

Due Diligence Statement

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Status: SUBMITTED

Created On: 18/09/2025

1. Company Internal Ref: DDS-2024-DUMMY-001

2. Activity: Import of Palm Oil Products

3. Operator/Trader name and address:

Name: KPN Corporation Berhad

Address: Level 6, Menara KPN, Jalan Sultan Ismail, 50250 Kuala Lumpur, Malaysia

Country: Malaysia

ISO Code: MY

Commodity(ies) or Product(s)

Description	Net Mass (Kg)	% Est.	Units
Crude Palm Oil (CPO)	2150	5%	MT

Scientific Name: Elaeis guineensis

Common Name: Oil Palm

Producer Name: Riau Cooperative Growers

Country of Production: Malaysia

Summary Plot Information

Total Producers: 15

Total Plots: 45

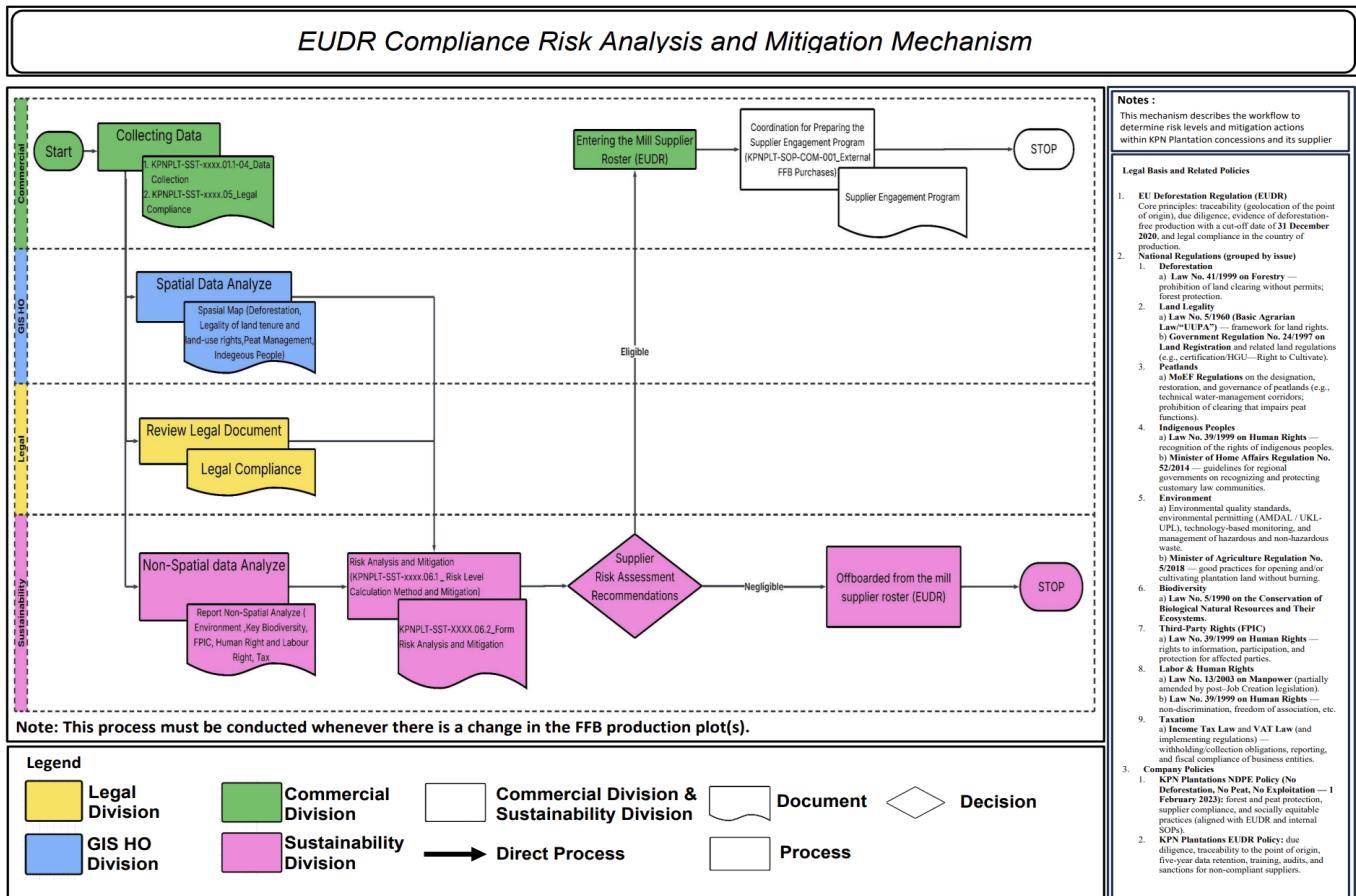
Total Production Area (ha): 1250.5

Country of Harvest: Malaysia

Max. Intermediaries: 2

Traceability Method: GPS Coordinates + Plot Mapping

PAGE 2 - METHODOLOGY



PAGE 3 - PLOT RISK ASSESSMENT

The plot risk assessment is based on the geospatial analysis on deforestation and land approved for farming map.

Geospatial analysis involves capturing plot polygons or GPS coordinates using KoliTrace and analyzing them to ensure no deforestation occurred after December 2020 and that the plots are on legally approved land. If deforestation is detected, further verifications are conducted. Plots showing no deforestation proceed to land legality analysis. The map reference for deforestation and land approved for farming is provided in the following information.

Geospatial analysis reference

Deforestation map: GFW

Land approved for farming map: WDPA & Or National Map. Please clarify with Koliva directly which map is being used.

Outputs:

The output includes deforestation, land-approved-for-farming maps, and land legality analysis, as well as providing negligibility status.

- Low: Assessment indicates that there is high certainty for EUDR negligible risk and proof is available. The low risk is categorized as negligible.
- Medium: Assessment shows that there is an indication of negligible risk. However, further mitigation actions are encouraged.
- High: Assessment indicates that the farmer/plots are high risk and categorized as non negligible.

Non-negligible plots are flagged with warning indicators, and users can view details of negligibility status and reasons for non-negligible through interactive map features. This detailed methodology ensures that operators can systematically assess and verify their negligibility status with the EUDR, promoting sustainable agricultural practices and mitigating deforestation risks.

PAGE 4 - LAND COVER CHANGE MONITORING

FLOWCHART LAND COVER CHANGE MONITORING

This flowchart illustrates the workflow for monitoring land cover changes across multiple stakeholders within the KPN Plantation concession area. It aims to conduct monitoring every 3 months as well as incidental events.

Process Flow:

1. GIS ! Alert ! Verify Coordinates Location ! Desktop Analysis
2. Estate Manager ! Controlled by Community ! Verify Field Location
3. System And Monitoring ! Verify Land Cover Change Final Report

Legal Framework:

1. UU No. 32 / 2009 on Environmental Protection and Management - Requires forest area clearing without permits
2. UU No. 32 / 2014 on Marine and Fisheries - Protection and Management - Requires plantation business activities
3. PERMEN LHK No. P.71/MENLHK.1/2019 - Environmental Information System - Including through monitoring system
4. EU Deforestation Regulation (EUDR) - Ensures supply chain traceability and proof of deforestation-free since 2020

GeoJSON Data Access:

Link: <https://api.kpn-eudr.com/geojson/plots-data.geojson>

This GeoJSON file contains detailed plot boundaries, coordinates, and verification status for all plots included in this DDS report.