PUBLIC AUDIT REPORT

RTRS STANDARD ON RESPONSIBLE SOY PRODUCTION

1. Certification Body Details

Name	FoodChain ID Certification
RTRS member #	
Address	Av. Praia de Belas, 1212, sl 1320
Country	Brazil
Contact Person	Reinaldo Rodrigues
Contact email	reinaldo.rodrigues@fcid.com.br
Accreditation Body	INMETRO
Web Page	www.foodchainid.com

2. Client's Details

Name	Kedelai Trading Company	CB's client number	
Address	Godhani Raod Mankapur/ No. FN 203 Satyam Gardan/City Nagpur State Mahasashtra /Índia		
Country	India		
Contact Person & Role	Shivani Sharma		
RTRS member #	No		
Contact email	shivani@thekedelai.com		
Web Page			

3. General audit details

Certificate's Number	Soy: RTRS-FCID-AGR-COC-N380		
	Corn:		
	Non-GMO:		
Certificate Type	Production standard, Group	Number of certified establishments	
Audit Type	Soy:Initial		
	Corn:		
	Non-GMO:		
Certificate start date	Soy:03/12/2025 00:00:00	Certificate end date	Soy:03/12/2030 00:00:00
	Corn:		Corn:
	Non-GMO:		Non-GMO:
Partial Certificate:	Soy: False		
	Corn:		
	Non-GMO:		
Year of Harvest Audited	2025		

4.1 Audit Team

Type	Name	Qualifications
Lead Auditor	SANTIAGO REINALDO YANGUARAYL HERRERA	

4.2 Evaluated Standards

Evaluated Standards	● RTRS Standard for Responsible Soy Production ● Indian Interpretation RTRS Standard for Responsible Soy Production ● RTRS Group and Multi-site Certification Standard ● ● ●

4.4 Audit Schedule

Audit date	18/08/2025 00:00		
Audit Summary	Kedelai Trading Company is a soybean trading enterprise that centrally manages all its farms through a unified system for documentation, recruitment, and employee management at its head office. All farms cultivate non-GMO soybeans and receive advisory and technical support across various areas, including agronomic practices. During the audit, several nonconformities were identified at both the farm level and the group management level.		
Calculated Days	Number	19.5	The calculation of man-days (MD) was made
	Description		
Sampling Methodology	To compose the sample of producers to be audited, the critical points of the group manager's management system were analyzed, as well as the manager's risk assessment for each member. Based on this information, the group was assigned a "low" risk level. Using this information, the minimum sample was determined using the formula: Sampling formula (high risk) = 1 + √9372/2 x 1,5 = 1 + 73 Where: • 1 represents the group manager • 73 represents the number of farms at the time of sampling		

5. Details of Units under the scope

Crop	Establishment Name		Location		Coordinates		Planted Area		Total Production (est.)	Total Production (real)
			City	Estate	Lat	Long				

Soy	Smallholder		Undefined			33970	72695	

5.1 Interviews with stakeholders

Name	Organization/Background	Comments
Dr. Ashok Verma	Educational Organization	
Name	**Organization/Background**	**Comments**
Shri. Umesh Suryavanshi	Union	
Name	**Organization/Background**	**Comments**
Mr. Pramel Singh	Union	
Name	**Organization/Background**	**Comments**
Mr. Rajeev Pitalia	Union	
Name	**Organization/Background**	**Comments**
Mr. Mahendra Singh Dangi	Local Business	
Name	**Organization/Background**	**Comments**
Mr. Umesh Suryavanshi	Local Business	
Name	**Organization/Background**	**Comments**
Mr. Deepak Singh	ONG	
Name	**Organization/Background**	**Comments**
Mrs. Parul Singh	ONG	

5.2 Evaluation Results

5.2.1 RTRS Standard on Responsible Soy production

Principle 1: Legal Compliance and Good Business Practices

Criteria	Description

1.1	The farms audited during the 2025 cycle demonstrated compliance with the evaluated requirements, ensuring easy access to information and engaging specialized consultants in environmental, technical, accounting, labor, and occupational safety matters. Documentary evidence was provided, including valid Provisional Operating Authorizations, Operating Licenses, and various registration records. No non-compliances related to missing Operating Licenses for facilities were identified on the farms. The group also maintains a Code of Ethics and Anti-Corruption and Anti-Discrimination Policies, outlining clear principles that reinforce its commitment to legality, integrity, and respect.
1.2	The right to use the land was verified through the presentation of updated land registration documents for the audited farms, confirming their legal and lawful possession.
1.3	The assessment of indicator 4.1.1 identified several social, environmental, and agricultural aspects that require improvement in farm operations. Internal audits conducted by qualified professionals highlighted the following findings: • Social: Some units were found to lack internal Ethics and Conduct Policies. This represents a key area for improvement to strengthen principles of integrity and responsible organizational behavior. The baseline identified is the absence of formalized policies; progress will be measured through their development, communication, and related staff training. • Environmental: Biodiversity monitoring is currently performed using basic tools, such as spreadsheets, to record observations of local fauna and flora. The number and consistency of these records will serve as indicators for ongoing monitoring. The farms have established a structured system for periodic internal audits, through which monitoring results are reviewed. Nonconformities, observations, and improvement opportunities are documented in standardized forms and formally communicated to ensure traceability and support corrective and preventive actions. This process reinforces the continuous improvement of social, environmental, and agricultural practices across operations.

Principle 2: Responsible Labour Conditions

Criteria	Description
2.1	Based on interviews and document reviews conducted during the audits, no evidence of forced, child, or slave labor, or human trafficking was found on the audited farms. There were no instances of employees working without formal registration, and family members were not performing work without proper documentation. All farms maintain complete digital records of employees, and any apprentices present are appropriately documented. Children residing on the farms regularly attend educational institutions. A formal anti-discrimination policy is in place, addressing criteria such as gender, ethnicity, religion, sexual orientation, and personal or professional conditions. Most farms reported no pay disparities for equal work, and no unjustified differences were observed. No abusive practices, including corporal punishment or harassment, were identified. Secure reporting channels are available, such as communication boxes and contact information displayed at farm entrances. One non-conformity (NC) was raised regarding missing personal documents for a worker during the audit; this NC was closed after the documents were subsequently provided.
2.2	The farm complies with legal employment requirements by using formal contracts that clearly define working conditions. Collective bargaining agreements are established with representative unions, and third-party contractors are engaged with defined responsibilities. All workers receive mandatory health and safety training, supported by documented records.

2.3	The farm demonstrates a robust occupational health and safety management system. It maintains an updated Risk Management Program and an Occupational Health and Medical Control Program, both duly signed by qualified professionals. The health and safety team includes trained person on health and safety, safety technicians, and an occupational physician. Workers' health is monitored through risk-based assessments, with records of periodic and pre-employment medical examinations available for verification. The use of Personal Protective Equipment (PPE) is documented through signed acknowledgment forms and monitored through daily inspections conducted by a full-time safety technician. An emergency response plan is established, including the availability of an emergency contact details, first aid kit, contact details of nearest primary health care centres, and defined procedures for external medical referrals in case of accidents. Workers receive regular training, including first aid, with supporting documentation maintained. Non-Conformity with Farmer: Amarsingh, Anike pal, Gautam Singh, Imrat Sing, Randir Singh, Sarafet Feua, Vinod choukse, Ambik Prasad Sharma, Babulal, Dhira Singh, Ganesh Ram, Doulat Singh, Kamlesh Sige Ragluvanshi, Mnobat Singh Rghvanshi, Amrinder Sindhu, Apar Sngh, Dharamraj kewat, Dr. Prabal Rathore, Joginder Singh, Santosh Vyash, Tashkin Rievi. Non-Conformity: No Calibration Record was maintained by farmer. Objective evidence: The farms visited didn't have the calibration record of sprayers and tractors. Correction: Created records for sprayer and tractors calibrations.

2.4	The farm complies with RTRS requirements regarding workers' rights and freedom of association. There are no restrictions imposed on employees in terms of joining unions, participating in collective bargaining, or engaging with external parties outside of working hours. This demonstrates respect for workers' rights and supports a fair and transparent working environment.
2.5	The farm complies with RTRS requirements concerning fair labor practices, wage standards, and working

Principle 3: Responsible Community Relations

Criteria	Description
3.1	Two accessible communication channels are available to employees: a WhatsApp-based digital channel for direct and timely communication, and physical communication boxes placed in accessible locations. These boxes are regularly monitored by administrative staff, who ensure confidentiality by registering, evaluating, and forwarding the messages appropriately. The farm is well-recognized in the region and maintains multiple communication pathways that facilitate open dialogue with both workers and the surrounding community.
3.2	Based on document sampling and audit interviews, no disputes related to land ownership or use were identified. Additionally, there were no indications of disrespect toward the customs or cultures of indigenous peoples. All land areas are clearly defined and are being respected by the farm and its operators.

3.3	No complaints or disputes were recorded during the audit. The Grievance Team is responsible for receiving and managing complaints and suggestions. Two communication channels are available: physical communication boxes, which are monitored every 30 days, and regular meetings where feedback is shared with workers. These systems ensure confidentiality, responsiveness, and transparency in handling employee concerns. Non-Conformity with Farmer: Amarsingh, Anike pal, Gautam Singh, Imrat Sing, Randir Singh, Sarafet Feua, Vinod choukse, Amrinder Sindhu, Apar Sngh, Dharamraj kewat, Dr. Prabal Rathore, Joginder Singh, Santosh Vyash, Tashkin Rievi, Duli chandra, Nathan Singh, Nitendra Singh Raghuvanshi, Rajesh, Rajkishor, Rajveer Singh Raghuvanshi, Shailendra Singh Raghuvanshi, Anand, Anita Singh, Dhanraj, Dipesh shah, Divya Patel, Jagdish Prasad, Nandkishor. Non-Conformity: Interviews with ICS manager, workers, farmers, Verification of complaint procedure in ICS manual, however no complaint registers were maintained. Objective evidence: No complaint registered maintained. Correction: It was created a complaint record
3.4	The farms collaborate with vocational training programs, contributing financially to institutions that offer training to the local population, including rural and indigenous communities. Visa Proof of regular financial contribution to rural education and training institutions.

Principle 4: Environmental Responsibility

Criteria	Description

4.1	Internal audits are regularly conducted by Internal auditor, with formal documentation of nonconformities and defined timelines for corrective actions. These audits follow procedures outlined in the farm's management systems. Social and environmental assessments are carried out transparently by technically trained auditors, ensuring the reliability and integrity of the evaluation process. Farm managers, supported by a team of analysts, conduct regular technical visits to operational units to monitor conditions. All assessments and findings are recorded on dedicated platforms, enabling continuous compliance tracking and traceability of results.
4.2	The farms have well-organized waste management centers, equipped with proper containment and clearly marked areas for different types of waste. This setup reflects a structured and responsible approach to handling solid waste. Waste materials such as used oils, plastics, tires, metals, personal protective equipment (PPE), and organic waste are disposed of correctly through partnerships with authorized service providers. This ensures that all waste is managed in an environmentally sound and legally compliant manner. During on-site visits, it was confirmed that mechanical facilities—including workshops, storage areas, and decontamination yards—are equipped with appropriate infrastructure, such as paved surfaces and containment systems. These features help ensure compliance with both safety and environmental standards. The farms also practice waste segregation at the source, collecting different types of waste separately and ensuring they are sent to specialized companies for proper disposal. This contributes significantly to environmental sustainability and adherence to relevant regulations. Additionally, each farm maintains an up-to-date Solid Waste Management Plan (PGRS), which outlines the types of waste generated, their classifications, and the disposal methods used. These plans align with environmental legislation and reflect best practices in sustainable agriculture.

4.3	The farms maintain physical records of fuel deliveries, which are later digitized and tracked through electronic systems. Fuel consumption is regularly monitored while some farms report stable usage, others have noted increases due to expanded cultivation areas or greater reliance on mechanized operations. In terms of soil health, the farms conduct laboratory analyses to monitor the quantity and quality of organic matter in the soil. These tests are recent and well-documented. To maintain and improve soil organic matter, the farms implement several good agricultural practices, including crop rotation, minimal tillage in most areas, the application of biological agents in planting furrows, and careful management of fertilizer use.
4.4	According to the maps presented, prepared by technical team, which include information on location, distance from environmental liabilities and traditional communities, in addition to the comparison of satellite images from the years 2007, 2016 and 2023, it was possible to verify that there was no conversion of areas for agricultural cultivation.
4.5	The farms maintain detailed cartographic records that clearly identify water bodies, native vegetation areas, and designated Preservation Areas. They have formal wildlife monitoring plans in place, with defined procedures and documentation maintained by all employees. To support biodiversity conservation, the farms enforce strict policies prohibiting hunting and fishing. These rules are communicated to all employees during onboarding and reinforced through ongoing awareness efforts.

Principle 5: Good Agricultural Practices

Criteria	Description

5.1	The farms implement a range of sustainable agricultural practices aimed at conserving soil and water resources. These include crop rotation, cover cropping, terracing, and the use of biological products to enhance soil health and reduce environmental impact. Water used on the farms is sourced with valid permits and primarily serves domestic and agricultural needs, including irrigation in certain units. Water quality is regularly monitored through laboratory testing, and the farms are subject to inspections. In cases of contamination, appropriate notifications and corrective actions are initiated to ensure compliance with environmental standards.
5.2	The farms have agricultural air restriction maps identifying springs and rivers, used to guide pesticide application. Some have degraded areas declared in their environmental regularization processes, with defined parcels and deadlines for restoration, while most have no degraded areas. No wetlands were identified on the properties, other than riparian areas.
5.3	The farms adopt a robust set of sustainable agricultural practices aimed at soil conservation and improvement, including annual soil, leaf, and nematode analyses, with laboratory results demonstrating technical monitoring of production areas. They have dedicated soil management teams and implement techniques such as no-till farming, crop rotation, cover cropping, terracing, contour lines, regenerative and precision agriculture, and root sampling. They also have an Integrated Crop Management Plan (MIC).
5.4	The farms have internally developed Integrated Crop Management (ICM) Plans, with sustainable guidelines that include physical, Chemical, biological, Mechanical practices and targets for a 0.8% annual reduction in chemical input use. They use recognized pesticide brands and, for the most part, follow technical recommendations. Crops are monitored weekly by technicians, with detailed records maintained in farmer diary verified during the audit.

5.5	The Group Manager has distributed a Farmer Diary to all registered producers. This tool enables farmers to maintain detailed records of agrochemical use, including Application dates, Treated areas, Products applied, Responsible personnel, Weather conditions during application These records support safe and efficient agrochemical management. Farmers also follow strict protocols for: Storage and disposal of empty containers in designated locations, with documentary proof of proper disposal, Transportation and storage of products in accordance with safety standards, Signage in recently treated areas, indicating the products used and withdrawal periods Fertilizer application is based on soil analysis and technical guidelines, with doses adjusted to meet specific crop needs and minimize waste. Non-Conformity with Farmer: Amarsingh, Anike pal, Gautam Singh, Imrat Sing, Randir Singh, Sarafet Feua, Vinod choukse, Ambik Prasad Sharma, Babulal, Dhira Singh, Ganesh Ram, Doolat Singh, Kamlesh singh Raghuvanshi, Mnobat Singh Raghuvanshi, Amrinder Sindhu, Apar Sngh, Dharamraj kewat, Dr. Prabal Rathore, Joginder Singh, Santosh Vyash, Tashkin Rievi, Duli chandra, Nathan Singh, Nitendra Singh Raghuvanshi, Rajesh, RajKishor, Rajveer Singh Raghuvanshi, Shailendra Singh Raghuvanshi, Anand, Anita Singh, Dhanraj, Dipesh shah, Divya Patel, Jagdish Prasad, Nandkishor. Non-Conformity: As per the interview with farmers, Empty chemical containers are triple rinsed, however storage of empty containers is not adequate. Objective evidence: Filed verification it noticed that empty containers lie on the ground. Correction: Put in place a system for container collection.
5.6	Farms adopt practices to minimize the impacts of pesticides on human health, biodiversity, and the environment, using spreaders and anti-drift products, and applying at appropriate times and weather conditions to reduce evaporation and drift, preserving the quality of air, water, and surrounding life.

5.7	The units use biological products, such as Trichoderma and Azospirillum, to treat seeds, promoting sustainable management and soil health. Registration follows the same criteria adopted for agrochemicals, with systematic monitoring.
5.8	In cases where new pests are identified, the units notify the nearest Krushi Vigyan Kendra (KVK), Agriculture Department or Agriculture University, as required by state phytosanitary surveillance protocols.
5.9	The units demonstrate technical mastery of good pesticide application practices, prioritizing times with suitable weather conditions and recording meteorological data through applications and stations connected to the system.
5.10	The audited production units cultivate species common to the production region in which they operate, adopting conservation management and good agricultural practices to minimize risks and negative impacts, such as erosion and product drift, that could affect neighboring farms. Overall, no cases of damage or direct interference with the production systems of neighboring properties were reported.
5.11	The units use seeds acquired legally and traceably, whether through the company's own seedbed, from reputable suppliers, or through seed saving. Seed quality is ensured by laboratory tests that verify the germination rate and purity of the batches, with all materials duly registered to ensure compliance with current legislation.

5.2.1.1 Annex: Chain of Custody Requirements for Producers

Criteria	Description
2.1	The Kedelai Trading Company buys the soya from the farmer, stored centrally and ship the physical product with their Invoices and later the group manager sends to the purchasing company the RTRS Product Declaration, containing the name of the farm and owner, volume RTRS certificate and RTRS certificate number RTRS Custody.
2.2	The total volumes produced by each farm are maintained via system or manual records by the filed office and ICS manager

2.3	It also has this data for each harvest
2.4	The farms record the volumes produced and shipped through their systems or spreadsheets.

5.2.2 RTRS Group and Multi-site Certification Standard

A. Group Elements

Criteria	Description
1.1	The producer group is managed by Kedelai Trading Company, which internally appoints a Socio-environmental Manager with decision-making autonomy, as defined in the company's internal procedures and the Group Management Manual. All certification-related costs are covered by the company through its annual budget, with, Sustainability Department responsible for general expenses, Certifications Department overseeing audit-related activities. The manager's responsibilities, including the authority to exclude members who fail to meet certification standards, are formalized in documents distributed to producers. These documents are signed by producers to acknowledge their understanding and acceptance. During the audit, it was identified that the some of the farmers storage of empty containers is not adequate. This was recorded as a non-conformity (NC). The issue was subsequently closed after. Also, During the audit it was observed during the field visit that no signage or precautionary measures were in place to prevent entry into recently sprayed areas. Workers and visitors are not informed about the re-entry intervals after pesticide application, and no formal mechanism or training was documented to communicate spray schedules. This poses a risk of unintentional exposure to agrochemicals and does not comply with the requirement. All farmers received training on the relevant safety procedures. Corrective measures were implemented to ensure future compliance

1.2	The producer group, composed of 9,372 members, is managed by Kedelai Trading Company Management is based on formal contracts that establish each producer's commitment to comply with certification requirements. The Group Manager maintains internal control systems appropriate to the scale of operations, including. Monitoring of production areas, including those belonging to producers with multiple farms. Ensuring that only RTRS-certified non-GMO soybeans are sold Before admitting new members, the group conducts, technical visits, Internal audits, Consultations with the certifying body for background verification These procedures ensure that all members meet the required standards prior to inclusion.
1.3	The group's production units demonstrate compliance with RTRS certification requirements, with the Group Manager showing strong technical knowledge of the applicable standards. All farms undergo internal audits throughout the year, with additional visits conducted as needed to provide support or address non-conformities. Audit records were presented, including documentation from farmer code 21442 dated 18/05/2025, 25162 dated: 08/05/2025, 22811 dated: 08/05/2025, 42099 dated: 16/05/2025, 19872 dated: 19/05/2025 During audits and field visits, certified farms are kept informed by environmental analysts and demonstrate awareness of the RTRS standard, including the Chain of Custody requirements. The sale of soybeans as RTRS Non-GMO is practiced across the company. The entire chain of custody and RTRS credit sales are centrally managed by the Group Manager via a digital platform, ensuring traceability and transparency. Additionally, data on the consumption of agricultural inputs—including correctives, fertilizers, fuels (diesel and kerosene), and agrochemicals—is systematically collected and controlled. This data is used to calculate GHG (Greenhouse Gas) emissions, as documented in the "RTRS Scope 2025" spreadsheet.

B. Group and multi-site management procedures

Criteria	Description
2.1	Group Management and Compliance with RTRS Certification Requirements The group manager maintains documented procedures aligned with the RTRS certification requirements, based on KTC/ICS/2025 V1, KTC/POL/2005/001 TO KTC/POL/2025/020, and the Certification Management Manual. These documents comprehensively address: Certification policy • Organizational structure • Roles and responsibilities • Member admission criteria • Non-compliance management procedures Both documents have been audited and found to be compliant with the applicable requirements. The RTRS standard is reviewed and updated at least every two years, accompanied by: • Training sessions for analysts • Feedback mechanisms for producers The Sustainability Department is responsible for overseeing this management system. The documented procedures include: • Conducting internal audits • Managing member inclusion and exclusion • Facilitating access to auditors • Monitoring and addressing non-compliance issues Group management is entrusted to the Socio-environmental Manager, or in her absence, the Socio-environmental Supervisor. Both individuals are qualified according to the criteria defined by the Management System, which also outlines the training requirements for all involved personnel.

2.2	The obligations related to RTRS certification are clearly communicated to the group's producers. Each farm belongs to the group and has a Letter of Consent. During internal audits, the standard's full requirements are verified, with on-site support when necessary. Non-conformities are addressed remotely or through technical visits.

C. Control and monitoring of member/site compliance

Criteria	Description
3.1	Kedelai Trading Company has a structured internal audit process in place, as outlined in its Certification Management Manual. This includes initial audits for new members based on a risk assessment, followed by annual audits for all members under the 2025 Internal Audit Program. Risk levels are determined using a spreadsheet that evaluates 10 criteria on a scale from 1 to 5. Properties scoring 30 or below are considered low risk, and currently, no members fall into the high-risk category. The audit confirmed that all certification requirements are reviewed during these internal audits. For example, the audit of with the farmer code 21442 dated 18/05/2025, demonstrated full compliance. While no critical non-conformities have been identified so far, the system allows for the exclusion of members or production volumes from certification if standards are not met.

D. Record Keeping

Criteria	Description

4.1	In accordance with Item 12 of the Group Management Manual for Certifications, the company maintains records for a minimum of five years. Digital archiving is conducted via the internal network, with documents stored in designated folders such as RTRS Audits and Certifications/Year. Each document is saved in duplicate—one copy for the producer and one for the manager. Consent Letters and Risk Assessment Forms are maintained digitally. Member information, risk classifications, and property maps are organized in the RTRS Scope 2025 spreadsheet and securely stored on the company's server. The internal control system supports both physical and digital recordkeeping, covering internal audits, chain of custody documentation, and non-compliance reports (SACs). Non-conformity management is tracked using dedicated spreadsheets. Satellite imagery is updated annually and archived to monitor land use changes. Production volumes are recorded in the Scope 2025 spreadsheet. Volume management is overseen by the Sustainability Department, while the Sustainable Business and Innovation Department is responsible for monitoring sales

E. Chain of Custody

Criteria	Description
5.1	RTRS-certified soybean shipments from group members are centrally managed by the main office, with shipment records accessible to the group manager through the system. Each shipment is tracked using an RTRS Declaration, ensuring traceability and compliance. Physical volumes are monitored in the system through invoices and packing slip reports, and are reflected in the total balance of the Current Account. Importantly, physical volumes and RTRS credits are recorded separately to maintain clear and accurate tracking. All relevant data is consolidated in the "Scope 2025" spreadsheet. Credit transactions are exclusively handled by the group manager via the RTRS platform—there are no individual sales by group members.

5.2.3 RTRS Non-GMO Standard for Producers

Compliance Requirements for Producers Scope

Criteria	Description
1.	The organization maintains the entire segregation history of its NGMO soybean products, as well as certificates of origin, receipts, and other relevant documents related to all purchased seeds. There is no mixing of materials.
2.	

Handling of material

Criteria	Description
1.	Not applicable. Handles only NGMO.
2.	It maintains a single control system for NGMO and does not produce transgenic material.
3.	It maintains a centralized platform usage system and the company produces only NGMO soybeans and ensures segregation with transgenic soybeans

7. Assessment Findings

Summary of findings	During the audits, non-conformities were identified on the audited farms, all related to the Production Standard. However, it was possible to observe, even with a new manager in the group, the commitment to the principles and criteria of the RTRS Standards. After the audit, deadlines were set and corrective actions or action plans were implemented for the non-conformities found, which were evaluated by FoodChain ID. Therefore, I recommend that the certification.
Next Audit Date	18/08/2026 00:00
Certification decision	Granted
Client Acknowledge	Client informed about the certification decision.