# PUBLIC AUDIT REPORT

# RTRS STANDARD ON RESPONSIBLE SOY PRODUCTION

## 1. Certification Body Details

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|---|---|
| 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

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|---|---|---|---|
| Name | Sewagram Soya Company | CB's client number | |
| Address | Vijayanand Society, Plot No 2 Narendra Nagar | | |
| Country | India | | |
| Contact Person & Role | Praveen Waxer | | |
| RTRS member # | No | | |
| Contact email | praveen@sewagram.org | | |
| Web Page | | | |

## 3. General audit details

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|---|---|---|---|
| Certificate's Number | Soy: RTRS-FCID-AGR-COC-NGMO-2937 | | |
| | Corn: | | |
| | Non-GMO: | | |
| Certificate Type | Production standard, Group | Number of certified establishments | |
| Audit Type | Soy:Initial | | |
| | Corn: | | |
| | Non-GMO: | | |
| Certificate start date | Soy:22/09/2025 00:00:00 | Certificate end date | Soy:22/09/2030 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 | Reinaldo Rodrigues | |

### 4.2 Evaluated Standards

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

### 4.4 Audit Schedule

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|---|---|---|---|
| Audit date | 14/07/2025 00:00 | | |
| Audit Summary | Sewagram is a soybean trading company that manages all farms centrally, using a single system for preparing and filing documentation, hiring, and hiring employees at its central office. All properties are non-GMO and have access to advisory services and technical assistance in various areas, including agronomic requirements. During the audits, nonconformities were identified for the audited farms or the group's manager. | | |
| Calculated Days | Number | 18.5 | 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:<br>Sampling formula (high risk) = 1 + √8533/2 x 1,5 = 1 + 70<br>Where:<br>• 1 represents the group manager<br>• 70 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 | | | | | 55768 | 119344 | |

### 5.1 Interviews with stakeholders

| Name | Organization/Background | Comments |
|---|---|---|
| The person in charge did not identify | Ministry of Corporate Affairs, MCA | |
| **Name** | **Organization/Background** | **Comments** |
| The person in charge did not identify | Registrar of Companies (ROC), Mumbai | |
| **Name** | **Organization/Background** | **Comments** |
| The person in charge did not identify | Zilla Parishad Primary School, Sewagram | |

### 5.2 Evaluation Results

#### 5.2.1 RTRS Standard on Responsible Soy production

**Principle 1: Legal Compliance and Good Business Practices**

| Criteria | Description |
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| **1.1** | The farms audited in the 2025 cycle demonstrated compliance with the assessed requirements, with easy access to information and the hiring of specialized consultants in the environmental, technical, accounting, labor, and occupational safety areas. Documentary evidence was presented, such as valid Provisional Operating Authorizations and Operating Licenses, as well as various registration records.<br>No non-compliances related to the lack of Operating Licenses for facilities were identified on the properties.<br>The group also has a Code of Ethics and an Anti-Corruption and Anti-Discrimination Policy, with clear guidelines that reinforce its commitment to legality, integrity, and respect. |
| **1.2** | The right to use the land was proven through the presentation of the updated registrations of the areas belonging to the audited farms, demonstrating the legal and regular possession of the farms. |

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| **1.3** | The assessment of indicator 4.1.1 identified social, environmental, and agricultural aspects that require improvements in farm operations. Internal audits conducted by qualified professionals highlighted the following points:<br>• Social: The absence of internal Ethics and Conduct Policies was observed in some units, a significant area for improvement to strengthen the principles of integrity and organizational conduct. The baseline established is the lack of formal policies, and progress will be monitored through their implementation, dissemination, and associated training.<br>• Environmental: It was found that biodiversity monitoring is carried out through simple records, such as spreadsheets, with observations of local fauna and flora. The number of records will be used as an indicator, with periodic monitoring.<br>The farms maintain a structured process of periodic internal audits, through which monitoring results are evaluated. Nonconformities, interactions, and opportunities for improvement are recorded in standardized documents and formally communicated, ensuring traceability and providing a basis for corrective and preventive actions. This process contributes to the continuous improvement of social, environmental and agricultural practices in operations. |

**Principle 2: Responsible Labour Conditions**

| Criteria | Description |
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| **2.1** | Based on the interviews and documents analyzed during the audits, no evidence of forced, child, or slave labor or human trafficking was identified on the audited farms. There were also no cases of document retention or family members performing activities without formal registration.<br>The farms maintain complete digital records of employees, and any minor apprentices present are properly documented. Children residing on the properties regularly attend educational institutions.<br>The existence of a formal anti-discrimination policy was confirmed, covering various criteria such as gender, ethnicity, religion, sexual orientation, and personal or professional conditions. Most farms did not report pay differences for equal work, and no cases of disparity without formal justification were observed.<br>No abusive practices, such as corporal punishment or harassment, were identified, and secure channels are available for reporting, including communication boxes and contact information displayed at the farm entrances. One NC was raised regarding document, the farm didn't have the worker personal documents available during the audit and it was closed sending the document |
| **2.2** | The farm complies with legal hiring requirements, using formal contracts that specify working conditions. Collective bargaining agreements are in place with representative unions and third-party contractors with defined responsibilities are regularly hired. Workers receive mandatory health and safety training, as documented in valid records. |
| **2.3** | The farm demonstrates a solid occupational health and safety structure. It has an updated Risk Management Program and an Occupational Health Medical Control Program, duly signed by qualified professionals. There is a health and safety team comprised of an engineer, safety technicians, a nurse, and an occupational physician.<br>Workers' health is monitored based on risk assessments, with records of periodic and pre-employment exams available. The use of Personal Protective Equipment (PPE) is controlled by signed forms and monitored by daily rounds conducted by a full-time safety technician.<br>An emergency plan is in place, with resources such as an ambulance, a health team present, and structured referrals for external care in the event of accidents. Workers receive regular training, including first aid, with documented evidence. Was raised regarding EPP Uses, and it was closed providing training and correct EPP |

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| **2.4** | Farms do not impose restrictions on freedom of association, union activity, collective bargaining, or workers' interaction with outside parties outside of working hours. |
| **2.5** | The wages paid were found to be in accordance with Collective Bargaining Agreements, exceeding the |

**Principle 3: Responsible Community Relations**

| Criteria | Description |
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| **3.1** | The farms have two communication channels accessible to employees: a channel via WhatsApp, used for direct and quick communications with the teams, and physical communication boxes, installed in accessible locations. These boxes are opened and monitored by administrative officials, who register, evaluate and forward the demands received, ensuring confidentiality and proper handling of messages. The farms are widely recognized in the regions and have several communication channels, facilitating dialogue and interaction with communities and workers |
| **3.2** | During the audits, based on the sampled documents, no disputes related to land were identified, nor disrespect for customs and cultures of indigenous peoples. The areas mentioned are defined and being respected. |
| **3.3** | No cases were recorded. HR teams are responsible for receiving and handling complaints and suggestions, with communication boxes monitored every 30 days. When used, the demands are passed on to the workers through regular meetings. |
| **3.4** | No cases were recorded. HR teams are responsible for receiving and handling complaints and suggestions, with communication boxes monitored every 30 days. When used, the demands are passed on to the workers through regular meetings. |

**Principle 4: Environmental Responsibility**

| Criteria | Description |
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| **4.1** | Farms undergo internal audits conducted by qualified professionals, with formal records of nonconformities and their respective correction deadlines, following procedures documented in management systems. Social and environmental assessments are conducted transparently by auditors with technical training and experience, ensuring the quality and reliability of the processes. Managers conduct regular technical visits to the units, supported by a team of analysts, ensuring monitoring of operational conditions. Furthermore, assessments are recorded on specific platforms, allowing continuous monitoring of compliance criteria and traceability of results. |
| **4.2** | The farms maintain organized waste centers with adequate containment and identification areas, demonstrating systematic control over solid waste management. The correct disposal of waste, such as oils, plastics, tires, metals, PPE, and organic waste, is ensured through partnerships with licensed companies. During field visits, it was verified that the farms' mechanical facilities—such as workshops, warehouses, and decontamination yards—have adequate infrastructure, including paving and containment systems, ensuring compliance with safety and environmental requirements.<br>The farms conduct selective collection of all generated waste, adopting segregation practices at source and ensuring proper disposal through specialized companies, contributing to environmental sustainability and compliance with applicable regulations. Furthermore, the farms have updated Solid Waste Management Plans (PGRS), which detail the types of waste generated, their classifications and the disposal strategies adopted, in accordance with environmental legislation and good practices in the agricultural sector. |
| **4.3** | Farms keep physical records of fuel supplies, which are then entered into electronic systems. They monitor fuel consumption, with some not identifying increases, while others register growth due to the expansion of cultivated area or increased mechanized activities. Farms monitor the quantity and quality of organic matter in the soil through recent, documented laboratory analyses. They adopt practices to encourage the maintenance of organic matter, such as crop rotation, minimal tillage in most areas, application of biological agents in the planting furrow, and strict control of fertilizer use. |

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| **4.4** | There were no expansions of soybean cultivation after January 2008.<br>Maps of properties were verified, showing comparisons of areas in 2008, 2016 (when applicable), and 2025, describing the dynamics of land use and land cover. |
| **4.5** | The farms have detailed cartographic documentation identifying bodies of water, native areas, and Preservation Areas. They maintain formal wildlife monitoring plans, with defined procedures and records kept by all employees. They adopt policies that prohibit hunting and fishing, instructing employees on these restrictions during onboarding. Furthermore, they preserve more than 10% of their total area's native vegetation. |

**Principle 5: Good Agricultural Practices**

| Criteria | Description |
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| **5.1** | The farms adopt sustainable agricultural practices focused on soil and water conservation, such as crop rotation, cover cropping, the use of biological products, and terracing. Water is collected with valid permits and is mostly used for domestic and agricultural purposes, including irrigation in some units. Water quality is monitored through regular tests, and the farms are subject to inspections, which monitor the results and are notified in the event of contamination. |
| **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). |

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| **5.4** | The farms have internally developed Integrated Crop Management (ICM) Plans, with sustainable guidelines that include biological control (use of Beauveria and Bacillus) and targets for a 1% 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, such as the one conducted on December 9, 2024, in plot 20A, which identified several pests. |
| **5.5** | Farms maintain detailed records of agrochemical use, including dates, areas, products applied, responsible parties, and weather conditions to ensure safety and efficiency. They store empty containers in appropriate locations and dispose of them properly, with documentary proof. They follow strict standards for product transportation and storage. They use signs to mark recently applied areas, indicating products and withdrawal periods. They apply fertilizers according to soil analysis and technical guidelines, adjusting doses to meet specific needs and avoid waste. |
| **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 authorities, 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. |

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| **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 |
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| **2.1** | The audited farms 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<br>RTRS Custody. |
| **2.2** | The total volumes produced by each farm are maintained<br>via system or manual records. The manager |
| **2.3** | It also has this data for each harvest |
| **2.4** | The farms record the volumes produced and shipped<br>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 Sewagram, which internally appoints a person responsible for socio-environmental management, with decision-making autonomy, as outlined in its internal procedures and the Group Management Manual. All certification-related costs are covered by the company through its annual budget, with expenses allocated to the Sustainability department and audits under the responsibility of the Certifications department. The manager's responsibilities, including the possibility of excluding members who do not meet the standard's requirements, are formalized in documents delivered to the producers, who sign in acknowledgment.<br>The group didn’t included procedures to avoid people entering in the sprayed area, the NC was closed and all famres trained. |
| **1.2** | The producer group, composed of 8533 members, is managed based on formal contracts that establish the producers' commitment to comply with certification requirements. The group manager has internal control systems commensurate with the scale of operations, including monitoring of production areas, including those of producers with multiple farms. Only RTR-certified NGMO soybeans are sold. Before new members are included, technical visits, internal audits, and consultations with the certifying body are conducted for background checks. |

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| **1.3** | The group's units demonstrate compliance with RTRS certification requirements, with the manager demonstrating technical knowledge of the applicable requirements. All farms are audited internally throughout the year, with visits intensified as needed for support or to correct non-compliances.<br>Records of these audits were presented, such as that of the AAlahd Farm on March 13, 2025.<br>During audits and visits, certified farms are kept informed by environmental analysts and demonstrate knowledge of the RTRS standard, including the Chain of Custody.<br>The sale of soybeans as RTRS Non-GM is practiced throughout the company. Control of the entire chain of custody and sale of RTRS credits is centralized by the manager and carried out through a digital platform.<br>Furthermore, data on the consumption of inputs such as correctives, fertilizers, fuels (diesel and kerosene) and agrochemicals are collected and controlled, used to calculate GHG (Greenhouse Gas) emissions, as shown in the "RTRS Scope 2025" spreadsheet. |

**B. Group and multi-site management procedures**

| Criteria | Description |
|---|---|
| **2.1** | The group manager maintains documented procedures to meet RTRS certification, based on PO 0411, v.5, and the Certification Management Manual, which addresses policy, structure, responsibilities, member admission, and non-compliance management. Both documents were audited and demonstrated compliance with the requirements.<br>The standard is updated at least every two years, with training for analysts and feedback to producers. The sustainability department is responsible for this management. The procedures include internal audits, member inclusion/exclusion, access to auditors, and monitoring of non-compliance.<br>Group management is the responsibility of the socio-environmental manager, or, in her absence, the socio-environmental supervisor, both qualified according to the criteria defined by the Management System, which also establishes the necessary training for the employees involved. |

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| **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.<br>During internal audits, the standard's full requirements are verified, with on-site support when necessary.<br>Non-conformities are addressed remotely or through technical visits, as evidenced in the NC management spreadsheet dated June 23, 2025. |

## C. Control and monitoring of member/site compliance

| Criteria | Description |
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| **3.1** | Sewagram conducts internal audits as established in the Certification Management Manual, including initial admission audits based on a risk assessment. Audits are conducted annually for all members, in accordance with the 2025 Internal Audit Program.<br>Risk is classified using a spreadsheet with 10 topics evaluated on a scale of 1 to 5, and properties with a score of 30 or less are considered low risk. Currently, no members are classified as high risk.<br>During these audits, all requirements are verified, as demonstrated in the Allahd registration on March 13, 2025. Although no critical cases have yet occurred, members or volumes may be excluded from certification if they fail to meet the standards. |

## D. Record Keeping

| Criteria | Description |
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| **4.1** | Record storage for at least 5 years is required in item 12. The company uses its internal network for digital archiving, with documents saved in specific folders (e.g., Environmental Network/RTRS Audits and Certifications). Each document has two copies: one for the producer and one for the manager.<br>Consent Letters and Risk Assessment Forms are maintained digitally. Member information, risk levels, and property maps are organized in the RTRS Scope 2025 spreadsheet and stored in the cloud.<br>The internal control system maintains physical and digital records, including internal audits, chain of custody, and non-compliance SACs. NC management is monitored using specific spreadsheets.<br>Satellite imagery is updated annually and stored to monitor changes in land use. Production volumes are recorded in the RTRS Scope 2025 spreadsheet. The sustainability department manages volumes, and the Sustainable Business and Innovation department monitors sales. |

**E. Chain of Custody**

| Criteria | Description |
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| **5.1** | RTRS soybean shipments from group members are accounted for by the central office, with records accessed by the manager via the system. All shipments are tracked by an RTRS Declaration.<br>In the system, physical volumes are tracked through invoices and packing slip reports, within the total balance of the Current Account. Physical volumes and credits are separated in the records.<br>This data is recorded in the Scope 2025 spreadsheet. Credits are traded exclusively by the manager on the RTRS platform—there are no individual sales. |

## 7. Assessment Findings

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| **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.<br>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.<br>Therefore, I recommend that the certification. |
| **Next Audit Date** | 13/07/2026 00:00 |
| **Certification decision** | Granted-Samea Fernandes |
| **Client Acknowledge** | Client informed about the certification decision. |