



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	Sewagram Soya Company II	CB's client number	
Address	PLOT NO. 20, VIJAYANAND SOCIETY, NARENENDRA NAGAR District : Nagpur, State Maharashtra, India.		
Country	India		
Contact Person & Role	Vidya Kohlekar		
RTRS member #	No		
Contact email	vidya@sewagram.org		
Web Page			



3. General audit details

Certificate's Number	Soy: RTRS-FCID-AGR-COC-ID-2937-2		
	Corn:		
	Non-GMO:		
Certificate Type	Production standard, Group	Number of certified establishments	
Audit Type	Soy:Initial		
	Corn:		
	Non-GMO:		
Certificate start date	Soy:23/01/2026 00:00:00	Certificate end date	Soy:23/01/2031 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	15/09/2025 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. During the audits, nonconformities were identified for the audited farms or the group's manager.		
Calculated Days	Number	19.5	The calculation of man-days (MD) was
	Description		
Sampling Methodology	<p>The sample of producers selected for audit was determined through an analysis of the group manager's management system and individual member risk assessments. Based on this evaluation, the group was assigned a low-risk classification.</p> <p>Applying the RTRS sampling formula for high-risk groups, the minimum sample size was calculated as:</p> $1 + \sqrt{9894/2 \times 1,5} = 1 + 73$ <p>Where:</p> <ul style="list-style-type: none"> 1 corresponds to the group manager 76 corresponds to the number of farms included 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			63108	135051	





5.1 Interviews with stakeholders

Name	Organization/Background	Comments
Dr. J. R. Katore	Government Organization	
Name	Organization/Background	Comments
Dr. P. R. Dhumal	Government Organization	
Name	Organization/Background	Comments
Prashant Gund	Local Community	
Name	Organization/Background	Comments
Anmol Raut	Stakeholder Representative	
Name	Organization/Background	Comments
Arvind Maruti Deshmukh	Stakeholder Representative	
Name	Organization/Background	Comments
Ravindra Gharat	Local Business	
Name	Organization/Background	Comments
Sandeep Delip Rao Kale	Union	
Name	Organization/Background	Comments
Podar International School - Wardha	Educational Organization	

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	<p>During the 2025 audit cycle, the farms demonstrated compliance with the evaluated requirements. Information was readily accessible, and specialized consultants were engaged in environmental, technical, accounting, labor, and occupational safety areas. Documentary evidence included valid Provisional Operating Authorizations, Operating Licenses, and supporting registration records</p> <p>No noncompliances related to missing Operating Licenses for facilities were identified during the farm audits. In addition, the group maintains a Code of Ethics along with AntiCorruption and AntiDiscrimination Policies, which establish clear principles reinforcing its commitment to legality, integrity, and respect.</p>
1.2	<p>The right to use the land was verified through updated land registration documents presented by the audited farms, confirming their legal and lawful possession.</p>



1.3	<p>Following the issuance of the non-conformity related to the absence of a documented continuous improvement system, the supplier submitted a comprehensive Continuous Improvement Plan (Document No. SSC/2025/NCC/2025/01). The plan clearly outlines improvement actions across key RTRS focus areas, including legal compliance, ethical and transparent business practices, responsible labour management, community engagement, environmental responsibility, and Good Agricultural Practices. It also specifies measurable targets and expected outcomes to be achieved by Year 5, such as full legal compliance, improved occupational conditions, strengthened grievance-free community relations, reduced environmental impacts, enhanced soil health, improved water-use efficiency, and complete alignment with RTRS certification requirements.</p> <p>In addition, the operation has conducted a structured review to identify social, environmental, and agricultural aspects requiring improvement and has integrated these findings into the continuous improvement framework. Relevant indicators have been selected for each priority area, and baseline data has been established to support future monitoring and performance evaluation.</p> <p>The operator has developed documented procedures to ensure that monitoring outcomes will be periodically reviewed, and appropriate corrective or improvement actions will be taken when necessary. The systems in place demonstrate that the operator has established a robust framework and is fully prepared to implement and track continual improvement throughout subsequent audit cycles.</p>
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Principle 2: Responsible Labour Conditions

Criteria	Description
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2.1	<p>Audit interviews and document verification confirmed that the farms operate in compliance with labour standards: no indications of forced labour, child labour, bonded labour, or trafficking were identified. All workers were formally registered, and family members were not engaged in farm tasks without proper documentation.</p> <p>Employee records are maintained digitally, ensuring traceability of contracts and apprenticeships. Children living on the farms were observed to be enrolled in and attending school, demonstrating adherence to child welfare requirements.</p> <p>A documented anti discrimination policy was available, covering gender, ethnicity, religion, sexual orientation, and other personal or professional conditions. Payroll reviews and worker interviews showed equal pay for equal work, with no unjustified disparities reported.</p> <p>No abusive practices were detected. Workers reported absence of corporal punishment, harassment, or intimidation. Accessible grievance channels were in place, including communication boxes and posted contact details at farm entrances.</p> <p>Farms maintain a formal antidiscrimination policy covering gender, ethnicity, religion, sexual orientation, and other conditions. No discriminatory practices were observed</p> <p>Audits verified that workers receive fair pay for equal work, with no unjustified disparities observed. All employees have equitable access to training, benefits, and opportunities for advancement</p> <p>Audits confirmed that workers are free from punishment, coercion, harassment, or intimidation. Interviews and observations showed workplace practices uphold dignity and respect</p> <p>Audits verified that workers have safe and confidential channels to report abuses and protect their rights. Mechanisms such as communication boxes and posted contacts ensure accessibility and trust</p>
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2.2	<p>Audits confirmed that all workers, including temporary staff, sharecroppers, contractors, and subcontractors, have written agreements. These contracts are provided in a language they understand and comply with local legal requirements.</p> <p>Audits confirmed that labour laws, union agreements, and contracts detailing employment conditions are accessible to workers. These are provided in languages understood or explained clearly by supervisors</p> <p>Audits confirmed that all workers receive adequate training and clear instructions on rights, health, and safety. Guidance and supervision are provided to ensure tasks are carried out responsibly</p>
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2.3

2.3.1 - The farm has a strong occupational health and safety management system, supported by an updated Risk Management Program and an Occupational Health and Medical Control Program, both validated by qualified professionals. A dedicated team—comprising trained staff, safety technicians, and an occupational physician—ensures effective implementation and oversight

2.3.2 - Workers' health is safeguarded through riskbased medical assessments, with records of periodic and preemployment examinations available for verification. The consistent use of Personal Protective Equipment (PPE) is ensured through signed acknowledgment forms and daily inspections led by a fulltime safety technician

2.3.3 - Hazardous tasks are only carried out by competent workers. Assignments are managed to avoid undue health risks

An emergency response plan is in place, with contact details, first aid kits, and referral procedures clearly defined. Workers are regularly trained, including first aid, and supporting documentation is maintained to verify compliance

2.3.4 - A few farmers have not ensured consistent provision or use of Personal Protective Equipment (PPE) during pesticide handling and mechanized operations. Daily inspections revealed gaps in PPE availability and compliance.

2.3.5 - Mechanisms are in place to ensure workers consistently follow safety requirements. Supervisors and safety technicians monitor compliance daily, reinforcing protective practices across all operations

2.3.6 - An emergency response plan is established, including contact details, first aid kits, and referral procedures to nearby health centres. Workers receive regular training, including first aid, with documentation maintained to verify preparedness

2.3.7 - In case of accidents or illness, workers have immediate access to first aid and medical assistance. Procedures ensure timely response, minimizing risks and safeguarding worker health

2.3.8 - Machinery and equipment are regularly inspected and maintained to ensure safe operation. Preventive servicing reduces risks of accidents and supports a safe working environment for all employees



2.4	The farm complies with RTRS requirements on workers' rights and freedom of association. Employees face no restrictions in joining unions, engaging in collective bargaining, or interacting with external parties outside working hours. This demonstrates respect for workers' rights and supports a fair, transparent workplace environment
2.5	The farm demonstrates compliance with RTRS requirements on fair labor practices, wage standards, and



Principle 3: Responsible Community Relations

Criteria	Description
3.1	Employees have access to clear and reliable communication pathways, including a WhatsAppbased digital line and physical boxes placed in accessible locations. Administrative staff monitor these channels regularly, ensuring confidentiality by registering, evaluating, and forwarding messages appropriately. The farm is wellrecognized in the region and maintains multiple avenues that foster open dialogue with workers and the surrounding community
3.2	Audit interviews and document sampling confirmed that no disputes exist regarding land ownership or use. Customs and cultures of indigenous peoples are respected, with no evidence of disregard or conflict. All land boundaries are clearly defined and consistently upheld by the farm and its operators
3.3	The audit confirmed that no complaints or disputes were raised during the assessment period. A designated Grievance Team oversees the process, managing suggestions and concerns through two channels: physical boxes checked every 30 days and regular meetings where feedback is shared with workers. These mechanisms uphold confidentiality, responsiveness, and transparency in handling employee issues
3.4	The farm actively shares employment opportunities within the local area and collaborates with training programs to build skills among the community, including indigenous peoples where possible. Local suppliers are engaged to provide goods and services, strengthening economic participation. These practices foster inclusion and reinforce positive relationships with surrounding communities

Principle 4: Environmental Responsibility

Criteria	Description
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<p>4.1</p>	<p>Regular internal audits are carried out with documented nonconformities and defined timelines for corrective actions, following established farm management procedures. Social and environmental assessments are conducted transparently by trained auditors, ensuring reliability and integrity of the evaluation process. Farm managers, supported by analysts, perform technical visits to operational units, with all findings recorded on dedicated platforms for continuous compliance tracking and traceability</p>
<p>4.2</p>	<p>Farms operate structured waste management centers with proper containment and clearly marked areas for different waste streams. Materials such as oils, plastics, tires, metals, PPE, and organic waste are disposed of responsibly through authorized service providers, ensuring environmental and legal compliance. Mechanical facilities—including workshops, storage areas, and decontamination yards—are equipped with paved surfaces and containment systems that meet safety and environmental standards.</p> <p>Waste is segregated at the source, with different categories collected separately and sent to specialized companies for proper disposal, reinforcing sustainability and regulatory adherence. Each farm maintains an updated Solid Waste Management Plan (PGRS), detailing waste types, classifications, and disposal methods, aligned with environmental legislation and best practices in sustainable agriculture</p>
<p>4.3</p>	<p>Fuel deliveries are recorded physically and later digitized, with consumption monitored across farms. While some report stable usage, others note increases linked to expanded cultivation or greater mechanization. This tracking ensures transparency and supports efficient resource management.</p> <p>Soil health is safeguarded through recent, well-documented laboratory analyses of organic matter. To maintain and improve soil quality, farms apply good agricultural practices such as crop rotation, minimal tillage, biological agents in planting furrows, and careful fertilizer management</p>



4.4	<p>Since May 2009, no farm areas have been cleared or converted, in line with RTRS requirements. Where RTRS maps are available, all Category 1 areas remain intact; where maps are not available, native forests, riparian vegetation, wetlands, steep slopes, and legally protected conservation or cultural areas are preserved. Land under unresolved claims by traditional users remains untouched until litigation is resolved.</p> <p>After 3 June 2016, no conversion has occurred in natural lands, steep slopes, or legally designated conservation and cultural protection areas. These measures demonstrate strict adherence to RTRS standards and respect for environmental and social safeguards</p>
4.5	<p>Cartographic records are maintained to clearly identify water bodies, native vegetation, and designated Preservation Areas. Formal wildlife monitoring plans are in place, with procedures documented and followed by all employees. Strict policies prohibit hunting and fishing, communicated during onboarding and reinforced through ongoing awareness programs, supporting biodiversity conservation and compliance with RTRS requirements</p>

Principle 5: Good Agricultural Practices

Criteria	Description
5.1	<p>Farms apply a diverse set of sustainable practices to protect soil and water resources, including crop rotation, cover cropping, terracing, and the use of biological products that strengthen soil health while reducing environmental impact. Water is sourced under valid permits and used for domestic and agricultural purposes, including irrigation in certain units.</p> <p>Laboratory testing ensures water quality is regularly monitored, with inspections confirming compliance. In the event of contamination, farms initiate notifications and corrective actions to safeguard environmental standards and maintain transparency.</p>
5.2	<p>Agricultural air restriction maps are maintained to identify springs and rivers, guiding responsible pesticide application. Environmental regularization processes have declared certain degraded parcels with defined deadlines for restoration, while most farms report no degraded areas. No wetlands were identified on the properties beyond riparian zones, confirming compliance with RTRS requirements</p>



5.3	Farms apply a comprehensive set of sustainable practices to conserve and improve soil health, supported by annual soil, leaf, and nematode analyses with laboratory results documenting technical monitoring of production areas. Dedicated soil management teams oversee the implementation of techniques such as no-till farming, crop rotation, cover cropping, terracing, contour lines, regenerative and precision agriculture, and root sampling. An Integrated Crop Management Plan (MIC) guides these efforts, ensuring consistency and alignment with best practices in sustainable agriculture
5.4	Farms have developed their own Integrated Crop Management (ICM) Plans, setting sustainable guidelines that combine physical, chemical, biological, and mechanical practices. These plans include clear targets, such as achieving a 0.5% annual reduction in chemical inputs, while ensuring the use of recognized pesticide brands aligned with technical recommendations. Weekly crop monitoring is carried out by trained technicians, with detailed records maintained in farmer diaries and verified during the audit
5.5	All registered producers receive a Farmer Diary from the Group Manager, enabling detailed recordkeeping of agrochemical use, including application dates, treated areas, products applied, responsible personnel, and weather conditions. These records strengthen safe and efficient management practices. Farmers also follow strict protocols for storage and disposal of empty containers, transportation and storage of products in line with safety standards, and signage in recently treated areas to indicate products used and withdrawal periods. Fertilizer application is guided by soil analysis and technical recommendations, with doses adjusted to crop needs to minimize waste and environmental impact
5.6	Farms implement responsible pesticide management practices designed to protect human health, biodiversity, and the environment. Applications are carried out with spreaders and antidrift products, scheduled at appropriate times and under suitable weather conditions to minimize evaporation and drift. These measures safeguard the quality of air, water, and surrounding ecosystems, reinforcing compliance with sustainability standards



5.7	Farms apply biological products such as Trichoderma and Azospirillum in seed treatment, supporting sustainable management and strengthening soil health. Registration of these inputs follows the same criteria established for agrochemicals, ensuring consistency and compliance. Systematic monitoring is carried out to verify proper use and effectiveness, reinforcing environmentally responsible production practices
5.8	When new pests are detected, farms promptly notify the nearest Krushi Vigyan Kendra (KVK), Agriculture Department, or Agriculture University in line with state phytosanitary surveillance protocols. This reporting system ensures timely technical support and reinforces compliance with regulatory requirements. The practice strengthens pest management strategies while safeguarding crop health and environmental integrity
5.9	Farms show strong technical capacity in pesticide application, prioritizing suitable weather conditions to minimize risks. Meteorological data is systematically recorded through applications and stations connected to the monitoring system, ensuring precision and accountability. These practices safeguard human health, biodiversity, and environmental quality while reinforcing compliance with sustainability standards
5.10	Production units cultivate species that are typical of their operating region, applying conservation management and good agricultural practices to reduce risks such as erosion and product drift. These measures help safeguard surrounding ecosystems and minimize potential impacts on neighboring farms. Audit findings confirmed that no cases of damage or direct interference with the production systems of adjacent properties were reported, demonstrating responsible and regionally adapted farming practices
5.11	Farms ensure that all seeds are acquired through legal and traceable channels, whether from their own seedbeds, reputable suppliers, or seed saving practices. Seed quality is verified through laboratory testing of germination rates and batch purity, with results documented to demonstrate technical monitoring. All seed materials are duly registered, ensuring compliance with current legislation and reinforcing sustainable production standards

5.2.1.1 Annex: Chain of Custody Requirements for Producers

Criteria	Description
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2.1	The Sewagram Soya company purchases soya directly from farmers, stores it centrally, and ships the physical product with invoices. Subsequently, the group manager issues the RTRS Product Declaration to the purchasing company, including farm and owner details, certified volume, and the RTRS certificate number, ensuring full compliance with RTRS custody requirements.
2.2	Total volumes produced by each farm are recorded either through system entries or manual registers, maintained by the field office and ICS manager. This ensures traceability, accountability, and compliance with certification requirements.
2.3	Total volumes produced by each farm are recorded through system or manual registers, maintained by the field office and ICS manager. These records also capture data for each harvest, ensuring traceability across production cycles and compliance with certification requirements
2.4	Farms record the volumes produced and shipped using systems or spreadsheets, ensuring traceability and accountability of outputs.



5.2.2 RTRS Group and Multi-site Certification Standard

A. Group Elements

Criteria	Description
1.1	<p>The producer group is managed by Sewagram Soya Company, which appoints a Socioenvironmental Manager with decisionmaking autonomy, as defined in internal procedures and the Group Management Manual. All certificationrelated costs are covered by the company’s annual budget, with the Sustainability Department responsible for general expenses and the Certifications Department overseeing audit activities. The manager’s responsibilities, including authority to exclude members who fail to meet certification standards, are formalized in documents distributed to producers and signed to confirm their understanding and acceptance.</p> <p>During the audit, observations included storage of empty containers and safety practices in sprayed areas. Farmers subsequently received training on proper procedures, signage, and reentry intervals after pesticide application. Corrective measures were implemented, ensuring compliance with certification requirements and safeguarding workers and visitors against agrochemical exposure</p>
1.2	<p>Sewagram Soya Company oversees a producer group of 9,894 members under formal contracts that bind each farmer to certification requirements. Internal control systems are scaled to the group’s size, covering monitoring of production areas (including multifarm producers) and ensuring that only RTRScertified soybeans enter the market.</p> <p>Admission of new members follows a structured process involving technical visits, internal audits, and background checks with the certifying body. These measures confirm that all entrants meet RTRS standards before joining the group</p>



<p>1.3</p>	<p>The producer group’s farms operate under RTRS certification, with the Group Manager applying strong technical expertise to oversee compliance. Internal audits are carried out across all units during the year, and additional visits are scheduled to provide support or resolve issues. Records from farmers were presented as evidence of these activities.</p> <p>Certified producers remain informed through environmental analysts and demonstrate awareness of RTRS requirements, including Chain of Custody. Soybeans are marketed exclusively as RTRS certified, with custody and credit sales coordinated centrally by the Group Manager via a digital platform, ensuring transparency and traceability.</p> <p>Agricultural input data—covering correctives, fertilizers, fuels, and agrochemicals—is systematically monitored. This information supports greenhouse gas (GHG) emission calculations, documented in the “RTRS Scope 2025” spreadsheet, reinforcing the group’s commitment to sustainability</p>
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B. Group and multi-site management procedures

Criteria	Description
<p>2.1</p>	<p>The Group Manager maintains documented procedures aligned with RTRS certification requirements, referencing SSC/ICS/2025 V1, SSC/POL/2005/001 through SSC/POL/2025/030, and the Certification Management Manual. These documents cover certification policy, organizational structure, defined roles and responsibilities, criteria for member admission, and processes for managing noncompliance. 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 biennially, supported by training sessions for analysts and feedback mechanisms for producers. Oversight of the management system rests with the Sustainability Department, which ensures implementation of procedures including internal audits, member inclusion and exclusion, auditor access, and monitoring of noncompliance.</p> <p>Group management responsibilities are assigned to the Socioenvironmental Manager, or in her absence, the Socioenvironmental Supervisor. Both are qualified under the criteria defined by the Management System, which also specifies training requirements for all personnel involved</p>



2.2	RTRS certification obligations are clearly communicated to all producers within the group, with each farm formally included through a signed Letter of Consent. Internal audits verify compliance with the full scope of the standard, supported by onsite visits when required. Any nonconformities identified are managed either remotely or through targeted technical visits, ensuring timely resolution and continued compliance
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C. Control and monitoring of member/site compliance

Criteria	Description
3.1	<p>Sewagram Soya Company implements a structured internal audit system as defined in the Certification Management Manual. New members undergo initial audits based on risk assessment, followed by annual audits for all producers under the 2025 Internal Audit Program. Risk levels are calculated using a spreadsheet that scores 10 criteria from 1 to 5; properties with totals of 30 or less are classified as low risk, and currently no members fall into the high-risk category.</p> <p>Internal audits cover all certification requirements, with records confirming compliance. For instance, the audit of farmer code 127092 on 17/05/2025 demonstrated full adherence to the standard. Although no critical non-conformities have been identified to date, the system provides for exclusion of members or production volumes from certification if requirements are not met</p>

D. Record Keeping

Criteria	Description
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<p>4.1</p>	<p>In line with Item 12 of the Group Management Manual for Certifications, the company maintains records for a minimum of five years. Digital archiving is carried out through the internal network, with documents stored in designated folders such as RTRS Audits and Certifications/Year. Each file is saved in duplicate—one copy for the producer and one for the manager.</p> <p>Consent Letters and Risk Assessment Forms are retained digitally, while member information, risk classifications, and property maps are consolidated 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 noncompliance reports (SACs). Nonconformity management is tracked using dedicated spreadsheets.</p> <p>Satellite imagery is updated annually and archived to monitor landuse changes. Production volumes are recorded in the Scope 2025 spreadsheet, with oversight of volume management assigned to the Sustainability Department. Monitoring of sales is carried out by the Sustainable Business and Innovation Department, ensuring transparency and accountability across operations.</p>
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E. Chain of Custody

<p>Criteria</p>	<p>Description</p>
<p>5.1</p>	<p>Shipments of RTRScertified soybeans from group members are centrally coordinated by the main office, with records accessible to the Group Manager through the internal system. Each shipment is documented with an RTRS Declaration, guaranteeing traceability and compliance with certification requirements.</p> <p>Physical volumes are tracked using invoices and packing slip reports, and balances are reflected in the Current Account. To maintain accuracy, physical volumes and RTRS credits are recorded separately. All shipment and transaction data is consolidated in the Scope 2025 spreadsheet. Credit sales are managed exclusively by the Group Manager through the RTRS platform, ensuring centralized oversight and transparent reporting</p>



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	15/09/2026 00:00
Certification decision	Granted
Client Acknowledge	Informed to Vidya Kohlekar