



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 II	CB's client number	
Address	Godhani Raod Mankapur, Nagpur, FN 203 Satyam Gardan, India		
Country	India		
Contact Person & Role	Vinamtra Nayak		
RTRS member #	No		
Contact email	vinamtra@thekedelai.com		
Web Page			



3. General audit details

Certificate's Number	Soy: RTRS-FCID-AGR-COC-N4722		
	Corn:		
	Non-GMO:		
Certificate Type	Production standard, Multi-site	Number of certified establishments	
Audit Type	Soy:Initial		
	Corn:		
	Non-GMO:		
Certificate start date	Soy:31/03/2026 00:00:00	Certificate end date	Soy:31/03/2031 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	Reinaldo Rodrigues	

4.2 Evaluated Standards

Evaluated Standards	<ul style="list-style-type: none">● RTRS Standard for Responsible Soy Production<ul style="list-style-type: none">● Indian Interpretation RTRS Standard for Responsible Soy Production● RTRS Group and Multi-site Certification Standard●●●
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4.4 Audit Schedule

Audit date	01/10/2025 00:00		
Audit Summary	Kedelai Trading Company II 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	18	The calculation of man-days (MD) was made
	Description		
Sampling Methodology	<p>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:</p> <p>Sampling formula (high risk) = $1 + \sqrt{8844/2} \times 1,5 = 1 + 71$</p> <p>Where:</p> <ul style="list-style-type: none"> • 1 represents the group manager • 71 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			48086	102904	



5.1 Interviews with stakeholders

Summary of Interviews with stakeholders
Stakeholders were consulted regarding potential complaints or any other comments relevant to the RTRS audit. The feedback was unanimous, with no complaints or concerns reported by any of the parties involved.

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	During the 2025 audit cycle, farms demonstrated compliance with the evaluated requirements, ensuring transparent access to information and engaging specialized consultants in environmental, technical, accounting, labour, and occupational safety matters. Documentary evidence was presented, including valid Provisional Operating Authorizations, Operating Licenses, and various registration records. No non-compliances related to missing Operating Licenses for facilities were identified. In addition, the group maintains a Code of Ethics together with Anti-Corruption and Anti-Discrimination Policies, which set out clear principles reinforcing its commitment to legality, integrity, and respect .
1.2	Legal possession of the audited farms was confirmed through the presentation of updated land registration documents, verifying the right to use the land. These records provide assurance of lawful ownership and compliance with certification requirements.



<p>1.3</p>	<p>The assessment of indicator 4.1.1 identified social, environmental, and agricultural aspects requiring improvement in farm operations. Internal audits conducted by qualified professionals highlighted the following findings:</p> <ul style="list-style-type: none"> - Social: Certain units lack internal Ethics and Conduct Policies. This is a key area for improvement to strengthen integrity and responsible organizational behaviour. The baseline is the absence of formalized policies, with progress to be measured through their development, communication, and 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. <p>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 continuous improvement in social, environmental, and agricultural practices across operations.</p>
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Principle 2: Responsible Labour Conditions

Criteria	Description
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2.1	<p>Interviews and document reviews conducted during the audits confirmed that no evidence of forced, child, or slave labor, or human trafficking was present on the audited farms. All employees were formally registered, and family members were not engaged in work without proper documentation. Farms maintain complete digital employee records, with apprentices appropriately documented, and children residing on the farms regularly attending educational institutions. A formal anti-discrimination policy is in place, covering 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, including communication boxes and contact information displayed at farm entrances.</p> <p>One non-conformity was raised regarding missing personal documents for a worker during the audit; this was subsequently closed once the documents were provided.</p>
2.2	<p>The farm complies with legal employment requirements through the use of formal contracts that clearly define working conditions. Collective bargaining agreements are in place with representative unions, and thirdparty contractors are engaged under defined responsibilities. All workers receive mandatory health and safety training, with documented records maintained to demonstrate compliance .</p>



<p>2.3</p>	<p>The farm demonstrates a comprehensive occupational health and safety management system. It maintains an updated Risk Management Program and an Occupational Health and Medical Control Program, both formally approved and signed by qualified professionals. The health and safety team includes trained personnel, safety technicians, and an occupational physician.</p> <p>Workers' health is monitored through riskbased assessments, with records of periodic and preemployment 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 fulltime safety technician</p> <p>An emergency response plan is in place, providing emergency contact details, first aid kits, contact information for nearby primary health care centers, and defined procedures for external medical referrals in case of accidents. Workers also receive regular training, including first aid, with supporting documentation maintained .</p>
<p>2.4</p>	<p>Audit findings confirmed that the farm complies with RTRS requirements regarding workers' rights and freedom of association. Employees face no restrictions in 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.</p>
<p>2.5</p>	<p>Audit findings confirmed that the farm complies with RTRS requirements concerning fair labor practices, wage</p>



Principle 3: Responsible Community Relations

Criteria	Description
3.1	Audit verification confirmed that 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	The farms are recognized for maintaining clearly defined land areas, with no disputes related to ownership or use identified during document sampling and audit interviews. There were also no indications of disrespect toward the customs or cultures of indigenous peoples. All land areas are respected by the farm and its operators, reflecting a commitment to responsible land management and community harmony.
3.3	No complaints or disputes were recorded during the audit. The Grievance Team is designated to receive and manage complaints and suggestions. Two communication channels are in place: physical communication boxes, monitored every 30 days, and regular meetings where workers share feedback. These mechanisms provide confidentiality, responsiveness, and transparency in addressing employee concerns.
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Principle 4: Environmental Responsibility

Criteria	Description
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4.1	Regular internal audits are carried out by the appointed auditor, with nonconformities formally documented and corrective action timelines defined. These audits follow procedures established in the farm’s management systems. Social and environmental assessments are conducted transparently by technically trained auditors, ensuring reliability and integrity in the evaluation process. Farm managers, supported by analysts, perform routine 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	A summary of the social and environmental assessment report is not made available upon request. During the audit, it was observed that no summary report was accessible, when requested, demonstrating non-compliance with the requirement to provide social and environmental assessment information
4.3	<p>he farms maintain physical records of fuel deliveries, which are subsequently digitized and tracked through electronic systems. Fuel consumption is monitored regularly, with some farms reporting stable usage while others note increases due to expanded cultivation areas or greater reliance on mechanized operations.</p> <p>For soil health, the farms conduct recent and welldocumented laboratory analyses to assess the quantity and quality of organic matter. To maintain and enhance soil organic matter, several good agricultural practices are implemented, including crop rotation, minimal tillage in most areas, the application of biological agents in planting furrows, and careful management of fertilizer use.</p>
4.4	<p>No farm areas have been cleared or converted since May 2009, in compliance with RTRS requirements. Category 1 areas remain intact where maps are available, and in their absence, native forests, riparian zones, wetlands, steep slopes, and legally protected conservation or cultural sites are preserved. Land under unresolved claims by traditional users remains untouched until litigation is resolved.</p> <p>Since 3 June 2016, no conversion has occurred in natural lands, steep slopes, or legally designated conservation and cultural protection areas. This confirms strict compliance with RTRS standards and reinforces environmental and social safeguards</p>



4.5	<p>The farms keep detailed cartographic records identifying water bodies, native vegetation, and Preservation Areas. Wildlife monitoring plans are formally established, with procedures documented and maintained by employees.</p> <p>Strict rules prohibit hunting and fishing, communicated during onboarding and reinforced through ongoing awareness programs. These measures safeguard biodiversity and ensure compliance with sustainable management standards.</p>
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Principle 5: Good Agricultural Practices

Criteria	Description
5.1	<p>The farms apply sustainable agricultural practices to conserve soil and water resources, including crop rotation, cover cropping, terracing, and the use of biological products to improve soil health and reduce environmental impact.</p> <p>Water is sourced under valid permits and used for domestic and agricultural purposes, including irrigation in certain units. Quality is monitored through laboratory testing, with inspections conducted regularly. In cases of contamination, notifications are issued and corrective measures implemented to ensure compliance with environmental standards .</p>
5.2	<p>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.</p>



5.3	<p>Knowledge of techniques to maintain soil quality (physical, chemical, and biological) is demonstrated, and these techniques are effectively implemented across the farms. Measures to control soil erosion are also demonstrated and appropriately applied.</p> <p>A crop rotation plan is in place to prevent consecutive soy cultivation on the same field. During the rotation gap, farmers cultivate a second crop or pasture, or leave land fallow/under cover vegetation to allow regeneration. The plan is adapted to specific climatic and agroecological regional conditions, ensuring compliance with RTRS requirements. Needs for improvement were identified during the audit. An action plan was submitted, evaluated, and approved as sufficient to meet the required needs.</p>
5.4	<p>Within their operations, farms have established Integrated Crop Management (ICM) Plans that set sustainable guidelines combining physical, chemical, biological, and mechanical practices. These plans ensure the responsible use of recognized pesticide brands aligned with technical recommendations. Weekly crop monitoring is conducted by trained technicians, with detailed records maintained in farmer diaries and verified during the audit.</p>



<p>5.5</p>	<p>All farms maintain a Farmer Diary to systematically record agrochemical applications, including application date, treatment area, product details, dosage, responsible personnel, weather conditions, and post-application temperature readings. This ensures traceability, safe usage, and compliance with environmental requirements.</p> <p>However, Non-Conformities were identified. An action plan was submitted, evaluated, and approved as sufficient to meet the required needs.</p> <p>Demonstrates compliance, as agrochemical transport and storage procedures are properly followed by resellers and farms. Products are transported safely and stored in clearly marked, controlled-access areas to prevent leaks, exposure, and environmental contamination.</p> <p>Fertilizer applications are based on soil analysis and professional technical guidance. Application rates are adjusted according to crop and plot-specific nutrient needs, supporting sustainable and efficient agricultural practices. Overall, while record-keeping, transport, storage, and nutrient management systems are well established, corrective measures are required to address deficiencies in empty container management and post-application field safety controls.</p>
<p>5.6</p>	<p>Farms implement measures to reduce the effects of pesticides on human health, biodiversity, and the environment. This includes using precision spreaders, anti-drift products, and applying chemicals under suitable weather conditions and timing to limit evaporation and drift, thereby protecting air, water, and surrounding ecosystems .</p>
<p>5.7</p>	<p>The farms utilize biological products, including Trichoderma and Azospirillum, for seed treatment, supporting sustainable management practices and enhancing soil health. The registration and use of these products follow the same standards applied to agrochemicals, with systematic monitoring to ensure compliance and effectiveness .</p>



5.8	When new pests are detected, the farms promptly inform the nearest Krushi Vigyan Kendra (KVK), the Agriculture Department, or the relevant Agriculture University, in accordance with state phytosanitary surveillance protocols .
5.9	The units exhibit technical proficiency in pesticide application, selecting appropriate weather conditions for treatments and recording relevant meteorological data via on-site applications and connected weather stations .
5.10	The production units grow crop species native to their operating region, implementing conservation management and good agricultural practices to mitigate risks such as erosion and product drift. These measures protect surrounding ecosystems and reduce potential impacts on neighboring farms. Audit findings confirmed that no instances of damage or interference with adjacent production systems were observed, demonstrating responsible, regionally adapted farming practices.
5.11	The units use seeds obtained through legal and traceable channels, including their own seedbeds, reputable suppliers, or seed-saving practices. Seed quality is verified through laboratory testing for germination rates and purity, and all seed lots are properly registered to ensure compliance with applicable legislation.

5.2.1.1 Annex: Chain of Custody Requirements for Producers

Criteria	Description
2.1	The Kedelai Trading Company II 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	<p>he producer group is managed by Kedelai Trading Company II, 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 through the company’s annual budget, with the Sustainability Department responsible for general expenses and the Certifications Department overseeing audit-related activities.</p> <p>The manager’s responsibilities, including the authority to exclude members who fail to meet certification requirements, are formalized in documents distributed to producers and acknowledged through signed agreements.</p> <p>During the audit, field verification and farmer interviews confirmed that agrochemical containers are properly handled and that storage practices are in place to ensure safe management. In addition, precautionary measures and signage are implemented to prevent entry into recently sprayed areas, and workers and visitors are informed about re-entry intervals after pesticide application.</p>
1.2	<p>Kedelai Trading Company II oversees a producer group of 8844 members under formal contracts that establish each producer’s commitment to certification requirements. The Group Manager maintains internal control systems proportionate to the scale of operations, which include monitoring production areas—covering producers with multiple farms—and ensuring that only RTRScertified soybeans are sold. Before admitting new members, the group undertakes technical visits, internal audits, and consultations with the certifying body for background verification. These procedures ensure that all members comply with the required standards prior to inclusion</p>



<p>1.3</p>	<p>Compliance with RTRS certification requirements is demonstrated across the group’s production units, supported by the Group Manager’s strong technical knowledge of the standards. Internal audits are carried out throughout the year on all farms, with additional visits conducted as needed to provide support or address nonconformities. During audits and field visits, certified farms are kept informed by environmental analysts and demonstrate awareness of the RTRS standard, including Chain of Custody requirements. The sale of soybeans as RTRS NonGMO is consistently practiced across the company. The entire chain of custody and RTRS credit sales are centrally managed by the Group Manager through a digital platform, ensuring traceability and transparency. Data on the consumption of agricultural inputs—including correctives, fertilizers, fuels (diesel and kerosene), and agrochemicals—is systematically collected and controlled. This information is then applied to calculate GHG emissions, as documented in the “RTRS Scope 2025” spreadsheet, reinforcing accountability and environmental compliance.</p>
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B. Group and multi-site management procedures

Criteria	Description
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<p>2.1</p>	<p>Documented procedures aligned with RTRS certification requirements are maintained by the Group Manager, 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, and noncompliance management procedures. Both sets of documents have been audited and confirmed as compliant with applicable requirements.</p> <p>The RTRS standard is reviewed and updated at least every two years, supported by training sessions for analysts and feedback mechanisms for producers. Oversight of this management system rests with the Sustainability Department. Documented procedures cover internal audits, member inclusion and exclusion, facilitation of auditor access, and monitoring and resolution of noncompliance issues.</p> <p>Responsibility for group management lies with the Socioenvironmental Manager, or in her absence, the Socioenvironmental Supervisor. Both individuals are qualified under the criteria defined by the Management System, which also specifies training requirements for all personnel involved.</p>
<p>2.2</p>	<p>Obligations related to RTRS certification are clearly communicated to all producers within the group. Each farm is formally included through a Letter of Consent. Internal audits verify compliance with the full requirements of the standard, with onsite support provided when necessary. Identified nonconformities are addressed either remotely or through targeted technical visits.</p>

C. Control and monitoring of member/site compliance

Criteria	Description
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3.1	Kedelai Trading Company II implements a structured internal audit process, as defined in its Certification Management Manual. This process includes initial audits for new members based on 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 of 1 to 5. Properties scoring 30 or below are classified as low risk, and currently no members fall into the highrisk category. Internal audits confirm that all certification requirements are reviewed. Although no critical nonconformities have been identified to date, the system provides for the exclusion of members or production volumes from certification if standards are not met.
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D. Record Keeping

Criteria	Description
4.1	In accordance with Item 12 of the Group Management Manual for Certifications, the company retains records for a minimum of five years. Digital archiving is carried out 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, while 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, with volume management overseen by the Sustainability Department. Sales monitoring is the responsibility of the Sustainable Business and Innovation Department, ensuring traceability and accountability across all operations.

E. Chain of Custody



Criteria	Description
5.1	RTRS-certified soybean shipments from group members are centrally coordinated by the main office, with shipment records accessible to the Group Manager through the system. Each shipment is tracked using an RTRS Declaration to ensure traceability and compliance. Physical volumes are monitored in the system through invoices and packing slip reports, and reflected in the total balance of the Current Account. To maintain clarity and accuracy, physical volumes and RTRS credits are recorded separately. All relevant data is consolidated in the Scope 2025 spreadsheet. Credit transactions are managed exclusively by the Group Manager via the RTRS platform, with no individual sales conducted by group members.



7. Assessment Findings

Summary of findings	<p>During the audits, non-conformities were identified on the audited farms, all related to the Production Standard. However, it was possible to demonstrate, even with a new manager in the group, a commitment to the principles and criteria of the RTRS Standards.</p> <p>After the audit, deadlines were established and corrective actions or action plans were implemented for the non-conformities found, which were evaluated by FoodChain ID.</p> <p>Therefore, I recommend that the certification be maintained.</p>
Next Audit Date	01/10/2026 00:00
Certification decision	Granted.
Client Acknowledge	This certification decision was communicated.