EU Due Diligence Statement

1. Reference Information

Company Internal Ref:	DDS-2024-001
Activity:	Import of Palm Oil Products

2. Operator/Trader Information

Name:	PT Sawit Mas Indonesia
Address:	Jl. Sudirman No. 123, Jakarta 10220, Indonesia
Country:	Malaysia

3. Commodity Information

Description	Net Mass (Kg)	% Est.	Units
Refined Palm Oil Scientific: Elaeis guineensis	1500.000 Common: Oil Palm	undefined%	MT

4. Summary Statistics

Total Producers:	15	**Total Area (ha):**	1250.50
Total Plots:	45	**Country of Harvest:**	Malaysia

EUDR Compliance Methodology

1. EUDR Compliance Verification Process

The EUDR compliance verification follows Article 2.40 requirements through a systematic three-step process: Proof of No Deforestation after 2020, Proof located on Approved Land, and Proof of Legality across 8 key indicators.

Data Sources:
• Geospatial data based on plot GPS/Polygon coordinates
• On-site surveys from farmers and plot assessments
• Satellite imagery analysis and desktop verification
• Field verification and land legality confirmation

1. Deforestation Analysis Methodology

Our deforestation analysis employs a multi-layer satellite monitoring approach:

• Global Forest Watch (GFW) - Provides annual tree cover loss data
• Joint Research Centre (JRC) - EU's forest monitoring system
• Science Based Targets Network (SBTN) - Advanced deforestation alerts

Analysis Workflow:
1. Plot boundary verification using GPS coordinates
2. Historical forest cover analysis (2000-2023)
3. Cross-reference with protected area databases
4. Risk assessment scoring and compliance determination

2. Risk Assessment & Compliance Framework

Risk Classification System:

• HIGH RISK: Forest loss detected after December 31, 2020
• MEDIUM RISK: Forest loss between 2018-2020 (requires additional verification)
• LOW RISK: No significant forest loss detected in monitoring period

Compliance Determination Process:
• COMPLIANT: No deforestation after cutoff date, all documentation verified
• NON-COMPLIANT: Evidence of post-2020 deforestation or legal violations
• UNDER REVIEW: Additional verification required for final determination

3. Data Integration & Verification Sources

Plot boundaries and verification data are provided in standardized GeoJSON format ensuring full compatibility with EU TRACE system requirements and regulations.

Risk Analysis & Process Flowcharts

1. Risk Assessment Process Overview

This section outlines the systematic risk assessment approach used to evaluate deforestation risks and ensure EUDR compliance across all production plots.

Key Process Components:
- Data Collection !' Risk Identification !' Impact Assessment !' Scoring
- Satellite Monitoring !' Field Verification !' Documentation Review
- Legal Compliance Check !' Final Risk Determination !' Mitigation Planning

2. Risk Categories & Assessment Matrix

Risk Category	Assessment Criteria	Compliance Action
Deforestation	Satellite imagery analysis	No forest loss post-2020
Legal Compliance	Permits & certifications	Valid documentation
Supply Chain	Traceability verification	Complete chain of custody
Operational	Quality & production data	Standards compliance

3. Data Verification & Quality Assurance

Quality assurance measures ensure accuracy and reliability of all compliance data:

• Multi-source data cross-validation and consistency checks
• Independent third-party verification of critical findings
• Automated monitoring systems with manual verification protocols
• Regular audit trails and documentation review processes

All verification data and plot geometries are accessible through standardized GeoJSON files that accompany this Due Diligence Statement.

GeoJSON Data Access:

Link: https://api.kpn-compliance.com/dds/geojson/plots-data.geojson

Land Cover Change Monitoring

Land Cover Change Monitoring Flowchart

This flowchart illustrates the systematic workflow for monitoring and verifying deforestation alerts across plantation concession areas. The monitoring system operates on both scheduled (bi-weekly) and incident-based protocols.

[LAND COVER CHANGE MONITORING FLOWCHART]

(See attached flowchart document for complete monitoring process)

Key Process Components:

Process Stage	Responsible Party & Action
1. GIS Alert Detection	System Monitoring - Automated satellite analysis
2. Coordinate Verification	GIS Team - Location accuracy confirmation
3. Desktop Analysis	Technical Team - Preliminary assessment
4. Field Verification	Estate Manager - On-ground validation
5. Final Report	System Monitoring - Compliance determination

Legal Framework & Compliance:

• UU No. 41 Tahun 1999 - Forestry Law: Prohibits unauthorized land clearing

• UU No. 32 Tahun 2009 - Environmental Protection: Requires environmental monitoring

• UU No. 39 Tahun 2014 - Plantation Law: Mandates sustainable practices

• PERMEN LHK No. P.8/2019 - Environmental information systems

• ISPO (Indonesian Sustainable Palm Oil) - No deforestation requirements

• NDPE Policy KPN Plantations - No Deforestation, No Peat, No Exploitation