

Roosendaal, November 2023

## **No Deforestation, No Peat, No Exploitation Policy**

As a member of the Roundtable on Sustainable Palm Oil (RSPO), Sisterna is proud to declare her commitment to No Deforestation, No Peat, No Exploitation (NDPE) practices.

### **Introduction:**

Sisterna, as small user of palm oil, recognizes the need for sustainable palm oil sourcing. It is an essential issue for the global environment, biodiversity and the working conditions for the local plantation workers. Therefore we take our responsibility in offering a sustainable palm-based emulsifier.

Both DKS, producer of sucrose esters, and Sisterna as distributor are registered as a Member of the Round Table of Sustainable Palm Oil (RSPO). The production with certified and traceable palm oil according to the Mass Balance (MB) system has started as of 2017 (except for Sisterna L70-C, see <https://www.sisterna.com/about-sisterna/our-rspo-journey/>).

The RSPO Principles & Criteria and RSPO Supply Chain Certification are the best way for companies and governments to meet their No Deforestation, No Peat, No Exploitation (NDPE) commitments as it applies to palm oil sourcing policies.

The RSPO Principles & Criteria consists of seven core principles, one of which is to “operate legally and respect rights.” Legality is a requirement for RSPO certified production, making RSPO Certification a viable tool for due diligence related to illegal deforestation.

This policy reflects our commitment to both the RSPO and the NDPE principles, and highlights our transparency through the publication of the sustainable palm oil mill list, see Mill List Submissions <https://rspo.org/members/2-0889-18-000-00/>.

### **1. Deforestation-Free Commitment**

Both Sisterna BV and DKS Co. Ltd. are dedicated to sourcing palm oil products that are produced without causing deforestation or degradation of High Conservation Value (HCV) and High Carbon Stock (HCS) forests, in alignment with RSPO standards.

On June 9th, 2023, the regulation (EU) 2023/1115 of the European Parliament concerning the export from the Union of certain commodities and products associated with deforestation was published, where oil palm is included. Sucrose esters are not listed in Annex I to the Regulation (EU 2023/1115), and are not considered as relevant product and are therefore out of scope, even if the ingredient is produced using palm oil as a raw material.

Although sucrose esters are exempt from the new regulation, the palm oil used in the production of sucrose esters is traceable and therefore we have published this NDPE policy.

### **2. No Peatland Development**

As members of RSPO, both Sisterna and DKS Co. Ltd. comply with the RSPO guidelines and do not intentionally support palm oil production on peatlands. The RSPO guidelines mention no new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.

### **3. Respect for Human Rights and Communities**

We do not engage with suppliers who violate human rights or practice forced labor.

### **4. RSPO Certification**

DKS Co. Ltd. is an active member of the RSPO since 2014 and is committed to sourcing Certified Sustainable Palm Oil (CSPO) through supply chain model Mass Balance (MB), as defined by RSPO standards (except for Sisterna L70-C, see <https://www.sisterna.com/about-sisterna/our-rspo-journey/>). Sisterna, as distributor for Sisterna sucrose esters, is registered for an RSPO distributors' license. Sisterna expects suppliers to select suppliers and mills that hold valid RSPO certification.

### **5. Traceability and Transparency**

DKS Co. Ltd. requires full traceability of palm oil in our supply chain, back to RSPO-certified plantations. A list of mills is published on the RSPO website biennially (<https://rspo.org/members/2-0889-18-000-00/>).

### **6. Verification and Monitoring**

DKS Co. Ltd. is audited annually by the company Control Union to ensure compliance with RSPO standards.

### **7. Grievance Mechanism**

DKS Co. Ltd. has established a mechanism for stakeholders to raise concerns or complaints related to our palm oil sourcing practices. [https://www.dks-web.co.jp/english/rc\\_pdf/declaration.pdf](https://www.dks-web.co.jp/english/rc_pdf/declaration.pdf)

### **8. Continuous Improvement**

DKS Co. Ltd. is dedicated to continuous improvement in their palm oil sourcing practices and works closely with stakeholders, including suppliers and industry partners, to explore sustainable solutions. (Source: ACOP Report Submissions on <https://rspo.org/members/2-0889-18-000-00/>).

### **9. Collaboration**


DKS Co. Ltd. actively engages with industry associations to promote sustainable palm oil production. (Source: ACOP Report Submissions on <https://rspo.org/members/2-0889-18-000-00/>).

### **10. Review and Revision**

This NDPE policy will be reviewed periodically to ensure its continued effectiveness and relevance, in accordance with RSPO standards.

**Signed, November 2023**

Sisterna B.V.



Miranda Huppertz  
Managing Director