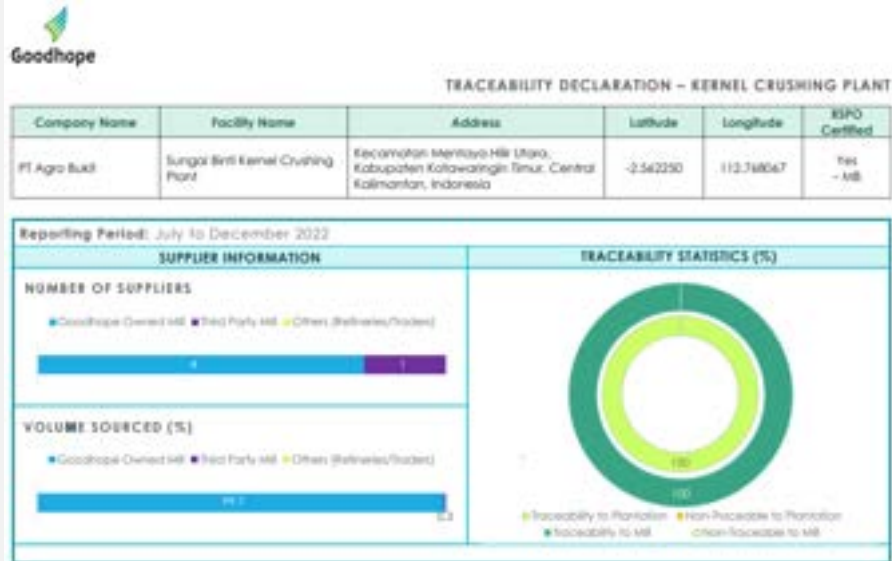

List of Supplying Mills

No.	Parent Company	Plant Of MSB	Country	UML ID	Latitude	Longitude	RSPO Certified	Material Sourced
1	Achi Agro Plantations Sdn Bhd	Iskoh Lohs POM	Malaysia	PO300001713	2.211472	103.551306	N	PK
2	Beil Group	Beil Palm Industries POM	Malaysia	PO300001724	1.916178	103.496750	N	PK
3	Beil Group	Syarikat Perusahaan Kelapa Sawit POM	Malaysia	PO300001721	2.168967	103.288453	N	PK
4	Victory Snghee Plantations Sdn Bhd	Southern Malay POM	Malaysia	PO300001953	1.781003	103.342937	N	PK
5	Cleasex Palm Oil Mill Sdn Bhd	Cleasex POM	Malaysia	PO300001763	2.400889	103.424609	N	PK
6	Cleasex Palm Oil Mill Sdn Bhd	Cleasex Segamat POM	Malaysia	PO300010025	2.418236	103.409944	N	PK
7	RSQA Estates Sdn Bhd	RSQA Durian Mas POM	Malaysia	PO300001803	4.985091	103.202805	N	PK
8	Far East Holdings Berhad	Enklu POM	Malaysia	PO300001949	2.879444	103.505301	N	PK
9	TEC Oils Berhad	Tecon Sungai Melayu POM	Malaysia	PO300001767	2.886147	103.801396	N	PK
10	Jaya Huat (Bhd) Realty Sdn Bhd	Kahang POM	Malaysia	PO300001805	2.942378	103.436400	N	PK
11	Tradeinvests Plantation Berhad	Ulu Sebur POM	Malaysia	PO300004808	1.888611	103.621833	N	PK
12	MROK Engineering Sdn Bhd	Poloh POM	Malaysia	PO300001830	2.211246	103.213124	N	PK
13	RSQA Estates Sdn Bhd	RSQA Ulu Kemuning POM	Malaysia	PO300001750	2.717472	103.812656	N	PK
14	Far East Holdings Berhad	Andapan POM	Malaysia	PO300001871	2.893400	103.820000	N	PK
15	PELLARA Berhad	PELLARA Bukit Kajang POM	Malaysia	PO300001751	2.893876	103.881994	N	PK
16	RSQA Estates Sdn Bhd	RSQA Sg Jambur POM	Malaysia	PO300001749	2.194146	103.817960	N	PK
17	Far East Holdings Berhad	Selang Makmur POM	Malaysia	PO300001752	2.987583	103.892444	N	PK
18	Beil Group	United Beil POM	Malaysia	PO300001823	1.985451	103.467964	N	PK
19	Kim Loong Resources Berhad	Kim Loong POM	Malaysia	PO300001825	1.804038	103.861972	N	PK
20	Krisang Sdn Bhd	Muar POM	Malaysia	PO300001821	1.807418	103.879904	N	PK
21	Apulim (Malaysia) Berhad	Sedemak POM	Malaysia	PO300001819	1.739818	103.538121	N	PK
22	Prosper Group	Merangkap POM	Malaysia	PO300011183	2.809350	103.396157	N	PK
23	Beil Group	Rintong POM	Malaysia	PO300001863	2.107444	103.124420	N	PK
24	Perubuhan Peladang Negeri Johor (PPNJ)	PPNJ Bukit Sijang POM	Malaysia	PO300001861	2.798894	103.758411	N	PK

List of Supplying Refineries

No.	Parent Company	Refinery	Country	Latitude	Longitude	RSPO Certified	Material Sourced
1	J.C Chang (Pte) Ltd	Carotoko Sdn Bhd	Malaysia	1.450356	103.902854	Y	RPO
2	Kack Seng (Malaysia) Berhad	Kack Seng (Malaysia) Berhad	Malaysia	1.840285	103.964509	Y	RPO, RPL, SRL
3	Kuala Lumpur Kaping Berhad	KL Kaping Edible Oils Sdn Bhd	Malaysia	1.449280	103.903210	Y	RPO, RPL, SRL
4	Mawath Group	Mawathex Industries Sdn Bhd	Malaysia	1.452820	103.903280	Y	RPO, RPL
5	Muslim Mas Group	Muslim Masika Oil & Fats	Malaysia	1.457231	103.986735	Y	RPO, RPL, SRL
6	Silimar Group	PGEO Edible Oils Sdn Bhd	Malaysia	1.450426	103.897364	Y	RPO, RPL, SRL
7	Time Darby Plantation Berhad	Time Darby Oils Plant Gading	Malaysia	1.481806	103.905833	Y	RPL
8	Time Darby Plantation Berhad	Time Darby Oils Port Klang	Malaysia	3.044679	101.170639	Y	RPL
9	Bunge Leaders Crakleoon	Bunge Leaders Crakleoon Plant Gading	Malaysia	1.449388	103.908608	Y	RPO, SRL
10	Fuji Oil Group	Palmexia Edible Oil Sdn Bhd	Malaysia	1.448647	103.898611	Y	RPL
11	Jin Lee (Oil Mills) Sdn Bhd	Jin Lee (Oil Mills) Sdn Bhd	Malaysia	1.447390	103.911000	Y	CPKO
12	Nam Bee Co. Sdn Bhd	Nam Bee Co. Sdn Bhd	Malaysia	2.496779	103.489400	N	CPKO

- Kernel Crushing Plant (KCP): The declaration made includes the information such as period of reporting, TTP%, TTM%, percentage of volume sourcing from supplier, total number of suppliers and details for list of supplying mill. The traceability declaration was made available as respective KCPs. (https://www.goodhopeholdings.com/images/sustainability/Summary_Traceability_Declarations_KCP_2H2022.pdf)



i) Sungai Binti KCP Mills Traceability

Goodhope

List of Supplying Mills

No.	Company Name	Palm Oil Mill	Country	UML ID	Latitude	Longitude	RSPO Certified	Material Sourced
1.	PT Agro Indonesia	Sungai Pujun POM	Indonesia	PO1000003276	-2.524252	112.416800	Yes	PK
2.	PT Agro Indonesia	Sezewan POM	Indonesia	PO1000002677	-2.599952	112.373650	Yes	PK
3.	PT Agro Bukit	Sungai Binti POM	Indonesia	PO1000003323	-2.562250	112.768067	Yes	PK
4.	PT Agro Wana Lestari	Bukit Santia POM	Indonesia	PO1000003927	-1.808458	112.794565	Yes	PK
5.	Triputra Agro Perdana	Gawai Bohandop Sawit Mill POM	Indonesia	PO1000016118	-2.951233	112.347033	Yes	PK

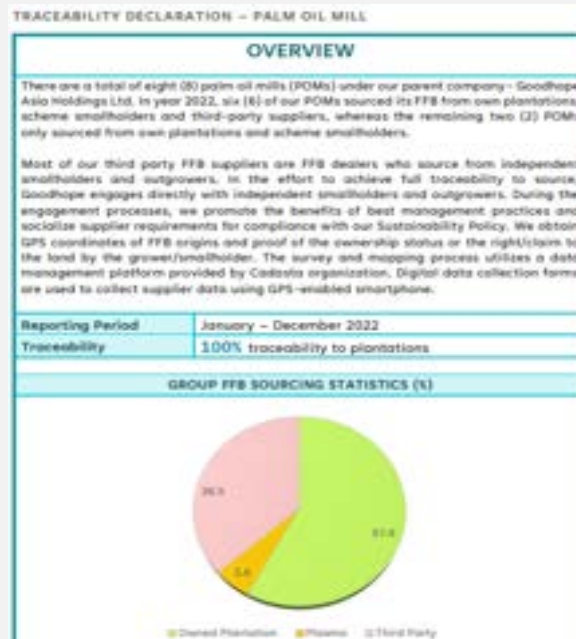
ii) Nabire Matoa KCP Mills Traceability



Goodhope

List of Supplying Mill

No.	Company Name	Palm Oil Mill	Country	UML ID	Latitude	Longitude	RSPO Certified	Material Sourced
1.	PT Nabire Baru	Nabire Matoa POM	Indonesia	PO100011404	-3.461500	135.256344	Yes	PK

- Palm Oil Mill: The declaration made includes the information such as period of reporting, TTP% and percentage of volume sourcing from suppliers. The traceability declaration was made available for respective palm oil mills.



	<p>TRACEABILITY DECLARATION – PALM OIL MILL</p> <div data-bbox="486 235 1045 683"> <p>BUMI JAYA PALM OIL MILL</p> <table border="1"> <tr><td>Company Name</td><td>PT Agro Indonesia</td></tr> <tr><td>Location</td><td>Kecamatan Sepaku, Kabupaten Paser Utara, Enrek Kalimantan, Indonesia</td></tr> <tr><td>GPS Coordinates</td><td>-1.034824, 116.889541</td></tr> <tr><td>Reporting Period</td><td>January – December 2022</td></tr> </table> <p>FFB SOURCING STATISTICS (%)</p>  <p>Legend: Owned Plantation (Green), Planted (Yellow), Third Party (Red), Traceability to Plantation (Green), Non-Traceable to Plantation (Yellow)</p> </div> <div data-bbox="486 728 1045 1220"> <p>TRACEABILITY DECLARATION – PALM OIL MILL</p> <p>BATU MAS SEJAHTERA PALM OIL MILL</p> <table border="1"> <tr><td>Company Name</td><td>PT Batu Mas Sejahtera</td></tr> <tr><td>Location</td><td>Kecamatan Sungai Laur, Kabupaten Kutapang, West Kalimantan, Indonesia</td></tr> <tr><td>GPS Coordinates</td><td>-1.013813, 110.532620</td></tr> <tr><td>Reporting Period</td><td>January – December 2022</td></tr> </table> <p>FFB SOURCING STATISTICS (%)</p>  <p>Legend: Owned Plantation (Green), Planted (Yellow), Third Party (Red), Traceability to Plantation (Green), Non-Traceable to Plantation (Yellow)</p> </div>	Company Name	PT Agro Indonesia	Location	Kecamatan Sepaku, Kabupaten Paser Utara, Enrek Kalimantan, Indonesia	GPS Coordinates	-1.034824, 116.889541	Reporting Period	January – December 2022	Company Name	PT Batu Mas Sejahtera	Location	Kecamatan Sungai Laur, Kabupaten Kutapang, West Kalimantan, Indonesia	GPS Coordinates	-1.013813, 110.532620	Reporting Period	January – December 2022	
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Reporting Period	January – December 2022																	
<p>Publishes traceability data at crusher level (<i>Indicator 38</i>)</p>																		
	<p>During this period of verification assessment, there were 2 KCPs included in the audit scope;</p> <ul style="list-style-type: none"> • Sungai Binti KCP • Nabire Matoa KCP <p>Referring to the published Traceability Declaration on company website, traceability to the plantation and mill for both KCPs were achieved at 100%.</p> <p>(https://www.goodhopeholdings.com/images/sustainability/Summary_Traceability_Declarations_KCP_2H2022.pdf)</p>	<p>Comprehensive</p>																

- *“No deforestation and no conversion of natural ecosystem: Comply with the cut-off date of 5th May 2017 for Goodhope’s own operations and 4th May 2019 for its suppliers”*
- Responsible Sourcing and Supply Chain Management Policy, doc. No.: GAHL.SP.0722 dated 28.07.2022;
 - *“Supplier requirements - Goodhope requires suppliers to demonstrate that the materials they supply are produced in compliance with the Group’s Sustainability Policy, including No Deforestation, No development on Peat, and No Exploitation (NDPE). These expectations are communicated during supplier engagement processes.”*
- Disclosure of Management Approach – Responsible Sourcing Y2022; ([https://www.goodhopeholdings.com/images/sustainability/DMA Responsible Sourcing_2022b.pdf](https://www.goodhopeholdings.com/images/sustainability/DMA_Responsible_Sourcing_2022b.pdf))
 - III Responsible Sourcing and Traceability Roadmap – *“Our Responsible Sourcing and Traceability Roadmap outlines the key objectives and targets as we aim to ensure that NDPE compliance is extended throughout our entire supply chain.”*
 - Deforestation Risk Monitoring, Review & Field Verification – *“To monitor deforestation risk in our existing and prospective supply base areas, we have started to analyze the risk periodically using publicly available Radar Alerts for Detecting Deforestation (RADD) forest disturbance alerts.”*
 - Deforestation Risk Monitoring, Review & Field Verification – *“Strengthening our capacity to increasingly utilize the publicly available deforestation monitoring system provided by GFW. Training and technical support is being provided by World Resources Indonesia (WRI)”*

GAHL performed monitoring in several ways including the integration with various platform to ensure the transparency and uphold their commitments towards no deforestation. The platforms as follows:

- Self-Assessment Tool (SAT)
- NDPE Implementation Reporting Framework (IRF), questionnaires template develops under Palm Oil Collaboration group (POCG)
- Radar Alerts for Detecting Deforestation (RADD)
- Global Forest Watch Pro (GFW)

Risk analysis and monitoring will be performed via spatial analysis and cross referenced with reliable data provided by local authority such as Map of Forest Zone by province, peat Moratorium by KLHK, Peat Ecological Function map, RADD Alerts, The World Database of Protected Areas, UNC and UNEP, High Confidence Hotspot – KLHK and Open Street Map.

The monitoring was conducted by the Responsible Sourcing and Traceability department consistently on monthly basis, and as for 3rd party alert will be based on the alert received. Sighted sample of 3rd party mill; PT Gawi Bahandep Sawit Mekar supplied to sampled KCP – Sg. Binti KCP. The latest monitoring was made available and verified covering period for Y2021/2022 for a radius of 50km from mill.

GAHL established a procedure detailing on the process flow for deforestation monitoring; *SOP Analisa Risiko Pemasok Pihak Ketiga*, doc. No.: SOP TRA. Doc-01 dated 20.08.2022 described as follows:

- Section 13, Radar Alerts for Detecting Deforestation (RADD): A data serving to observe changes in land cover on a regular basis provided by Wageningen University through the acquisition of Sentinel-1 satellite imagery data that has a cloud-penetrating radar.
- Section 7, Buffer 50KM from palm oil mills. An area within a radius of 50km around palm oil mills that is the focus of spatial assessment of environmental variables.

At time of verification audit, there is no alert for deforestation lodged for in supplier operations.

Implementing a landscape or jurisdictional level approach (<i>Indicator 66</i>)	
<p>Goodhope Asia Holdings Ltd has published a Sustainability Policy in their website and can be extracted from : https://www.goodhopeholdings.com/images/sustainability/Goodhope_Sustainability_Policy_2022_-_Rev.pdf</p> <p>Sighted the policy dated 28th July 2022 [document number GAHL.SP.0122] for Goodhope Asia Holdings Ltd, which covering the details such as :</p> <ul style="list-style-type: none"> i) Respect for Human Rights ii) Ethical Conduct iii) Environmental and Occupational Health and Safety iv) Conservation and Sustainable Land Use v) Community Relations vi) Smallholder Support vii) Responsible Sourcing viii) Verification of Performance and Conformity to Standards ix) Continuous Improvement and Transparency x) Stakeholder Feedback xi) Collaborations and Memberships xii) Grievance Handling xiii) Recruitment and Employment Standards <p>In regards to the communication and socialization of the sustainability policy, Goodhope had conducted a webinar for the refinery - Premium vegetable Oils in April 2022 which socialize the Group Sustainability Policy to downstream suppliers, the webinar lead by Mr. Poey Shao Jiann (Responsible Sourcing and Sustainability Lead- Manager for Goodhope) for the communication with the suppliers which related to NDPE commitments, traceability related tools and stakeholder expectation of labor practices.</p> <p>Sighted 33 participants joining the webinar which consist of briefing on :</p> <ul style="list-style-type: none"> i) Introduction of 'Goodhope Sustainability Policy' ii) Traceability to Plantation iii) Self-Assessment Tool iv) Supplier Code of Conduct v) Stakeholder Expectation of Labor Practices <p>The webinar details conduction on the 3rd party supplier for Premium Vegetables Oil in Johor has been conducted to all the suppliers dated 20th April 2022. Sighted the invitation email has been sent to the suppliers dated 5th April 2023 (Felcra Mill) and sighted the reply and respond from the respective parties on 14th April 2022. Sighted also the email sent to Prosper Mill and the parties had attended the webinar at the mentioned date. Meeting attendance list dated 20th April 2022 was sighted from the teams Meeting.</p> <p>Total of 56 sub questions have been communicated to the supplier. The risk has been calculated and categorized the suppliers into Low, Medium and High based on the number of questions raised from the questionnaire. The webinar has been conducted to refinery suppliers in which the questionnaire related to risk indication and assessment of the company has been send to the supplier (Supplier Declaration, Self-Assessment Tool) SAT covering the period of year 2022. The Self-Assessment Tool consist of details such as :</p> <ul style="list-style-type: none"> i) Mill Information , Mill Name ii) Sustainability / No deforestation , No Peat and No Exploitation Policy iii) Environmental Aspect iv) Social Aspects v) Company Own Plantations related vi) Third Party Supply related 	<p>Comprehensive</p>

The engagement towards the high risk supplier has been communicated to 2 palm oil mill located in Segamat Johor on 14th And 15th March 2023. Sighted the form and respond from the suppliers regarding the engagement visit which has been attended by mill manager, sustainability compliance executive, senior clerk, engineers and sustainability officer. Based on the evidence from physical meeting, the agenda included :

- PVO Group Sustainability Policy
- Deforestation Free Commitment
- Stakeholders Expectation on Labor practices
- GHG Emission Accounting
- Year 2022 Self Assessment Tool and TTP Declaration

Sighted the Traceability Procedure for KCP -Responsible Sourcing and Supply Chain management policy which committed to sourcing and processing traceable material-reference no. RSSOP/KCP/01, revision no. 1 dated 1st March 2022.

For Sungai Binti KCP, due to the location is in Kalimantan, the questionnaires and template has been made in Bahasa Indonesia and has been communicated to the third-party suppliers. Only one third party mill supplying to Sungai Binti KCP – PT Gawi Bahandep Sawit Mekar Palm Oil Mill located in Desa Jahitan, Kecamatan Seruyan Hilir which has been certified as RSPO MB and ISPO.

Sighted the Supplier Declaration Traceability to Plantations with the details of Mill name, Address of Mill, GPS Coordinates, Mill capacity and production of CPO and PKO Supplied.

Based on the evidence from Traceability Declaration for Kernel Crushing Plant, Sungai Binti KCP only sourcing 0.3% from the third party mill which is PT Gawi Bahandep Sawit Mekar Palm Oil mill. Whereas for Nabire Matoa KCP, the PK sources are 100% form Goodhope Owned Mill.

The FFB Sources for the third party palm oil mill has been recorded throughout the year ranging from own estate, third party supplying, dealers, smallholders and collection center. The details of supplier has been recorded for FFB Supplier which include the name of FBB Supplier, type of supplier , address of supplier , geocoordinate of supplier , Planted Area, Volume sourcing from the mill and tonnage production per hectare. Total of 16 Suppliers to PT Gawi Bahandep has been captured in the Traceability to Plantations Data including own concession estate, Plasma estate , Agent and dealers, Smallholders, and collector.

Disclosure of Management Approach – Responsible Sourcing Y2022;

[https://www.goodhopeholdings.com/images/sustainability/DMA Responsible Sourcing 2022b.pdf](https://www.goodhopeholdings.com/images/sustainability/DMA%20Responsible%20Sourcing%2022b.pdf)

- III Responsible Sourcing and Traceability Roadmap – “Our Responsible Sourcing and Traceability Roadmap outlines the key objectives and targets as we aim to ensure that NDPE compliance is extended throughout our entire supply chain.”
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GAHL performed monitoring in several ways including the integration with various platform to ensure the transparency and uphold their commitments towards no deforestation. The platforms as follows:

- Self-Assessment Tool (SAT)

- NDPE Implementation Reporting Framework (IRF), questionnaires template develops under Palm Oil Collaboration group (POCG)
- Radar Alerts for Detecting Deforestation (RADD)
- Global Forest Watch Pro (GFW)

Sighted the engagement for the Nabire Matoa in Papua, Indonesia which Goodhope has established a long-term partnership with PILI Green Network (*Pusat Informasi Lingkungan Indonesia*) to facilitate planning of the Nabire Landscape Conservation Program and to drive the implementation of planned activities. PILI 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. The Company had also worked with representative of Papuan Customary Council, Indigenous Peoples Institutions, Universities, NGO's, Companies, and village heads to deliver on this project.

As part of its commitments to RSPO, Goodhope has pledged to protect a forested area of 4,475 ha outside of its concessions in Nabire Regency, Papua. The conservation of this area (compensation area) together with the protection of High Conservation Values (HCV) and High Carbon Stock (HSC) forest in our concessions is at the core of a collaborative program to conserve natural ecosystems in the Nabire Regency.

Preliminary activities (program scoping, planning and seeking consent from local stakeholders) began in 2019. Since then, participatory processes have been undertaken to attain legal recognition as an Essential Ecosystem Area (*Kawasan Ekosistem Esensial*, KEE).

In total, 107,582 ha of the Nabire Regency has been identified and designated as KEE. Conservation management and monitoring activities of the NLCP focus on areas of forest within and in the vicinity of Goodhope's concessions, including 4,475 ha area outside of company boundaries. The NLCP also contributes to the protection of KEE across Nabire Regency by encouraging government support for KEE management across the wider landscape.

Goodhope continue to provide 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. Goodhope are working with the two community patrol teams and supporting them to implement Spatial Monitoring and Reporting Tool (SMART). Village Farmer Groups will play important roles in managing tree nurseries and promoting sustainable farming. Nabire Earth Field School, 'Bumi Nabire', has been established to facilitate training and capacity building. The Field School includes demonstration plots for hands-on training and forms the core of our outreach efforts.

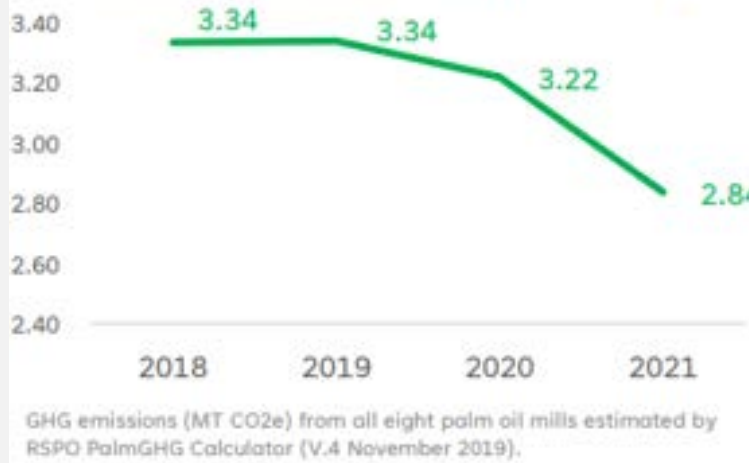
https://www.goodhopeholdings.com/images/sustainability/Managing_Community_Relations_2022-23.pdf

https://www.goodhopeholdings.com/images/sustainability/Goodhope_Sustainability_Journey_Q3_2022.pdf

Implementation of commitment to no planting on peat of any depth (Indicator 91)	
<p>GAHL established a policy and documents to demonstrate in their commitments to avoid deforestation in units as well supplier operations as follows, and this policy is made publicly available in company website.</p> <ul style="list-style-type: none"> • Sustainability Policy, doc. No.: GAHL.SP.0122 dated 28.07.2022. <ul style="list-style-type: none"> - <i>“Goodhope Asia Holdings Ltd. (Goodhope) made its pledge to ... No Development on Peat ... (NDPE) in May 2017 and has since been working to enforce these principles both within its own operations and across the supply chain”.</i> - <i>“Goodhope will not conduct any new development on ... peatland of any depth and is working to eliminate deforestation and conversion of other natural ecosystems from its supply chains.”</i> • Conservation and Sustainable Land Use Policy, doc. No.: GAHL.SP.0622 dated 28.07.2022. <ul style="list-style-type: none"> - <i>“Goodhope will not conduct any new development on ... peatland of any depth and is working to eliminate deforestation and conversion of other natural ecosystems from its supply chains.”</i> - <i>“No deforestation and no conversion of natural ecosystem: Comply with the cut-off date of 5th May 2017 for Goodhope’s own operations and 4th May 2019 for its suppliers”</i> - No development on peat • Responsible Sourcing and Supply Chain Management Policy, doc. No.: GAHL.SP.0722 dated 28.07.2022. <ul style="list-style-type: none"> - <i>“Supplier requirements - Goodhope requires suppliers to demonstrate that the materials they supply are produced in compliance with the Group’s Sustainability Policy, including ..., No development on Peat... (NDPE). These expectations are communicated during supplier engagement processes.”</i> • Disclosure of Management Approach – Responsible Sourcing Y2022. <ul style="list-style-type: none"> - <i>Section III Responsible Sourcing and Traceability Roadmap – “Our Responsible Sourcing and Traceability Roadmap outlines the key objectives and targets as we aim to ensure that NDPE compliance is extended throughout our entire supply chain.”</i> <p>GAHL performed monitoring in several ways including the integration with various platform to ensure the transparency and uphold their commitment towards no deforestation. The platforms as follows:</p> <ul style="list-style-type: none"> • Self-Assessment Tool (SAT) • NDPE Implementation Reporting Framework (IRF), questionnaires template develops under Palm Oil Collaboration group (POCG) • Radar Alerts for Detecting Deforestation (RADD) • Global Forest Watch Pro (GFW) <p>Risk analysis and monitoring will be performed via spatial analysis and cross reference with reliable data provided by local authority such as Map of Forest Zone by province, peat Moratorium by KLHK, Peat Ecological Function map, RADD Alerts, The world Database of Protected Areas, UNC and UNEP, High Confidence Hotspot – KLHK and Open Street Map. The monitoring was conducted in 2 years or as necessary in accordance with the change made by local authority on Peat Moratorium and Peat Ecological Function map declaration.</p> <p>GAHL established a procedure detail on the process flow for deforestation and peat monitoring; <i>SOP Analisa Risiko Pemasok Pihak Ketiga</i>, doc. No.: SOP TRA. Doc-01 dated 20.08.2022 described as follows:</p> <ul style="list-style-type: none"> • Section 13, Radar Alerts for Detecting Deforestation (RADD): A data serving to observe changes in land cover on a regular basis provided by Wageningen University 	<p>Comprehensive</p>

<p>through the acquisition of Sentinel-1 satellite imagery data that has a cloud-penetrating radar.</p> <ul style="list-style-type: none"> Section 7, Buffer 50KM from palm oil mills. An area within a radius of 50km around palm oil mills that is the focus of spatial assessment of environmental variables. <p>During the verification assessment, reviewed the sampled suppliers to PT Gawi Bahandep Sawit Mekar (PK supplier to Sg. Binti KCP) the latest comparison was made available, review on the Spatial Risk Analysis Map dated 28.06.2022; scale 1: 400,000 and verified covering period for Y 2021/2022 for a radius of 50km from mill.</p>	
Progress towards commitment to reduce GHG emissions intensity (<i>Indicator 103</i>)	
<p>GAHL established policy and documents to demonstrate the commitment towards reduction of GHG emission intensity as follows:</p> <ul style="list-style-type: none"> Conservation and Sustainable Land Use Policy, doc. No.: GAHL.SP.0622 dated 28.07.2022, this policy is made publicly available in company website. <ul style="list-style-type: none"> Mitigation of greenhouse gas emissions – <i>“Adopt improved land management practices and other viable approaches for reducing greenhouse gas emissions.”</i> Yearly reporting; Sustainability Brief: Greenhouse Gas Emissions Y2021, this was made available in company website. <p>https://www.goodhopeholdings.com/images/sustainability/GHG_Emissions_2021.pdf</p> <ul style="list-style-type: none"> <i>“Goodhope is taking measures to monitor its GHG emissions and implement viable methods for emissions reduction.”</i> Plan for GHG Reduction was sighted and available during verification audit include the targeted of GHG intensity reduction and time frame. <p>As verified during the assessment based on document review and interviewed with the management, GAHL applied GHG protocol (reviewed by 3rd party in year 2022 for the correct calculation method application purpose) for GHG calculation methodology for its downstream, while for upstream applied RSPO PalmGHG calculator.</p> <p>Review on the sampled mills, refinery and KCPs, sighted the data collection for GHG was captured and tabulated in document “Template Calculation GHG” respectively. Finalization of the GHG reduction intensity result will be reported and made available on the company website titled Sustainability Brief: Greenhouse Gas Emissions Y2021.</p> <p>Observed the Perhitungan GHG 2021 - starting 2018 calculated GHG Emission, <i>Ikutan Kementerian Lingkungan Hidup. Peraturan Presiden Republik Indonesia Nomor 61 Tahun 2011 Tentang Rencana Aksi Nasional Penurunan Emisi Gas Rumah Kaca. Bidang Industri (Section 4) Tahun 2010 - 2020</i> as per Indonesian Regulation period requirements.</p> <p>Upstream:</p>	<p>Comprehensive</p>

GHG EMISSIONS INTENSITY FROM PALM OIL PRODUCTION (MT CO₂e / MT CPO)



Downstream:

Downstream GHG Emissions				
	2018	2019	2020	2021
Scope 1 (MT CO ₂ e)	26,279	24,502	19,162	20,033
Scope 2 (MT CO ₂ e)	22,860	24,869	21,712	23,342
Total (MT CO₂e)	49,139	49,371	40,874	43,375
Intensity (MT CO₂e / MT Product)	0.27	0.24	0.23	0.22

Based on the published result on company website for downstream and upstream, GHG reduction intensity for GAHL showed a reduction trend than previous years since Y2018. The raw data of the records are gathered from various records including production report, electricity usage, fossil fuel, fertilizer usage, chemical usage and water flowmeter was reviewed and verified during the verification audit.

Progress towards commitment on water use intensity (*Indicator 108*)

GAHL established policy and documents to demonstrate the commitment towards reduction of water use intensity as follows:

- Sustainability Brief: Water use and Wastewater Management FY2021/2022 (https://www.goodhopeholdings.com/images/sustainability/Water_Use_and_Wastewater_Management_2021_22.pdf)
 - "Water Use – Target for water use by palm oil mills are < 1.0 M³."
 - Action plan to reduce the water use intensity: "... by optimizing mill utilization and installing new water piping system."
 - Turbine cooling water and vacuum drier sealing water is recycled and use of condensate replace the need for dilution water."
- Sustainability Policy Document, SOP no.: GAHL.SP.0522 dated 28.07.2022: Environmental and Occupational Health and Safety Policy

Comprehensive

The result of water use intensity for period of FY2021/2022 was publicly available on the company website.



The Sustainability Department of GAHL will be updating the results covering all unit operations and making it available on the company website. GAHL published the final result on the company website on an annual basis and the data is reported based on the company financial year accordingly. The data is collected from respective palm oil mills, kernel crushing plants and refinery on monthly basis for data analysis as well for its own internal monitoring.

Review on the sampled mills, refinery and KCPs, sighted the data collection for water use intensity was captured and tabulated in document “*Mill Environment, Health & Safety – EHS Performance – FY2021/2022*” respectively. Result of the overall water usage monthly and its intensity will be reported and made available on the company website titled Sustainability Brief: Water use and Wastewater Management FY2021/2022.

The total water consumption and water intensity are made available during assessment and verified. Overall, GAHL water use intensity indicates a decreasing trend as compared to previous years.

Progress towards commitment on water quality (BOD and COD) (Indicator 110)

GAHL established policy and documents to demonstrate the commitment on water quality as follows:

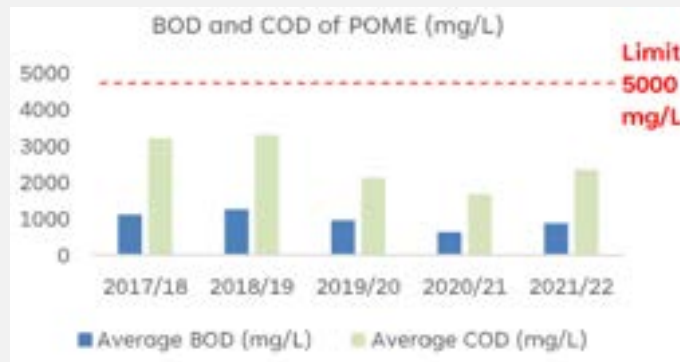
- Sustainability Brief: Water use and Wastewater Management FY2021/2022
 - *The biological oxygen demand (BOD) and the chemical oxygen demand (COD) of treated POME is kept well below the legal limits for land application in Indonesia (5000 mg/L).*
 - *Flow chart on Treatment of Palm oil refinery effluent to ensure the BOD and COD are within the allowed parameter determined by legislations. Details on the process are described accordingly in this flow chart.*
- Sustainability Policy Document: SOP no.: GAHL.SP.0522 dated 28.07.2022 – Water, sanitation and hygiene.
 - *“Implement a water quality... ensure compliance with national regulations”.*
 - *“...Meet the accepted standard of ... availability of clean water at all emplacements.”*

During the verification assessment, based on interviewed with the GAHL management informed the wastewater will be discharged into land application after treated via ponding system and recycle for other usage for other mill operations purpose. This is to ensure that only treated wastewater will be discharged to minimize the negative impact on water quality. GAHL respective palm oil mills, kernel crushing plants and refinery will carry out consistently water quality monitoring through engaging with 3rd party accredited laboratory on monthly basis.

The data of test results are collected, captured, and tabulated in document titled “*Mill Environment, Health & Safety – EHS Performance – FY2021/2022*”. During verification

Comprehensive

assessment reviewed and verified the test result respectively. Based on the result analysis from 3rd party the BOD and COD readings are within the allowed parameter determined by national regulations.



Treatment of palm oil refinery effluent (PORE) (Indicator 112)

GAHL established policy and documents to demonstrate the commitment on water quality as follows:

- Sustainability Brief: Water use and Wastewater Management FY2021/2022 (https://www.goodhopeholdings.com/images/sustainability/Water_Use_and_Wastewater_Management_2021_22.pdf)
 - The biological oxygen demand (BOD) and the chemical oxygen demand (COD) of treated POME is kept well below the legal limits for land application in Indonesia (5000 mg/L).
 - Flow chart on Treatment of Palm oil refinery effluent to ensure the BOD and COD are within the allowed parameter determined by legislations. Details on the process are described accordingly in this flow chart.
- Sustainability Policy Document: SOP no.: GAHL.SP.0522 dated 28.07.2022 – Water, sanitation, and hygiene.
 - “Implement a water quality... ensure compliance with national regulations”.
 - “...Meet the accepted standard of ... availability of clean water at all emplacements.”
- Procedure: PVO PORE Process Descriptions: Details on the treatment flow of the PORE treatment.

During the verification assessment, based on interviewed with the GAHL management informed the wastewater will be discharged into land application after treated via ponding system and recycle for other usage for other mill operations purposed. This is to ensure that only treated wastewater will be discharged to minimize the negative impact on water quality. Apart from that, it was noted that the approval letter or permit for wastewater discharge from respective province of operating units was made available during the assessment and verified.

GAHL respective palm oil mills, kernel crushing plants and refinery will carry out consistently water quality monitoring through engaging with 3rd party accredited laboratory on monthly basis.

The data of test result will be collected, captured, and tabulated in document titled “Mill Environment, Health & Safety – EHS Performance – FY2021/2022” respectively. During verification assessment reviewed and verified the test result respectively. Based on the result analysis from 3rd party the BOD and COD readings are within the allowed parameter determined by national regulations.

The parameter follows by the refinery in Johor following the schedule 7 regulation no. 12 Environmental Quality Industrial Effluent regulations 2009 (Environmental Quality Act 1974)

Comprehensive

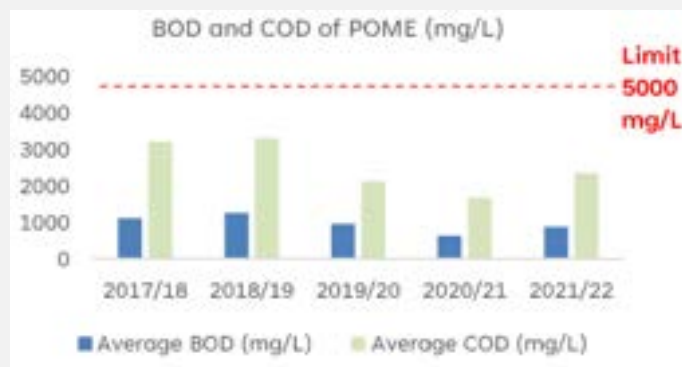
entitled “Acceptable Condition for the disposal of industrial effluents containing Chemical Oxygen Demand (COD) for certain sectors or industries effluent ”

C) Fermentation and distilled industry → unit mg/L → standard 400mg/L(A) → 400 mg/L (B

Sighted the result from the Refinery Premium Vegetable Oil data of sample effluent water dated 7th February – 13th February 2023 (date of sample reported – 13th February 2023)

Results of Analysis :

Parameters	Methods	Results	Standard B
COD (mg/L)	APHA 5520C	76	200
BOD at 20C mg/L	APHA 5210 B	15	50
Total Suspended Solids mg/L	APHA 2540 D	36	100



Examples of local stakeholder engagement to prevent conflicts (Indicator 137)

Goodhope had committed towards the local community engagement towards the commitment mentioned in the Sustainability Policy as follows :

“Community Relations Goodhope is committed to establish and maintain mutually beneficial relationships with the communities in and around its operating locations. The Group supports the welfare and wellbeing of local communities and encourages sustainable social and economic development. All Goodhope’s operations, subsidiaries and suppliers are expected to comply with Goodhope’s Community Relations Policy”

Local stakeholder engagement conducted towards the local people by using FPIC Process (Free Prior and Informed consent) methodology which has a set of procedure such as Social Project Risk Scoping and Initial Information Delivery (Initial Socialization) which aims to establish the good relationship between companies and communities on site of the Palm Oil Plantation development plan.

The implementation for scoping has been done through depth interviews and consultation with community through focus group discussion as well as special meeting with other community groups at the time and locations as agreed by potential resource person.

Sighted the key issues highlighted for the Free Prior Informed Consent (FPIC) including :

- i) Social Profile of the community (population / ethnicity and culture)
- ii) Identify the presence of indigenous and tribal peoples
- iii) Economic condition and society

Comprehensive

- iv) Traditional concept of society
- v) Land use and land use plan
- vi) Soil topography / degree of vulnerability on site
- vii) Public perception related to palm oil plantation.
- viii) Social risk and potential social risk

The FPIC process has been mentioned in the Goodhope Sustainability under Human Right Policy as the company commitment towards transparency:

Free, Prior and Informed Consent

- Uphold the right of indigenous peoples, landowners and land-users to free, prior, and informed consent (FPIC) in relation to project proposals that will impact their land or resources.
- Allow stakeholders to make objective decisions regarding proposed conservation and land-use plans, recognizing that any group or individual with landowner or land-user rights has the right to reject plans for development or conservation.
- Provide potentially affected landowners and land-users with sufficient information and seek consent for the proposed plans through consultative and participative processes without the use of coercion, intimidation or manipulation before commencing actions that may affect the land or resource rights of landowners or land-users.

Sighted the project has been conducted for the local communities in Papua and Indonesia as the operation unit conducting by Focus Group Discussion (FGD), Participatory Mapping, Participatory Rural Appraisal (PRA), and stakeholder consultations with local communities, the company gains the information it requires about land tenure and land rights, potential or actual areas of conflict, and community needs and aspirations.

Sungai Binti KCP located at Kecamatan Mentaya Hilir Utara, Kabupaten Kotawaringin Timur, Central Kalimantan, Indonesia. As part of our efforts to support independent smallholders, Goodhope has conducted the Farmer Field School (FFS) Program, developed and implemented in collaboration with Daemeter Consulting. FFS is a capacity building program that has been developed based on smallholder needs analysis. The program is to build relationship with independent smallholders, enhance their knowledge on sustainable agronomic practices, and ensure awareness of Goodhope’s Sustainability Policy. The program was launched in 2019, with 269 independent smallholders benefitted from the training provided by FFS. Having been put on hold due to the COVID-19 pandemic, the program resumed in September 2022. 97 independent smallholders enrolled in the FFS program in year 2022. Through the FFS, they able to learn how to successfully and sustainably cultivate oil palm. Topics of training include the morphology and physiology of oil palm, composting processes, optimal use of fertilizer, handling of pests and disease, and soil health.

As for Nabire Matoa KCP which located at Desa Wami, Kecamatan Yaur, Kabupaten Nabire, Papua, Indonesia the collaboration on the local people in Nabire Matoa where Goodhope has been conducted as follows:

A series of Focus Group Discussion (FGDs) have been conducted to form the Nabire Regency KEE Management Unit (*Badan Pengelola KEE*). The establishment of the Management Unit is formalized by legal decree: Nabire Regent Decree Number 228 of 2022

dated 1st July 2022. A follow up FGD was held on 10th August 2022 in commemoration of Indonesia's National Wildlife Conservation Day, *Hari Konservasi Alam Nasional*. At the FGD, the Head of BAPPEDA (and Head of the Nabire Regency KEE Management Unit) declared the full support of the Nabire Regency Government to management of KEE by prioritizing the empowerment of indigenous wisdom around areas of high conservation value.

Community engagement in Nabire :

Social Governance review and pre condition on application of essential ecosystem areas for PT Nabire Baru and PT Sariwana Adi Perkasa. Sighted the Social assessment has been conducted on year 2021. The program covering the details such as:

- Aspects that affect tenure issues, strengthening community groups, improving the economy of the surrounding village community, strengthening communication and strengthening networks with stakeholders
- Improvement of the village environment and access
- Improvement of health facilities
- Declining the quality of education in the among community
- Employment improvement

The report has been conducted by PILI Green Network (*Pusat Informasi Lingkungan Indonesia*) such as program protection of conservation area The strategi for this program involved the details such as:

- a) Completeness of Facilities and Infrastructure – local, Clean energy and sustainability
- b) Sustainable marine and resterial ecosystems
- c) The active role and independence of stakeholders increases
- d) Economy and human development index increase
- e) Productivity relations and stakeholders

POM (Batu Mas Sejahtera POM, Bumi Jaya POM, Sungai Purun POM)

Local communities engagement has been made for PT Agro Indomas East Kalimantan's FFB suppliers supplying to Bumi Jaya POM for year 2019 in collaboration with Daemeter Consulting.

Sighted the Smallholder training program for PT Agro Wana Lestari, Central Kalimantan on year 2020 to enhance farmers knowledge and understanding of Good agricultural Practices. The training program has been developed for the smallholders from November 2019 – January 2020 in three villages: Batu Agung , Tribuana, Bukit Indah in Telaga Antang Sub District of Kotawaringin Timur Central Kalimantan.

Sighted the report on year 2022 which comprise the Smallholder Training Program Report for PT Agro Indomas an PT Agro Bukit at Central Kalimantan. The objectives of the program are :

- i) Improve the relation and loyalty of independent palm oil smallholder in the Goodhope supply chain in Central Kalimantan
- ii) Improve independent palm oil smallholder capacity on Good Agricultural Practices
- iii) Identify the FFB quality that supply to two Goodhope mills in Central

<p>iv) Kalimantan Providing smallholder support program and securing FFB supply from third party in Goodhope working area</p> <p>Farmer field school approach uses education method and farmer action research methodology based on farmer needs and actual field problems. The training was delivered directly in the field and the farmers oil palm plantations are used as learning media. The duration of training is from month of September and November 2022 in three villages Lapansa, Kelurahan Tanah Mas and Bapeang in Kotawaringin Timur Central Kalimantan.</p>	
Percentage of independent smallholders / outgrowers involved in programme (Indicator 166)	
<p>Goodhope had started the out growers and smallholder program with Daemeter Consulting called Farmers Field School (FFS). A Farmer Field School (FFS) program has been developed in collaboration with Daemeter Consulting to share tools and knowledge to help smallholders to increase their yields and profitability. The program is designed to further build relationships with independent smallholders, to enhance their knowledge on sustainable agronomic practices, and reduce the negative environmental impacts of their activities through improved management practices. Based on the smallholder support programme located in Indonesia, total number of 4911 Independent Smallholders involved in the supply chain and 100% of them has been engaged through the survey data management platform and data collection form is using GPS enabled smartphone. The process started with engaging with the dealer and sub dealers, and the connection through the local people which will take around 2 years to complete.</p> <p>On the other hands, Goodhope had extended the engagement towards the training and further collaboration with Daemeter Consulting, involving :</p> <ul style="list-style-type: none"> i) PT Agro Indomas East Kalimantan and Agro Wana Lestari involving 269 smallholders – Year 2019 ii) PT Agro Indomas and PT Agro Bukit Located in Central Kalimantan involving 97 smallholders / farmers for year 2022 <p>Details of the program engagement are as follows :</p> <p>1st Daemeter Report on 2019 :</p> <p>Sighted the smallholder Training program in PT Agro Indomas East Kalimantan for FFB suppliers supplying to Bumi Jaya POM in year 2019 in collaboration with Daemeter Consulting. The goal of activities to develop traceability system which to obtain the information on agricultural practice , design to appropriate training program , for the independent Smallholders as complementary of TTP survey at PT Agro Indomas East Kalimantan. Training started on April 2019 , and aims to enhance knowledge and understanding of plant sanitation , pruning soil, Quality of planting materials, good harvesting practices and the right time to take the harvest beside plant.</p> <p>Sighted the socialization training aim to improve farmers understanding on the objective/goal of the training program which the process conducted in 6 village and 4 main suppliers. The traceability of the data for smallholder program (FFS) can be tracked from the website of Goodhope.</p> <p>https://www.goodhopeholdings.com/images/sustainability/Smallholder_Support_2022.pdf</p>	<p>Comprehensive</p>

2nd Daemeter Report 2022

Sighted the report on year 2022 which comprise the Smallholder Training Program Report for PT Agro Indomas and PT Agro Bukit at Central Kalimantan. The objectives of the program are :

- i) Improve relation and loyalty of independent palm oil smallholder in the Goodhope supply chain in Central Kalimantan
- ii) Improve independent palm oil smallholder capacity in Good Agricultural practices
- iii) FFB Quality that supply to two Goodhope mills in Central Kalimantan
- iv) Providing smallholder support program then will secure FFB supply from third party in Goodhope working area .

The project and training duration was held from September to November 2022 in four classes and 3 locations located in Lapansa, Baamang and Bapeang of Kotawaringin Timur District , Central Kalimantan. Sighted the list name of certificate for training of farmers at PT Agro Bukit comprising the list of (Independent smallholder name) including the name of participant , village name and “kelompok” origin.

Daemeter has appointed a senior trainer in the field for Farmer Field School in Agro Bukit and Terawan Mill. There are 4 classes of smallholder trainings involving 97 smallholder farmers who supply to PT Agro Indomas and PT Agro Bukit over a period 2 months (with one training topic each week). Farmer Field School held in three village: Lapansa, Bapeang and Baamang which sees the attendance of more than 80% of the farmers join the training. Sighted the list of participant and certificate recipient in 4 FFS Classes.

3rd report for Daemeter on year 2020

Sighted the Smallholder training program located at PT Agro Wana Lestari , central Kalimantan for year 2020 to improve farmer’s understanding of Good agricultural Practice. The training program developed for the smallholders from November 2019 – January 2020 in three villages ,Batu Agung , Tribuana, Bukit Indah in Telaga Antang Sub District of Kotawaringin Timur Central Kalimantan.

Socialization meeting conducted in 4 villages that main supply to CV Elfat Kasia Jaya under Mr fatah Suppliers (working agreement) . Sighted the series of socialization meeting including the feedback in November 2019 :

- I) Met with Mr Bejo Susanto , accepted the training well and fully supported the program
- II) Met with Mr Suherman in Tumbang Mayan Village . accepted the training well and fully supported the program
- III) Met with Mr Achmad Badirun in Tribuana Village , He keens to have training soon and expected that it will give benefit on productivity improvement to his community
- IV) Met with Herman Usianto in SP III Village . Much Appreciated the plan and fully supported it.

<p>Engagement with local stakeholders in Papua Indonesia</p> <p>Sighted the engagement for the Nabire Matoa in Papua, Indonesia which Goodhope has established a long-term partnership with PILI Green Network (<i>Pusat Informasi Lingkungan Indonesia</i>) to facilitate planning of the Nabire Landscape Conservation Program and to drive the implementation of planned activities. PILI 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. Preliminary activities (program scoping, planning and seeking consent from local stakeholders) began in 2019. Since then, participatory processes have been undertaken to attain legal recognition as an Essential Ecosystem Area (Kawasan Ekosistem Esensial, KEE). In total, 107,582 ha of the Nabire Regency has been identified and designated as KEE. Conservation management and monitoring activities of the NLCP focus on areas of forest within and in the vicinity of Goodhope's concessions, including 4,475 ha area outside of company boundaries. The NLCP also contributes to the protection of KEE across Nabire Regency by encouraging government support for KEE management across the wider landscape.</p> <p>Goodhope continue to provide 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. Goodhope are working with the two community patrol teams and supporting them to implement Spatial Monitoring and Reporting Tool (SMART). Village Farmer Groups will play important roles in managing tree nurseries and promoting sustainable farming. Nabire Earth Field School, 'Bumi Nabire', has been established to facilitate training and capacity building. The Field School includes demonstration plots for hands-on training and forms the core of our outreach efforts.</p> <p>https://www.goodhopeholdings.com/images/sustainability/Managing_Community_Relations_2022-23.pdf</p> <p>https://www.goodhopeholdings.com/images/sustainability/Goodhope_Sustainability_Journey_Q3_2022.pdf</p>	
<p>Number or percentage of suppliers assessed and/or engaged on compliance with company's policy and/or legal requirements (<i>Indicator 168</i>)</p>	
<p>Goodhope refinery located in Pasir Gudang Johor, Malaysia name [Premium vegetable oil Refinery] had suppliers of 46 third party mills and 12 refineries/traders and has been declared in the traceability declaration in the website following the links :</p> <p>https://www.goodhopeholdings.com/images/sustainability/Traceability_Declaration_PVO_2H2022.pdf</p> <p>The number of suppliers for the refinery had been visualized in the graphic below and volume sourced percentage for other refineries supplies and third party mill as per stated :</p>	<p>Comprehensive</p>



TRACEABILITY DECLARATION - PREMIUM VEGETABLE OILS & PREMIUM FATS SDN. BHD.

Parent Company	Facility Name	Address	Latitude	Longitude	RSPO Certified	MSPQ Certified
Goodhope Asia Holdings Ltd.	Premium Vegetable Oils Sdn. Bhd. & Premium Fats Sdn. Bhd.	PLD 66, Jalan Tiram Dat, Pasir Gudang Industrial Estate, 82701, Pasir Gudang, Johor, Malaysia.	1.467485	103.913308	Yes - SG, MB	Yes - SG, MB



The mill list was sighted in the List of Supplying Mills which categorized into Parent company, Palm Oil Mill, Country, UML ID, Latitude, Longitude, RSPO Certified, Material Sourced:

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 Lohas POM	Malaysia	PG0000003713	2.252472	103.051308	N	PK
2	Bell Group	Bell Palm Industries POM	Malaysia	PG0000003724	3.924778	102.892750	N	PK
3	Bell Group	Syarikat Perusahaan Kelapa Sawit POM	Malaysia	PG0000003721	3.166957	103.058453	N	PK
4	Victory Enghee Plantations Sdn Bhd	Southern Malay POM	Malaysia	PG0000003953	3.780003	103.362557	N	PK
5	Classic Palm Oil Mill Sdn Bhd	Classic POM	Malaysia	PG0000003743	3.600889	102.624639	N	PK
6	Classic Palm Oil Mill Sdn Bhd	Classic Segamat POM	Malaysia	PG0000003025	3.618106	102.809564	N	PK
7	RISDA Estates Sdn Bhd	RISDA Durian Mers POM	Malaysia	PG0000004353	4.595091	103.202805	N	PK
8	Far East Holdings Berhad	Endau POM	Malaysia	PG0000003869	2.679944	103.505361	N	PK
9	FELCRA Berhad	Felcra Sungai Melikal POM	Malaysia	PG0000003757	2.388242	103.802396	N	PK
10	Jeng Huat (Bahau) Realty Sdn Bhd	Kahang POM	Malaysia	PG0000003805	2.342278	103.438400	N	PK
11	Tradewinds Plantation Berhad	Ulu Sebol POM	Malaysia	PG0000004838	1.888611	103.625833	N	PK
12	MSM Engineering Sdn Bhd	Paloh POM	Malaysia	PG0000003830	2.231246	103.233124	N	PK
13	RISDA Estates Sdn Bhd	RISDA Ulu Kerotang POM	Malaysia	PG0000003750	2.737472	102.910556	N	PK
14	Far East Holdings Berhad	Kanlun POM	Malaysia	PG0000003871	2.993400	102.820000	N	PK
15	FELCRA Berhad	FELCRA Bukit Kepang POM	Malaysia	PG0000003753	2.390676	102.882394	N	PK
16	RISDA Estates Sdn Bhd	RISDA Sg Ambok POM	Malaysia	PG0000003749	3.194746	103.677980	N	PK
17	Far East Holdings Berhad	Sawir Makmur POM	Malaysia	PG0000003752	2.967983	103.092444	N	PK
18	Bell Group	United Bell POM	Malaysia	PG0000003823	3.565451	103.467984	N	PK
19	Kim Loong Resources Berhad	Kim Loong POM	Malaysia	PG0000003825	3.808028	103.963972	N	PK
20	Kilang Smart Muar Berhad	Muar POM	Malaysia	PG0000003821	3.009418	102.679904	N	PK
21	Kulim (Malaysia) Berhad	Sederuk POM	Malaysia	PG0000000019	3.730838	103.538323	Y	PK
22	Prosper Group	Merchong POM	Malaysia	PG0000001183	2.803550	103.306237	N	PK
23	Bell Group	Bintang POM	Malaysia	PG0000003863	3.157444	103.123425	N	PK
24	Pertubuhan Peladang Negeri Johor [PPN]	PPN Bukit Bujang POM	Malaysia	PG0000003861	2.799894	102.758411	N	PK

25	Pertubuhan Peladang Negeri Ipoh (PPNU)	PPNU Kelang POM	Malaysia	PO1000003862	2,171400	103.479600	N	PK
26	For East Holdings Berhad	Praseg POM	Malaysia	PO1000003872	2,890796	102.522013	N	PK
27	For East Holdings Berhad	Ladang Siang POM	Malaysia	PO1000003874	1,833615	104.218689	N	PK
28	Kulim (Malaysia) Berhad	Sindora POM	Malaysia	PO1000001264	1,985372	103.462310	Y	PK
29	Southern Kelang Plantations Sdn Bhd	Bukit Berembun POM	Malaysia	PO1000003895	3,075403	102.768156	N	PK
30	Mharon Group	Sri Jelutong POM	Malaysia	PO1000003899	3,351525	103.527619	N	PK
31	Tradewinds Plantation Berhad	Sungai Ruchor POM	Malaysia	PO1000003945	1,783328	103.762662	N	PK
32	Tayang Plantation Sdn Bhd	Sungai Kelang POM	Malaysia	PO1000003888	2,231850	103.526014	N	PK
33	Tian Siang Holdings Sdn Bhd	Tian Siang Pahang POM	Malaysia	PO1000006189	3,986498	101.792486	N	PK
34	For East Holdings Berhad	Wajau Wawasan POM	Malaysia	PO1000003874	3,533934	102.840363	N	PK
35	Kulim (Malaysia) Berhad	Pasar Panjang POM	Malaysia	PO1000004258	2,018014	103.948577	Y	PK
36	Kuantan Trading Oil Mill Sdn Bhd	Kuantan Trading POM	Malaysia	PO1000003831	2,729528	102.940028	N	PK
37	Kian Hoe Plantations Berhad	Coronation POM	Malaysia	PO1000003811	2,022778	103.267194	N	PK
38	For East Holdings Berhad	Cenderawasih POM	Malaysia	PO1000006234	2,778090	102.962000	N	PK
39	Klang Sawit Pangr Alam Sdn Bhd	Panj Alam POM	Malaysia	PO1000003822	4,374444	103.349167	N	PK
40	Bell Group	Bell Keritang Palm Industries POM	Malaysia	PO1000003901	2,748994	102.999292	N	PK
41	Bell Group	Bell-KSL (Sungai) POM	Malaysia	PO1000007579	3,468325	101.893762	N	PK
42	Rakyat Kelang Permas Sdn Bhd	Rakyat Kelang Permas POM	Malaysia	PO1000003878	4,119153	103.203506	N	PK
43	Seng Thyi Plantations Sdn Bhd	Ladang Padang POM (Seng Thyi)	Malaysia	PO1000003890	2,309604	103.529202	N	PK
44	United Malacca Berhad	Bukit Serampang POM	Malaysia	PO1000003950	3,091490	102.426680	N	PK
45	Kulim (Malaysia) Berhad	Padang Cerna POM	Malaysia	PO1000001265	2,706400	102.785012	Y	PK
46	Kulim (Malaysia) Berhad	Terah POM	Malaysia	PO1000001263	2,217023	103.352357	Y	PK

Based on the invitation, as of December 2022, 65% of our supplying mills and refineries attended the webinar briefing on 20th April 2022; and 82% of supplying mills completed the Self-Assessment Tool. Data were presented, and sampled data were verified.

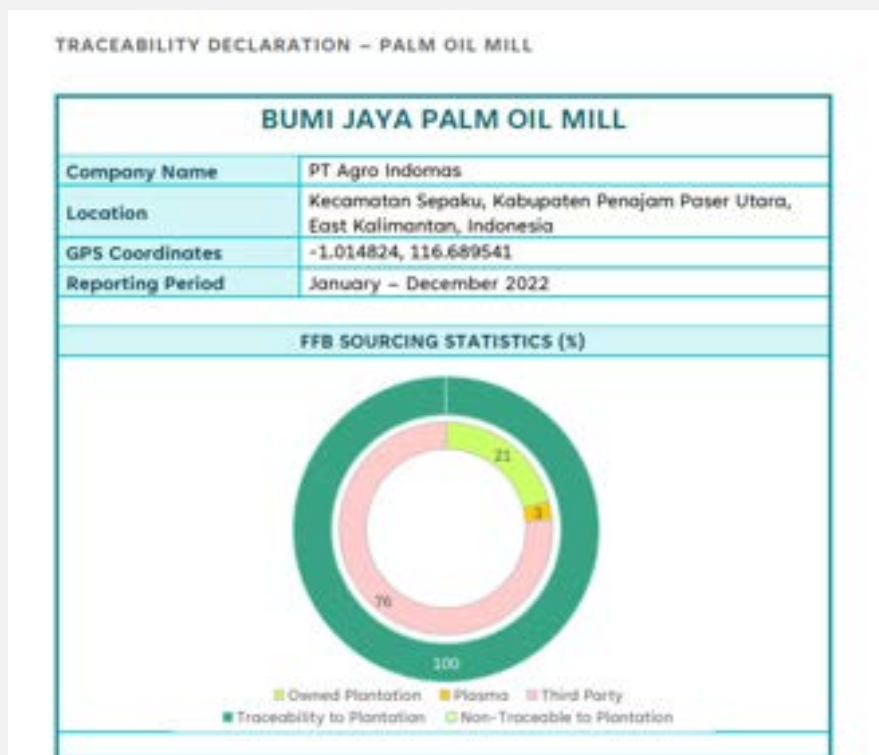
List of Supplying Refineries

No.	Parent Company	Refinery	Country	Latitude	Longitude	RSPQ Certified	Material Sourced
1	JC Chang (Pte) Ltd	Coratino Sdn Bhd	Malaysia	1.452356	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	Miwah Group	Miwaholeo Industries Sdn Bhd	Malaysia	1.452820	103.902280	Y	RPO, RPS
5	Muslim Mas Group	Muslim Mastika Oils & Fats	Malaysia	1.457231	103.986735	Y	RPO, RPS, RPL
6	Wilmar Group	PGEO Edible Oils Sdn. Bhd.	Malaysia	1.450426	103.897164	Y	RPO, RPS, RPL
7	Sime Darby Plantation Berhad	Sime Darby Oils Pasir Gudang	Malaysia	1.445806	103.905833	Y	RPS
8	Sime Darby Plantation Berhad	Sime Darby Oils Port Klang	Malaysia	3.044079	101.370659	Y	RPS
9	Bunge Limited Crakbean	Bunge Loders Crakbean Pasir Gudang	Malaysia	1.449368	103.908608	Y	RPO, RPL
10	Fuji Oil Group	Palmaju Edible Oil Sdn Bhd	Malaysia	1.444667	103.898611	Y	RPL
11	Jin Lee (Oil Mills) Sdn Bhd	Jin Lee (Oil Mills) Sdn Bhd	Malaysia	1.447700	103.911000	Y	CPKO
12	Nam Bee Co. Sdn Bhd	Nam Bee Co. Sdn Bhd	Malaysia	2.486779	102.489400	N	CPKO

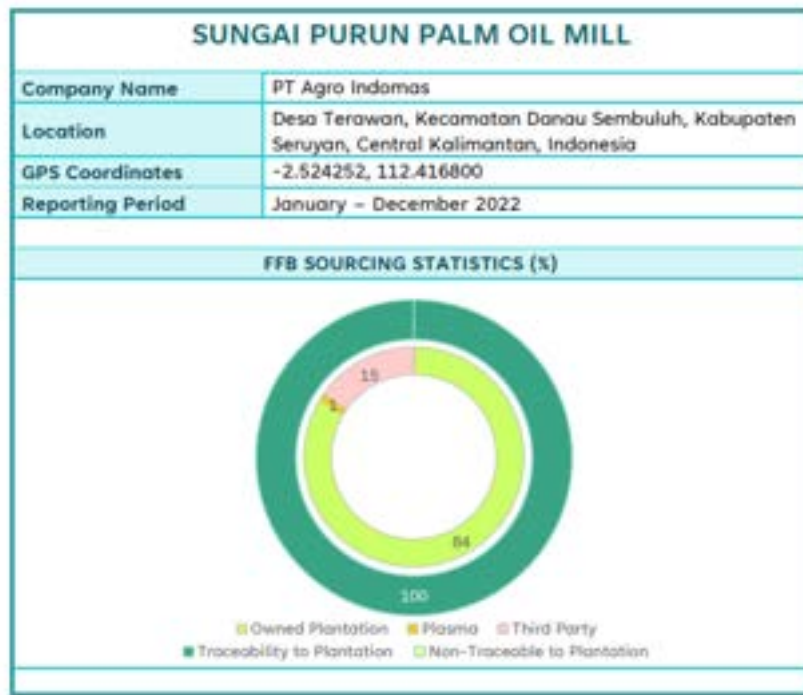
POM (Batu Mas Sejahtera POM, Bumi Jaya POM, Sungai Purun POM)

There are a total of eight (8) palm oil mills (POMs) under our parent company- Goodhope Asia Holdings Ltd. In year 2022, six (6) of our POMs sourced its FFB from own plantations, scheme smallholders and third-party suppliers, whereas the remaining two (2) POMs only sourced from own plantations and scheme smallholders. Most of our third party FFB suppliers are FFB dealers who source from independent smallholders and outgrowers. In the effort to achieve full traceability to source, Goodhope engages directly with all independent smallholders and out growers. During the engagement processes, Goodhope has promote the benefits of best management practices and socialized supplier requirements for compliance with our Sustainability Policy. We obtain GPS coordinates of FFB origins and proof of the ownership status or the right/claim to the land by the grower/smallholder. The survey and mapping process utilizes a data management platform provided by *Cadasta organization* and supported by data validation from *Cadasta* and visualized by Microsoft power BI . Digital data collection forms are used to collect supplier data using GPS-enabled smartphone. Reporting Period January –

December 2022 Traceability and 100% traceability to plantations



TRACEABILITY DECLARATION – PALM OIL MILL



Goodhope had a list of internal and external supply of FFB up to the plantations which include owned plantation, plasma, third party, and agent. Sighted the Internal and external list of FFB sending to the mill with include the details such as name of FFB Supplier, type of supplier, (Perusahaan, company, agent) Address and Geo coordinate location of the company.

Proportion of direct and indirect supply from third-parties that comes from palm oil plantations which are compliant with palm oil sourcing policies (*Indicator 171*)

Goodhope Asia Holdings Ltd is using the NDPE IRF tools to report on supplier's progress in delivering NDPE commitments.

Website:

https://www.goodhopeholdings.com/images/sustainability/DMA_Responsible_Sourcing_2022b.pdf

NDPE Implementation Reporting Framework

Our supplying mills are assessed for compliance to NDPE requirement via self-assessment tool (SAT) and NDPE Implementation Reporting Framework (IRF) annually. Questions in the NDPE IRF profile template developed under the Palm Oil Collaboration Group (POCG) are integrated in the SAT. The NDPE IRF is a monitoring and reporting tool designed to help companies along the supply chain to report on progress in delivering NDPE commitments. By using the IRF profiles, it allows us to track the progress and demonstrate the percentage of volumes within our supply chain that are 100% delivering on NDPE commitments.

NDPE Implementation Reporting Framework Premium Vegetable Oils

Reporting Period: January to December 2022

Comprehensive



Figure 2. Progress on no deforestation and no development on peat commitments among the refinery Premium Vegetable Oil suppliers

Sighted the raw data form of NDPE IRF from the period of Q1 2022 – Q4 2022 with total volume sourced for refinery in 2022 is 170,206.25 Tons. Data were presented, and sampled data were verified. Based on the NDPE Implementation Reporting Framework by Goodhope period of January to December 2022, sighted :

- i) 6% Source their FFB from Own Plantation
- ii) 62% Source from Own Plantation and third-Party Supply
- iii) 32% Source from third-Party supply only

Total Known : 149,544.82 Tons total PK supplied form all third party mills

Remaining Known : 20,661.43 Tons remaining from refinery, including the details of supplier name , verification status, unique verification code, profile completion, volume source form supplier (tons), volume sourced from supplier % , unknown volume at supplier

level %, Known DF FFB %, Awareness DF FFB %, Commitment and starting action DF FFB %, Progressing DF FFB %, Delivering Deforestation Free FFB %, Known Peat P FFB%, Awareness P FFB %, Commitment and starting action P FFB%, Progressing P FFB %, and Delivering P FFB %

The traceability data of the refinery has been published in the website with the links below :

https://www.goodhopeholdings.com/images/sustainability/Traceability_Declaration_PVO_2H2022.pdf

Sighted the list of supplying refineries for PVO with details below :

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, RPI
3	Kuala Lumpur Kepong Berhad	KL Kepong Edible Oils Sdn Bhd	Malaysia	1.446080	103.903210	Y	RPO, RPI, RPI
4	Mawath Group	Mawatholes Industries Sdn Bhd	Malaysia	1.452820	103.903280	Y	RPO, RPS
5	Muslim Mas Group	Muslim Masjika Oils & Fats	Malaysia	1.457231	103.986735	Y	RPO, RPI, RPI
6	Wilmar Group	PGEO Edible Oils Sdn. Bhd.	Malaysia	1.450426	103.897364	Y	RPO, RPI, RPI
7	Time Darby Plantation Berhad	Time Darby Oils Pasar Guling	Malaysia	1.445806	103.905833	Y	RPS
8	Time Darby Plantation Berhad	Time Darby Oils Pant Klang	Malaysia	1.044079	101.370659	Y	RPS
9	Bunge Loders Crokolan	Bunge Loders Crokolan Pasar Gudang	Malaysia	1.449368	103.908608	Y	RPO, RPI, RPI
10	Fuji Oil Group	Palmoju Edible Oil Sdn Bhd	Malaysia	1.444667	103.898611	Y	RPI
11	Jin Lee [Oil Mills] Sdn Bhd	Jin Lee [Oil Mills] Sdn Bhd	Malaysia	1.447700	103.911000	Y	CPKO
12	Team Bee Co. Sdn Bhd	Team Bee Co. Sdn Bhd	Malaysia	2.496779	102.489400	N	CPKO

Details of the material supplied and volume to the Refinery for year 2022 were presented, and sampled data were verified.

Sighted the list of supplying mills (PK) to refinery PVO with details below :

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	1.938778	102.891790	N	PK
3	Bell Group	Syarikat Perusahaan Kelapa Sawit POM	Malaysia	PO1000003723	2.166967	103.058453	N	PK
4	Victory Enghee 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	PO1000010025	2.638106	102.809664	N	PK
7	RISDA Estates Sdn Bhd	RISDA Durian Mas POM	Malaysia	PO1000006353	4.595091	103.202826	N	PK
8	Far East Holdings Berhad	Endau POM	Malaysia	PO1000003869	2.679944	103.505361	N	PK
9	FELCRA Berhad	Felora Sungai Melikas POM	Malaysia	PO1000003757	2.388242	103.801396	N	PK
10	Jeng Huat (Batu) Realty Sdn Bhd	Kahang POM	Malaysia	PO1000003805	2.342278	103.438400	N	PK
11	Tradewinds Plantation Berhad	Ulu Sebal POM	Malaysia	PO1000004638	1.888611	103.621833	N	PK
12	MSPK Engineering Sdn Bhd	Paloh POM	Malaysia	PO1000003830	2.2511246	103.213124	N	PK
13	RISDA Estates Sdn Bhd	RISDA Ulu Keratong POM	Malaysia	PO1000003790	2.737472	102.910556	N	PK
14	Far East Holdings Berhad	Koslayn POM	Malaysia	PO1000003873	2.993400	102.820000	N	PK
15	FELCRA Berhad	FELCRA Bukit Kepong POM	Malaysia	PO1000003753	2.390676	102.881994	N	PK
16	RISDA Estates Sdn Bhd	RISDA Sg.Ambat POM	Malaysia	PO1000003749	2.194746	103.877980	N	PK
17	Far East Holdings Berhad	Sawina Makmur POM	Malaysia	PO1000003752	2.967583	103.092444	N	PK
18	Bell Group	Simber Bell POM	Malaysia	PO1000003823	3.565451	103.467984	N	PK
19	Kim Looing Resources Berhad	Kim Looing POM	Malaysia	PO1000003825	3.808028	103.961972	N	PK
20	Kilang Sawit Muar Berhad	Muar POM	Malaysia	PO1000003821	2.009418	102.679904	N	PK
21	Kulim (Malaysia) Berhad	Sedanak POM	Malaysia	PO1000000019	1.730818	103.538323	Y	PK
22	Prasap Group	Merching POM	Malaysia	PO1000011183	2.809350	103.306237	N	PK
23	Bell Group	Sintang POM	Malaysia	PO1000003863	2.157464	103.123425	N	PK
24	Pertubuhan Peladang Negeri Johor (PPN)	PPN Bukit Bujong POM	Malaysia	PO1000003861	2.799894	102.758411	N	PK

25	Pertubuhan Pelandang Negeri Johor (PPN)]	PPN] Kahang POM	Malaysia	PO000003862	2,171,400	103.479600	N	PK
26	Far East Holdings Berhad	Prosper POM	Malaysia	PO000003872	2,890,788	102.522013	N	PK
27	PH Palm Oil Mill Sdn Bhd	Ladang Siang POM	Malaysia	PO000003814	1,633,611	104.218889	N	PK
28	Kulim (Malaysia) Berhad	Sindora POM	Malaysia	PO000001264	1,985,172	103.462310	Y	PK
29	Southern Keratong Plantations Sdn Bhd	Bukit Berambun POM	Malaysia	PO000003895	3,075,403	102.766356	N	PK
30	Rhosas Group	Sri Jelutung POM	Malaysia	PO000003899	3,351,525	103.127818	N	PK
31	Treadwinds Plantation Berhad	Sungai Kachur POM	Malaysia	PO000003945	1,783,328	103.762661	N	PK
32	Sejyang Plantation Sdn Bhd	Sungai Kahang POM	Malaysia	PO000003886	2,231,850	103.526014	N	PK
33	Tian Siong Holdings Sdn Bhd	Tian Siong Pohong POM	Malaysia	PO000006189	3,986,498	101.792486	N	PK
34	Far East Holdings Berhad	Wajut Wakawan POM	Malaysia	PO000003874	3,033,934	102.860363	N	PK
35	Kulim (Malaysia) Berhad	Pasir Panjang POM	Malaysia	PO000005256	2,018,054	103.948577	Y	PK
36	Kuantan Trading Oil Mill Sdn Bhd	Kuantan Trading POM	Malaysia	PO000003831	2,729,528	102.940028	N	PK
37	Kian Hoe Plantations Berhad	Coronation POM	Malaysia	PO000003811	3,022,778	103.367194	N	PK
38	Far East Holdings Berhad	Cenderawasih POM	Malaysia	PO000006234	2,778,090	102.952000	N	PK
39	Kilang Sawit Pang Alam Sdn Bhd	Pangj Alam POM	Malaysia	PO000003823	4,374,444	103.349167	N	PK
40	Bell Group	Bell Keratong Palm Industries POM	Malaysia	PO000003901	2,748,894	102.989282	N	PK
41	Bell Group	Bell-KSL (Lingg) POM	Malaysia	PO000007579	2,468,125	101.993762	N	PK
42	Rakyat Kelengah Perwira Sdn Bhd	Rakyat Kelengah Perwira POM	Malaysia	PO000003876	4,119,153	103.203506	N	PK
43	Seang Thye Plantations Sdn Bhd	Ladang Padang POM (Seang Thye)	Malaysia	PO000003890	2,309,604	103.529202	N	PK
44	United Malacca Berhad	Bukit Senoang POM	Malaysia	PO000003950	3,097,660	102.426660	N	PK
45	Kulim (Malaysia) Berhad	Palang Cocoa POM	Malaysia	PO000001265	2,706,400	102.785012	Y	PK
46	Kulim (Malaysia) Berhad	Terah POM	Malaysia	PO000001263	2,217,023	103.352357	Y	PK

Details of the material supplied and volume to the Refinery for year 2022 were presented, and sampled data were verified.

Programme to support high-risk mills to become compliant with sourcing policies (Indicator 173)

Goodhope had categorized their suppliers into 3 categories which are Low Risk Mill, Medium Risk Mill and High Risk Mill. The high-risk mills will be regularly visited to better understand their challenges and assist them in identifying gaps for improvement. In March 2023, Goodhope have embarked on priority supplier engagement program where aim to visit the identified high risk mills regularly to better understand the challenges and assist them in identifying gaps and improvement.

Through the engagement visit, Goodhope provide guidance and new insights into their sustainability practices, with the objectives to enhance their awareness and understanding on our NDPE commitments as well as the importance of traceability and GHG emissions accounting. On top of that, after the engagement visit, Goodhope also continue to maintain a proactive relationship with the suppliers and provide the assistance whenever required.

The risk categorization is made based on geospatial analysis, as well as the answers supplier provided in the Self Assessment Tool.

Sighted the sample of mill risk :

- i. Low Risk Mills : 7 Mills scored 2 and 13 Mills scored 3
- ii. Medium Risk Mills : 17 Mills scored 4
- iii. High Risk Mills : 6 Mills scored 5 and 3 Mills scored 6

The Premium Vegetable Oils (SEP) supplier engagements program with high risk mill for 2 days :

- ii) Classic Palm Oil : 14th March 2023, 1100 am : Physical engagement attended by Mill Manager , Sustainability and Compliance Executive, Senior Clerk , Admin Clerk and Clerk.
- iii) Classic Segamat Palm Oil Mill : dated 15th March 2023, 0900 am attended by Mill

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<p>Manager , Chief Clerk, Cadet Engineer and MSPO officer</p> <p>Based on the evidence from physical meeting, the agenda included :</p> <ul style="list-style-type: none"> • PVO Group Sustainability Policy • Deforestation Free Commitment • Stakeholders Expectation on Labor practices • GHG Emission Accounting • Year 2022 Self Assessment Tool and TTP Declaration <p>The slides briefing on deforestation free commitment including :</p> <ul style="list-style-type: none"> - EU Regulation on Deforestation Free Supply Chains , commodities and products covered which stated the new regulation will ensure EU consumers that the products they buy are not associated with deforestation and forest degradation, ultimately inducing their replacement by deforestation-free commodities and products. - Stakeholder Expectations Labor practices , Definition of force labor . 11 ILO Indicators of Force labor (abuse of vulnerability, deception, restriction of movement, isolation, physical and sexual violence, intimidation and threats, retention of identity documents, withholding of wages, debt bondage, abusive working and living conditions, and excessive overtime) - The common allegations related to forced labour in Malaysia and why preventing forced labour makes business sense slides 	
Regularly assesses and categorizes the risk level of all own and third-party supplying mills (<i>Indicator 176</i>)	
<p>There is only one integrated refinery for Goodhope which is Premium Vegetable Oils Sdn Bhd located in Pasir Gudang Johor Bahru, Malaysia. The risk analysis has been mentioned in the “Downstream Traceability Procedure” with reference No. RSSOP/DT/01 revision no. 1 dated 1st March 2022. The KCP procedure entitled traceability procedure RSSOP /KCP /01 dated 1st March 2022 revision no. 1. During the verification, it was observed that all the mills supplying to Goodhope Refinery had been assessed and categorizes into the risk level based on the supplier traceability declaration, geospatial analysis and Self Assessment Tool (SAT) for year 2022. Goodhope had also published in the website related to Disclosure Management Approach which appear in the links below :</p> <p>https://www.goodhopeholdings.com/images/sustainability/DMA_Responsible_Sourcing_2022b.pdf</p>	<p>Comprehensive</p>

Components of our Responsible Sourcing Program

To deliver our responsible sourcing commitments, we have in place a comprehensive system consisting of policy, guidelines, procedures and tools for both our upstream and downstream operations.

Table 1. Components of our responsible sourcing program

PROGRAM COMPONENT	UPSTREAM (Palm Oil Mills)	DOWNSTREAM (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 	<ul style="list-style-type: none"> ▪ Supplier Engagement SOP ▪ Traceability SOP
	<ul style="list-style-type: none"> ▪ Group Grievance Approach Implementation SOP ▪ Managing Grievances Against Third Party Suppliers 	
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

Sighted the program component to all Goodhope Suppliers including Upstream and Downstream which has been included in the responsible sourcing programs of Goodhope. Based on the traceability procedure in reference to criteria for traceability to mill (TTM) measurement, the requirements include:

- i) Group Name
- ii) Mill name
- iii) Mill GPS coordinates

Where any part of three requirement above is incomplete, volumes from the particular mill will be considered non-traceable.

TTM percentage calculated using the formula below:

$$\text{TTM \%} = \frac{\text{Volume of palm product Traceable to Mill (MT)}}{\text{Total volume of palm product sourced (mt)}} \times 100\%$$

The criteria traceability to plantation (TTP) will require the supplying mill to provide information as follows:

- i) Company Owned Plantations, Direct 3rd Party Plantation, Direct Smallholder →
 - Plantation, smallholder name
 - GPS Coordinates
 - Volume supplied to the mill
 - Planted area hectare

- ii) Dealer / Collection center
- Dealer Collection center name
 - GPS Coordinate
 - Volume supplied to the mill
 - Name of sourcing to sub district village

$$\text{TTP \%} = \frac{\text{Volume of palm product traceable to Plantations (MT)}}{\text{Total volume of palm product sourced (mt)}} \times 100\%$$

The risk analysis has been conducted annually for all third-party suppliers that supplying the PK to refinery in Johor. The risk category had been mentioned as follows :

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".

For the risk assessment of the suppliers, the questionnaires will be sent to suppliers and the risk is determined based on the number of questions that answered "NO" and flagged. The questionnaire has been sent to the supplier (Supplier Traceability Declaration , Self Assessment Tool-SAT) covering the period of year 2022.The SAT details include :

- Mill Information
- Sustainability / No Deforestation, No Peat and No Exploitation Policy
- Environmental Aspects
- Social Aspects
- Company Own Plantations related
- Third Party Supply related

Total of 56 sub questions has been shared to the suppliers through SAT.

Example of the questionnaire as follows:

Kilang Sawit Muar Berhad located in Lot 2743, Mukim Parit Jawa 84150 Muar Johor .Questions related to 4.0 Social Aspects : can your company confirm that all employees are employed without being subject to forced or bonder labor ? – YES/NO Answer

Regularly reports the risk level of all own and third party supplying mills identified in its supply chain (*Indicator 177*)

Goodhope had conducted the risk assessment for all third party supplying mills that supply the palm products to the refinery (downstream) . Latest update on December 2022 from the Disclosure Management Approach on responsibility sourcing published on the Goodhope Website :

https://www.goodhopeholdings.com/images/sustainability/DMA_Responsible_Sourcing_2022b.pdf

Stated 65% of supplying mill has attended the webinar conducted by Sustainability manager from Goodhope (Mr. Poey Shao Jiann) and 82% had completed the Self Assessment Tools . All supplier had been attended and engaged on NDPE requirement via workshop , training , self assessment tools or site visit by end 2024.



Sighted the sample of mill risk :

- I) Low Risk Mills : 7 Mills scored 2 and 13 Mills scored 3
- II) Medium Risk Mills : 17 Mills scored 4
- III) High Risk Mills : 6 Mills scored 5 and 3 Mills scored 6


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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:	Carl Dagenhart	
Position:	Head, Group Sustainability	
Date:	17-05-2023	
		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:	Ebnun Holdoon	
Position:	Lead Assessor	
Date:	13-04-2023	
		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:	Zulkarnain Ishak	
Position:	Certifier	
Date:	11-05-2023	
		Signature