



## DSNG E&S ACTION PLAN – SUMMARY:

This Environmental & Social Action Plan (ESAP), agreed upon between Stichting &Green Fund (&Green) and PT Dharma Satya Nusantara Tbk. (DSNG), has been defined primarily for seven concessions representing approximately 75% of DSNG's productive planted areas: PT SWA, PT DAN, PT DIN, PT KPAS, PT DWD, PT BPN, PT BAS, and developed based on an IFC PS gap analysis carried out by an external E&S consultant. The actions agreed upon by &Green and DSNG are summarized below.

DSNG's ESAP compliance is being audited annually by external E&S consultants.

Action		Due date	Completion status
<b>1. PERMITS</b>			
1.1	Submit the Land Certificate Permit documentation for PT KPAS.	Quarter 1, 2021	
1.2	Follow up on existing submission of Water Extraction Permit for PT BPN.	Quarter 3, 2020	
<b>2. ENVIRONMENTAL AND SOCIAL MANAGEMENT SYSTEM</b>			
2.1	Formalize DSNG's ESMS in one overview document that captures all elements of an ESMS compliant to national laws, IFC PS and RSPO.	Quarter 1, 2021	
2.2	Approve the NDPE policy approved by &Green and incorporate it into DSNG's sustainability policy at group level.	Quarter 2, 2020	
2.3	Develop an NDPE implementation strategy for 3rd party FFB suppliers for each subsidiary to reach 100% compliance by 2025.	Quarter 3, 2020	
2.4	Establish and approve a procedure (SOP) for reviewing SIA documents and the effectiveness of measures taken to mitigate risks at group level and develop monitoring templates for capturing results.	Quarter 1, 2021	



2.5	Establish and approve procedure (SOP) for ensuring that all contractors comply with national regulation and DSNG sustainability policy.	Quarter 3, 2020	
2.6	Establish and approve procedure SOP to ensure that all subsidiaries' Children Day-care (Tempat Penitipan Anak/TPA) comply with national regulation.	Quarter 1, 2021	
2.7	Develop the NDPE implementation SOP at group level or adjust existing purchasing SOPs to include NDPE commitments (for own plantation, plasma and 3rd party FFB suppliers).	Quarter 3, 2020	
2.8	Implement the SOP of SIA monitoring and review.	Quarter 3, 2021	
2.9	Implement the SOP of contractor compliance with national regulation and DSNG sustainability policy.	Quarter 4, 2020	
2.10	Implement the SOP of Children Day-care (Tempat Penitipan Anak/TPA).	Quarter 3, 2021	
2.11	Implement the SOP for NDPE implementation at group level, and within each subsidiary.	Quarter 4, 2020	
2.12	Standardise and formalise the E&S Management Program for each subsidiary and for the implementation of DSNG' group level sustainability policy based on identified risks identified at the level of each subsidiary.	Quarter 1, 2021	
2.13	Appoint or recruit a person to be in charge of managing the ESMS at group level. Appointee should have sufficient experience with IFC PS or obtain requisite training to fulfil the role.	Quarter 1, 2021	
2.14	Establish the Stakeholder Engagement Plan (SEP) for each subsidiary.	Quarter 1, 2021	
2.15	Submit annual progress report on the progress on NDPE compliance by all of the Group's operation and all 3rd party FFB suppliers.	Annually	
2.16	Develop external communication tools and designate a person responsible for communicating progress on NDPE implementation and compliance, and updates via the developed tools.	Annually	



2.17	Carry out an evaluation of the effectiveness of the SIA management plan for addressing the key identified impacts of SIA documents.	Quarter 1, 2022	
2.18	Monitor and review the effectiveness of measures taken based on SIA in PT BPN and PT BAS.	Quarter 1, 2021	
2.19	Develop and implement an E&S risk management plan for PT PUL, based on 3 <sup>rd</sup> party E&S assessment against IFC PS.	Quarter 4, 2020	
<b>3. RESSOURCE EFFICIENCY</b>			
3.1	Build permanent fertilizer warehouse with material that can prevent the leachate spillage to the ground for PT BPN.	Quarter 1, 2021	
3.2	Provide spill prevention system of diesel tank area for PT BPN.	Quarter 3, 2020	
3.3	Build a permanent sediment pond connected to the wastewater treatment plant for PT BPN.	Quarter 3, 2020	
3.4	Develop and implement a plan to increase fuel consumption efficiency and renewable energy optimization for each subsidiary.	Quarter 1, 2022	
<b>4. COMMUNITY</b>			
4.1	Create a separation between existing roads to provide alternative access for the community for all subsidiaries.	Quarter 4, 2020	
4.2	Conduct socialization to the community regarding alternative routes and road safety.	Quarter 1, 2021	
<b>5. LAND RESETTLEMENT</b>			
5.1	Perform an analysis to assess the effectiveness of DSNG's CSR and community programs on livelihood restoration for affected and vulnerable communities.	Quarter 1, 2021	
<b>6. BIODIVERSITY</b>			



6.1	Perform land inventory and develop clear boundary of HCV area that had been planted, prior to Replanting for each subsidiary (prioritized in PT SWA which has the earliest replanting schedule).	Quarter 3, 2020 for PT SWA. (Based on replanting schedule for the other subsidiaries)	
6.2	Improve the HCV management implementation in PT BPN and PT BAS (i.e. campaign boards, HCV demarcation and socialization).	Quarter 4, 2020	
6.3	Execute the remedial actions as per the LUCA recommendation relevant for PT DAN and PT DWT.	Quarter 3, 2021	
6.4	Develop replanting plan by considering the rehabilitation of the incidentally planted HCV at each subsidiary (prioritizing PT SWA which has the earliest replanting schedule).	Quarter 3, 2020 for PT SWA. (Based on replanting schedule for the other subsidiaries)	
<b>7. INDIGENOUS PEOPLE</b>			
7.1	Develop an Indigenous People's Plan within PT BPN and PT BAS areas.	Quarter 2, 2021	
7.2	Develop an Indigenous Peoples Plan or community development program within the Muara Wahau area for the IP community as identified in the ethnography assessment and stakeholder mapping report.	Quarter 3, 2021	
<b>8. CULTURAL HERITAGE</b>			
8.1	Conduct cultural heritage assessment to identify the intangible Cultural Heritage within village around PT BAS and PT BPN area and develop necessary management plan in accordance with the assessment.	Quarter 1, 2022	
8.2	Muara Wahau block is to develop a program to preserve the tangible and intangible cultural heritage that has been identified in the report and monitor the program implementation.	Quarter 3, 2021	