

# PT DHARMA SATYA NUSANTARA Tbk

## SBU-Agro

# NDPE PROGRESS REPORT

**2023**

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## 1. PROGRESS SUMMARY



PT Dharma Satya Nusantara Tbk (DSNG) Palm Oil Plantation has established the *No Deforestation, No Peat, No Exploitation* (NDPE) Policy since March 2020. The Company has determined that NDPE implementation will reach 100%, consisting of implementation internally in the Company's management area, and implementation carried out by the Suppliers of main raw material, namely Fresh Fruit Bunches (FFB) from third parties. The suppliers consist of external Plantation Companies that not affiliated with DSNG (referred to as *Independent Plantation Company - IPC*), and Independent Smallholders who deliver FFB through Cooperative and Agents (Intermediaries for FFB sales to PKS).

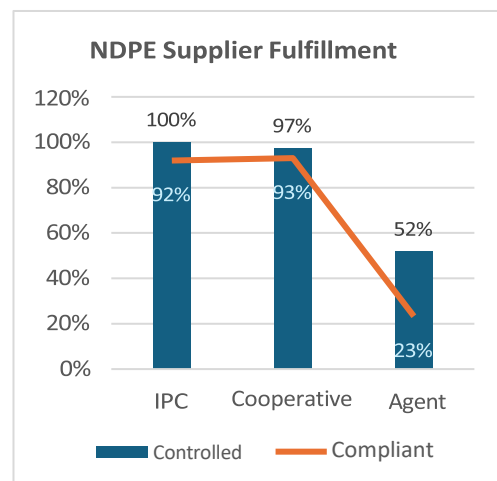
Progress on NDPE implementation has been reported annually starting in 2021. This report is the 4th Progress Report. Various progress has been made during the reporting period since 2021. The progress achieved in the 2023 Reporting period are:

1. The overall FFB supply increase was 1.02% against 2022, including external FFB supply which also saw an increase of 0.9%.

**Table 1. DSNG 2023 FFB Supply Development**

Supplier Type	Planted Area 2022 (ha)	FFB Supply 2022 (Tons)		Planted Area 2023 (ha)	FFB Supply 2023 (Tons)	
		Total %			Total %	
Core	84.547	1.759.238	62%	84.605	1.765.280	62%
Plasma	28.023	455.760	16%	28.229	472.830	16%
External Suppliers	-	622.326	22%	-	628.019	22%
<b>Total</b>	<b>112.570</b>	<b>2.837.324</b>	<b>100%</b>	<b>112.570</b>	<b>2.866.129</b>	<b>100%</b>

2. Achievement of Supplier registration (IPC, Cooperatives, Agents) 99.3% of total suppliers by 2023.
3. Achievement of "Controlled" and "Compliant" supplier status for all Supplier Types exceeded the 2023 target, except for the Agent in Sekadau which was still below target. In total, by the end of 2023 almost all IPC and Cooperative suppliers are assessed as NDPE compliant through the MRV process.



**Figure 1. 2023 Supplier NDPE Outcomes**

4. Landscape Monitoring is conducted using the more accurate Satelligence platform. Monitoring is conducted across entire DSNG landscapes starting in January 2023.
5. MRV-NDPE process started to run regularly with new structure of Supplier Audit Staff.
6. Staff capacity building with NDPE training conducted in November 2023.

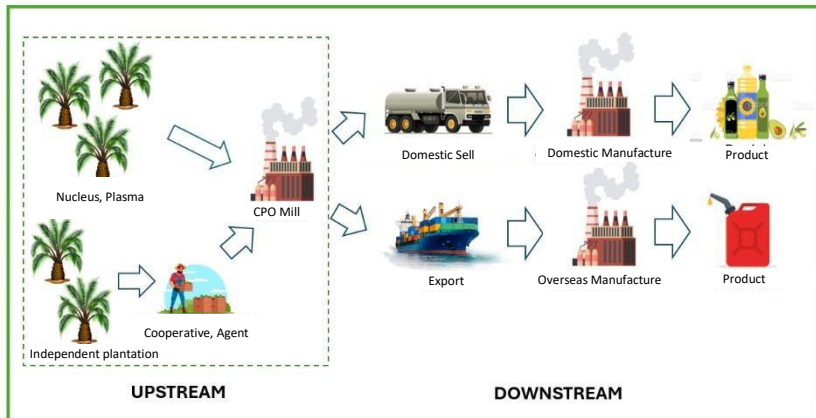
## 2. INTRODUCTION

Large-scale oil palm plantations operated by both private and state-owned companies have grown rapidly since the mid-1990s. The progress of the oil palm plantation sector is driven by the growing demand for palm oil products. *Crude palm oil (CPO)* and *palm kernel oil (PKO)* are the basic ingredients for the manufacture of a wide range of daily goods, from food to fuel, from oil to cosmetics. These vegetable oils are renowned for their high productivity, more than 3 times more productive than other vegetable oils. Because of this, land use is more efficient, and the price is cheaper.

The need for land expansion of oil palm plantations drives land conversion, some of which comes from forest areas. A stakeholder initiative in Indonesia in 2016 formulated efforts to control the conversion of forest land into oil palm plantations. These efforts later evolved into NDPE requirements for oil palm plantation management, which are currently implemented by major players in the palm oil industry in Indonesia.

The implementation of NDPE is expected to reduce the rate of deforestation due to new land clearing for Oil Palm Plantations. Therefore, NDPE applies in entire supply chain. As such, products from oil palm plantations that clear forest cover during the land clearing process cannot be accepted in the supply chain.

DSNG is a palm oil processing company from fresh fruit bunches (FFB) or what is often referred to as the *upstream* industry, where NDPE applies to suppliers up to the supplying farmers' plantations. This supply chain may seem short, but it is highly vulnerable, especially when many suppliers are independent smallholders. To ensure NDPE implementation, DSNG has established an *NDPE policy* in March 2020.



The NDPE Policy is implemented internally and to the main supply chain, namely FFB suppliers to DSNG's palm oil mills. Since the NDPE Policy is in place, the entire DSNG FFB supply chain must fulfil these NDPE requirements.

**Figure 2.** Upstream and Downstream Supply Chain of Palm Oil Products

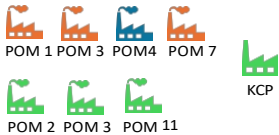




In the 2023 period, various activities have been carried out to meet NDPE targets, especially in the DSNG upstream supply chain. The process of Supplier registration, NDPE socialization to Suppliers and Farmers, data collection of Farmer Suppliers, engagement of Suppliers and Farmers through self-assessment, fulfillment of requirements and implementation gaps, capacity building through field schools, and verification of NDPE implementation through *Monitoring, Reporting & Verification (MRV)* activities for Suppliers and Farmers Suppliers have been carried out. Although not all activities achieved the desired results, most activities achieved the expected targets.



### 3. NDPE IMPLEMENTATION STRATEGY

Not all DSNG mills receive external FFB. There are 3 mills that only accept nucleus and plasma FFB, namely PKS 2, PKS 3, and PKS 11 which are *RSPO Identified Preserve* (RSPO-IP) certified. *Crude Palm Oil* (CPO) from RSPO-IP mills is managed separately (segregation) in the *RSPO Segregation* supply chain (RSPO-SG). DSNG also has a *Kernel Crushing Plant* (KCP) that produces *Palm Kernel Oil* (PKO) located near PKS 3. The supply chain areas within DSNG's operational landscape are as shown in **Table 2** below.

**Table 2. Supplier Areas within the DSNG Landscape**

LANSEKAP	MCC	SUPPLIER AREA
Wahau	 POM 1 POM 3 POM 4 POM 7 POM 2 POM 3 POM 11 KCP	Sub-districts of Muara Wahau, Kongbeng, Telen, and surrounding areas
Bengalon	 POM 9	Sub-districts Bengalon, Rantau Pulung, Kaliorang and surrounding areas
Karangan	 POM 10	Karangan sub-district and surrounding areas
Lamandau	 POM 5 POM 12	Sub-districts of Lamandau, Nanga Bulik, Sematu, Balai Riam, Pangkalan Lada and surrounding areas
Sekadau	 POM 8	Sub-districts of Sekadau Hulu, Sekadau Hilir, Sepauk, Tempunak, Tebelian and surrounding areas

**Note:**  ISPO-RSPO MB  ISPO-RSPO IP  ISPO-RSPO MB-ISCC  ISPO

DSNG identifies suppliers into 5 types:

- a. Nucleus
- b. Plasma (full operate)
- c. External Plantation
- d. Cooperative
- e. Agent

For Nucleus and Plasma, NDPE implementation follows the fulfillment of internal requirements. This process follows the implementation of various sustainability requirements, such as Indonesia Sustainable Palm Oil (ISPO), Roundtable on Sustainable Palm Oil (RSPO), International Sustainability & Carbon Certification (ISCC), and International Finance Corporation - Performance Standard (IFC-PS). All aspects of NDPE are similar to these requirements.

DSNG's external suppliers consist of 3: Independent Plantation Company (IPC), Cooperative, and Agent. For these external suppliers, there are 7 stages of NDPE implementation.

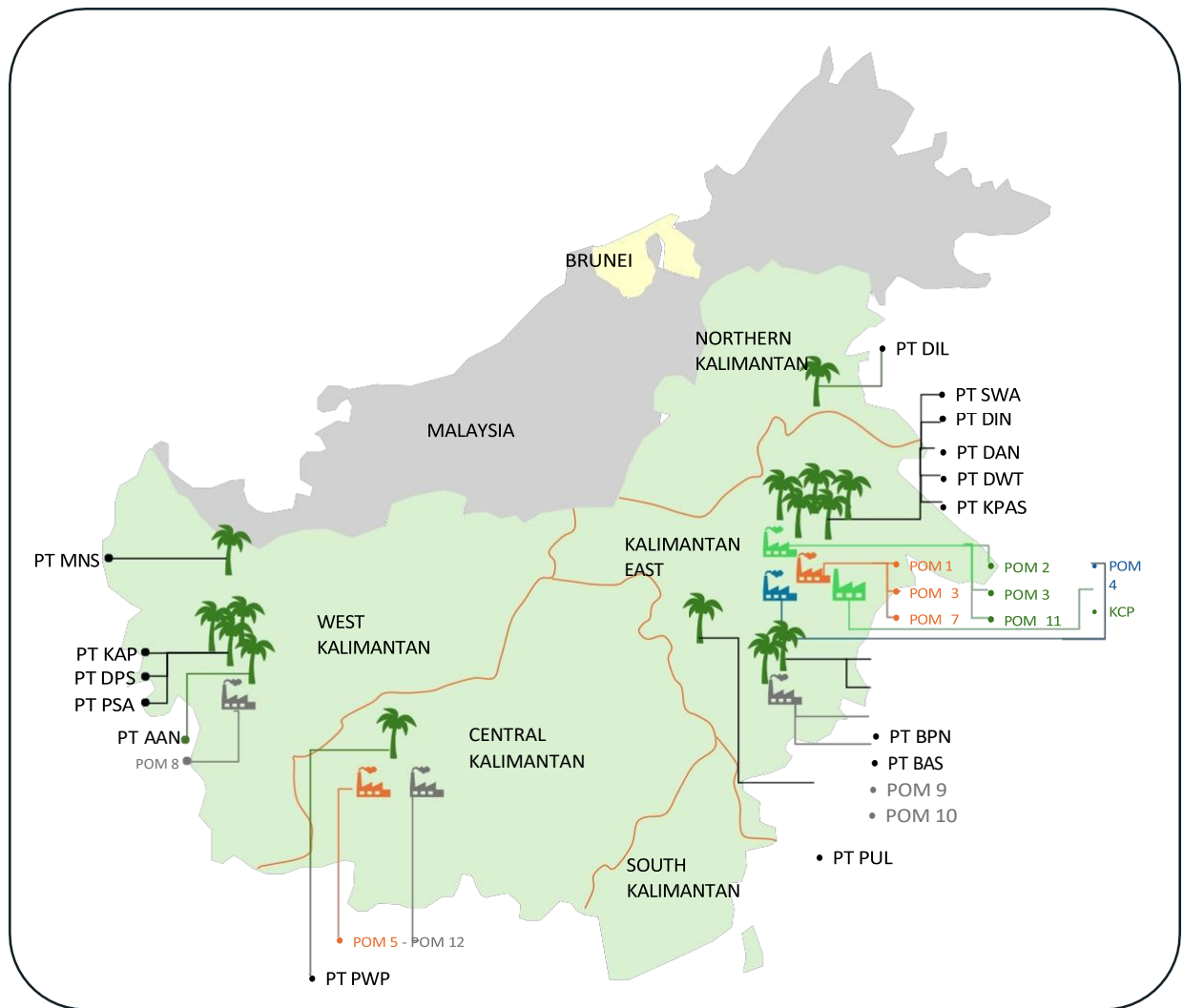




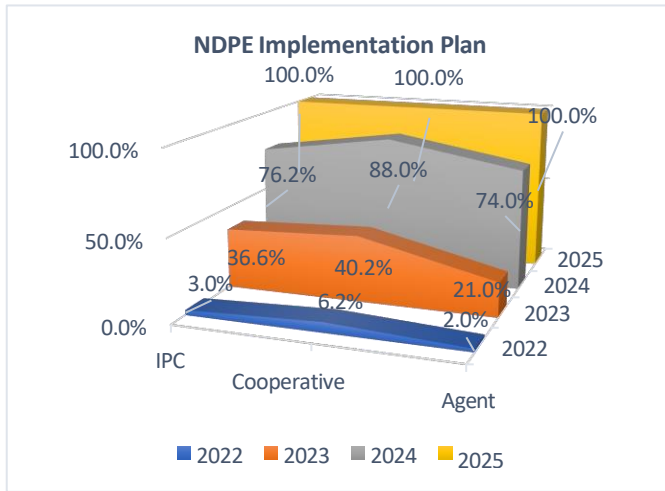


Figure 3. DSNG landscape

Table 3. NDPE Implementation Stages

Process Steps	Suppliers (Cooperatives, Agents)	Independent Farmers
 <b>SOCIALIZATION</b>	<b>1</b> Explanation of Ethical & NDPE requirements in FFB supply <b>Output:</b> Signing of Code of Conduct and NDPE Approval Forms	<b>3</b> Explanation of NDPE requirements in oil palm plantation management <b>Output:</b> NDPE Understanding
 <b>REGISTRATION</b>	<b>2</b> Register suppliers with complete data <b>Output:</b> Supplier Registration Form, Farmer Supplier Data	<b>4</b> Registration of farmer supplier as well as their farm data and geospatial location <b>Output:</b> Farmer Registration Form
 <b>IMPLEMENTATION</b>	<b>5</b> Conduct self-assessment on fulfilment of NDPE requirements and action plans for fulfilment <b>Output:</b> SSA Form, NDPE Fulfilment Action Plan Form	<b>6</b> Efforts to fulfil requirements at farmer level: legality, competence, implementation <b>Output:</b> <b>Farmer Data, Field School</b>
 <b>MRV</b>		<b>7</b> Conduct Farmer NDPE fulfilment checks <b>Output:</b> MRV results



NDPE is implemented in stages in accordance with the prioritisation of implementation that has been set. The main target is traceability to supplier farms and NDPE implementation of suppliers can be achieved by the end of 2025.

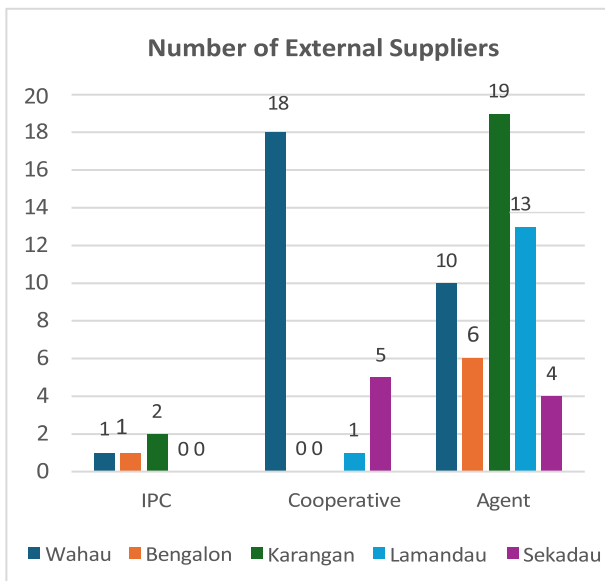
**Figure 4. NDPE Implementation Plan**

The percentage of target achievement is calculated from the total annual FFB supply volume from the previous year's data, which is converted into the area of the external supplier's plantation. The suppliers targeted to meet NDPE requirements each year are determined based on the calculation of accumulated plantation area.

## 4. TRACEABILITY

*Traceable to Plantation (TTP)* is central to NDPE. Supplier engagement in NDPE implementation goes all the way down to the supplying farmers, making farmer data collection the first step in NDPE. This process ensures:

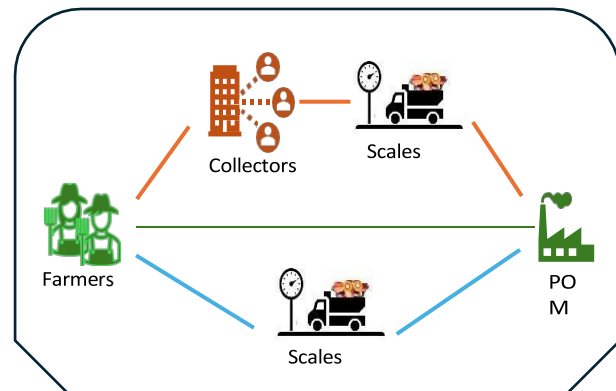
1. Each supplier is registered, understands the NDPE and commits to the NDPE and Code of Conduct.
2. The farmers of each supplier are registered, and their farm locations and production capacity are known.
3. The FFB delivered is from registered farms, indicating that it does not exceed the production capacity of the farm.



The number of external suppliers of each type in the DSNG landscape in 2023 is given in Figure 5. Number of suppliers remains relatively constant compared to 2022, except in Wahau with an additional 3 Agent suppliers, in Lamandau 1 Agent supplier, and in Sekadau 2 Cooperative suppliers. Of these suppliers, 100% of IPC and Cooperative type suppliers are registered. For Agents, 88% of suppliers are registered. In total, out of 80 external suppliers, 74 suppliers are registered. Thus, registered suppliers have reached 92.5%.

**Figure 5:** Number of DSNG External Suppliers

Independent smallholder farms are the end of the supply chain, producing FFB as the main raw material for the palm oil industry. Independent smallholders sell their FFBs through cooperatives as members, or through a longer supply chain through agents. The Agent's supply chain can have several channels, as illustrated in **Figure 6**. The length of the Agent's supply chain causes difficulties in the data collection of the supplying smallholders' farms.

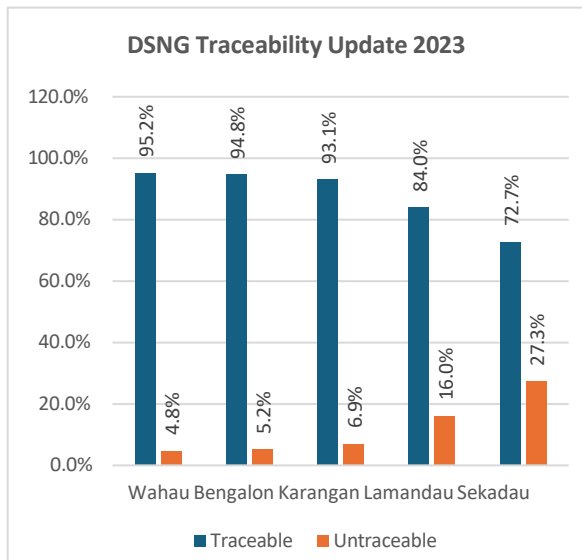


**Figure 6:** Agent FFB Sales Supply Chain

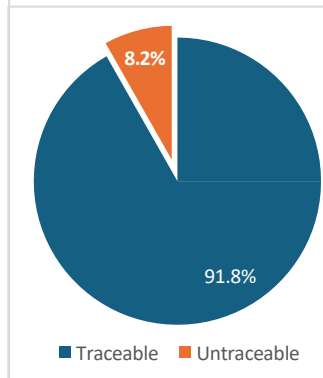
Farmer traceability is fulfilled as per steps 2 and 4 of the NDPE program strategy for external suppliers. The mechanism is regulated through the Supplier Registration Procedure. The criteria for supplier traceability is when the registered smallholders' area is equal to or exceeds the required farm area to produce FFB delivered to DSNG's mills. The result of step 4 is the registered smallholders for each supplier, including the coordinates of the farm location and area, as shown in Figure 8.

In 2023, the Nucleus supply 1,760,280 tons of FFB (61.6%), Plasma supply 472,829 tons of FFB (16.5%), and external suppliers supply 628,019 tons of FFB (21.9%). 100% of Nucleus and Plasma supply can be traced to its farm origin, as it is managed by the company.

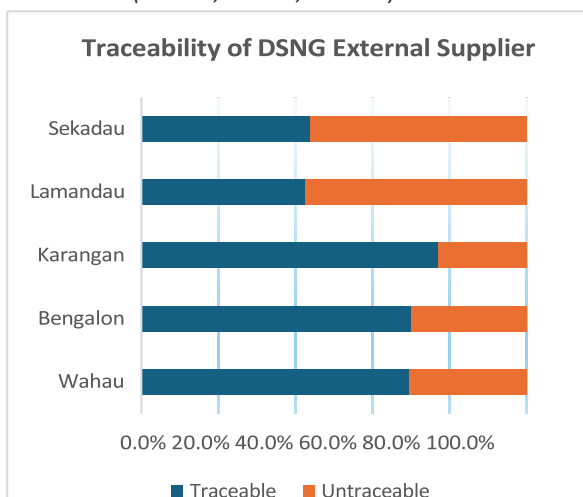




By the end of 2023, DSNG's overall FFB supply (from Nucleus, Plasma and External) that has been traceable is 91.8%.



**Figure 7.** Traceability Achievements of All Suppliers (Nucleus, Plasma, External)



For external suppliers, the traceability achievement for each DSNG external supplier landscape is between 42.5% - 77%. Total Traceability of external suppliers is 60.42%. Most of the suppliers that are not 100% traceable are Agent Suppliers. This is due to the complexity of the supply chain (as shown in **Figure 6**), which often leads to Agent managers not knowing who the supplying farmers are, as purchases are made indirectly.

**Figure 8.** External Supplier Traceability Achievements

Another cause is the presence of new suppliers who have not been traced. New suppliers often emerge at the end of the year, when mills are trying to achieve their production targets.

The approach that has begun to be developed is through the tracing of Scales in collaboration with Agents, and Farmer Groups/Collectors/Toke who often send FFB through these Scales. This process takes longer than the traceability process in the Cooperative, which is based on Farmer membership.

*Traceability to Plantation (TTP) of FFB supply from DSNG's Nucleus, Plasma and External plantations reached **91.8%**. This traceability achievement was supported by the successful registration and data collection of suppliers by **92.5%**, and farm data collection of external supplier farmers by **60.42%**. Unregistered supplier farms are mostly plantation that supply through agents.*

## 5. ENGAGEMENT OF INDEPENDENT SUPPLIERS AND FARMERS

### a. NDPE Program Acceptance

In order for FFB suppliers and supplying farmers understand NDPE, NDPE socialization is conducted as per steps no. 1 and 3 of the NDPE compliance strategy. Farmer socialization is conducted in 2 ways:

- 1) Gather farmers in groups and explain NDPE and its requirements, or
- 2) Provide explanations for each farmer in conjunction with the farmer's farm data collection.

By the end of 2023, the socialization process is targeted to reach 3,811 farmers. The realization of NDPE socialization to farmers has reached 3,637 farmers or 95.43% of the 2023 target. In addition, out of 80 DSNG suppliers in 2023, 76 of them (95.0%) have received NDPE socialization and expressed their willingness to implement NDPE for their supplying farmers.

### b. Institutional

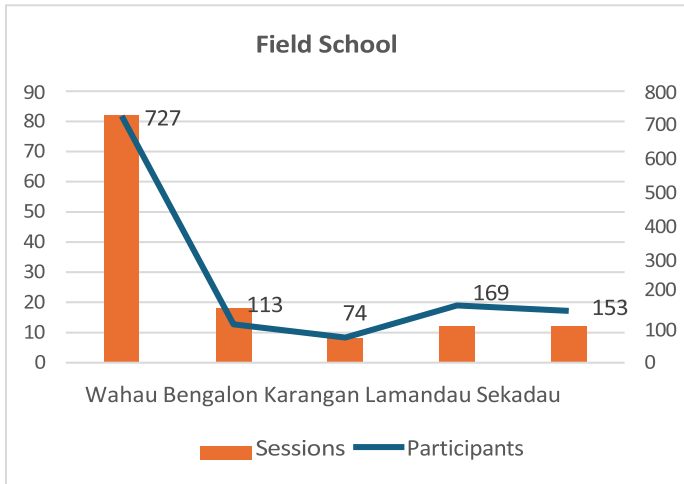
Institutionalized Supplier engagement begins with an agreement to implement the Ethical Commitment and NDPE, signed by the Supplier. As of this reporting period, 100% of the registered Suppliers have committed to the implementation of the NDPE. Among the commitments made by the Suppliers are:

- Identify Farmer members (for Cooperatives) and Farmer suppliers (for Agents) who have not fulfilled NDPE requirements. This identification is included in the *Self-Assessment* program. The results of the Self-Assessment are summarized in a *Gap Analysis* that also formulates the steps planned to meet NDPE requirements.
- Agents can organise FFB supply only from Farmers who are eligible to be sent to DSNG's mills.
- The Cooperative will encourage Farmer suppliers who have not yet fulfilled the requirements to do so.

The implementation of the institutional commitment is carried out in stages, with the assistance of DSNG's Supplier Engagement Team. Suppliers that have been institutionally engaged are recorded as "*Controlled*". The achievement of Supplier engagement in NDPE fulfillment to date has exceeded the target set for 2023. All IPC Suppliers have achieved "*Controlled*" status. 97.3% and 51.7% "*Controlled*" status are achieved for Cooperative and Agent Suppliers respectively. The supplier status data is given in **Table 4**.

### c. Capacity Building

DSNG made efforts to provide supplying smallholders with additional knowledge and skills in the NDPE engagement program. Capacity building is carried out in a series of field schools (*Sekolah Lapang/SL*), with various materials ranging from understanding NDPE and its important aspects, best practices in oil palm plantations, Occupational Health and Safety (OHS), to institutional improvement.



In the 2023 period, 132 field schools were organized with a total of 1,236 farmers participating, as shown in **Figure 8**.

**Figure 7.** DSNG-2023 Independent Smallholder Field School

**d. STDB Acquisition**

The Plantation Registration Certificate (STDB) is one of the important instruments in the governance of smallholder plantations. This document is a legal sign showing that the plantation business has been registered with the Plantation and Agriculture Office. All administrative and technical processes related to plantations require this document, including support with agricultural production facilities, assistance and counselling, replanting assistance, and assistance for Indonesia sustainable certification (ISPO).

The government's target of ISPO certification by 2025 prompted the formation of the National Action Plan-Sustainable Palm Oil (RAN-KSB). As one of the requirements in the certification process and various other purposes, DSNG helps facilitate independent smallholders involved in the NDPE implementation program to be able to obtain STDB.

Until the end of 2023, independent smallholders who are included in the NDPE program and have been assisted in obtaining STDB reached 1,296 Farmers, spread across Muara Wahau, Lamandau and Sekadau-Sintang.

*Supplier engagement starts with the socialization process, so that each supplier is willing to implement NDPE within their supplying farmers. Supplier socialization has been conducted for **95.0%** of suppliers who have agreed to implement NDPE, and **95.43%** of supplying farmers targeted in 2023 have received NDPE socialization.*

*Further engagement is done with Self-Assessment and Gap Analysis of NDPE implementation. 100% of IPC suppliers have undertaken such steps, while Cooperative and Agent suppliers are 97.3% and 51.7% respectively. These suppliers have "Controlled" status.*

*Capacity building of farmers is done through Field Schools. During 2023, 123 field schools were held with various materials, and 1,236 farmers were involved.*

*Another engagement is to encourage the fulfillment of STDB for farmers. Until the end of 2023, DSNG has assisted the acquisition of STDB for 1.296 farmers.*

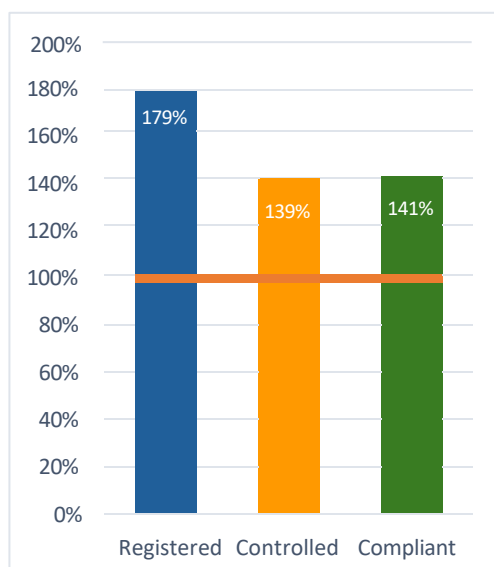
## 7.NDPE Fulfillment

To ensure NDPE implementation for each Supplier, a *Monitoring, Reporting and Verification (MRV)* process is conducted. This process is the final process that determines whether the Supplier can be declared NDPE as compliant or not. MRV is conducted by the Supplier Audit Team, by sampling farmers in proportion to the number of farmers per Supplier. Sampling is in accordance with the ISO 19011 sample calculation standard for Management System Audits.

In 2023, MRV is targeted for 1 IPC supplier, 13 Cooperative suppliers, and 8 Agent suppliers. All supplier MRV targets in 2023 were achieved. By 2023, MRV has been conducted on 3 IPCs, 15 Cooperatives and 10 Agents. Of the total supply volume, the MRV implementation of NDPE implementation for DSNG's external suppliers as a percentage of FFB supply volume is given in Table 4 and Figure 8.

**Table 4. NDPE Status of DSNG External Suppliers 2023**

No	Type Supplier	Status					
		Registered		Controlled		Compliant	
		Target	Realization	Target	Realization	Target	Realization
<b>IPC</b>							
1	Muara Wahau	100%	100%	100%	100%	25%	100%
2	Karangan	80%	100%	80%	100%	55%	84%
<b>Cooperative</b>							
1	Muara Wahau	81%	100%	81%	94%	81%	86%
2	Lamandau	50%	100%	30%	100%	10%	100%
3	Sekadau-Sintang	30%	100%	30%	98%	20%	93%
<b>Agent</b>							
1	Muara Wahau	40%	100%	40%	42%	30%	42%
2	Bengalon	60%	100%	60%	82%	20%	50%
3	karangan	80%	100%	30%	30%	25%	29%
4	Lamandau	60%	98%	10%	13%	10%	13%
5	Sekadau-Sintang	50%	96%	50%	91%	20%	6%



In general, NDPE's target to achieve 'Registered', 'Controlled' and 'Compliant' status for DSNG's external suppliers for all Supplier Types and all landscapes by the end of 2023 was achieved.

In terms of percentage of supply volume, Table 4 shows that IPC MRV reached 91.9%, Cooperatives 93.0% and Agents 23.3%. However, for Agent-type suppliers in Sekadau-Sintang, the target 'Compliant' status obtained from MRV results was not achieved. This is due to the uneven distribution of Agent supply. There is one dominant agent, and MRV at this agent cannot be declared as NDPE compliant.

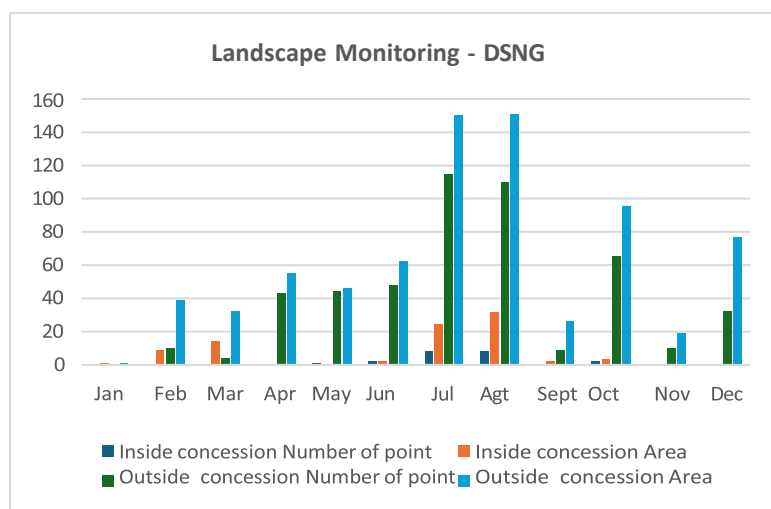
**Figure 8. NDPE Status of DSNG Suppliers against Targets until the end of 2023**

Until 2023, MRV has been conducted for 3 IPCs, 15 Cooperatives and 10 Agents. In terms of percentage of supply volume, MRV of IPC reached 91.9%, Cooperatives 93.0% and Agents 23.3%. The percentage achievement exceeds the target, although the MRV percentage achievement of Agents in 2023 is still below the target.

## 8. Landscape Monitoring

DSNG monitors deforestation in the landscape associated with its Plantation operations. The areas included in the scope of monitoring (*Area of Interest (AoI)*) are nucleus plantations, plasma plantations, DSNG supplier independent smallholder plantations, and conservation areas outside concessions managed with communities. Monitoring is conducted using deforestation alerts from the Satelligence platform and field verification when necessary.

During 2023, deforestation monitoring result in this landscape is shown in Figure 9, with verification results described in Table 5.



**Figure 9.** Results of landscape monitoring in the DSNG AoI

**Table 5. Landscape Monitoring Verification Results**

Location		Verification Result
Inside Concession	Wahau	Land Clearing for Replanting
	Lamandau	Land clearing within the HGU that is controlled by the community to plant oil palm
	Sekadau	Land clearing within the HGU that is controlled by the community to plant oil palm.
Outside Concession	Wahau	Land clearing by the community for gardening
	Bengalon	Land Clearing by Mining Contractors in PT KPC Concession area Land clearing by community for gardening
	Karangan	Land clearing for construction of elementary school building. Not forest land based on HCV-HCS Assessment
		Land clearing by PT Warga Rimba, a supplier of PT BAS. Not forest land based on HCV-HCS Assessment
		Land Clearing inside other parties' concessions (Oil Palm Plantation, HTI)
	Lamandau	Land clearing by the community for gardening Land Clearing inside other parties' concessions (Oil Palm Plantation, HTI)
		Sekadau



## 9. Grievance Handling

One of the best controls to know whether the Company's operations are still in accordance with good governance is to listen to complaints from stakeholders. As per the procedure, grievances submitted to DSNG consist of 2 types: internal grievances, originating from DSNG employees, and external grievances, originating from stakeholders from outside the Company. During 2023, and most of the grievance submitted have been resolved. The list of internal grievances is given in Table 6, and external grievances in Table 7.

**Table 6. Types and Number of Resolved Internal Grievances**

Complaint Type	Number of Resolved Grievance	%
Environment	1	0,32
Health	1	0,32
Education	2	0,65
Residential Facilities	223	81,61
Public Facilities	20	6,45
Clean Water Procurement	17	5,81
Electricity Procurement	5	1,61
Shopping Needs	0	0,00
BPJS Employment	3	1,29
etc	5	1,94
<b>Total</b>	<b>277</b>	<b>100,00</b>

**Table 7. Types and Number of Resolved External Grievances**

Complaint Type	Total	Follow-up
Infrastructure	40	1. Follow-up improvement 2. Explanation has been given and is acceptable to the concerned
Farm/cooperative Partnership	97	Coordination with Cooperative Management
Growing Plant Compensation (GRTT)/ Land Compensation (GRL)/ Land Claims	178	1. Checking the claimed land 2. Measurement of the claimed land 3. Adjustment of track document results with company documents.
Job Opportunities and Employment	16	1. Explanation to Management regarding work grievances 2. Explanations have been given regarding the recruitment process and the current vacancy conditions to replace resigned employees (not a new position)
External FFB	4	1. Socialization of FFB Acceptance Standard of PT. PWP 2. The complainant accepted the explanation from CSR
Fruit Theft	4	Coordination with Village Officials & Customary Administrators
Security Misunderstandings with the community	1	Coordination with Village Officials & Customary Administrators
Education	1	Coordination with School Transportation Contractor

Complaint Type	Total	Follow-up
Community empowerment	25	Coordination with Tamiang Village Government & TPKD Tamiang village - explanation of CSR related to community assistance.
Deforestation	1	CSR explained that in the agreement between PT PWP and its partner KL-1, only land that already exists now
POM / FFB / CPO / Bulking	1	Meetings and explanations have been made to the complainant and are accepted.
Contractor/payment contractor	26	1. Explanation to management regarding contractor complaints 2. Operational transportation cooperation
Territory Boundary	3	Coordination with Tamiang Village Government & TPKD Management
Operational Process	12	Communication with related parties
Environment	3	Communication with Tepian langsung village and related agencies
<b>Total</b>	<b>412</b>	

Of all the external complaints received, there are two issues related to NDPE. The first is the standard of External FFB received at the DSN POM, and the second is the issue of Deforestation for plasma land clearing. All grievances from the Community related to NDPE can be resolved properly.