<table>
<thead>
<tr>
<th>Document Verification</th>
<th>14 October 2020</th>
</tr>
</thead>
<tbody>
<tr>
<td>Field Verification</td>
<td>4 December 2020</td>
</tr>
<tr>
<td>1st Satellite Imagery Reassurance</td>
<td>N/A</td>
</tr>
<tr>
<td>2nd Reassurance Verification Satellite Imagery</td>
<td>N/A</td>
</tr>
<tr>
<td>Name of Grower</td>
<td>PT Dharma Satya Nusantara</td>
</tr>
<tr>
<td>Name of Subsidiary</td>
<td>PT Bima Agri Sawit</td>
</tr>
<tr>
<td>RSPO Membership No.</td>
<td>1-0135-12-000-00</td>
</tr>
<tr>
<td>Date of Joining RSPO</td>
<td>28 July 2008</td>
</tr>
</tbody>
</table>
NPP Notification Statement (Including Verification Statement by CB)

1. Date of Notification 25 May 2021
2. Name of Grower PT Dharma Satya Nusantara
3. Name of Subsidiary (if any) PT Bima Agri Sawit
4. RSPO Membership No. 1-0135-12-000-00
5. Legal land entity

**Land Use Rights (HGU)**

- Land use rights decree No. 14-HGU-BPN-RI-2008 regarding land use rights for PT Bima Agri Sawit, with total land 5,222 ha, valid for 35 years, located in Desa Baay and Karangan Seberang, Karangan sub-district, Kutai Timur district, Kalimantan Timur province. Issued date on 5 May 2008 in Jakarta. The land use rights decree, has eight (8) land use rights certificate with follow information below:
  1. Land use rights certificate no. 23; Desa/Kel: Baay/Karangan Seberang; total area 1767 ha. Valid until 04 May 2043;
  2. Land use rights certificate no. 24; Desa/Kel: Baay/Karangan Seberang; total area 13 ha. Valid until 04 May 2043;
  3. Land use rights certificate no. 25; Desa/Kel: Baay/Karangan Seberang; total area 1578 ha. Valid until 04 May 2043;
  4. Land use rights certificate no. 26; Desa/Kel: Baay/Karangan Seberang; total area 1219 ha. Valid until 04 May 2043;
  5. Land use rights certificate no. 27; Desa/Kel: Baay/Karangan Seberang; total area 23 ha. Valid until 04 May 2043;
  6. Land use rights certificate no. 28; Desa/Kel: Baay/Karangan Seberang; total area 541 ha. Valid until 04 May 2043;
  7. Land use rights certificate no. 29; Desa/Kel: Baay/Karangan Seberang; total area 73 ha. Valid until 04 May 2043;
  8. Land use rights certificate no. 30; Desa/Kel: Baay/Karangan Seberang; total area 8 ha. Valid until 04 May 2043.

**Permission to Undertake Plantation Activities (IUP/Izin Usaha Perkebunan):**

1. Decree No. 1884.45/124/Eko.1-VII/2013, total area ±480 ha, for oil palm plantation located at Karangan subdistrict, Kutai Timur district, Kalimantan Timur province. Date of issued 8 Jul 2013, valid as long as no revision of the land purposes.
2. Decree No. 525.26/208/EKO.1-XI/2016, total area 5222 ha, with processing unit capacity 40 ton FFB per hours, for oil palm plantation located at Karangan subdistrict, Kutai Timur district, Kalimantan Timur province. Date of issued 8 November 2016, valid as long as no revision of the land purposes.

7. Type of business Oil palm plantation
8. Location of proposed new planting:
   i. Grower Address Desa Baay and Karangan Seberang, Karangan Subdistrict, Kutai Timur district, East Kalimantan Province
   ii. Size total (ha) 5404.00
   iii. Size proposed for NPP (ha) 742.39
   iv. Contact person Agustinus Tri Wibowo
   v. Phone/Fax +62 21 4618 135 / +62 21 460 642
vi. E-mail address  agustinus.triwibowo@dsgroup.co.id
vii. Geographical location
   North  Production Forests (HP), Limited Production Forest (HPT), Forest Protected Areas (HL).
   East  Oil palm company
   South  Production Forests (HP), Limited Production Forest (HPT), Forest Protected Areas (HL).
   West  Oil palm company
viii. Spatial Reference 1°16'4.84''N; 117°36'2.85''E
ix. Hydrology  Karangan River and Muara Bulan River
x. Boundary map  Please refer to Figure 1
xi. Area and time plan for new planting

<table>
<thead>
<tr>
<th>Year</th>
<th>Planting plan (ha)</th>
</tr>
</thead>
<tbody>
<tr>
<td>2021</td>
<td>337.26</td>
</tr>
<tr>
<td>2022</td>
<td>405.13</td>
</tr>
<tr>
<td>Total</td>
<td>742.39</td>
</tr>
</tbody>
</table>

Source: table 1.1 summary report of assessment and management plan.

9. Current condition  Area for proposed to NPP is not cleared yet.

10. Statement of Acceptance of Responsibility for NPP  The management of the Dharma Satya Nusantara (member of the RSPO since 28 July 2008) and its subsidiary PT Bima Agri Sawit acknowledge the veracity of this report. We commit ourselves to making every effort to comply with its provisions and to implement the mitigation action plans of the various assessments related to the new planting procedures and the studies carried out to realize it.

11. Name of Grower  PT Dharma Satya Nusantara
Name of Person Responsible  Agustinus Triwibowo
Position  Head of Sustainability
Signed

Date  25 May 2021

12. Verification Statement by Certification Body (CB)  The NPP verification of PT Dharma Satya Nusantara – PT Bima Agri Sawit conducted through document verification and on-site visit. TÜV Rheinland auditor conducted a preliminary document reviewed on 14 October 2020 by remote (virtual process). This followed up with onsite visit verification to the proposed area for a new planting site on 4 December 2020. The information on the proposed area for new planting communicated transparently to the surrounding community who will be affected by the proposed new planting. At the time of field verification, clearing and preparation for the proposed area for new planting has not commenced but some area inside the concession area planted by the company.

The on ground verification to check whether the proposed area is not open yet by the company. Sampling GPS point during on ground checking is present on the figure of sampling below (Figure 3). The sampling point location checked was:

<table>
<thead>
<tr>
<th>Sampling no.</th>
<th>N</th>
<th>E</th>
<th>Visual Land Cover</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>1°21'22.190''</td>
<td>117°35'53.085''</td>
<td><a href="https://www.google.com/maps/place/1.3560921266189347,117.59803544729948">https://www.google.com/maps/place/1.3560921266189347,117.59803544729948</a></td>
</tr>
<tr>
<td>2</td>
<td>1°20'42.529''</td>
<td>117°36'48.258''</td>
<td><a href="https://www.google.com/maps/place/1.345170189319989,117.61347055435179">https://www.google.com/maps/place/1.345170189319989,117.61347055435179</a></td>
</tr>
<tr>
<td>3</td>
<td>1°20'31.344''</td>
<td>117°36'36.241''</td>
<td><a href="https://www.google.com/maps/place/1.341969517794129,117.6100192219019">https://www.google.com/maps/place/1.341969517794129,117.6100192219019</a></td>
</tr>
<tr>
<td>4</td>
<td>1°20'27.636''</td>
<td>117°37'40.051''</td>
<td><a href="https://www.google.com/maps/place/1.3403315746521,117.62773957103491">https://www.google.com/maps/place/1.3403315746521,117.62773957103491</a></td>
</tr>
<tr>
<td>5</td>
<td>1°19'27.293''</td>
<td>117°35'14.780''</td>
<td><a href="https://www.google.com/maps/place/1.324280444817693,117.5874262843568">https://www.google.com/maps/place/1.324280444817693,117.5874262843568</a></td>
</tr>
<tr>
<td>6</td>
<td>1°17'17.408''</td>
<td>117°35'24.036''</td>
<td><a href="https://www.google.com/maps/place/1.288184947520143,117.5905434948349">https://www.google.com/maps/place/1.288184947520143,117.5905434948349</a></td>
</tr>
<tr>
<td>7</td>
<td>1°17'15.234''</td>
<td>117°35'25.681''</td>
<td><a href="https://www.google.com/maps/place/1.2876278593668447,117.5905434948349">https://www.google.com/maps/place/1.2876278593668447,117.5905434948349</a></td>
</tr>
</tbody>
</table>
The company has obtained permission for environmental impact assessment (AMDAL) based on Bupati Kutai Timur district letter no. 120/660/BUP.KUTIM/VI/2008, date of issued 27 Jun 2008. The EIA assessment coverage total area was 8.089 ha (location permit document). The EIA document assessment details content was name of initiator (company name), consultant name, history of area, the connectivity the area of interest with other potential natural sources surrounded, assessment of pre-construction, construction, operational phase, environmental baseline information (climate, air condition, topography, slope, geology, soil type, soil chemical, soil physically, erosion, sedimentation, hydrology, biology, socio-eco-cultural), and important impact assessment. No irrigation system applied on this estate. All the information required already assessed in the EIA document. The EIA document coverage all concession area including proposed area for NPP. Due to the EIA document was older than three years, the company carry out the re-evaluation to ensure and update the environmental potential impact, where it was done by internal company. The result mentioned in the summary report of assessment and management plan. Due to this EIA document is older than three (3) years, the company carry out the re-evaluation by internal to update the environmental potential impact will appear against to the new planting activity, and the result was included in the summary report assessment.

Based on permission to undertake plantation activities and land use rights document information, the proposed area for NPP located at non forest area (Kawasan Non Budidaya Kehutanan) refer to spatial map of Kalimantan Timur province (Rencana Tata Ruang Wilayah). This is supported by HCV assessment document and EIA document explanation.

PT Bima Agri Sawit is proposed the new planting area approximately about 742.39 ha, based on permission to undertake plantation activities document below:
1. Decree No. 1884.45/124/Eko.1-VII/2013, total area ±480 ha, for oil palm plantation located at Karangan subdistrict, Kutai Timur distric, Kalimantan Timur province. Date of issued 8 Jul 2013, valid as long as no revision of the land purposes.
2. Decree No. 525.26/208/EKO.1-XI/2016, total area 5222 ha, with processing unit capacity 40 ton FFB per hours, for oil palm plantation located at Karangan subdistrict, Kutai Timur distric, Kalimantan Timur province. Date of issued 8 November 2016, valid as long as no revision of the land purposes.

The land use right (HGU) document was in place as legal entity for land ownership.


The new SIA assessment document was conducted on 11-12 January 2021 which coverage the sustainability social livelihood such as human capital, social capital, natural capital, physical capital and financial capital. The method of SIA assessment was pre-assessment through the literature review, and onsite verification through carried out the social mapping and participatory mapping, onsite verification, focused group discussion, analysis and record of onsite verification into finding, and analysis and social impact prediction. There are 3 villages were include on this SIA assessment (Karangan Sebrang, Baay and Karangan) and the public consultation done to all the villages. Record of public consultation served in the annex of the SIA assessment. The potential impact (positive and negative) was cleare defined in the new SIA assessment and put into summary report of assessment and management plan.

Based on consultation with affected stakeholders during on site visit, found several issues raised by stakeholders which becomes impact management priorities, there are:
1. Resolving land tenure related to customary rights around company area
2. Build communication and network with all related stakeholders
3. Economic Empowerment of Society

These issue has completely assessed and documented as Social Impact Assessment Document of the company. Interview conducted during site visit with Community Member and Customary Leader. Issue raised by stakeholders during on site visit are:

<table>
<thead>
<tr>
<th>Community</th>
<th>Key remarks/concerns raised</th>
</tr>
</thead>
<tbody>
<tr>
<td>Karangan Sebrang village Head and Rantau Pakis Farmers Group Management</td>
<td>Interview result with head of the Rantau Pakis farmer group and 4 members and the head of the Village of Karangan Sebrang found that PT BAS with government agencies has conducted Plantation Plan socialization in 21 January 2014, 4, 13 and 23 November 2020 and he said that he attended the meeting. Every community members impacted by the plan invited, personally and/or representative of their family. He stated that all of customary leaders invited agreed regarding plantation plan. The meeting conclude that the plantation area will only impacted land owned by community member who agree to be part of Plantation Development and scheme Smallholder program. Impacted Community will receive 2 kind of compensation, first compensation regarding vegetation above the land (GRTT) and second would be part of scheme smallholder and receive 30% of their submitted land as schemed smallholder area. Any community member who want to be part of Oil Palm Plantation Development Program could directly meet the team, and then team will measure the land, calculate the compensation and facilitated the community to receive the compensation payment from PT BAS. After the socialization process, community member who has willingness to join or participate Oil Palm Plantation Program could meet the land Acquisition Team and/or Company’s Field team, offering their land, and receive compensation. He, the head of customary himself, admitted that he has willingness to join Oil palm Plantation especially Schemed Smallholder Program. The motive is that he has no enough capital to manage his land as commercial productive land. Measurement of land and mapping always conducted in participative way. Community member and team conducting field survey for the submitted land, and signed the field visit note. Community member stated that company never use intimidated methods during acquisition process. No para military and/or mercenaries used at any process. All of process always participated by community members and appointed (by head of regency) land acquisition team consist of village community members/leaders. Regarding any social and environmental assessment conducted by company, he said that he knew the process. He also aware of environment affect assessment process and stated that he invited and attended the stakeholder meeting.</td>
</tr>
<tr>
<td>Karangan Head Village</td>
<td>The location plan for oil palm plantation development is administratively located in Karangan Sebrang Village. Therefore, they do not know the information on the development of the oil palm plantation. Suggestion: land acquisition should be carried out transparently, fairly and not to harm the community. Oil palm plantation development can improve community welfare. Based on explanation above, in general all community has been well informed regarding the Palm Oil plantation projects, including the positive and negative impacts that may occur. Most of community members showed their positive acceptance of upcoming program as part of palm oil plantation development in that area. The company stated their commitment into SIA Management Plan the Company will contribute to increase positive impacts that could improve community welfare through the Management and Mitigation program such as infrastructure development, religion and education support, smallholder scheme program. Then the important statement from the local communities it is that they agree freely without coercion, and support to PT BAS project to continue the development of palm oil plantation immediately, because they want to immediately be part of smallholder scheme program and recruited as worker, business partner in all level projects.</td>
</tr>
</tbody>
</table>
The LUC analysis was in place to ensure there is no deforestation due to land development for oil palm plantation. The LUC analysis conducted by external consultant of PT Gagas Dinamika Aksena with date of assessment from 27 Jun – 02 Jul 2019. The land clearance period assessed was 1 Nov 2005; 1 Dec 2007; 1 Jan 2010; Jun 2014; 27 Jun 2019 and Jun 2020 (until LUCA NPP report). Based on LUC analysis found some information of land clearance by community in that area. No corporate land clearance activity by estate.

Then for HCS and GHG assessment conducted by external consultant on behalf PT Gagas Dinamika Aksena with clear information regarding assessment process and procedures (including the methodology). The HCS and GHG assessment coverage all company concession area. The information regarding carbon stock per land cover in the development areas also available in the HCS and GHG report, which information:
- Opened land about 5.40 tC/ha
- Plant forest about 16.30 tC/ha
- Shrubs about 16.80 tC/ha

Clear information of description for new developments scenarios per land covers explained in the GHG report, including for chart bar for both of scenarios. Then selection of optimal scenarios choosed by company also clearly mentioned in the HCS and GHG report assessment. The GHG assessment tools used was RSPO GHG Calculator for NPP area version 3.0.

This NPP proposed area including nucleus and scheme associated smallholder.

The soil analysis was conducted by external consultant. Based on soil analysis, the soil type present in the NPP proposed area categorized as tropaquepts, Dystropepts, Tropaquepts, Tropudults, Paleudults, Tropohemist and Troposaprist. Refer to the soil information found two type of peat i.e.: Tropohemist and Troposaprist. This information is different between HCV assessment document, where the HCV assessment mentioned no peat soil present. Based on site inspection (block sampling taken) no peat found. The soil suitability for NPP proposed area was suitable with soil management due to potential soil erosion category was medium until high.

Based on field inspection (please see Figure 3) all the block checked is still coverage by vegetation, no indication found land clearance performed by company. Some area was opened by community, and some area was planted by community with agricultural crops and oil palm.

The RaCP calculation process of the company still on process in the RSPO Compensation Panel due to found area planted with oil palm prior NPP assessment (outside the NPP proposed area).

The summary of assessments and management plans contain about summary management and mitigation plan of social and environmental management, HCV-HCS management and monitoring plan, fragile soil management plan and summary of management plan for GHG emissions mitigation.

Conclusion

The TUV Rheinland Indonesia auditors were present with the management team of PT Bima Agri Sawit on that time to verify the findings of the desk study and held further discussions on the review and verification conducted. It is the opinion of the TUV Rheinland Indonesia auditors that the HCV-HCS, SEIA, GHG, LUCA and soil assessment and management plan at PT Bima Agri Sawit are comprehensive, professional and complied to RSPO New Planting Procedure.

Signed on behalf of PT Dharma Satya Nusantara – PT Bima Agri Sawit
Agustinus Triwibowo
Sustainability Head

Signed on behalf of TUV Rheinland Indonesia
Muhammad Fundy Cholis Kurniawan
Lead Auditor

The summary of assessment reports (SEIA, HCV, LUC, Carbon Stock, Soil analysis and Topography) and summary of management plans shall be present with this NPP Notification Statement. The summary of assessment and management plans will be in ANNEX of this report.

Spatial Reference (GPS Coordinates)
1°22'27.43” – 1°13'48.11” N and 117°34'28.53” – 117°39'29.63” E based on HCV document assessment.
Figure 1. Location (IUP map overlay with forest designated area) and boundary location of company land use rights (including the NPP proposed area)
Information for new planting proposed area:
1. Light yellow; plan for planting 2021, total 337.26 ha;
2. Light brown; plan for planting 2022, total 405.13 ha.
Figure 3. Sampling map location during site inspection
Figure 4. Visual Condition of Land Cover from Sampling Location

<table>
<thead>
<tr>
<th>Location</th>
<th>Map</th>
</tr>
</thead>
<tbody>
<tr>
<td><a href="https://www.google.com/maps/place/1%C2%B021'21.9%22N+117%C2%B035'52.9%22E/@1.3560921,117.5980354,17/17.5315134,3.3217862/data=!3m1!1e3!4m5!3m4!1s0x0:0x0!8m2!3d1.3560921!4d117.5980354">https://www.google.com/maps/place/1%C2%B021'21.9&quot;N+117%C2%B035'52.9&quot;E/@1.3560921,117.5980354,17/17.5315134,3.3217862/data=!3m1!1e3!4m5!3m4!1s0x0:0x0!8m2!3d1.3560921!4d117.5980354</a></td>
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