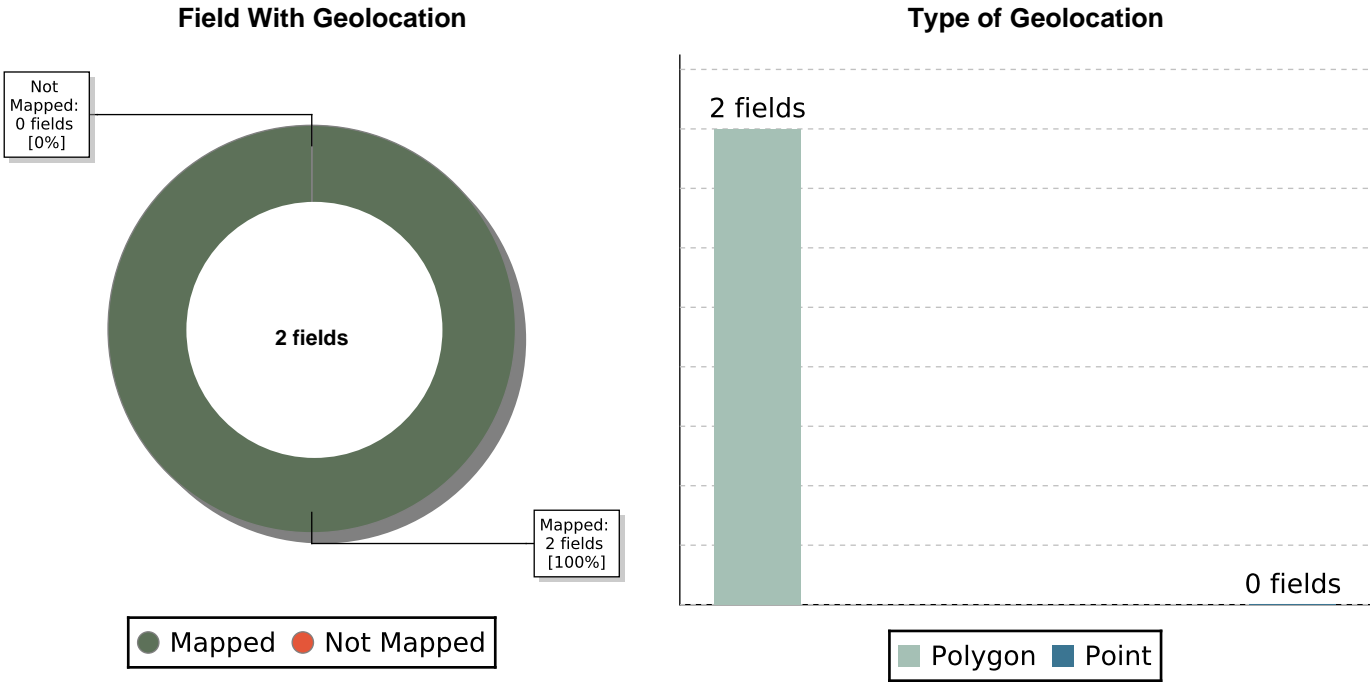


FARMFORCE EUDR DUE DILIGENCE REPORT

A. Operator Information	
Operator's legal name:	PT Cocoa Trader Ltd.
Operator's address:	Jalan Kampang No.4, Makassar 90241, Indonesia
Economic Operators Registration and Identification Number (EORI):	ID 593 842 100 00231
B. Overall Conclusion	
Additional information to Competent Authorities:	<p>Negligible Risk Conclusion</p> <p>1) Deforestation risk is negligible as all plots passed Global Forest Watch checks, and manual audits confirmed compliance where needed.</p> <p>2) Legality risk is negligible based on farm level legality assessments covering applicable local laws, verified land titles, negative satellite checks for overlap with sensitive ecosystem areas and Indigenous communities' land.</p> <p>Certifications (Rainforest Alliance) and our own farmer training and capacity building in key legality areas further support compliance. Relevant documentation is attached.</p>
C. Product Information	
Harmonized System (HS) Code:	1801
Product description:	Cocoa beans, whole or broken, raw or roasted
Scientific name:	Criollo (<i>Theobroma cacao</i> subsp. <i>cacao</i> var. <i>criollo</i>)
Quantity (kg. of net mass):	10,000.00 KG
Number of units:	100 Units
D. Supply Chain Mapping	
Country of production:	Cote d'Ivoire
Country of production subregion(s):	Gagnoa, Tiébissou
Complexity of Supply Chain:	Direct sourcing from coops and farmers. No intermediaries
Total number of suppliers (coops / exporters):	1 Supplier

Total number of sub-suppliers	2 Producers
Total number of plots:	2 Plots
Number of plots with geolocation:	2 Plots
Date or time range of production:	1/10/2024 - 30/09/2025



E. Deforestation Risk Assessment	
Deforestation risk level (based on country EU benchmarking):	Standard
Total number of plots checked for deforestation:	Total Plot: 2 Plot with Valid Status: 1 Plot with Invalid Status: 0 Plot with No Status: 0
Deforestation assessment risk:	Total Fields Validated: 1 fields High Risk(0-20%): 0 fields Medium Risk(21-80%): 0 fields Low Risk(81-100%): 1 fields The negligible risk % indicates if this field carries a risk of deforestation in the near future basis past trends. Lower percentage means higher risk
Risk mitigation measures & verification methods:	1. All plots have undergone a deforestation check via Global Forest Watch 2. Plots that showed invalid in the deforestation check were manually audited and the audit showed no risk of deforestation as per EUDR requirements

F. Legal Compliance Assessment														
Total number of farms checked for legal compliance:	Total Plot: 2 Plot with Compliant Survey Status: 0 Plot with Non-Compliant Survey Status: 0 Plot with No Survey Status: 0													
Country specific risk analysis:	<p>Overall Sustainability Risk Score: 3.5 (significant to high risk) Based on an overall assessment of the cocoa value chain in Indonesia 1 = Low, 2 = Moderate, 3 = Significant, 4 = High, 5 = Very high risk.</p> <table><tr><td>Fair Business Practice</td><td>3</td><td>Corruption remains a concern, particularly in rural areas, affecting transparency in land use and taxation</td></tr><tr><td>Human Rights & Ethics</td><td>4</td><td>Land conflicts, displacement of communities, and security threats from armed groups create instability in cocoa-growing re..</td></tr><tr><td>Environment</td><td>4</td><td>Cocoa expansion drives deforestation in biodiversity hotspots; climate risks and water scarcity further stress sustainab..</td></tr><tr><td>Labour Rights</td><td>3</td><td>Informal labor, wage disparities, and child labor risks persist, though certification programs have improved conditions.</td></tr></table>		Fair Business Practice	3	Corruption remains a concern, particularly in rural areas, affecting transparency in land use and taxation	Human Rights & Ethics	4	Land conflicts, displacement of communities, and security threats from armed groups create instability in cocoa-growing re..	Environment	4	Cocoa expansion drives deforestation in biodiversity hotspots; climate risks and water scarcity further stress sustainab..	Labour Rights	3	Informal labor, wage disparities, and child labor risks persist, though certification programs have improved conditions.
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Environment	4	Cocoa expansion drives deforestation in biodiversity hotspots; climate risks and water scarcity further stress sustainab..												
Labour Rights	3	Informal labor, wage disparities, and child labor risks persist, though certification programs have improved conditions.												
Presence of indigenous communities and lands:	No 4 fields with indigenous lands data 0.0% of overlap with indigenous lands													
Applicable local laws:	<ul style="list-style-type: none">• Land-use rights: While formal land titles are not mandatory for smallholders to farm legally in Indonesia, obtaining such titles is highly beneficial for ensuring legal security and accessing various economic opportunities.• Environmental legislation: Indonesia requires Environmental Impact Assessments (EIAs) for large-scale agricultural projects, but smallholder farms may be exempt unless located in sensitive ecosystems.• Forest related rules: Forest clearing for agriculture in Indonesia requires a Forest Use Permit if it involves removing natural forests. Exceptions may apply for small-scale farming in designated areas or traditional use by Indigenous and Afro-Indonesian communities.• Third parties' legal rights & Free Prior and Informed Concern (FPIC): Farmers must respect Indigenous community land rights, as per Indonesia's legal framework on ethnic territories.• Labour rights: Indonesia's labour laws set minimum wages, working hours, and conditions for agricultural workers, with social security obligations for formal employment.• Human rights: Indonesian law prohibits child labour, particularly in hazardous agricultural activities.													

<p>Legal assessment risk:</p>	<p>Given the results of the risk assessment, mitigation and verification measures we conclude negligible legality risk</p>
<p>Risk Mitigation Measures (if applicable):</p>	<ol style="list-style-type: none"> 1. All farmers and plots of lands have been assessed on site with a legality survey covering applicable local laws questions as summarized above. 2. All farmers provided formal land titles which are attached to this DDS 3. Satellite check through Global Forest Watch of all polygons showed that all plots included here are not located in sensitive ecosystem land or Indigenous communities' land 4. All plots are located in land where land conflicts, displacement of communities, and security threats from armed groups is relatively low 5. Human rights and labour rights were checked through the survey and no significant risks were uncovered 6. All farmers are Rainforest Alliance certified and their certification as well as audits results are attached to this report 7. Our 'sustainably grown cocoa' programme also provides training and capacity awareness in all key legality areas

Farmer Survey

Plot Survey

2 farmers

2 fields

● Compliant
● Non-Compliant
● No Response

● Compliant
● Non-Compliant
● No Response

G. Supporting Information (link to the file library)	
Suppliers: List of all suppliers and sub-suppliers with contact details	Link to file
Geolocation: Geolocation data files (GeoJSON format)	Link to file
Chain of custody documentation: Details of the item collected (e.g., description, quantity, unique identifiers), Date and time of collection or transfer, Names and signatures of individuals handling the item, Purpose of each transfer (processing stages), Locations of storage and transfer	Link to file
Certifications or sustainability standards that the production areas comply with	Link to file
Possible documentation showing compliance at plot level with local laws (country dependent)	Link to file
Possible documentation showing compliance at supplier level with local laws (country dependent)	Link to file

Appendix

1. Documentation

- **Possible documentation showing compliance at plot level with local laws (country dependent):**

- **Land-use rights:** documentation on ownership/rights to land use; contract, land lease or concession agreements; protected areas and admitted areas within protected areas; remote sensing images.

Ex: Under the national laws of Ghana and Côte d'Ivoire, *farmers are not required to have documented use rights (such as production or plantation permits) to produce cocoa legally outside the protected forest area.* However, in Côte d'Ivoire and Ghana, where admitted agricultural areas exist within classified forests and forest reserves. *When and if sourcing from these areas, operators would need to access official evidence proving that farmers are allowed to produce cocoa in these areas.*

- **Environmental legislation:** official audit reports; environmental clearance certificates; codes of conduct; publicly available information showing rigorous legislative supervision and cocoa tracking and control procedures; official documents issued by competent authorities in a country of production.

Ex: While the legal requirements related to the protection of the environment in the production of cocoa in West and Central Africa varies across countries, they will typically cover issues related to water management, waste disposal, soil management, pesticide and chemicals use, and the protection of wildlife and biodiversity. *Cameroun, Côte d'Ivoire and Ghana have legal provisions subjecting activities likely to impact adversely on the environment, including agricultural activities, to an environmental assessment.* However, the requirement applies to agricultural activities that involve the clearing of a land area greater than a certain threshold. Since most cocoa farming is carried out by smallholders on small areas of land, this obligation would not apply. *Nonetheless, in Ghana, the obligation to carry out an environmental impact assessment applies without any surface threshold if the planned activity is in an environmentally sensitive area.*

- **Third parties' legal rights:** reports of environmental impact assessments; management plans; environmental audit reports; social responsibility agreements.

Cocoa farmers have a responsibility to prevent harm to others. This encompasses, for example, using pesticides and water carefully to avoid harmful runoffs. This also entails not encroaching upon lands held by indigenous peoples or local communities, respecting their rightful ownership and traditional use of the land and forests. Environmental regulations may also include provisions on the right to be informed about the state of the environment and participate in the procedures before making decisions likely to have harmful effects on the environment.

- **Labour rights at the plot level:** employment contracts, sharecropping contracts, identity card of employees, and certificates of payment of social security fees

Cocoa producing countries in West and Central Africa have different legal requirements regarding the minimum wage, maximum working hours, minimum working age, union organisation, social payments, discrimination and gender equality.

- **Human rights obligations:** certification documents; audit reports; supplier codes of conduct; training and education records; child labour monitoring and risk assessment reports; child labour remediation plans; records of incidents, grievances, and their resolutions; and sustainability reports.

Ex: Cameroon, Côte d'Ivoire and Ghana are all parties to international conventions on child labour and have adopted related national legislation. *All three countries prohibit hazardous child labour (i.e. under 18 years old), which is defined in the respective legal frameworks. In the three countries, it includes: the 6 manipulation of agrochemicals; working with motorised farm machinery; carrying heavy loads beyond permissible carrying weight; night work and working long hours.*

- **Free Prior and Informed Concern:** specific reports on tenure and rights claims and conflicts; community consent agreement; community consultation records; Environmental Impact Assessments, social impact assessments and project plans provided to the community in a language and format they can understand; records of negotiations between the project proponent and the affected community; community resolutions or statements; third-party assessments of the FPIC process.

FPIC is a right granted to Indigenous Peoples recognised in the UN Declaration on the Rights of Indigenous Peoples. FPIC allows Indigenous Peoples to engage in negotiations to shape the design, implementation, monitoring and evaluation of projects.

Ex: *While Cameroon, Côte d'Ivoire and Ghana are signatories to the Declaration, none of them are parties to the ILO Indigenous and Tribal Peoples Convention of 1989. The application of FPIC therefore largely relies on whether the national legal framework covers the different elements of this right.* FPIC is more commonly associated with major projects that have significant impacts on communities. Furthermore, in many cocoa-producing regions, smallholder farmers have been engaging in cocoa cultivation for generations as part of their traditional 8 livelihoods. The need for FPIC may be less relevant when the farming activities align with long-standing practices and are not introducing entirely new or disruptive elements.

- **Tax, Fees and Anti-Corruption:** contracts, import licences, export licences, official receipts for export duties, export ban lists, export quota awards.

Since the EUDR legality criteria applies to the area of production, it is reasonable to infer that the relevant taxes and fees would be those related to the cocoa plot only and not those related to other stages in the supply chain. Additionally, customs rules would not be applicable to smallholder cocoa farmers who typically do not directly export their products, and thus are not directly impacted by such regulations. Further guidance on this point could be useful to inform operators' due diligence efforts.

- **Possible documentation showing compliance at supplier level with local laws (country dependent):**

- Company policies and codes of conduct
- CSR/Sustainability reports
- Official documents: Administrative permits issued by authorities.
- Contractual obligations: Agreements/contracts with indigenous peoples or local communities.
- Third-party verification: Certification schemes or reports.
- Impact assessments: Environmental audits, management plans.
- Reports on tenure, rights claims, and conflicts.

2. Relevant commodities and products (Extract from Annex 1 EUDR)

Cocoa

1801 Cocoa beans, whole or broken, raw or roasted
 1802 Cocoa shells, husks, skins and other cocoa waste
 1803 Cocoa paste, whether or not defatted
 1804 Cocoa butter, fat and oil
 1805 Cocoa powder, not containing added sugar
 1806 Chocolate and other food preparations containing cocoa

Coffee

0901 Coffee, whether or not roasted or decaffeinated; coffee husks and skins; coffee substitutes containing coffee in any proportion

Oil Palm

1207 10 Palm nuts and kernels
 1511 Palm oil and its fractions, whether or not refined, but not chemically modified
 1513 21 Crude palm kernel and babassu oil and fractions thereof
 1513 29 Palm kernel and babassu oil and their fractions
 2306 60 Oilcake and other solid residues of palm nuts or kernels
 ex 2905 45 Glycerol, with a purity of 95% or more
 2915 70 Palmitic acid, stearic acid, their salts and esters
 2915 90 Saturated acyclic monocarboxylic acids
 3823 11 Stearic acid, industrial
 3823 12 Oleic acid, industrial
 3823 19 Industrial monocarboxylic fatty acids
 3823 70 Industrial fatty alcohols

Rubber

4001 Natural rubber, balata, gutta-percha, guayule, chicle and similar natural gums
 ex 4005 Compounded rubber, unvulcanised
 ex 4006 Unvulcanised rubber in other forms
 ex 4007 Vulcanised rubber thread and cord
 ex 4008 Plates, sheets, strips, rods and profile shapes of vulcanised rubber
 ex 4010 Conveyer or transmission belts or belting
 ex 4011 New pneumatic tyres
 ex 4012 Retreaded or used pneumatic tyres
 ex 4013 Inner tubes
 ex 4015 Articles of apparel and clothing accessories
 ex 4016 Other articles of vulcanised rubber
 ex 4017 Hard rubber

Supporting Information - Geolocation

Factory Name	Farmer Name	Field ID	Field Geolocation
COOP-CA BBC	Anané Bonsrah	COOP1-003_F1	{ "type": "Polygon", "coordinates": [[[-5.562463290989399, 6.495548863952408], [-5.561414547264576, 6.495016531724855], [-5.560072436928749, 6.49716218027374], [-5.561843030154705, 6.497823428603071], [-5.562463290989399, 6.495548863952408]]]] }
	Fatoumata Konate	COOP1-029_F1	{ "type": "Polygon", "coordinates": [[[-5.588464299999998, 6.4014321], [-5.588455699999997, 6.4014341], [-5.588450700000001, 6.4014347], [-5.5884360000000015, 6.4014063], [-5.5884130000000003, 6.4013798], [-5.5883599, 6.4013198], [-5.588322199999993, 6.4012906], [-5.588296700000001, 6.4012843], [-5.588231900000011, 6.4013164], [-5.588251299999996, 6.401365], [-5.588252500000001, 6.4014539], [-5.588195299999995, 6.4015093], [-5.588165099999998, 6.4015444], [-5.588178300000001, 6.4016199], [-5.5881477000000075, 6.4016862], [-5.588160100000001, 6.4017143], [-5.588119699999993, 6.4017781], [-5.588095900000013, 6.4018442], [-5.588058200000006, 6.4019333], [-5.588022499999994, 6.4020379], [-5.5880195000000015, 6.4021062], [-5.587999300000007, 6.4022008], [-5.587919800000009, 6.4023214], [-5.587842200000011, 6.4024218], [-5.587803799999989, 6.4024825], [-5.587792799999988, 6.4024862], [-5.587715599999996, 6.4024975], [-5.5876725999999906, 6.4025612], [-5.587618899999995, 6.4026158], [-5.587549899999999, 6.4026565], [-5.587486699999995, 6.4027059], [-5.587473899999992, 6.4027292], [-5.587418000000014, 6.4027647], [-5.5872995, 6.4027913], [-5.587195799999989, 6.4027719], [-5.587206699999996, 6.4027495], [-5.587131499999998, 6.4027025], [-5.587051300000013, 6.4027212], [-5.5870113, 6.4027456], [-5.586972599999996, 6.4027871], [-5.586950900000005, 6.4028359], [-5.586864899999995, 6.4028587], [-5.586805499999997, 6.4029203], [-5.586813400000011, 6.4029989], [-5.586748099999994, 6.4030414], [-5.586686299999997, 6.4031192], [-5.586595200000005, 6.4031703], [-5.586543000000006, 6.40325], [-5.586456300000009, 6.4033252], [-5.586444499999999, 6.4033896],

Supporting Information - Geolocation

Factory Name	Farmer Name	Field ID	Field Geolocation
			[-5.5864650000000004, 6.4034884], [-5.5864550999999995, 6.403524], [-5.5864769000000008, 6.4035179], [-5.5865358000000007, 6.4035662], [-5.5866245999999993, 6.403592], [-5.5867331000000004, 6.4035906], [-5.5867757999999998, 6.4036616], [-5.5867585999999996, 6.4037477], [-5.5868102999999996, 6.4037977], [-5.586909499999999, 6.4038102], [-5.5869806999999998, 6.4038389], [-5.5869530999999998, 6.4039019], [-5.5869827999999997, 6.403956], [-5.5870146000000003, 6.4039921], [-5.5870794999999997, 6.40398], [-5.5871348000000001, 6.404032], [-5.5871276999999996, 6.4040418], [-5.5871701000000009, 6.4041181], [-5.5871994999999997, 6.4042216], [-5.5872363999999995, 6.4042948], [-5.5872353999999997, 6.4043476], [-5.587226899999999, 6.404425], [-5.5872550999999993, 6.4044575], [-5.5873411000000003, 6.404473], [-5.58744100000000125, 6.404508], [-5.5874972000000001, 6.4045092], [-5.5877399999999997, 6.4045172], [-5.5878010000000013, 6.4045045], [-5.58790970000000115, 6.4044907], [-5.5880706000000009, 6.4044288], [-5.5881548000000012, 6.4044138], [-5.58825429999999885, 6.4043853], [-5.58835070000000066, 6.404365], [-5.58844669999999916, 6.4043139], [-5.5885443999999989, 6.4042714], [-5.588663599999999, 6.4042032], [-5.5887418000000008, 6.4041559], [-5.58877240000000105, 6.4041108], [-5.5887768000000005, 6.4040414], [-5.5887505999999997, 6.4039507], [-5.5887551000000014, 6.4038959], [-5.5887652000000012, 6.4038197], [-5.58877319999999914, 6.4037505], [-5.5887746999999988, 6.4037038], [-5.588801799999999, 6.4036634], [-5.58886300000000035, 6.4036166], [-5.5889541999999989, 6.4035866], [-5.5889597999999998, 6.4035151], [-5.5890163999999991, 6.4034584], [-5.5890458000000008, 6.4033961], [-5.5890765000000004, 6.4033537], [-5.5891240999999992, 6.4033138], [-5.5891646000000004, 6.4032813], [-5.5891799000000005, 6.403265], [-5.58923659999999924, 6.4032462], [-5.5892824999999996, 6.40321], [-5.5893111000000003, 6.4031805], [-5.5893341999999996, 6.4031357], [-5.5893404999999992, 6.4030914], [-5.5893920999999998, 6.4030322], [-5.5894364000000011, 6.4030114], [-5.5894471000000001, 6.402957],

Supporting Information - Geolocation

Factory Name	Farmer Name	Field ID	Field Geolocation
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