

Siat recognises that responsible land management is essential to sustainable agricultural development, environmental protection and the long-term resilience of rural landscapes. Land acquisition, development and plantation management must therefore be conducted in a manner that preserves ecosystems, respects community rights and ensures responsible use of natural resources.

This Policy defines the principles governing land acquisition, land development, plantation establishment and land management across all Siat operations. It applies to all subsidiaries and concessions managed by the Group, as well as to any new acquisitions or development projects.

IMPACT PREVENTION AND REDUCTION



Siat engages internal and external experts to identify, assess, and monitor the impacts of its operations, and regularly evaluates the effectiveness of prevention, mitigation, and remediation measures.

Siat core commitments regarding land management are:

- ⦿ Responsible land planning based on scientific assessments including ESIA, soil maps and soil surveys.
- ⦿ Responsible land management includes the long-term protection and regeneration of soils, ensuring that agricultural productivity is maintained while preserving ecosystem functions.
- ⦿ Demonstration of the long-term suitability of land for cultivation.

Siat core commitments regarding land use rights are:

- ⦿ No land grabbing: continuous and transparent FPIC is followed, no involuntary displacement, fair compensations, no speculative acquisition.
- ⦿ Transparency of the land allocation process.
- ⦿ Proper maintenance of boundaries demarcations.
- ⦿ Mechanisms to resolve land-disputes if any.

NEW DEVELOPMENT



All new developments are subject to the Group's New Planting Procedure (NPP), which ensures that plantation establishment is conducted in a transparent and responsible manner and does not negatively impact environment or local communities.

Independent assessments are conducted, including public consultation, to identify impacts and mitigate them.

The NPP framework includes provisions such as no conversion, rehabilitation and maintaining of forests, preservation of conservations areas including High Conservation Values, High Carbon Stocks, marginal soils, fragile soils, biodiversity, critical habitats, peat soils, wetland, watercourses, riparian areas, buffer zone and no planting on steep terrain.

Siat conducts land tenure due diligence prior to land acquisition to identify legal, customary and informal land rights and to assess potential land conflicts.

CERTIFICATION AND CONTINUOUS IMPROVEMENT



Environmental and social performance related to land management is monitored through internal controls, external audits and certification processes. Where appropriate, Siat may engage independent experts to review land management practices and conservation outcomes.

TRANSPARENCY



Siat publishes an annual Sustainability Report presenting relevant KPIs and progress against its policies.

Siat promotes open communication and engagement with stakeholders regarding its performance.

RESOURCE ALLOCATION



Siat allocates appropriate financial, technical, and human resources to ensure effective implementation of this Policy.

GOVERNANCE



Oversight of land management Policy is ensured at Group and subsidiaries level under the responsibility of senior management.

Implementation involves cross-functional coordination between Agric department, Sustainability, GIS department, Business Development team.

STRATEGIC PILLARS CONSISTENT WITH THE GROUP'S LONG-TERM DIRECTION

- ⦿ Strict adherence to RSPO standards for existing and new plantations.
- ⦿ Leadership in sustainability innovation across the edible oil value chain (farm-to-fork).
- ⦿ Continuous reduction of carbon footprint.
- ⦿ Prevention of environmental risks that could result in financial loss or reputational damage.

METRICS AND PERFORMANCE TARGETS

Siat defines measurable environmental objectives, including:

- ⦿ Zero critical non-compliance during certification audits.
- ⦿ 10% of land are allocated to conservation areas.
- ⦿ 0ha deforestation within Siat concessions.

DETAILED IMPLEMENTATION POLICY IS DEFINED IN SEPARATE OPERATIONAL DOCUMENTS, POSTED ON ALL SUBSIDIARIES BOARDS.

Siat Group recognises that its activities have an impact on the land and acknowledges its responsibility towards current and future generations. This policy set out Siat's commitments, values and expectations across all its subsidiaries and supply chains, to all employees and stakeholders. Management expects all its employees, business partners and associates to comply with and actively implement this policy.

LAND RIGHTS

Siat commits to full compliance with international, national, state and local environmental regulations, guidelines and standards in all steps of its operations.

This policy aligns with, and supports, recognised international frameworks including RSPO, FPIC, ISO 14001, the UN Guiding Principles, SBTN, FAO VGGT and NDPE commitments.

Siat only develops and manages lands for which it has obtained legal ownership or lease and authorised use of through a FPIC process.

COMMUNITY ENGAGEMENT AND LAND RIGHTS

Siat recognises that land development must respect the rights and livelihoods of local communities.

The Group applies the principle of Free, Prior and Informed Consent (FPIC) for all projects that may affect community lands or resource use. Participatory mapping, stakeholder consultations and transparent communication are conducted throughout the process.

Where land use overlaps with community activities, negotiations are conducted to reach fair and documented agreements.

Fair compensation mechanisms are implemented where farms, crops or land use rights are affected.

Accessible grievance mechanisms allow communities to raise concerns and seek resolution in a transparent manner.

NO DEFORESTATION, NO PEAT, NO EXPLOITATION

Siat commits to:

No deforestation or development of High Conservation Value (HCV) or High Carbon Stock (HCS) areas.

No development on peatlands: Siat has not identified any peat soils within its plantations and commits to avoiding any new development on peatland areas.

No exploitation - see Human Rights and Human resources policies.

Protecting Non-Timber Forest Products (NTFP) when they are essential to stakeholder communities.

Siat respects cultural heritage and sacred sites identified during stakeholder consultations and impact assessments.

RESPECT FOR THE ENVIRONMENT

see Siat Environmental policy - Siat commits to:

To identify and respect the areas set aside for conservation by doing third party assessments, protecting and monitoring them.

Protect, implement reforestation programs and not cut trees in conservation areas (BDP, HCV, HCS, buffer zones, etc.).

Preserving biodiversity, including rare, threatened and endangered flora and fauna (hunting is prohibited; hunting of protected species is sanctioned as serious misconduct).

Protecting watercourses within the concession by creating, re-establishing (when replanting) and maintaining buffer zones and monitoring water quality.

Continuous improvement in environmental performance through periodical internal and external audits.

Monitoring of the environmental impacts of its operations and the effectiveness of mitigation measures.

LAND MANAGEMENT

For the long-term resilience of its activities and the ecosystems, Siat promote Smart agriculture and Regenerative agriculture including:

Collects and analyses data, in real time, to optimize crop yields, water use, and resource management with the aims to balance productivity with environmental impact.

Maintains geospatial mapping of concessions, conservation areas and land-use zones to support responsible land planning and monitoring.

Land management practices integrate climate resilience considerations, including water retention, soil conservation and landscape connectivity.

SOIL PROTECTION AND REGENERATION

Siat implements soil management practices designed to protect soil structure, maintain fertility and prevent degradation.

Soil Management Plan is implemented, including practices aimed at maintaining living soil, reducing soil disturbance and promoting organic matter accumulation.

Measures to prevent soil erosion such as cover cropping, mulching are implemented where necessary.

Carrying out land preparation mechanically (with measures that avoid soil compaction) and shredding felled vegetation for nutrient recycling.

Carbon sequestration and nutrient recycling.

NEW DEVELOPMENTS

All Siat subsidiaries and projects are subject to the New Planting Procedure whether certified or not. Siat commits to:

Carrying out environmental and socio-economic impact assessments before implementing any new project and implementing recommended mitigation measures.

Conducting soil suitability and topographic surveys to identify fragile areas. Consideration of results into the land use plan.

ZERO BURNING

Siat respects a strict zero burning policy ensuring that:

Fire is not used in any operations, including land-clearing and waste disposal.

Employees are sensitized on the zero-burning policy and fire-surveillance teams are trained to monitor, react to, control and manage involuntary fire outbreaks in the plantations.

OTHER INITIATIVES

Siat supports landscape-level initiatives aimed at preserving ecological connectivity, protecting watersheds and promoting sustainable land use beyond concession boundaries.

Siat promotes restoration of degraded land and supports ecological rehabilitation initiatives within and around its concessions.

Siat contributes to the protection of watershed functions and hydrological balance in areas surrounding its operations.

Siat encourages suppliers and smallholders expanding agricultural areas to follow similar responsible land development principles.