Particulars

About Your Organisation

1.1 Name of your organisation
Golden Agri-Resources Ltd

1.2 What is/are the primary activity(ies) or product(s) of your organisation?
- [✓] Palm Oil Grower
- [✓] Processor and/or Trader
- [ ] Consumer Goods Manufacturer
- [ ] Retailer
- [ ] Bank and/or Investor
- [ ] Social and/or Development NGO
- [ ] Environmental and/or Conservation NGO
- [ ] Affiliate

1.3 Membership number
1-0096-11-000-00

1.4 Membership category
Oil Palm Growers

1.5 Membership sector
Ordinary
Grower

1. Operational Profile

1.1 Please state your main activities as a palm oil grower:
- [ ] Oil palm grower without palm oil mill
- [ ] Oil palm grower with palm oil mill
- [x] Oil palm grower with palm oil mill and palm kernel crushing plant
- [ ] Smallholder Group Manager

2. Operations and Certification Progress

Information in Section 2 - Operations and Certification Progress - is a mandatory declaration in your ACOP. This includes hectarage data, to enable the RSPO to accurately calculate certification on a member, sector and total level. ACOP reports without reported hectarage data will be considered as incomplete and will not be accepted.

2.1 Land area controlled and managed associated to palm oil

2.1.1 Please state the total number of palm oil estates, certified and uncertified, controlled or managed by the member

172

2.1.7 Land area controlled and managed associated to palm oil

<table>
<thead>
<tr>
<th>Description</th>
<th>Hectares</th>
</tr>
</thead>
<tbody>
<tr>
<td>2.1.2 Total land controlled or managed for oil palm cultivation - planted and infrastructure (hectares)</td>
<td>392836.0</td>
</tr>
<tr>
<td>2.1.3 Total land controlled or managed for oil palm cultivation - unplanted (hectares)</td>
<td>0.0</td>
</tr>
<tr>
<td>2.1.4 Total land designated and managed as HCV areas (hectares)</td>
<td>53275.0</td>
</tr>
<tr>
<td>2.1.5 Other conservation land set aside, excluding HCV areas reported in 2.1.4 (hectares)</td>
<td>19082.0</td>
</tr>
<tr>
<td>2.1.6 Total land under scheme smallholders (hectares)</td>
<td>103480.0</td>
</tr>
<tr>
<td>Total</td>
<td>568673.0</td>
</tr>
</tbody>
</table>

2.2 Certification progress:

2.2.1 Number of management units certified under RSPO P&C Certification

77

2.2.2 Total certified land under the RSPO P&C Certification, excluding scheme smallholders (hectares)

205827.44

2.2.2.1 Certification progress - land under RSPO P&C Certification, excluding scheme smallholders

44.25%

2.2.3 Total certified land under scheme smallholders (hectares)

51128.14

2.2.3.1 Certification progress - land under scheme smallholders

49.41%
2.3 In which countries are your estates located?

2.3.1 Indonesia - Please indicate which province(s)
Bangka Belitung, Central Kalimantan, East Kalimantan, Jambi, Lampung, North Sumatra, Papua, Riau, South Kalimantan, South Sumatra, West Kalimantan

2.3.2 Malaysia - Please indicate which state(s)

2.3.3 Other - Please indicate which country/countries

2.4 New plantings and development (excluding replanting)

2.4.1 How much new land was planted by your company during this reporting period (hectares)?

0.0

2.5 Supply of Fresh Fruit Bunches (FFB)

2.5.1 Total FFB volume produced by estates managed or controlled by your company (tonnes)

7616846.0

2.5.1.1 Total certified FFB volume produced by certified estates managed or controlled by your company (tonnes)

4297165.0

2.5.2 In addition to FFB produced by your company's estates, does your supply base include any of the following?

- [ ] Scheme Smallholders
- [ ] Independent Smallholders
- [ ] Outgrowers
- [ ] Other Third-Party Suppliers

2.5.3 Scheme smallholder operations that supply your operations:

2.5.3.1 Total FFB volume supplied (tonnes)

2254471.0

2.5.3.2 Total certified FFB volume supplied (tonnes)

1261571.0
2.6 Fresh Fruit Bunches (FFB) processing and production operations

2.6.1 Number of palm oil mills operated
46

2.6.2 Number of palm oil mills certified under RSPO P&C
29

2.7 Palm Kernel processing and production operations

2.7.1 Number of palm kernel crushers and/or palm kernel mills operated
9

2.7.2 Number of palm kernel crushers and/or palm kernel mills certified under RSPO Supply Chain Certification (SCC)
9
3. Palm Oil and Certified Palm Oil Production

3.1 Total Crude Palm Oil produced (tonnes)

<table>
<thead>
<tr>
<th>Countries/Regions</th>
<th>Tonnes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Malaysia</td>
<td>0.0</td>
</tr>
<tr>
<td>Indonesia</td>
<td>2305712.0</td>
</tr>
<tr>
<td>Latin America</td>
<td>0.0</td>
</tr>
<tr>
<td>Africa</td>
<td>0.0</td>
</tr>
<tr>
<td>Rest of the World</td>
<td>0.0</td>
</tr>
<tr>
<td>Total</td>
<td>2305712.0</td>
</tr>
</tbody>
</table>

3.3 CSPO sold as RSPO certified

<table>
<thead>
<tr>
<th>Description</th>
<th>Tonnes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Identity Preserved (IP)</td>
<td>235567.55</td>
</tr>
<tr>
<td>Segregated (SG)</td>
<td>0.0</td>
</tr>
<tr>
<td>Mass Balance (MB)</td>
<td>91681.92</td>
</tr>
<tr>
<td>RSPO Credits</td>
<td>0.0</td>
</tr>
<tr>
<td>Total</td>
<td>327249.47</td>
</tr>
</tbody>
</table>

3.6 Total CSPO

<table>
<thead>
<tr>
<th>Description</th>
<th>Tonnes</th>
</tr>
</thead>
<tbody>
<tr>
<td>3.3 CSPO sold as RSPO-certified</td>
<td>327249.47</td>
</tr>
<tr>
<td>3.4 CSPO sold under other certification schemes</td>
<td>626400.31</td>
</tr>
<tr>
<td>3.5 CSPO sold as conventional</td>
<td>346664.2</td>
</tr>
<tr>
<td>Total</td>
<td>1300313.98</td>
</tr>
</tbody>
</table>

3.7 According to the volume information you have provided in this questionnaire, CSPO represents the following percentage of your total CPO production

56.40%
3.8 Based on total CSPO volumes sold (Question G.3.6), please estimate the percentage of the volumes originating from your operations in the following regions/countries:

<table>
<thead>
<tr>
<th>Countries/Regions</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>Malaysia</td>
<td>0.0</td>
</tr>
<tr>
<td>Indonesia</td>
<td>100.0</td>
</tr>
<tr>
<td>Latin America</td>
<td>0.0</td>
</tr>
<tr>
<td>Africa</td>
<td>0.0</td>
</tr>
<tr>
<td>Rest of the World</td>
<td>0.0</td>
</tr>
</tbody>
</table>
3.2 Total Crude Palm Kernel produced (tonnes)

<table>
<thead>
<tr>
<th>Countries/Regions</th>
<th>Tonnes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Malaysia</td>
<td>0.0</td>
</tr>
<tr>
<td>Indonesia</td>
<td>607027.0</td>
</tr>
<tr>
<td>Latin America</td>
<td>0.0</td>
</tr>
<tr>
<td>Africa</td>
<td>0.0</td>
</tr>
<tr>
<td>Rest of the World</td>
<td>0.0</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>607027.0</strong></td>
</tr>
</tbody>
</table>

3.9 CSPK sold as RSPO certified

<table>
<thead>
<tr>
<th>Description</th>
<th>Tonnes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Identity Preserved (IP)</td>
<td>120741.84</td>
</tr>
<tr>
<td>Segregated (SG)</td>
<td>7050.08</td>
</tr>
<tr>
<td>Mass Balance (MB)</td>
<td>164160.98</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>291952.9</strong></td>
</tr>
</tbody>
</table>

3.12 Total CSPK sold as RSPO-certified (tonnes)

<table>
<thead>
<tr>
<th>Description</th>
<th>Tonnes</th>
</tr>
</thead>
<tbody>
<tr>
<td>3.9 CSPK sold as RSPO-certified</td>
<td>291952.9</td>
</tr>
<tr>
<td>3.10 CSPK sold under other certification schemes</td>
<td>33.34</td>
</tr>
<tr>
<td>3.11 CSPK sold as conventional</td>
<td>74692.65</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>366678.89</strong></td>
</tr>
</tbody>
</table>

3.13 According to the volume information you have provided in this questionnaire, CSPK represents the following percentage of your total CPK production

60.41%
3.14 Based on the CSPK sold volumes (Question G.3.12), please estimate the percentage of volumes originating from your operations in the following regions/countries:

<table>
<thead>
<tr>
<th>Countries/Regions</th>
<th>Tonnes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Malaysia</td>
<td>0.0</td>
</tr>
<tr>
<td>Indonesia</td>
<td>100.0</td>
</tr>
<tr>
<td>Latin America</td>
<td>0.0</td>
</tr>
<tr>
<td>Africa</td>
<td>0.0</td>
</tr>
<tr>
<td>Rest of the World</td>
<td>0.0</td>
</tr>
</tbody>
</table>
4. TimeBound Plan

4.1 Which year did your company achieve (or plans to achieve) its first RSPO P&C certification?
2011

4.2 Which year did your company achieve (or plans to achieve) 100% RSPO certification for all its estates and mills?
2020

4.2.1 If the previous target year for G.4.2 has not been met, please explain why
We have continued to communicate with the main stakeholder to acquire the HGU and the liability data as required by RSPO. Nevertheless, due to the current global health condition that has affected the process to acquire certification, GAR will continue to communicate with RSPO and will ponder and deliberate of appropriate strategies to overcome this condition.

4.3 Which year did your company achieve (or plans to achieve) 100% RSPO certification of scheme smallholders?
2020

4.3.1 If the previous target year for G.4.3 has not been met, please explain why
GAR continues to communicate with the parties involved to reach its target. In addition, the company will deliberate of a more strategic approach so that the target that have been made are achieved in accordance with the intended plan.

4.4 Which year did your company achieve (or plans to achieve) 100% RSPO certification for all FFB, regardless of source?
2025

4.4.1 If the previous target year for G.4.4 has not been met, please explain why
Currently, GAR is seriously undergoing the time bound. This year is the last year of the time bound, nevertheless GAR continues to ensure that the target made is in accordance with the conservative estimate for the time needed to acquire data and information. The company continues to make the necessary improvements so that the target can be achieved.
5. Concession Map

5.1 The RSPO General Assembly Resolution 6G (2013) calls for all members with Grower operations to submit maps of their concessions through ACOP. Has your company submitted concession maps to the RSPO in previous ACOP cycles?

No

5.3 Please upload your company's updated estate location concession map(s) in Shapefile format here.

RSPO_ACOP_5 Juni 2020.7z

6. GHG Footprint

6.1 What is the average GHG footprint for all certified management units by hectare (tCO2e/ha)?

9.27

6.2 What is the average GHG footprint for all certified management units per tonne of crude palm oil (tCO2e/tCPO)?

2.54

6.3 What are the key emission sources identified by your company in certified management units?

- [ ] Land use change
- [x] Existing cultivation peatland
- [ ] Palm oil mill effluent (POME)
- [ ] Fertiliser application
- [x] Others

Others

1. Optimising the use of Empty Fruit Bunch (EFB) and land application as organic fertilisers
2. Conducting drainability assessment in existing peat land area
3. Establishing biogas installation in more mills (methane capture)

6.4 Does your company have a baseline for GHG reporting?

No

6.4.2 Please explain why your company does not have an existing baseline, and if it is planning to develop a baseline for GHG reporting?

GAR is still in the middle of audit and verification process in developing a baseline for GHG reporting.
7. Support for Oil Palm Smallholders

7.1 How is your company supporting Independent Smallholder groups?

- ✓ Sourcing of physical FFB
- ✓ Financial support
- ✓ Operations support
- ✓ Training support
- ✓ Community development
- □ Not supporting Independent Smallholder groups
- ✓ Others

Others

GAR has been a strong supporter of the Independent Farmers Replanting Scheme since it was launched in 2014. The programme was set up to encourage independent smallholders to replant with better quality, higher-yielding seeds which will help boost productivity and incomes, while potentially reducing the demand for new agricultural land. It gives farmers access to financing, helping them sustain their livelihoods during the four years it takes for the new seedlings to mature. Since 2014, GAR has helped independent farmers in Riau and Jambi secure loans of nearly IDR 400 billion from state-owned banks. As at end 2019, around 945 farmers had enrolled in the scheme. We continue to run other finance and support programmes for independent smallholders. Through the Smallholders Development Programme, GAR has provided technical assistance and long tenure interest-free credit to over 2,800 independent farmers in East Kalimantan since 2013. Farmers have access to high-yielding seeds, fertiliser and herbicides, and heavy equipment rental, at below market rates. To date, we have disbursed more than IDR30 billion in interest-free loans and other aid.
8. Actions For Next Reporting Period

8.1 Outline activities that your company will undertake in the coming year to advance its certification efforts.

We aim to certify a total remaining of 18 mills and 364,860 hectares of our plantations which includes plasma estates by 2020. Despite many challenges, this proves that GAR is very committed to completing the target. In addition, this target reflects our conservative estimate for the time needed to acquire the HGU and the liability data as required recently by RSPO. However, due to the global health conditions where Covid-19 is happening, we must be realistic about the targets that we are implementing right now.

8.2 Outline activities that your company will undertake in the coming year to promote the uptake CSPO along the supply chain.

In 2016, we launched our action plan to achieve Traceability to the Plantation (“TTP”) by 2020. Working with these mills, we are now mapping the supply chain all the way back to the plantation level. This expands the outreach of our efforts to the next tier of suppliers including middlemen and smallholders that supplies FFB to the mills that we buy from. This will further extend the outreach responsible Palm Oil practices and build supplier capability to adopt these practices. The traceability exercise offers us crucial information about the provenance of our raw materials, improving our transparency to buyers and customers, which we hope will also bring increased confidence and uptake of CSPO. We continued to make significant progress towards full Traceability to the Plantation (TTP) for our palm supply chain in 2019. By end 2019, we achieved nearly 80 percent TTP for GAR-owned and third party supplier mills. We believe we are on track to hit our target of 100 percent TTP by end 2020, (subject to possible delays due to the Covid19 pandemic). The latest mapping data is available on the Sustainability Dashboard: https://goldenagri.com.sg/sustainability-dashboard/
9. Challenges

9.1 What significant obstacles or challenges has your company encountered in the promotion of certified sustainable palm oil (CSPO)? What efforts has your company taken to address these obstacles or challenges?

- Awareness of RSPO in the market
- Difficulties in the certification process
- Certification of smallholders
- Competition with non-RSPO members
- High costs in achieving or adhering to certification
- Human rights issues
- Insufficient demand for RSPO-certified palm oil
- Low usage of palm oil
- Reputation of palm oil in the market
- Reputation of RSPO in the market
- Supply issues
- Traceability issues
- No challenges faced
- Others

Others

1. Certification process needs more requirements each year and is a challenge for the company to adjust to the new requirements.
2. Certification bodies have different approaches and standards. A. Scope of audit has no limit, therefore, it would be very difficult to fulfill all the requirements.

9.2 In addition to the actions already reported in this ACOP report, what other ways has your company supported the vision of the RSPO to transform markets to make sustainable palm oil the norm?

- Engagement with business partners or consumers on the use of CSPO
- Engagement with government agencies
- Promotion of CSPO outside of RSPO venues such as trade workshops or industry associations
- Promotion of physical CSPO
- Providing funding or support for CSPO development efforts
- Research & Development support
- Stakeholder engagement
- No actions taken
- Others

Others

9.3 If your company has any other publicly-available reports or information regarding its palm oil-related policies and activities, please provide the links here

2. GAR Sustainability Dashboard, link: https://goldenagri.com.sg/sustainability-dashboard/
1. Operational Profile

1.1 Please state your company’s main activity within the palm oil supply chain.

- Refiner of CPO and PKO
- Palm Kernel Crusher
- Trader with Physical Possession
- Trader without Physical Possession
- Integrated Refiner-Trader-Processor
- Food and Non-Food Ingredients Producer
- Power, Energy and Biofuel Processor
- Animal Feed Producer
- Oleochemicals Producer
- Distribution & Logistics
- Other

2. Palm Oil and Certified Sustainable Palm Oil Consumption

Information in Section 2 - Palm Oil and Certified Sustainable Palm Oil Sourcing is a mandatory declaration in your ACOP. This includes volume data on palm oil and palm oil products consumed, to enable the RSPO to accurately calculate uptake on a member, sector and total level. ACOP reports without reported volume data will be considered incomplete and will not be accepted.

2.1 Please include details of all operations using palm oil, owned and/or managed by the member and/or all entities that belong to the group.

Fully-owned

2.1.1 In which countries does your company sell goods with palm oil and palm oil products?

Applies globally

2.2 Total volume of all palm oil and palm oil products sourced in the year:

<table>
<thead>
<tr>
<th>Description</th>
<th>Tonnes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Crude palm oil, including derivatives refined from CPO (tonnes)</td>
<td>7860035.0</td>
</tr>
<tr>
<td>Crude palm kernel oil, including derivatives refined from CPKO (tonnes)</td>
<td>782591.0</td>
</tr>
<tr>
<td>Crude palm kernel expeller (tonnes)</td>
<td>839775.0</td>
</tr>
<tr>
<td>Total</td>
<td>9482401.0</td>
</tr>
</tbody>
</table>
### 2.3 Volume of RSPO-certified palm oil and oil palm products sourced in the year (tonnes):

<table>
<thead>
<tr>
<th>Description</th>
<th>Crude Palm Oil (CPO) and CSPO Derivatives</th>
<th>Crude Palm Kernel Oil (CSPKO) and CSPKO Derivatives</th>
<th>Palm Kernel Expeller (CSPKE)</th>
</tr>
</thead>
<tbody>
<tr>
<td>RSPO Credits from Mill / Crusher</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
</tr>
<tr>
<td>RSPO Credits from Independent Smallholder</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
</tr>
<tr>
<td>Mass Balance (MB)</td>
<td>192768.0</td>
<td>116924.0</td>
<td>0.0</td>
</tr>
<tr>
<td>Segregated (SG)</td>
<td>27103.0</td>
<td>17145.0</td>
<td>0.0</td>
</tr>
<tr>
<td>Identity Preserved (IP)</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
</tr>
<tr>
<td>Total</td>
<td>219871.0</td>
<td>134069.0</td>
<td>0.0</td>
</tr>
</tbody>
</table>

### 2.4 According to the volume information you have provided in Question PT.2.2 and Question PT.2.3, your company's certified palm oil and palm oil products uptake is:

3.73%

### 2.5 What is the estimated percentage of Certified Sustainable Palm Oil in the palm oil and palm oil products sold by your company in the following regions:

<table>
<thead>
<tr>
<th>Countries/Regions</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>Europe</td>
<td>0.0</td>
</tr>
<tr>
<td>North America</td>
<td>0.0</td>
</tr>
<tr>
<td>Malaysia</td>
<td>0.0</td>
</tr>
<tr>
<td>Indonesia</td>
<td>0.0</td>
</tr>
<tr>
<td>China</td>
<td>0.0</td>
</tr>
<tr>
<td>India</td>
<td>0.0</td>
</tr>
<tr>
<td>Latin America</td>
<td>0.0</td>
</tr>
<tr>
<td>Africa</td>
<td>0.0</td>
</tr>
<tr>
<td>Rest of World</td>
<td>0.0</td>
</tr>
</tbody>
</table>
3. **TimeBound Plan**

3.1 Which year did your company achieve/obtain (or expects to achieve/obtain) the RSPO supply chain certification or RSPO trader/distributor licence?

<table>
<thead>
<tr>
<th>Year</th>
</tr>
</thead>
<tbody>
<tr>
<td>2013</td>
</tr>
</tbody>
</table>

3.2 Which year did your company start (or expect to start) to source any RSPO-certified palm oil and oil palm products?

<table>
<thead>
<tr>
<th>Year</th>
</tr>
</thead>
<tbody>
<tr>
<td>2013</td>
</tr>
</tbody>
</table>

3.2.1 If the previous target year for PT.3.2 has not been met, please explain why.

Target has been achieved.

3.3 Which year did your company achieve (or expects to achieve) 100% RSPO certification of all palm product processing facilities.

<table>
<thead>
<tr>
<th>Year</th>
</tr>
</thead>
<tbody>
<tr>
<td>2017</td>
</tr>
</tbody>
</table>

3.3.1 If the previous target year for PT.3.3 has not been met, please explain why.

Target has been achieved.

3.4 Which year did your company begin (or expects to begin) sourcing only 100% RSPO-certified palm oil and oil palm products.

<table>
<thead>
<tr>
<th>Year</th>
</tr>
</thead>
<tbody>
<tr>
<td>2030</td>
</tr>
</tbody>
</table>

3.5 If the TimeBound Plan commitments declared above do not cover all countries in which the member sells goods with palm oil or palm oil products, please explain why.

We believe the handling of RSPO Certified products can only be achieved via transformation of the industry, where the majority of our producers produce RSPO Certified products, and the majority of consumers demand it. GAR is committed to work through an engagement with our suppliers and customers, and working with other RSPO members towards this goal.

3.6 How does your company proactively promote RSPO and RSPO-certified sustainable palm oil and oil palm products to your customers?

We proactively communicate and update our customers on our ability to deliver RSPO, CSPO, and CSPKO physical supply chain modules: MB and SG. We also work with our customers on additional RSPO requirements such as traceability.
4. Actions For Next Reporting Period

4.1 Please outline activities that your company will take in the coming year to promote the production or consumption of certified sustainable palm oil (CSPO)

We proactively communicate and update our ability to deliver RSPO CSPO physical supply chain modules: MB & SG to our customers. We also promote RSPO standards to our suppliers. Please refer to our GAR Website (https://goldenagri.com.sg/sustainability/standards-certifications/rspo/) and GAR Sustainability Dashboard (https://goldenagri.com.sg/sustainability-dashboard/) for more information on our efforts in promoting the use of RSPO Certification on oil palm products in our supply chain.
5. Shared Responsibility

The Board of Governors of the Roundtable on Sustainable Palm Oil (RSPO) approved new Shared Responsibility rules on 31 October 2019, requiring all members to share sustainability requirements and obligations. Reporting of Shared Responsibility indicators will be done through several channels, including ACOP. As the implementation of Shared Responsibility reporting is still on-going and in development, the Shared Responsibility section in ACOP is not yet final and may change in future ACOP cycles. For more information on Shared Responsibility, please go to https://rspo.org/news-and-events/news/what-are-the-new-shared-responsibility-rules or email the ACOP team at acop@rspo.org

Labour & Labour Rights

5.1 Does your company have a publicly-available policy covering Labour & Labour Rights?

Yes

5.1.1 Does the policy cover:

- [✓] No discrimination
- [✓] Wage and working conditions
- [✓] Freedom of association
- [✓] No child labour
- [✓] No harassment
- [✓] No forced or trafficked labour

5.1.2 Has your company previously uploaded or linked its Labour & Labour Rights policy in previous ACOP reporting cycles?

Yes

Ethical Conduct & Human Rights

5.2 Does your company have a publicly-available Policy covering Ethical Conduct & Human Rights?

Yes

5.2.1 Does the policy cover:

- [✓] Recruitment
- [✓] Contractors
- [✓] Sub-Contractors & Third-Party Contractors

5.2.2 Has your company previously uploaded or linked its Ethical Conduct & Human Rights policy in previous ACOP reporting cycles?

Yes

Land Use

5.3 Does your company have a publicly-available Policy covering Land Use?

Yes

5.3.1 Does the policy cover:

- [✓] Free Prior and Informed Consent (FPIC)
- [ ] Compensation

5.3.2 Has your company previously uploaded or linked its Land Use policy in previous ACOP reporting cycles?

Yes
Occupational Health & Safety

5.4 Does your company have a publicly-available Policy covering Occupational Health & Safety?
Yes

5.4.1 Has your company previously uploaded or linked its Occupational Health & Safety policy in previous ACOP reporting cycles?
Yes

Climate Change & Greenhouse Gas (GHG)

5.5 Does your company have a publicly-available policy covering Climate Change & Greenhouse Gas (GHG)?
No

Complaints & Grievances

5.6 Does your company have a Complaints & Grievances Mechanism?
Yes

5.6.1 Is your Complaints & Grievances mechanism in line with the RSPO's grievance mechanism? For details of the RSPO's grievance mechanism, please go to https://askrspo.force.com/Complaint/s/
Yes

Smallholders

5.7 Does your company support oil palm independent smallholder groups?
Yes

5.7.1 Does this support cover:

- ✔ Fair and transparent dealings with Smallholders
- ✔ Improved Smallholder livelihoods

5.7.2 How is your company supporting them?

GAR initiated a program called "Ksatria Sawit". It means ‘palm oil warrior’ in English. The name is also an abbreviation which means transforming the supply chain through independent smallholders and agents, that’s why we chose the name. This programme reflects one of the pillars of our GAR Social and Environmental Policy (GSEP) which is to build a traceable and transparent supply chain that extends to farmers, and is a continuation of our efforts since 2015. We have organised region-specific Ksatria Sawit workshops for our suppliers, to educate them on the traceability process. There, we introduce them to our supply chain mapping partner, Koltiva. GAR provides the suppliers’ profiles, then Koltiva follows up by conducting field surveys with the mills, agents and smallholder farmers. By bringing multiple mills together, sharing resources and working at a landscape level, we hope to accomplish TTP much more quickly. To date, Ksatria Sawit has been run in regencies from Aceh to Lampung. More than 50 mills have participated in the programme. Through these mills, we have also reached 34,665 dealers and farmers who manage a collective plantation area of 271,989 hectares.
6. Challenges

6.1 What significant obstacles or challenges has your company encountered in the promotion of certified sustainable palm oil (CSPO)? What efforts has your company taken to address these obstacles or challenges?

- Awareness of RSPO in the market
- Difficulties in the certification process
- Certification of smallholders
- Competition with non-RSPO members
- High costs in achieving or adhering to certification
- Human rights issues
- Insufficient demand for RSPO-certified palm oil
- Low usage of palm oil
- Reputation of palm oil in the market
- Reputation of RSPO in the market
- Supply issues
- Traceability issues
- No challenges faced
- Others

Others
1. Limited demand in key markets where we operate. 2. On supply side, it is hard to encourage other plantations to join RSPO where no immediate demand is present. 3. Not all suppliers have the capacity to achieve RSPO certification and not all customers are requiring RSPO certified products.

6.2 In addition to the actions already reported in this ACOP report, what other ways has your company supported the vision of the RSPO to transform markets to make sustainable palm oil the norm?

- Engagement with business partners or consumers on the use of CSPO
- Engagement with government agencies
- Promotion of CSPO outside of RSPO venues such as trade workshops or industry associations
- Promotion of physical CSPO
- Providing funding or support for CSPO development efforts
- Research & Development support
- Stakeholder engagement
- No actions taken
- Others

Others
Continuing to work with suppliers on adoption of sustainable practices.

6.3 If your company has any other publicly-available reports or information regarding its palm oil-related policies and activities, please provide the links here