



Supply Base Report:

Reforestadora del Sinu

Second Surveillance Audit

Sustainable Biomass Program
sbp-cert.org



Completed in accordance with the Supply Base Report Template Version 2.2 and SBP Bridging Requirements for Meeting the Directive EU/2023/2413 (REDIII)

For further information on the SBP Framework and to view the full set of documentation see www.sbp-cert.org

Document history

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1 Overview

Producer name:	Reforestadora del Sinu
Producer address:	Calle 47, Comuna 8, Perímetro, 230002 Monteria, Colombia
SBP Certificate Code:	SBP-13-02
Geographic position:	8.762557, -75.871530
Primary contact:	Juana Buelbas, +57 310 440 0005, jbuelvas@refosinu.com
Company website:	https://www.refosinu.com
Date report finalised:	30 Apr 2026
SBR reporting period from:	01 Apr 2025
SBR reporting period to:	31 Mar 2026
Name of the Certification Body:	Preferred by Nature OÜ
Certification Body Approval date:	23 Jul 2026
SBP Standard(s) used:	SBP Standard 1: Feedstock Compliance v2.0, SBP Standard 2: Feedstock Verification v2.0, SBP Standard 4: Chain of Custody v2.0, SBP Standard 5: Collection and Communication of Data v2.0, Instruction Document 5E: Collection and Communication of Energy and Carbon data. v2.1, Instruction Document EU RED: Bridging Requirements for Meeting the Directive EU/2023/2413 v2.0
Feedstock origin (countries)	Colombia (Departments of Córdoba and Antioquia)
Weblink to Standard(s) used:	https://sbp-cert.org/documents/standards-documents/standards

2 Description of the Biomass Producer and the Supply Base

2.1 Description of the company

Reforestadora del Sinú S.C. (Refosinu) is a company dedicated to the development of forestry activities, such as the establishment and use of private plantations, created based on the need to fulfill the supply of pulp mills worldwide. The company is located in the city of Montería, in the department of Córdoba, northwest of Colombia. The forestry project is located on the Colombian Caribbean coast, in the departments of Antioquia and Córdoba. All of these forest areas are Forest Management (FM) FSC® certified. Refosinu is *Carbono Neutro* (ICONTEC) certified in various municipalities in the departments of Antioquia and Córdoba, a climate change certification. The company is currently undergoing a verification process to ensure its compliance with European Union Deforestation Regulation (EUDR). As part of this process Refosinu was subject to a third-party audit. The species used in the forest plantations is a hybrid generated by crossing two tree species from the genus *Eucalyptus*: *Eucalyptus urophylla*, native to Indonesia, and *Eucalyptus grandis*, native to Australia. This cross gave rise to the hybrid known as *Eucalyptus urograndis*. The selection and development of this hybrid took place primarily in Brazil, where eucalyptus plantations play a crucial role in the forest industry. *Eucalyptus urograndis*, belonging to the *Myrtaceae* family, inherits phenological and physiological characteristics from its parent species, *Eucalyptus urophylla* and *Eucalyptus grandis*. It is known for its rapid growth cycle, with harvesting typically occurring between 7 and 8 years, depending on local conditions. This hybrid shows moderate water requirements in its early growth stages but develops notable drought tolerance over time, enduring prolonged periods of dry conditions. Its adaptability ranges from well-drained soils to low fertility soils, facilitating establishment in a wide range of environments. These characteristics makes *Eucalyptus urograndis* a great choice for the pulp industry and other forest products due to its efficiency in growth and ability to adapt to diverse soil and climatic conditions.

Products included in the scope of SBP Certification: WB 2.1 Wood chips, WB 4.1 Roundwood

Number of employees: 48

Annual maximum production capacity (metric tonnes): 75300

Number of direct feedstock suppliers: 1

Approximate number of feedstock sub-suppliers: 0

Description of the chain-of-custody and upstream supply chain:

Our feedstock (100%) comes from our own forest plantations. The supply base is defined as Refosinu own forest planted land area of 13 932 hectares located within the departments of Córdoba and Antioquia, in the northern region of Colombia. The properties are grouped into five (5) nuclei, according to their geographical location. Córdoba: Guadual, Los Volcanes, and San Francisco. Antioquia: Las Platas and Mono Macho. Refosinu holds FSC® forest management certification for all its forest areas, under the certificate number GFA-FM/COC-003586.

Forestry work within the chain of custody is performed by company workers. After harvest, sorting and chipping (in case of wood chips), biomass is transported by truck to a wood yard. From there the wood chips shall be sent to a port, where all material is recorded in "Resumen Despacho.xls", and the broken and firewood is collected in the wood yard by international or national customer(s). All biomass, wood chips or broken/firewood, is FSC 100% and can be delivered with the SBP-compliant claim. Volumes of biomass are all accounted and recorded in the SBP EU RED mass balance systems of Refosinu, at the wood yard and at the port. There is no mixing between certified and non-certified material along the supply chain.

2.2 Detailed description of the Supply Base

Guidance: Tables below have been generated automatically for each sourcing country based on the selection of 'Feedstock origin (countries)' in section 1 above.

Annex 1 is generated by the system if the SBP SBE is used without Regional Risk Assessment(s) (RRAs). In case RRA(s) is used, further details shall be given only in section 3 below.

Annex 2 is generated if EU RED SBE is in the scope for each country separately.

Country	Colombia
Area/Region	Departments of Córdoba and Antioquia
Exclusions	
Feedstock types	Primary
Feedstock Product Groups	Forest feedstock (1A)
Feedstock inputs	SBP Compliant feedstock
Is the forest managed to supply energy and non-energy markets?	No
For the forests in the Supply Base, is there an intention to retain, restock or encourage natural regeneration within 5 years of felling?	Yes - Majority
Risk assessment(s)	Yes – Biomass Producer's own risk assessment used (SBE)
Provide a concise summary of why a SBE was determined to be required or not required here:	
Refosinu is committed to meet the market sustainability requirements for biomass. Although all the feedstock sourced by Refosinu is FSC 100%, there are SBP and EU RED sustainability indicators that shall be evaluated to allow the biomass to become SBP-compliant EU RED-compliant (chips or firewood).	
Feedstock types included in SBE:	Primary
Includes EU RED SBE:	Yes
Includes EU RED II SBE grandfathering	No
Includes EU RED TOF:	No
Includes EU RED II TOF grandfathering	No
Size of Supply Base area (million ha):	0.0139
Map(s) of the Supply Base area:	

Political Map



2.3 Feedstock information

- a. **Total volume of Feedstock:** 1-200,000 tonnes
- b. **Volume of primary feedstock:** 1-200,000 tonnes
- c. **List of all the species in primary feedstock, including scientific name:**

Eucalyptus grandis × Eucalyptus
urophylla

Eucalyptus urograndis

- d. **Was the feedstock used in the biomass removed from a forest as part of a pest/disease control measure or a salvage operation?** No
Explanation: No sanitary harvest has occurred.
- e. **Hardwood (i.e. broadleaf trees): specify proportion of feedstock from (%):** 100.00
- f. **Softwood (i.e. coniferous trees): specify proportion of feedstock from (%):** 0.00
- g. **Proportion of feedstock composed of or derived from saw logs by weight (%):** 0.00
- h. **Indicate how you determine the proportion of saw log:** Specification used by the sawmill closest to where the wood was grown.
- i. **Roundwood from fellings from forests with > 40 yr rotation times - Average % volume of fellings delivered to BP (%):** 0.00
- j. **Select forest type(s) where the primary feedstock was sourced from:** Planted Forest
- k. **Select the main harvesting system(s) used for the sourced primary feedstock:** Clearcutting
- l. **Volume of primary feedstock from primary forest:** 0
- m. **Volume of processing residues feedstock:** 0
Physical form of the feedstock:
- n. **Share of SBP-recognised system claim for processing residues:**

- o. **Volume of post-consumer feedstock:** 0
Physical form of the feedstock:
- p. **Estimated amount of EU RED-compliant sustainable feedstock that could be collected annually by the BP:** 74300 tonnes
- q. **What is the estimated amount of EU RED-compliant sustainable feedstock that could be harvested annually in a Supply Base (estimated):** 75300.00 tonnes
Explanation: Actual annual maximum production capacity is 26.000 tonnes for wood chips, and 49.300 tonnes of firewood. Based on the forestry project inventories and the information collected from the 2,454 monitoring plots, the Average Annual Increment (AAI) has been calculated at 27 units per year. This value corresponds to the seven-year rotation defined by the forestry project and the forest rotation and reestablishment schedule. This calculation indicates that the maximum annual production is aligned with the project's principles of environmental, social, and economic sustainability. This approach ensures that forest resources are exploited in a way that ensures long-term forest regeneration and maintenance, thus protecting both the natural environment and the social and economic benefits derived from sustainable forestry.

3 Supply Base Risk Assessments and Risk Management Measures

Guidance: Biomass Producers shall demonstrate that any specified risks of sourcing feedstock not in compliance with SBP Standard 1 have been adequately reduced to low risk, following Standard 2 requirements. Following section applies to Biomass Producer's implementing SBP Supply Base Evaluation (SBP RRA or company own risk assessment). EU RED Supply Base Evaluation details are reported in Annex 2.

☐ **Not Applicable – Supply Base Evaluation not implemented**

3.1 Summary of the Supply Base Evaluation

All of Refosinu forest areas are all under FSC® Forest Management certification scheme. The SBP benchmarking of FSC® was considered and therefore, 34 of the 42 indicators are considered as Low risk. The remaining 8 indicators were evaluated by Refosinu. 1 indicator was identified as a Specified risk.

3.2 Conflicts with applicable national and sub-national legislation

There aren't known conflicts with applicable legislation.

3.3 Risk Management Measures

Guidance: Please provide more details about specified risk indicators in each supply country and describe mitigation measures taken to address all specified risks associated with indicators.

Country: Colombia	
Area/sub-scope:	
Risk Assessment used:	
	☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☒ Biomass Producer's own risk assessment
Indicator with specified risk:	
3.3.1 Feedstock sourcing shall be in compliance with the principles of cascading use, high quality stem wood shall not be used as feedstock if it is in substantial demand for long-lived products in the Supply Base.	
Description of the specific risk:	

Refosinu's forest areas are all certified under FSC Forest Management. As a forest management standard, the FSC-STD-60-004 can affect optimum use of harvested products mainly through setting requirements for harvesting methods. Affecting the use of stem wood after the harvesting is not within the standard's scope. The SBP performance requirement is therefore considered as only partially met.

Mitigation measure:

- Maintain FSC Forest Management certification in all forest areas and include it in each new forest area acquired by Refosinu.
- Keep the Forest Management Plan up-to-date.
- Establish clear definitions of broken/firewood that cannot be used by the pulp industry (Refosinu's market);
- Train forestry workers on sorting properly the broken/firewood from the stemwood with the quality required by the pulp market.
- Keep quantitative records of forestry activities, including estimates of the quantity of forest residues and broken/firewood resulting from Refosinu's forestry operations.

Monitoring and outcomes:

- Visit forestry operations to verify:
 - the type of feedstock sorted as broken/firewood, and
 - the type of feedstock used for wood chips production.
- Check quantitative records to verify:
 - if wood chips production does not exceed the estimated amounts of forest residues;
 - if the broken/firewood collected does not exceed the estimated amounts of the forest management project.

If the type of feedstock used for biomass (wood chips or firewood) does not correspond with the type of feedstock defined, i.e., if wood used for biomass is found to be high quality stemwood, the feedstock used cannot be considered as SBP-compliant.

If biomass produced surpasses the estimated amounts of Refosinu's FM project(s), this is further investigated, more frequent visits to operations are made, and estimations are reviewed if necessary.

4 Stakeholder engagement

4.1 General description

Biomass Producer's stakeholder engagement start date: 01 Jan 2025

Biomass Producer's stakeholder engagement end date: 31 Dec 2025

Total number of stakeholders contacted: 35

Give a general description of the process of Stakeholders Engagement, including stakeholders contacted, method of communication and a summary of the comments received:

Stakeholder engagement management at Reforestadora del Sinú is conducted in accordance with Reforestadora del Sinú Social Foundation's stakeholder engagement procedure, in line with the procedure PRO-PF-22 for the Management of Stakeholder Complaints and Grievances. This procedure is continuously monitored, evaluated, and adjusted whenever necessary. Stakeholder concerns, complaints, and requests are recorded in the Excel matrix F-FU-01 "Register of Concerns."

4.2 Response to stakeholder comments

Stakeholder description: Stakeholders contacted for engagement include economic, environmental and social interests: - Government forest regulators; - Forestry contractors; - Local and regional authorities; - Community; - Environment, nature conservation, NGO's; - Forest and forest biomass certification entities; - Research institutes.

Stakeholder comment: During the assessed period, two (2) comments were registered and documented using the following formats: F-PF-11 Complaint Submission – Traffic and Schedules; and F-PF-11 Complaint Submission – Overhead Cabling. The complaints received highlight impacts primarily associated with timber transportation in urban areas, which result in disruptions to mobility and pose risks to road safety.

Response to the stakeholder: The company implemented a management process based on: • formal recording of comments, • technical assessment of the reported situations, • coordination with the relevant authorities, and • provision of timely responses within the established timeframes. • An agreement was reached between both parties, and the matter has been addressed and considered closed.

5 Report updates and approval

This document is: Updated SBR (surveillance audits/scope-change audits)

Summary of changes: N/A

Name	Dayana Tobar
Title	Management representative
Date of report approval	30 Apr 2026

Annex 1: Detailed findings for Supply Base Evaluation indicators

Colombia Departments of Córdoba and Antioquia	Indicator
1.1.1	Operations related to feedstock sourcing and biomass production shall comply with all existing applicable laws and regulations.
Supply Base Verifiers	- Refosinu FSC FM Certificate. - Plan Maestro de Manejo - Reforestadora del Sinú. - El Estándar Nacional de Manejo Forestal Responsable FSC de Colombia FSC-STD-COL-02-2021 ES. - SBP Process Document: Framework for benchmarking and recognition of certification schemes relevant to the scope of SBP certification. - SBP Process Document: Evaluation of the Forest Stewardship Council (FSC®) scheme using the Framework for benchmarking and recognition of certification schemes relevant to the scope of SBP certification.
Risk Rating justification	All of Refosinu forest areas are under FSC Forest Management certification and therefore the SBP benchmarking of FSC® certification scheme applies. From the SBP evaluation of the FSC® scheme, this indicator is completely met by Refosinu's Performance Requirements.
Risk Rating	Low Risk

Colombia Departments of Córdoba and Antioquia	Indicator
1.1.2	Legal ownership of land and resource use rights shall be respected.
Supply Base Verifiers	- Refosinu FSC FM Certificate. - Plan Maestro de Manejo - Reforestadora del Sinú. - El Estándar Nacional de Manejo Forestal Responsable FSC de Colombia FSC-STD-COL-02-2021 ES. - SBP Process Document: Framework for benchmarking and recognition of certification schemes relevant to the scope of SBP certification. - SBP Process Document: Evaluation of the Forest Stewardship Council (FSC®) scheme using the Framework for benchmarking and recognition of certification schemes relevant to the scope of SBP certification.
Risk Rating justification	All of Refosinu forest areas are under FSC Forest Management certification and therefore the SBP benchmarking of FSC® certification scheme applies. From the SBP evaluation of the FSC® scheme, this indicator is completely met by Refosinu's Performance Requirements.
Risk Rating	Low Risk

Colombia	Indicator
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Departments of Córdoba and Antioquia	
1.1.3	Feedstock shall be legally harvested, supplied and produced, including in compliance with CITES, EUTR and other applicable legal trade requirements.
Supply Base Verifiers	- Refosinu FSC FM Certificate. - Plan Maestro de Manejo - Reforestadora del Sinú. - El Estándar Nacional de Manejo Forestal Responsable FSC de Colombia FSC-STD-COL-02-2021 ES. - SBP Process Document: Framework for benchmarking and recognition of certification schemes relevant to the scope of SBP certification. - SBP Process Document: Evaluation of the Forest Stewardship Council (FSC®) scheme using the Framework for benchmarking and recognition of certification schemes relevant to the scope of SBP certification.
Risk Rating justification	All of Refosinu forest areas are under FSC Forest Management certification and therefore the SBP benchmarking of FSC® certification scheme applies. From the SBP evaluation of the FSC® scheme, this indicator is completely met by Refosinu's Performance Requirements.
Risk Rating	Low Risk

Colombia Departments of Córdoba and Antioquia	Indicator
1.1.4	Payments for harvest rights and feedstock, including duties, relevant royalties and taxes related to timber harvesting shall be complete and up-to-date.
Supply Base Verifiers	- Refosinu FSC FM Certificate. - Plan Maestro de Manejo - Reforestadora del Sinú. - El Estándar Nacional de Manejo Forestal Responsable FSC de Colombia FSC-STD-COL-02-2021 ES. - SBP Process Document: Framework for benchmarking and recognition of certification schemes relevant to the scope of SBP certification. - SBP Process Document: Evaluation of the Forest Stewardship Council (FSC®) scheme using the Framework for benchmarking and recognition of certification schemes relevant to the scope of SBP certification.
Risk Rating justification	All of Refosinu forest areas are under FSC Forest Management certification and therefore the SBP benchmarking of FSC® certification scheme applies. From the SBP evaluation of the FSC® scheme, this indicator is completely met by Refosinu's Performance Requirements.
Risk Rating	Low Risk

Colombia Departments of Córdoba and Antioquia	Indicator
1.1.5	There shall be adequate protection of the Supply Base from unauthorised and illegal activities, such as illegal logging, mining, and encroachment.

Supply Base Verifiers	- Refosinu FSC FM Certificate. - Plan Maestro de Manejo - Reforestadora del Sinú. - El Estándar Nacional de Manejo Forestal Responsable FSC de Colombia FSC-STD-COL-02-2021 ES. - SBP Process Document: Framework for benchmarking and recognition of certification schemes relevant to the scope of SBP certification. - SBP Process Document: Evaluation of the Forest Stewardship Council (FSC®) scheme using the Framework for benchmarking and recognition of certification schemes relevant to the scope of SBP certification.
Risk Rating justification	All of Refosinu forest areas are under FSC Forest Management certification and therefore the SBP benchmarking of FSC® certification scheme applies. From the SBP evaluation of the FSC® scheme, this indicator is completely met by Refosinu's Performance Requirements.
Risk Rating	Low Risk

Colombia Departments of Córdoba and Antioquia	Indicator
2.1.1	Key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be identified.
Supply Base Verifiers	- Refosinu FSC FM Certificate. - Plan Maestro de Manejo - Reforestadora del Sinú. - El Estándar Nacional de Manejo Forestal Responsable FSC de Colombia FSC-STD-COL-02-2021 ES. - SBP Process Document: Framework for benchmarking and recognition of certification schemes relevant to the scope of SBP certification. - SBP Process Document: Evaluation of the Forest Stewardship Council (FSC®) scheme using the Framework for benchmarking and recognition of certification schemes relevant to the scope of SBP certification.
Risk Rating justification	All of Refosinu forest areas are under FSC Forest Management certification and therefore the SBP benchmarking of FSC® certification scheme applies. From the SBP evaluation of the FSC® scheme, this indicator is completely met by Refosinu's Performance Requirements.
Risk Rating	Low Risk

Colombia Departments of Córdoba and Antioquia	Indicator
2.1.2	Threats to and impacts on the identified key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be identified and evaluated.
Supply Base Verifiers	- Refosinu FSC FM Certificate. - Plan Maestro de Manejo - Reforestadora del Sinú. - El Estándar Nacional de Manejo Forestal Responsable FSC de Colombia

	FSC-STD-COL-02-2021 ES. - SBP Process Document: Framework for benchmarking and recognition of certification schemes relevant to the scope of SBP certification. - SBP Process Document: Evaluation of the Forest Stewardship Council (FSC®) scheme using the Framework for benchmarking and recognition of certification schemes relevant to the scope of SBP certification.
Risk Rating justification	All of Refosinu forest areas are under FSC Forest Management certification and therefore the SBP benchmarking of FSC® certification scheme applies. From the SBP evaluation of the FSC® scheme, this indicator is completely met by Refosinu's Performance Requirements.
Risk Rating	Low Risk

Colombia Departments of Córdoba and Antioquia	Indicator
2.1.3	Key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be maintained or enhanced.
Supply Base Verifiers	- Refosinu FSC FM Certificate. - Plan Maestro de Manejo - Reforestadora del Sinú. - El Estándar Nacional de Manejo Forestal Responsable FSC de Colombia FSC-STD-COL-02-2021 ES. - SBP Process Document: Framework for benchmarking and recognition of certification schemes relevant to the scope of SBP certification. - SBP Process Document: Evaluation of the Forest Stewardship Council (FSC®) scheme using the Framework for benchmarking and recognition of certification schemes relevant to the scope of SBP certification.
Risk Rating justification	All of Refosinu forest areas are under FSC Forest Management certification and therefore the SBP benchmarking of FSC® certification scheme applies. From the SBP evaluation of the FSC® scheme, this indicator is completely met by Refosinu's Performance Requirements.
Risk Rating	Low Risk

Colombia Departments of Córdoba and Antioquia	Indicator
2.2.1	Feedstock shall not be sourced from land that had one of the following statuses in January 2008 and no longer has that status due to land conversion: a. Forests b. Wetlands c. Peatlands d. Highly biodiverse grasslands.
Supply Base Verifiers	<u>Laws and Regulations:</u> - The Forest Law of 1959; - Decree 2811 of 1974, which adopted the National Code of Renewable Natural Resources (Código Nacional de Recursos Naturales Renovables y de Protección al Medio Ambiente); - The 1993 General Environment Law (Ley General Ambiental, Ley 99),

which adopted the National Environmental System;

- Decree 1791 of 1996, which adopted a forest harvesting regime;
- The National Forestry Development Plan (Plan Nacional de Desarrollo Forestal) published in 2000, which is designed to span 25 years and comprises 16 sub-programs to promote planted forests and natural forest management.
- Law 1377 of 2010, which replaced the 1959 forest law and permits the use of planted forests for production purposes.

Enforcement:

Natural forests and plantations are supervised by three levels of authorities: the Ministry of Environment and Sustainable Development (MADS), the Ministry of Agriculture and Rural Development (MADR) and the Regional Autonomous Corporation for Sustainable Development (CAR). MADS formulates policy on the environment and renewable natural resources and establishes the broad guidelines, rules and criteria for the environmental regulation of land use, including forestry (in close collaboration with MADR regarding commercial forest plantations). MADR formulate policy, but also guide and direct the formulation of plans, programs and projects for the development of the agricultural, fisheries and rural development sector. According to Law 1377 (2010), MADR is the main regulating authority for commercial plantation forestry. It formulates policies for commercial forest activities and is also responsible for the implementation of the incentive programme (*Certificado de Incentivo Forestal*) to enhance the commercial forestry value chain.

References to legislation compliance and best practices implemented:

- Refosinu FSC FM Certificate.
- *PL-MF-01 -Plan Maestro de Manejo* - Reforestadora del Sinú. Version 11, 13/11/2024.
- *PRO-PF-19 - Procedimiento de Monitoreo Interno* - Reforestadora del Sinú. Version 2, 30/05/2022.
- Report on verification of changes in forest cover on properties acquired by Reforestadora del Sinú by Refosinu's Cartography Department.
- *PL-MF-02 -Plan de Identificación de Atributos de Alto Valor de Conservación* - Reforestadora del Sinú. 30/06/2022.
- *Evaluación y Seguimiento de Altos Valores de Conservación 2024*- Reforestadora del Sinú.
- *Mapa de Red de Áreas de Protección y Corredores Biológicos* - Reforestadora del Sinú. 06/2024.
- *Política Integral* - Reforestadora del Sinú
- *El Estándar Nacional de Manejo Forestal Responsable FSC de Colombia* FSC-STD-COL-02-2021 ES.
- FSC Advice-20-007-23: Maximum hectare threshold for 'very limited portion'.
- SBP Process Document: Framework for benchmarking and recognition of certification schemes relevant to the scope of SBP certification.
- SBP Process Document: Evaluation of the Forest Stewardship Council

	(FSC®) scheme using the Framework for benchmarking and recognition of certification schemes relevant to the scope of SBP certification.
Risk Rating justification	All of Refosinu forest areas are under FSC Forest Management certification and therefore the SBP benchmarking of FSC® certification scheme applies. From the SBP evaluation of the FSC® scheme, this indicator is partially met by Refosinu's Performance Requirements. The Colombian territory hosts different types of forests. Among these are dry tropical forests, Andean forests, gallery forests, mangrove forests, and the majestic tropical rainforests. All of Refosinu's forest areas are of type tropical dry forest (<i>bosque seco tropical</i>). An analysis to comply with indicator 6.11.2 for FSC Colombia is made. Following this indicator and the limits established by Advice Note ADV-20-007-23, the converted portion should not exceed 1,000 hectares. From Refosinu's analysis it was verified that the converted areas represent only a limited fraction of Refosinu's forestry project, do not affect the high conservation values identified nor compromise the high conservation values or the resources needed to maintain or enhance these ecosystems; on the contrary, clear long-term benefits are anticipated. A study was developed by Refosinu's Cartography Department to verify changes in forest cover on the properties acquired by Reforestadora del Sinú Project. The study reviews forest cover in the area where the Refosinu Project is being developed, based on official information for Colombia available from the Institute of Hydrology, Meteorology, and Environmental Studies (IDEAM), which is responsible for managing scientific, hydrological, meteorological, and environmental characterization information in Colombia. IDEAM periodically identifies forest cover and its distribution across Colombian territory through the digital processing and interpretation of remote sensing images. The Non-Forest Forest Cover layer was overlaid with the company's properties to verify changes in forest cover within the project area. This procedure was performed in cartographic information software, which allows for visualization and generation of various graphic outputs. After overlaying the information, the areas classified as Natural Forest by IDEAM were identified, delimited, and calculated. After verifying and analysing the information, the results were obtained by preparing Forest and Non-Forest Analysis plans for each core and time period. These plans show the existence or absence of natural forest, as well as the protection and conservation areas established by the company. These areas are considered areas of increased forest cover due to the care, maintenance, and increase in vegetation cover driven by a natural regeneration process, as well as by the planting and reforestation activities with native species that the company has been carrying out in these areas. Biological corridors have been developed to preserve and ensure the maintenance and transit of existing fauna. This study was done based on what existed in the properties acquired from 1994 and this SBP indicator requires it for 2008 -the analysis was done for an even earlier period. It is concluded Low Risk for this indicator as Refosinu's feedstock is not sourced from land that had one of the indicated statuses (forests, wetlands, peatlands, highly biodiverse grasslands) in January 2008 and no longer has that status due to land conversion.

Risk Rating	Low Risk
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Colombia Departments of Córdoba and Antioquia	Indicator
2.2.2	Ecosystems, their health, vitality, functions and services in the Supply Base shall be maintained or enhanced.
Supply Base Verifiers	- Refosinu FSC FM Certificate. - Plan Maestro de Manejo - Reforestadora del Sinú. - El Estándar Nacional de Manejo Forestal Responsable FSC de Colombia FSC-STD-COL-02-2021 ES. - SBP Process Document: Framework for benchmarking and recognition of certification schemes relevant to the scope of SBP certification. - SBP Process Document: Evaluation of the Forest Stewardship Council (FSC®) scheme using the Framework for benchmarking and recognition of certification schemes relevant to the scope of SBP certification.
Risk Rating justification	All of Refosinu forest areas are under FSC Forest Management certification and therefore the SBP benchmarking of FSC® certification scheme applies. From the SBP evaluation of the FSC® scheme, this indicator is completely met by Refosinu's Performance Requirements.
Risk Rating	Low Risk

Colombia Departments of Córdoba and Antioquia	Indicator
2.2.3	Soil quality in the Supply Base shall be maintained or enhanced
Supply Base Verifiers	- Refosinu FSC FM Certificate. - Plan Maestro de Manejo - Reforestadora del Sinú. - El Estándar Nacional de Manejo Forestal Responsable FSC de Colombia FSC-STD-COL-02-2021 ES. - SBP Process Document: Framework for benchmarking and recognition of certification schemes relevant to the scope of SBP certification. - SBP Process Document: Evaluation of the Forest Stewardship Council (FSC®) scheme using the Framework for benchmarking and recognition of certification schemes relevant to the scope of SBP certification.
Risk Rating justification	All of Refosinu forest areas are under FSC Forest Management certification and therefore the SBP benchmarking of FSC® certification scheme applies. From the SBP evaluation of the FSC® scheme, this indicator is completely met by Refosinu's Performance Requirements.
Risk Rating	Low Risk

Colombia Departments of Córdoba and	Indicator
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Antioquia	
2.2.4	Where the removal of harvest forest residues and/or stumps occurs, this shall not lead to irreversible negative impacts to the ecosystem.
Supply Base Verifiers	- Refosinu FSC FM Certificate. - Plan Maestro de Manejo - Reforestadora del Sinú. - El Estándar Nacional de Manejo Forestal Responsable FSC de Colombia FSC-STD-COL-02-2021 ES. - SBP Process Document: Framework for benchmarking and recognition of certification schemes relevant to the scope of SBP certification. - SBP Process Document: Evaluation of the Forest Stewardship Council (FSC®) scheme using the Framework for benchmarking and recognition of certification schemes relevant to the scope of SBP certification.
Risk Rating justification	All of Refosinu forest areas are under FSC Forest Management certification and therefore the SBP benchmarking of FSC® certification scheme applies. From the SBP evaluation of the FSC® scheme, this indicator is completely met by Refosinu's Performance Requirements.
Risk Rating	Low Risk

Colombia Departments of Córdoba and Antioquia	Indicator
2.2.5	Quality and quantity of ground water, surface water and water downstream shall be maintained or enhanced.
Supply Base Verifiers	- Refosinu FSC FM Certificate. - Plan Maestro de Manejo - Reforestadora del Sinú. - El Estándar Nacional de Manejo Forestal Responsable FSC de Colombia FSC-STD-COL-02-2021 ES. - SBP Process Document: Framework for benchmarking and recognition of certification schemes relevant to the scope of SBP certification. - SBP Process Document: Evaluation of the Forest Stewardship Council (FSC®) scheme using the Framework for benchmarking and recognition of certification schemes relevant to the scope of SBP certification.
Risk Rating justification	All of Refosinu forest areas are under FSC Forest Management certification and therefore the SBP benchmarking of FSC® certification scheme applies. From the SBP evaluation of the FSC® scheme, this indicator is completely met by Refosinu's Performance Requirements.
Risk Rating	Low Risk

Colombia Departments of Córdoba and Antioquia	Indicator
2.2.6	Air emissions shall comply with national legislation or in the absence of national legislation with industry best practice.

Supply Base Verifiers	<u>Laws and Regulations:</u> - Law N° 769 of 2002: By means of which the National Land Transport Code (Código Nacional de Tránsito Terrestre) is issued, and other regulations are established. - Resolution 3257, 2018, <i>Ministerio de Transporte</i> - Resolution Nr. 18, July 2022, <i>Ministerio de Ambiente y Desarrollo Sostenible</i> - Decreto 1076 de 2015. <u>Enforcement:</u> On air emissions, the National Land Transport Code (Código Nacional de Tránsito Terrestre), section 103, states that it is the Government's duty to regulate acceptable levels of pollutant emissions from mobile land sources using any kind of fuel. <u>References to legislation compliance and best practices implemented:</u> - Maintenance plan of forestry machinery - Reforestadora del Sinú. - Refosinu FSC FM Certificate. - <i>Plan Maestro de Manejo</i> - Reforestadora del Sinú. Version 11, 13/11/2024. - <i>PRO-PF-19 - Procedimiento de Monitoreo Interno</i> - Reforestadora del Sinú. Version 2, 30/05/2022. - <i>Política Integral</i> - Reforestadora del Sinú. - El Estándar Nacional de Manejo Forestal Responsable FSC de Colombia FSC-STD-COL-02-2021 ES. - SBP Process Document: Framework for benchmarking and recognition of certification schemes relevant to the scope of SBP certification. - SBP Process Document: Evaluation of the Forest Stewardship Council (FSC®) scheme using the Framework for benchmarking and recognition of certification schemes relevant to the scope of SBP certification.
Risk Rating justification	All of Refosinu forest areas are under FSC Forest Management certification and therefore the SBP benchmarking of FSC® certification scheme applies. From the SBP evaluation of the FSC® scheme, this indicator is partially met by Refosinu's Performance Requirements. In Colombia any motor vehicle that has been registered and authorised for circulation in the national territory (including movable machinery) shall be registered by the competent authority in the National Motor Vehicle Register (<i>Registro Nacional Automotor</i>) managed by the Transport Ministry (<i>Ministerio de Transporte</i>). Trailers and semi-trailers shall also be registered. All registered and authorised motor vehicles shall present a valid vehicle inspection certificate fulfilling the requirements set out in the Code. Resolution nr. 18, of 22 July 2022 is "Whereby the maximum permissible limits for pollutant emissions that mobile land sources must comply with are regulated, articles 2.2.5.1.6.1, 2.2.5.1.8.2 and 2.2.5.1.8.3 of Decree 1076 of 2015 are regulated and other provisions are adopted". However, there are exceptions established in Article 3, c.: "The following land mobile sources are exempt from compliance with the provisions of this resolution: (...)

	c. Land mobile sources for off-road use intended exclusively for agricultural work; others that operate with fuels other than diesel; and those that, regardless of their fuel and functions, have a nominal power of less than 19 kW or greater than 560 kW." Where agricultural work includes forestry. Air emissions applicable to Refosinu's activities are only from wood/biomass transport trucks and forestry machinery: harvesters, forwarders skidders, wood chipper. It is concluded Low Risk for this indicator as air emissions addressed to Refosinu's activities comply with national legislation. Furthermore, all forest equipment used and owned by Refosinu is recent (have not many working hours), and are subject to proper planned maintenance and adequate technical assistance.
Risk Rating	Low Risk

Colombia Departments of Córdoba and Antioquia	Indicator
2.2.7	Pesticides shall only be used as part of an Integrated Pest Management (IPM) plan in compliance with national legislation, chemical safety data sheets and industry best practice. Banned pesticides shall not be used.
Supply Base Verifiers	- Refosinu FSC FM Certificate. - Plan Maestro de Manejo - Reforestadora del Sinú. - El Estándar Nacional de Manejo Forestal Responsable FSC de Colombia FSC-STD-COL-02-2021 ES. - SBP Process Document: Framework for benchmarking and recognition of certification schemes relevant to the scope of SBP certification. - SBP Process Document: Evaluation of the Forest Stewardship Council (FSC®) scheme using the Framework for benchmarking and recognition of certification schemes relevant to the scope of SBP certification.
Risk Rating justification	All of Refosinu forest areas are under FSC Forest Management certification and therefore the SBP benchmarking of FSC® certification scheme applies. From the SBP evaluation of the FSC® scheme, this indicator is completely met by Refosinu's Performance Requirements.
Risk Rating	Low Risk

Colombia Departments of Córdoba and Antioquia	Indicator
2.2.8	Waste shall be disposed of in an environmentally appropriate manner.
Supply Base Verifiers	- Refosinu FSC FM Certificate. - Plan Maestro de Manejo - Reforestadora del Sinú. - El Estándar Nacional de Manejo Forestal Responsable FSC de Colombia

	FSC-STD-COL-02-2021 ES. - SBP Process Document: Framework for benchmarking and recognition of certification schemes relevant to the scope of SBP certification. - SBP Process Document: Evaluation of the Forest Stewardship Council (FSC®) scheme using the Framework for benchmarking and recognition of certification schemes relevant to the scope of SBP certification.
Risk Rating justification	All of Refosinu forest areas are under FSC Forest Management certification and therefore the SBP benchmarking of FSC® certification scheme applies. From the SBP evaluation of the FSC® scheme, this indicator is completely met by Refosinu's Performance Requirements.
Risk Rating	Low Risk

Colombia Departments of Córdoba and Antioquia	Indicator
2.2.9	Harvesting levels shall be justified as to how they can be sustained with reference to inventory and growth data for the Supply Base.
Supply Base Verifiers	- Refosinu FSC FM Certificate. - Plan Maestro de Manejo - Reforestadora del Sinú. - El Estándar Nacional de Manejo Forestal Responsable FSC de Colombia FSC-STD-COL-02-2021 ES. - SBP Process Document: Framework for benchmarking and recognition of certification schemes relevant to the scope of SBP certification. - SBP Process Document: Evaluation of the Forest Stewardship Council (FSC®) scheme using the Framework for benchmarking and recognition of certification schemes relevant to the scope of SBP certification.
Risk Rating justification	Refosinu forest areas are under FSC Forest Management certification, and All of Refosinu forest areas are under FSC Forest Management certification and therefore the SBP benchmarking of FSC® certification scheme applies. From the SBP evaluation of the FSC® scheme, this indicator is completely met by Refosinu's Performance Requirements.
Risk Rating	Low Risk

Colombia Departments of Córdoba and Antioquia	Indicator
2.2.10	Harvested areas shall be regenerated
Supply Base Verifiers	- Refosinu FSC FM Certificate. - Plan Maestro de Manejo - Reforestadora del Sinú. - El Estándar Nacional de Manejo Forestal Responsable FSC de Colombia FSC-STD-COL-02-2021 ES. - SBP Process Document: Framework for benchmarking and recognition of certification schemes relevant to the scope of SBP certification. - SBP Process Document: Evaluation of the Forest Stewardship Council

	(FSC®) scheme using the Framework for benchmarking and recognition of certification schemes relevant to the scope of SBP certification.
Risk Rating justification	All of Refosinu forest areas are under FSC Forest Management certification and therefore the SBP benchmarking of FSC® certification scheme applies. From the SBP evaluation of the FSC® scheme, this indicator is completely met by Refosinu's Performance Requirements.
Risk Rating	Low Risk

Colombia Departments of Córdoba and Antioquia	Indicator
2.2.11	The impacts of natural processes such as fires, pests and diseases shall be managed.
Supply Base Verifiers	- Refosinu FSC FM Certificate. - Plan Maestro de Manejo - Reforestadora del Sinú. - El Estándar Nacional de Manejo Forestal Responsable FSC de Colombia FSC-STD-COL-02-2021 ES. - SBP Process Document: Framework for benchmarking and recognition of certification schemes relevant to the scope of SBP certification. - SBP Process Document: Evaluation of the Forest Stewardship Council (FSC®) scheme using the Framework for benchmarking and recognition of certification schemes relevant to the scope of SBP certification.
Risk Rating justification	All of Refosinu forest areas are under FSC Forest Management certification and therefore the SBP benchmarking of FSC® certification scheme applies. From the SBP evaluation of the FSC® scheme, this indicator is completely met by Refosinu's Performance Requirements.
Risk Rating	Low Risk

Colombia Departments of Córdoba and Antioquia	Indicator
2.2.12	Genetically modified trees shall not be used.
Supply Base Verifiers	- Refosinu FSC FM Certificate. - Plan Maestro de Manejo - Reforestadora del Sinú. - El Estándar Nacional de Manejo Forestal Responsable FSC de Colombia FSC-STD-COL-02-2021 ES. - SBP Process Document: Framework for benchmarking and recognition of certification schemes relevant to the scope of SBP certification. - SBP Process Document: Evaluation of the Forest Stewardship Council (FSC®) scheme using the Framework for benchmarking and recognition of certification schemes relevant to the scope of SBP certification.
Risk Rating justification	All of Refosinu forest areas are under FSC Forest Management certification and therefore the SBP benchmarking of FSC® certification scheme applies. From the SBP evaluation of the FSC® scheme, this indicator is completely

	met by Refosinu's Performance Requirements.
Risk Rating	Low Risk

Colombia Departments of Córdoba and Antioquia	Indicator
3.1.1	LULUCF emissions shall be accounted for through one of the following routes: Route A Feedstock may be sourced from a country of origin which is party to the Paris Agreement, and which has submitted a Nationally Determined Contribution to the United Nations Framework Convention on Climate Change (UNFCCC) covering carbon emissions and removals from agriculture, forestry and land use which ensure the changes in carbon stock associated with biomass harvest are counted towards the country's commitment to reduce or limit greenhouse gas emissions, or Route B Feedstock may be sourced from a country of origin which is party to the Paris Agreement and has national or sub-national laws in place (developed in accordance with Article 5 of the Paris Agreement and applicable in the area of harvest), to conserve and enhance carbon stocks and sinks, and provided there is evidence that reported LULUCF-sector emissions do not exceed removals, or Route C Feedstock may be sourced from a Supply Base where an assessment demonstrates that both the carbon stock is stable, and the forests' capacity to act as a carbon sink is stable or increasing over the long term.
Supply Base Verifiers	<u>References to compliance and best practices implemented:</u> - Paris Agreement: https://treaties.un.org/Pages/ViewDetails.aspx?src=TREATY&mtdsg_no=XXV-II-7-d&chapter=27&clang=_en - List of Parties that signed the Paris Agreement on 22 April: https://www.un.org/sustainabledevelopment/blog/2016/04/parisagreementsin-gatures/ - <i>Actualización de la Contribución Determinada a Nivel Nacional de Colombia (NDC), Gobierno Nacional de Colombia, 10/12/2020</i> - <i>PORTAFOLIO DE METAS DE ADAPTACIÓN AL CAMBIO CLIMÁTICO Contribución Determinada a Nivel Nacional (NDC) de Colombia 2020, Gobierno Nacional de Colombia, 01/01/2020</i> - <i>PORTAFOLIO DE MEDIDAS SECTORIALES DE MITIGACIÓN DEL CAMBIO CLIMÁTICO Contribución Determinada a Nivel Nacional (NDC) de Colombia 2020, Gobierno Nacional de Colombia, 01/01/2020</i> - <i>Política Integral - Reforestadora del Sinú.</i>
Risk Rating justification	All of Refosinu forest areas are under FSC Forest Management certification and therefore the SBP benchmarking of FSC® certification scheme applies. From the SBP evaluation of the FSC® scheme, this indicator is not met by Refosinu's Performance Requirements and therefore not applicable for this indicator's evaluation. Route A is considered. Colombia's Nationally Determined Contribution (NDC) in its updated version was approved at the eighth session of the Intersectoral Commission on Climate Change in December 2020. The official delivery is composed of an

	official document and two annexes, which deal with the goals and measures in adaptation and mitigation, respectively. The process of updating the NDC was carried out thanks to the joint work of hundreds of people and dozens of entities, whose process was coordinated by the Ministry of Environment and Sustainable Development, and was strengthened with the inputs received through different instances of citizen participation. The NDC of Colombia includes a commitment to emit a maximum of 164.44 million tCO₂e in 2030, equivalent to a 51% reduction in emissions compared to estimates of emissions in 2030 in the baseline scenario. This initiates a decrease in emissions between 2027 and 2030 tending towards carbon neutrality by mid-century. The mitigation target covers all sectors of the economy and the following greenhouse gases, CO₂, CH₄, N₂O, HFCs PFCs and SF₆. The goal of reducing emissions from deforestation is calculated independently at a national level and will be monitored by the Forest and Carbon Monitoring System (SMBByC), and envisages a reduction in emissions from deforestation equivalent to reducing deforestation to 50,000 ha/year by 2030. It is concluded Low Risk for this indicator as Colombia is party to the Paris Agreement, has submitted a Nationally Determined Contribution to the United Nations Framework Convention on Climate Change (UNFCCC) covering carbon emissions and removals from agriculture, forestry and land use which ensure the changes in carbon stock associated with biomass harvest are counted towards the country's commitment to reduce or limit greenhouse gas emissions.
Risk Rating	Low Risk

Colombia Departments of Córdoba and Antioquia	Indicator
3.2.1	All feedstock sourcing shall be consistent with either of these two options: Option A. Feedstock may be sourced from Supply Bases where an assessment of the Supply Base shows that the forest carbon stocks are stable or increasing, or Option B. Feedstock may be sourced, if the assessment shows that the forest carbon stocks are declining in the Supply Base, provided that the decline is due to natural processes (fire, pests etc.), and sourcing of feedstock has the aim to recover feedstock that would otherwise be lost or to assist regeneration.
Supply Base Verifiers	<u>Laws and Regulations:</u> - The Forest Law of 1959; - Decree 2811 of 1974, which adopted the National Code of Renewable Natural Resources (Código Nacional de Recursos Naturales Renovables y de Protección al Medio Ambiente); - The 1993 General Environment Law (Ley General Ambiental, Ley 99), which adopted the National Environmental System; - Decree 1791 of 1996, which adopted a forest harvesting regime; - The National Forestry Development Plan (Plan Nacional de Desarrollo Forestal) published in 2000, which is designed to span 25 years and

	comprises 16 sub-programs to promote planted forests and natural forest management. - Law 1377 of 2010, which replaced the 1959 forest law and permits the use of planted forests for production purposes. <u>Enforcement:</u> Natural forests and plantations are supervised by three levels of authorities: the Ministry of Environment and Sustainable Development (MADS), the Ministry of Agriculture and Rural Development (MADR) and the Regional Autonomous Corporation for Sustainable Development (CAR). MADS formulates policy on the environment and renewable natural resources and establishes the broad guidelines, rules and criteria for the environmental regulation of land use, including forestry (in close collaboration with MADR regarding commercial forest plantations). MADR formulate policy, but also guide and direct the formulation of plans, programs and projects for the development of the agricultural, fisheries and rural development sector. According to Law 1377 (2010), MADR is the main regulating authority for commercial plantation forestry. It formulates policies for commercial forest activities and is also responsible for the implementation of the incentive programme (<i>Certificado de Incentivo Forestal</i>) to enhance the commercial forestry value chain. <u>References to legislation compliance and best practices implemented:</u> - Refosinu FSC FM Certificate. - <i>PL-MF-01 - Plan Maestro de Manejo</i> - Reforestadora del Sinú. Version 11, 13/11/2024. - <i>PRO-PF-19 - Procedimiento de Monitoreo Interno</i> - Reforestadora del Sinú. Version 2, 30/05/2022. - Report on verification of changes in forest cover on properties acquired by Reforestadora del Sinú by Refosinu's Cartography Department. - <i>PL-MF-02 -Plan de Identificación de Atributos de Alto Valor de Conservación</i> - Reforestadora del Sinú. 30/06/2022. - <i>Evaluación y Seguimiento de Altos Valores de Conservación 2024</i>- Reforestadora del Sinú. - <i>Mapa de Red de Áreas de Protección y Corredores Biológicos</i> - Reforestadora del Sinú. 06/2024. - <i>Política Integral</i> - Reforestadora del Sinú - <i>El Estándar Nacional de Manejo Forestal Responsable FSC de Colombia</i> FSC-STD-COL-02-2021 ES.
Risk Rating justification	All of Refosinu forest areas are under FSC Forest Management certification and therefore the SBP benchmarking of FSC® certification scheme applies. From the SBP evaluation of the FSC® scheme, this indicator is not met by Refosinu's Performance Requirements and therefore not applicable for this indicator's evaluation. Option A is considered. Colombia has developed the GHG Emission Reduction and Removal Accounting System to determine the emissions, emission reductions and

	GHG removals that are accounted for under the UNFCCC, applying the principles of transparency, accuracy, exhaustiveness, comparability, coherence, prevention of double counting and environmental integrity. Refosinu's forestry activities are taken under continuous improvement measures through compliance with Colombian regulations and the social, environmental, and economic guidelines of Sustainable Forest Management, in accordance with the FSC® framework, which promotes environmentally sound, socially beneficial, and economically viable forest management. A study was developed by Refosinu's Cartography Department to verify changes in forest cover on the properties acquired by Reforestadora del Sinú Project. The study reviews forest cover in the area where the Refosinu Project is being developed, based on official information for Colombia available from the Institute of Hydrology, Meteorology, and Environmental Studies (IDEAM), which is responsible for managing scientific, hydrological, meteorological, and environmental characterization information in Colombia. IDEAM periodically identifies forest cover and its distribution across Colombian territory through the digital processing and interpretation of remote sensing images. The Non-Forest Forest Cover layer was overlaid with the company's properties to verify changes in forest cover within the project area. This procedure was performed in cartographic information software, which allows for visualization and generation of various graphic outputs. After overlaying the information, the areas classified as Natural Forest by IDEAM were identified, delimited, and calculated. After verifying and analysing the information, the results were obtained by preparing Forest and Non-Forest Analysis plans for each core and time period. These plans show the existence or absence of natural forest, as well as the protection and conservation areas established by the company. These areas are considered areas of increased forest cover due to the care, maintenance, and increase in vegetation cover driven by a natural regeneration process, as well as by the planting and reforestation activities with native species that the company has been carrying out in these areas. Biological corridors have been developed to preserve and ensure the maintenance and transit of existing fauna. This study was done based on what existed in the properties acquired since 1994.
Risk Rating	Low Risk

Colombia Departments of Córdoba and Antioquia	Indicator
3.2.2	Primary feedstock shall not be sourced from forest areas where site productivity is low and, according to local definitions or norms, the areas are classified as low-productive or difficult to regenerate.
Supply Base Verifiers	<u>Laws and Regulations:</u> - The Forest Law of 1959; - Decree 2811 of 1974, which adopted the National Code of Renewable Natural Resources (Código Nacional de Recursos Naturales Renovables y de Protección al Medio Ambiente); - The 1993 General Environment Law (Ley General Ambiental, Ley 99),

	which adopted the National Environmental System; - Decree 1791 of 1996, which adopted a forest harvesting regime; - The National Forestry Development Plan (Plan Nacional de Desarrollo Forestal) published in 2000, which is designed to span 25 years and comprises 16 sub-programs to promote planted forests and natural forest management. - Law 1377 of 2010, which replaced the 1959 forest law and permits the use of planted forests for production purposes. <u>Enforcement:</u> Natural forests and plantations are supervised by three levels of authorities: the Ministry of Environment and Sustainable Development (MADS), the Ministry of Agriculture and Rural Development (MADR) and the Regional Autonomous Corporation for Sustainable Development (CAR). MADS formulates policy on the environment and renewable natural resources and establishes the broad guidelines, rules and criteria for the environmental regulation of land use, including forestry (in close collaboration with MADR regarding commercial forest plantations). MADR formulate policy, but also guide and direct the formulation of plans, programs and projects for the development of the agricultural, fisheries and rural development sector. According to Law 1377 (2010), MADR is the main regulating authority for commercial plantation forestry. It formulates policies for commercial forest activities and is also responsible for the implementation of the incentive programme (<i>Certificado de Incentivo Forestal</i>) to enhance the commercial forestry value chain. <u>References to legislation compliance and best practices implemented:</u> - Refosinu FSC FM Certificate. - <i>PL-MF-01 - Plan Maestro de Manejo</i> - Reforestadora del Sinú. Version 11, 13/11/2024. - <i>PRO-PF-19 - Procedimiento de Monitoreo Interno</i> - Reforestadora del Sinú. Version 2, 30/05/2022. - Report on verification of changes in forest cover on properties acquired by Reforestadora del Sinú by Refosinu's Cartography Department. - <i>PL-MF-02 -Plan de Identificación de Atributos de Alto Valor de Conservación</i> - Reforestadora del Sinú. 30/06/2022. - <i>Evaluación y Seguimiento de Altos Valores de Conservación 2024</i>- Reforestadora del Sinú. - <i>Mapa de Red de Áreas de Protección y Corredores Biológicos</i> - Reforestadora del Sinú. 06/2024. - <i>Política Integral</i> - Reforestadora del Sinú - <i>El Estándar Nacional de Manejo Forestal Responsable FSC de Colombia</i> FSC-STD-COL-02-2021 ES.
Risk Rating justification	All of Refosinu forest areas are under FSC Forest Management certification and therefore the SBP benchmarking of FSC® certification scheme applies. From the SBP evaluation of the FSC® scheme, this indicator is not met by Refosinu's Performance Requirements.

	Refosinu's forestry activities are taken under continuous improvement measures through compliance with Colombian regulations and the social, environmental, and economic guidelines of Sustainable Forest Management, in accordance with the FSC® framework, which promotes environmentally sound, socially beneficial, and economically viable forest management. Refosinu conducts an annual forest inventory of plantations 1 to 7 years old to obtain information that allows for inferring the value of the company's biological asset. The specifics of conducting this inventory are detailed in document <i>I-AT-01 - Instalación y Medición de Parcelas de Inventario</i>. Sampling is done randomly from the company's target population. In each case, the year of planting, the clone, and the farm in question are identified, among other factors. Sampling rigor is subject to the heterogeneity of the plantations found in past inventories. Permanent plots of RSSC monitoring are fixed sampling units designed to obtain reliable data that allow for the estimation of various growth parameters (volume, productivity, site quality, etc.). Therefore, the accuracy and precision of the data collected during the measurement process will allow for approximate calculations for future projections. The information gathered from the inventories can be used to obtain the clone growth indicator in each area. This indicator is the Average Annual Increment (<i>IMA - Incremento Medio Anual</i>), which corresponds to the amount of wood that a hectare of plantation produces annually. This can vary depending on the clone and the site conditions, reaching up to 30 m³/ha/year. It is concluded Low Risk for this indicator as primary feedstock is not sourced from forest areas where site productivity is low and, according to local definitions or norms, the areas are classified as low-productive or difficult to regenerate.
Risk Rating	Low Risk

Colombia Departments of Córdoba and Antioquia	Indicator
3.2.3	feedstock shall not be sourced from forest areas in the Supply Base which, according to local definitions or norms, are classified as having combined attributes of high carbon stocks and high conservation value (HCV).
Supply Base Verifiers	<u>Laws and Regulations:</u> - The Forest Law of 1959; - Decree 2811 of 1974, which adopted the National Code of Renewable Natural Resources (Código Nacional de Recursos Naturales Renovables y de Protección al Medio Ambiente); - The 1993 General Environment Law (Ley General Ambiental, Ley 99), which adopted the National Environmental System; - Decree 1791 of 1996, which adopted a forest harvesting regime; - The National Forestry Development Plan (Plan Nacional de Desarrollo Forestal) published in 2000, which is designed to span 25 years and comprises 16 sub-programs to promote planted forests and natural forest

	management. - Law 1377 of 2010, which replaced the 1959 forest law and permits the use of planted forests for production purposes. <u>Enforcement:</u> Natural forests and plantations are supervised by three levels of authorities: the Ministry of Environment and Sustainable Development (MADS), the Ministry of Agriculture and Rural Development (MADR) and the Regional Autonomous Corporation for Sustainable Development (CAR). MADS formulates policy on the environment and renewable natural resources and establishes the broad guidelines, rules and criteria for the environmental regulation of land use, including forestry (in close collaboration with MADR regarding commercial forest plantations). MADR formulate policy, but also guide and direct the formulation of plans, programs and projects for the development of the agricultural, fisheries and rural development sector. According to Law 1377 (2010), MADR is the main regulating authority for commercial plantation forestry. It formulates policies for commercial forest activities and is also responsible for the implementation of the incentive programme (<i>Certificado de Incentivo Forestal</i>) to enhance the commercial forestry value chain. <u>References to legislation compliance and best practices implemented:</u> - Refosinu FSC FM Certificate. - <i>PL-MF-01 - Plan Maestro de Manejo</i> - Reforestadora del Sinú. Version 11, 13/11/2024. - <i>PRO-PF-19 - Procedimiento de Monitoreo Interno</i> - Reforestadora del Sinú. Version 2, 30/05/2022. - Report on verification of changes in forest cover on properties acquired by Reforestadora del Sinú by Refosinu's Cartography Department. - <i>PL-MF-02 -Plan de Identificación de Atributos de Alto Valor de Conservación</i> - Reforestadora del Sinú. 30/06/2022. - <i>Evaluación y Seguimiento de Altos Valores de Conservación 2024</i>- Reforestadora del Sinú. - <i>Mapa de Red de Áreas de Protección y Corredores Biológicos</i> - Reforestadora del Sinú. 06/2024. - <i>Política Integral</i> - Reforestadora del Sinú - <i>El Estándar Nacional de Manejo Forestal Responsable FSC de Colombia</i> FSC-STD-COL-02-2021 ES. - SBP Process Document: Framework for benchmarking and recognition of certification schemes relevant to the scope of SBP certification. - SBP Process Document: Evaluation of the Forest Stewardship Council (FSC®) scheme using the Framework for benchmarking and recognition of certification schemes relevant to the scope of SBP certification.
Risk Rating justification	All of Refosinu forest areas are under FSC Forest Management certification and therefore the SBP benchmarking of FSC® certification scheme applies. From the SBP evaluation of the FSC® scheme, this indicator is partially met by Refosinu's Performance Requirements.

	Refosinu's forestry activities are taken under continuous improvement measures through compliance with Colombian regulations and the social, environmental, and economic guidelines of Sustainable Forest Management, in accordance with the FSC® framework, which promotes environmentally sound, socially beneficial, and economically viable forest management. A study was developed by Refosinu's Cartography Department to verify changes in forest cover on the properties acquired by Reforestadora del Sinú Project. After analysis of the information, the results were obtained by preparing Forest and Non-Forest Analysis plans for each core and time period. These plans show the existence or absence of natural forest, as well as the protection and conservation areas established by the company. These areas are considered areas of increased forest cover due to the care, maintenance, and increase in vegetation cover driven by a natural regeneration process, as well as by the planting and reforestation activities with native species that the company has been carrying out in these areas. Biological corridors have been developed to preserve and ensure the maintenance and transit of existing fauna (<i>Mapa de Red de Áreas de Protección y Corredores Biológicos - Reforestadora del Sinú, 2024</i>). In summary, Refosinu has established and monitors (through the <i>PRO-PF-19 Procedimiento de Monitoreo</i>) the areas declared as HCV and, when applicable, as high carbon stocks, within the forest management units previously identified in document PL-MF-02, in the RSSC Monitoring Matrix. It is concluded Low Risk for this indicator as primary feedstock is not sourced from forest areas which are classified as having combined attributes of high carbon stocks and high conservation value (HCV).
Risk Rating	Low Risk

Colombia Departments of Córdoba and Antioquia	Indicator
3.3.1	Feedstock sourcing shall be in compliance with the principles of cascading use, high quality stem wood shall not be used as feedstock if it is in substantial demand for long-lived products in the Supply Base.
Supply Base Verifiers	<u>Laws and Regulations:</u> - The Forest Law of 1959; - Decree 2811 of 1974, which adopted the National Code of Renewable Natural Resources (Código Nacional de Recursos Naturales Renovables y de Protección al Medio Ambiente); - The 1993 General Environment Law (Ley General Ambiental, Ley 99), which adopted the National Environmental System; - Decree 1791 of 1996, which adopted a forest harvesting regime; - The National Forestry Development Plan (Plan Nacional de Desarrollo Forestal) published in 2000, which is designed to span 25 years and comprises 16 sub-programs to promote planted forests and natural forest management. - Law 1377 of 2010, which replaced the 1959 forest law and permits the use

	of planted forests for production purposes. <u>Enforcement:</u> Natural forests and plantations are supervised by three levels of authorities: the Ministry of Environment and Sustainable Development (MADS), the Ministry of Agriculture and Rural Development (MADR) and the Regional Autonomous Corporation for Sustainable Development (CAR). MADS formulates policy on the environment and renewable natural resources and establishes the broad guidelines, rules and criteria for the environmental regulation of land use, including forestry (in close collaboration with MADR regarding commercial forest plantations). MADR formulate policy, but also guide and direct the formulation of plans, programs and projects for the development of the agricultural, fisheries and rural development sector. According to Law 1377 (2010), MADR is the main regulating authority for commercial plantation forestry. It formulates policies for commercial forest activities and is also responsible for the implementation of the incentive programme (<i>Certificado de Incentivo Forestal</i>) to enhance the commercial forestry value chain. <u>References to legislation compliance and best practices implemented:</u> - Refosinu FSC FM Certificate. - <i>PL-MF-01 - Plan Maestro de Manejo</i> - Reforestadora del Sinú. Version 11, 13/11/2024. - <i>PRO-PF-19 - Procedimiento de Monitoreo Interno</i> - Reforestadora del Sinú. Version 2, 30/05/2022. - Report on verification of changes in forest cover on properties acquired by Reforestadora del Sinú by Refosinu's Cartography Department. - <i>PL-MF-02 -Plan de Identificación de Atributos de Alto Valor de Conservación</i> - Reforestadora del Sinú. 30/06/2022. - <i>Evaluación y Seguimiento de Altos Valores de Conservación 2024-</i> Reforestadora del Sinú. - <i>Mapa de Red de Áreas de Protección y Corredores Biológicos</i> - Reforestadora del Sinú. 06/2024. - <i>Política Integral</i> - Reforestadora del Sinú - <i>El Estándar Nacional de Manejo Forestal Responsable FSC de Colombia</i> FSC-STD-COL-02-2021 ES. - SBP Process Document: Framework for benchmarking and recognition of certification schemes relevant to the scope of SBP certification. - SBP Process Document: Evaluation of the Forest Stewardship Council (FSC®) scheme using the Framework for benchmarking and recognition of certification schemes relevant to the scope of SBP certification.
Risk Rating justification	All of Refosinu forest areas are under FSC Forest Management certification and therefore the SBP benchmarking of FSC® certification scheme applies. From the SBP evaluation of the FSC® scheme, this indicator is partially met by Refosinu's Performance Requirements. Refosinu's forest areas are all certified under FSC Forest Management. As a forest management standard, the FSC-STD-60-004 can affect optimum use of harvested products mainly through setting requirements for harvesting

	methods. Affecting the use of stem wood after the harvesting is not within the standard's scope. The SBP performance requirement is therefore considered as only partially met. The harvesting operations of Refosinu originate two main types of forest residues: - Branches, tops, and bark, not suitable for the pulp or other higher valued markets, and directed to wood chips production for energy; and - Fire wood or broken wood, not suitable for the pulp market for other higher valued markets, and that can be delivered in the form of roundwood to local/regional pellet industry. Main reasons that these forest residues are not suitable for higher valued markets: dimensions, density, and various specific quality characteristics. The main objective and mission of Reforestadora del Sinú is to be the forest producer leader in Colombia to supply the pulp industry worldwide and therefore is not expected that the biomass market could destabilize Refosinu's core market. However, as a precaution, it is considered by Refosinu, as a first approach, Specified risk for this indicator.
Risk Rating	Specified Risk

Colombia Departments of Córdoba and Antioquia	Indicator
4.1.1	Freedom of association and the right to collective bargaining shall be respected in the workplace.
Supply Base Verifiers	- Refosinu FSC FM Certificate. - Plan Maestro de Manejo - Reforestadora del Sinú. - El Estándar Nacional de Manejo Forestal Responsable FSC de Colombia FSC-STD-COL-02-2021 ES. - SBP Process Document: Framework for benchmarking and recognition of certification schemes relevant to the scope of SBP certification. - SBP Process Document: Evaluation of the Forest Stewardship Council (FSC®) scheme using the Framework for benchmarking and recognition of certification schemes relevant to the scope of SBP certification.
Risk Rating justification	All of Refosinu forest areas are under FSC Forest Management certification and therefore the SBP benchmarking of FSC® certification scheme applies. From the SBP evaluation of the FSC® scheme, this indicator is completely met by Refosinu's Performance Requirements.
Risk Rating	Low Risk

Colombia Departments of Córdoba and Antioquia	Indicator
4.1.2	Forced or compulsory labour shall not be used.

Supply Base Verifiers	- Refosinu FSC FM Certificate. - Plan Maestro de Manejo - Reforestadora del Sinú. - El Estándar Nacional de Manejo Forestal Responsable FSC de Colombia FSC-STD-COL-02-2021 ES. - SBP Process Document: Framework for benchmarking and recognition of certification schemes relevant to the scope of SBP certification. - SBP Process Document: Evaluation of the Forest Stewardship Council (FSC®) scheme using the Framework for benchmarking and recognition of certification schemes relevant to the scope of SBP certification.
Risk Rating justification	All of Refosinu forest areas are under FSC Forest Management certification and therefore the SBP benchmarking of FSC® certification scheme applies. From the SBP evaluation of the FSC® scheme, this indicator is completely met by Refosinu's Performance Requirements.
Risk Rating	Low Risk

Colombia Departments of Córdoba and Antioquia	Indicator
4.1.3	Child labour shall not be used.
Supply Base Verifiers	- Refosinu FSC FM Certificate. - Plan Maestro de Manejo - Reforestadora del Sinú. - El Estándar Nacional de Manejo Forestal Responsable FSC de Colombia FSC-STD-COL-02-2021 ES. - SBP Process Document: Framework for benchmarking and recognition of certification schemes relevant to the scope of SBP certification. - SBP Process Document: Evaluation of the Forest Stewardship Council (FSC®) scheme using the Framework for benchmarking and recognition of certification schemes relevant to the scope of SBP certification.
Risk Rating justification	All of Refosinu forest areas are under FSC Forest Management certification and therefore the SBP benchmarking of FSC® certification scheme applies. From the SBP evaluation of the FSC® scheme, this indicator is completely met by Refosinu's Performance Requirements.
Risk Rating	Low Risk

Colombia Departments of Córdoba and Antioquia	Indicator
4.1.4	Workers shall not be discriminated in hiring, remuneration, access to training, promotion, termination or retirement.
Supply Base Verifiers	- Refosinu FSC FM Certificate. - Plan Maestro de Manejo - Reforestadora del Sinú. - El Estándar Nacional de Manejo Forestal Responsable FSC de Colombia FSC-STD-COL-02-2021 ES. - SBP Process Document: Framework for benchmarking and recognition of

	certification schemes relevant to the scope of SBP certification. - SBP Process Document: Evaluation of the Forest Stewardship Council (FSC®) scheme using the Framework for benchmarking and recognition of certification schemes relevant to the scope of SBP certification.
Risk Rating justification	All of Refosinu forest areas are under FSC Forest Management certification and therefore the SBP benchmarking of FSC® certification scheme applies. From the SBP evaluation of the FSC® scheme, this indicator is completely met by Refosinu's Performance Requirements.
Risk Rating	Low Risk

Colombia Departments of Córdoba and Antioquia	Indicator
4.1.5	Wages paid to workers shall meet or exceed the legal minimum wage or where there is no statutory minimum wage industry norms shall be met or exceeded
Supply Base Verifiers	- Refosinu FSC FM Certificate. - Plan Maestro de Manejo - Reforestadora del Sinú. - El Estándar Nacional de Manejo Forestal Responsable FSC de Colombia FSC-STD-COL-02-2021 ES. - SBP Process Document: Framework for benchmarking and recognition of certification schemes relevant to the scope of SBP certification. - SBP Process Document: Evaluation of the Forest Stewardship Council (FSC®) scheme using the Framework for benchmarking and recognition of certification schemes relevant to the scope of SBP certification.
Risk Rating justification	All of Refosinu forest areas are under FSC Forest Management certification and therefore the SBP benchmarking of FSC® certification scheme applies. From the SBP evaluation of the FSC® scheme, this indicator is completely met by Refosinu's Performance Requirements.
Risk Rating	Low Risk

Colombia Departments of Córdoba and Antioquia	Indicator
4.1.6	Working hours shall comply with legal requirements.
Supply Base Verifiers	- Refosinu FSC FM Certificate. - Plan Maestro de Manejo - Reforestadora del Sinú. - El Estándar Nacional de Manejo Forestal Responsable FSC de Colombia FSC-STD-COL-02-2021 ES. - SBP Process Document: Framework for benchmarking and recognition of certification schemes relevant to the scope of SBP certification. - SBP Process Document: Evaluation of the Forest Stewardship Council (FSC®) scheme using the Framework for benchmarking and recognition of certification schemes relevant to the scope of SBP certification.

Risk Rating justification	All of Refosinu forest areas are under FSC Forest Management certification and therefore the SBP benchmarking of FSC® certification scheme applies. From the SBP evaluation of the FSC® scheme, this indicator is completely met by Refosinu's Performance Requirements.
Risk Rating	Low Risk

Colombia Departments of Córdoba and Antioquia	Indicator
4.1.7	Workers shall have access to health care provisions, sickness benefits, retirement benefits, invalidity benefits, death benefits, and workers' compensation
Supply Base Verifiers	<u>Laws and Regulations:</u> - Article 53 of Colombia Constitution. - Labour Code, amended by Law No.50 of 1990 and Law No.789 of 2002. - Decree 1072 of 2015: <i>Decreto Único Reglamentario del Sector Trabajo</i>. - Security and Health Management System at Work (SG-SST). - General Labor Risk System (SGRL). <u>Enforcement:</u> The primary government entities responsible for the enforcement of employment statutes and regulations are the Ministry of Labour, the Ministry of Health and the pension and payroll tax authority. There are two mandatory committees that require an equal number of representatives from employees and the employer: the Work Cohabitation Committee, which is in charge of preventing harassment in the workplace, and the Health and Safety at Work Committee. In addition, Colombian legislation allows creation of unions, which is considered a constitutional right. <u>References to legislation compliance and best practices implemented:</u> - <i>Política Integral</i> - Reforestadora del Sinú. - Social security payment spreadsheet - Reforestadora del Sinú. - Internal working regulation - <i>Reglamento Interno de Trabajo</i> - Reforestadora del Sinú. - <i>PRG-GC-02 Programa Prevención de Riesgos</i> - Reforestadora del Sinú. - <i>M-AD-01 - Manual Talento Humano-CMI, V7</i> - Reforestadora del Sinú. - Refosinu FSC FM Certificate. - <i>El Estándar Nacional de Manejo Forestal Responsable FSC de Colombia</i> FSC-STD-COL-02-2021 ES. - SBP Process Document: Framework for benchmarking and recognition of certification schemes relevant to the scope of SBP certification. - SBP Process Document: Evaluation of the Forest Stewardship Council (FSC®) scheme using the Framework for benchmarking and recognition of certification schemes relevant to the scope of SBP certification.
Risk Rating justification	All of Refosinu forest areas are under FSC Forest Management certification and therefore the SBP benchmarking of FSC® certification scheme applies.

	From the SBP evaluation of the FSC® scheme, this indicator is partially met by Refosinu's Performance Requirements. In Colombia, employment rules and regulations are mandatory for employees and employers. This considers everything from providing a safe workplace, paying wages and benefits, complying with leave laws, and providing social security contributions. Workers are entitled to a series of benefits that protect them in the event of illness, accidents, disability, death and retirement. These benefits include health care, sick pay, retirement pension, disability pension, survivors' pension and compensation for occupational hazards. Workers have the right to health care through the General Health Social Security System (SGSSS). The General Labor Risk System (SGRL) provides protection to workers in the event of work accidents or occupational illnesses, with economic benefits and health services. Decree 1072 of 2015, also known as the Unique Regulatory Decree of the Labor Sector, establishes the regulations in force in Colombia regarding the labor sector. In essence, it compiles existing laws and regulations on topics such as the Security and Health Management System at Work (SG-SST), the obligations of employers and workers in matters of health and safety, and provisions for the payment of social benefits. Refosinu has a Security and Health Management System at Work (SG-SST), Led by Juana Buelbas, hygiene and occupational safety specialist with license recognized in Colombia; Specialized lawyer in labor law in Colombia: Carlos Mario Idárraga. Refosinu complies with the payment of the social security plan for all its employees and for all Refosinu's contractors. All employees have an employment contract. It is concluded Low Risk for this indicator as Refosinu workers have access to health care provisions, sickness benefits, retirement benefits, invalidity benefits, death benefits, and workers' compensation.
Risk Rating	Low Risk

Colombia Departments of Córdoba and Antioquia	Indicator
4.1.8	Training shall be provided for all workers to allow them to implement the conditions set out in all elements of the SBP Standards relevant to their responsibilities.
Supply Base Verifiers	- Refosinu FSC FM Certificate. - Plan Maestro de Manejo - Reforestadora del Sinú. - El Estándar Nacional de Manejo Forestal Responsable FSC de Colombia FSC-STD-COL-02-2021 ES. - SBP Process Document: Framework for benchmarking and recognition of certification schemes relevant to the scope of SBP certification. - SBP Process Document: Evaluation of the Forest Stewardship Council (FSC®) scheme using the Framework for benchmarking and recognition of certification schemes relevant to the scope of SBP certification.

Risk Rating justification	All of Refosinu forest areas are under FSC Forest Management certification and therefore the SBP benchmarking of FSC® certification scheme applies. From the SBP evaluation of the FSC® scheme, this indicator is completely met by Refosinu's Performance Requirements.
Risk Rating	Low Risk

Colombia Departments of Córdoba and Antioquia	Indicator
4.1.9	Mechanisms shall be in place for resolving grievances and disputes in the workplace.
Supply Base Verifiers	- Refosinu FSC FM Certificate. - Plan Maestro de Manejo - Reforestadora del Sinú. - El Estándar Nacional de Manejo Forestal Responsable FSC de Colombia FSC-STD-COL-02-2021 ES. - SBP Process Document: Framework for benchmarking and recognition of certification schemes relevant to the scope of SBP certification. - SBP Process Document: Evaluation of the Forest Stewardship Council (FSC®) scheme using the Framework for benchmarking and recognition of certification schemes relevant to the scope of SBP certification.
Risk Rating justification	All of Refosinu forest areas are under FSC Forest Management certification and therefore the SBP benchmarking of FSC® certification scheme applies. From the SBP evaluation of the FSC® scheme, this indicator is completely met by Refosinu's Performance Requirements.
Risk Rating	Low Risk

Colombia Departments of Córdoba and Antioquia	Indicator
4.1.10	Safeguards shall be put in place to protect the health and safety of workers by developing, communicating and implementing policies and procedures.
Supply Base Verifiers	- Refosinu FSC FM Certificate. - Plan Maestro de Manejo - Reforestadora del Sinú. - El Estándar Nacional de Manejo Forestal Responsable FSC de Colombia FSC-STD-COL-02-2021 ES. - SBP Process Document: Framework for benchmarking and recognition of certification schemes relevant to the scope of SBP certification. - SBP Process Document: Evaluation of the Forest Stewardship Council (FSC®) scheme using the Framework for benchmarking and recognition of certification schemes relevant to the scope of SBP certification.
Risk Rating justification	All of Refosinu forest areas are under FSC Forest Management certification and therefore the SBP benchmarking of FSC® certification scheme applies. From the SBP evaluation of the FSC® scheme, this indicator is completely met by Refosinu's Performance Requirements.

Risk Rating	Low Risk
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Colombia Departments of Córdoba and Antioquia	Indicator
4.2.1	Negative social and community impacts shall be identified and avoided.
Supply Base Verifiers	- Refosinu FSC FM Certificate. - Plan Maestro de Manejo - Reforestadora del Sinú. - El Estándar Nacional de Manejo Forestal Responsable FSC de Colombia FSC-STD-COL-02-2021 ES. - SBP Process Document: Framework for benchmarking and recognition of certification schemes relevant to the scope of SBP certification. - SBP Process Document: Evaluation of the Forest Stewardship Council (FSC®) scheme using the Framework for benchmarking and recognition of certification schemes relevant to the scope of SBP certification.
Risk Rating justification	All of Refosinu forest areas are under FSC Forest Management certification and therefore the SBP benchmarking of FSC® certification scheme applies. From the SBP evaluation of the FSC® scheme, this indicator is completely met by Refosinu's Performance Requirements.
Risk Rating	Low Risk

Colombia Departments of Córdoba and Antioquia	Indicator
4.2.2	Feedstock sourcing shall positively contribute to the local economy, including employment.
Supply Base Verifiers	- Refosinu FSC FM Certificate. - Plan Maestro de Manejo - Reforestadora del Sinú. - El Estándar Nacional de Manejo Forestal Responsable FSC de Colombia FSC-STD-COL-02-2021 ES. - SBP Process Document: Framework for benchmarking and recognition of certification schemes relevant to the scope of SBP certification. - SBP Process Document: Evaluation of the Forest Stewardship Council (FSC®) scheme using the Framework for benchmarking and recognition of certification schemes relevant to the scope of SBP certification.
Risk Rating justification	All of Refosinu forest areas are under FSC Forest Management certification and therefore the SBP benchmarking of FSC® certification scheme applies. From the SBP evaluation of the FSC® scheme, this indicator is completely met by Refosinu's Performance Requirements.
Risk Rating	Low Risk

Colombia Departments of Córdoba and	Indicator
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Antioquia	
4.2.3	Food, water supply or high conservation values (HCV) that are essential for the fulfilment of basic needs of communities shall be maintained or enhanced
Supply Base Verifiers	- Refosinu FSC FM Certificate. - Plan Maestro de Manejo - Reforestadora del Sinú. - El Estándar Nacional de Manejo Forestal Responsable FSC de Colombia FSC-STD-COL-02-2021 ES. - SBP Process Document: Framework for benchmarking and recognition of certification schemes relevant to the scope of SBP certification. - SBP Process Document: Evaluation of the Forest Stewardship Council (FSC®) scheme using the Framework for benchmarking and recognition of certification schemes relevant to the scope of SBP certification.
Risk Rating justification	All of Refosinu forest areas are under FSC Forest Management certification and therefore the SBP benchmarking of FSC® certification scheme applies. From the SBP evaluation of the FSC® scheme, this indicator is completely met by Refosinu's Performance Requirements.
Risk Rating	Low Risk

Colombia Departments of Córdoba and Antioquia	Indicator
4.2.4	Legal, customary, and traditional tenure and use rights of Indigenous Peoples and local communities related to the Supply Base shall be identified, documented, and respected.
Supply Base Verifiers	- Refosinu FSC FM Certificate. - Plan Maestro de Manejo - Reforestadora del Sinú. - El Estándar Nacional de Manejo Forestal Responsable FSC de Colombia FSC-STD-COL-02-2021 ES. - SBP Process Document: Framework for benchmarking and recognition of certification schemes relevant to the scope of SBP certification. - SBP Process Document: Evaluation of the Forest Stewardship Council (FSC®) scheme using the Framework for benchmarking and recognition of certification schemes relevant to the scope of SBP certification.
Risk Rating justification	All of Refosinu forest areas are under FSC Forest Management certification and therefore the SBP benchmarking of FSC® certification scheme applies. From the SBP evaluation of the FSC® scheme, this indicator is completely met by Refosinu's Performance Requirements.
Risk Rating	Low Risk

Colombia Departments of Córdoba and Antioquia	Indicator
4.2.5	Mechanisms shall be in place for resolving grievances and disputes relating to tenure and use rights of the forest and other land management practices.

Supply Base Verifiers	- Refosinu FSC FM Certificate. - Plan Maestro de Manejo - Reforestadora del Sinú. - El Estándar Nacional de Manejo Forestal Responsable FSC de Colombia FSC-STD-COL-02-2021 ES. - SBP Process Document: Framework for benchmarking and recognition of certification schemes relevant to the scope of SBP certification. - SBP Process Document: Evaluation of the Forest Stewardship Council (FSC®) scheme using the Framework for benchmarking and recognition of certification schemes relevant to the scope of SBP certification.
Risk Rating justification	All of Refosinu forest areas are under FSC Forest Management certification and therefore the SBP benchmarking of FSC® certification scheme applies. From the SBP evaluation of the FSC® scheme, this indicator is completely met by Refosinu's Performance Requirements.
Risk Rating	Low Risk

Colombia Departments of Córdoba and Antioquia	Indicator
4.2.6	Where Indigenous Peoples' rights are identified in the Supply Base, and Free Prior and Informed Consent (FPIC) has not been achieved for the proposed and planned activities, a consultation and, if required, accommodation process shall be put in place.
Supply Base Verifiers	- Refosinu FSC FM Certificate. - Plan Maestro de Manejo - Reforestadora del Sinú. - El Estándar Nacional de Manejo Forestal Responsable FSC de Colombia FSC-STD-COL-02-2021 ES. - SBP Process Document: Framework for benchmarking and recognition of certification schemes relevant to the scope of SBP certification. - SBP Process Document: Evaluation of the Forest Stewardship Council (FSC®) scheme using the Framework for benchmarking and recognition of certification schemes relevant to the scope of SBP certification.
Risk Rating justification	All of Refosinu forest areas are under FSC Forest Management certification and therefore the SBP benchmarking of FSC® certification scheme applies. From the SBP evaluation of the FSC® scheme, this indicator is completely met by Refosinu's Performance Requirements.
Risk Rating	Low Risk

Colombia Departments of Córdoba and Antioquia	Indicator
4.2.7	Designated cultural heritage sites shall be preserved.
Supply Base Verifiers	- Refosinu FSC FM Certificate. - Plan Maestro de Manejo - Reforestadora del Sinú. - El Estándar Nacional de Manejo Forestal Responsable FSC de Colombia FSC-STD-COL-02-2021 ES.

	- SBP Process Document: Framework for benchmarking and recognition of certification schemes relevant to the scope of SBP certification. - SBP Process Document: Evaluation of the Forest Stewardship Council (FSC®) scheme using the Framework for benchmarking and recognition of certification schemes relevant to the scope of SBP certification.
Risk Rating justification	All of Refosinu forest areas are under FSC Forest Management certification and therefore the SBP benchmarking of FSC® certification scheme applies. From the SBP evaluation of the FSC® scheme, this indicator is completely met by Refosinu's Performance Requirements.
Risk Rating	Low Risk

Annex 2: EU RED Supply Base Evaluation

Countries where EU RED Supply Base Evaluation is used	
Country	Colombia
Area	Departments of Córdoba and Antioquia
Sustainable harvesting criteria 29(6)	
(i) The legality of harvesting operations	
Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	Under Forest Stewardship Council (FSC) Principle 1 framework, Refosinu has implemented the Legal Requirements Matrix as a key tool to ensure compliance with applicable environmental and forestry legislation in its operations. This matrix, identified as F-GG-09, has been developed through a rigorous process involving comprehensive review of current legislation in Colombia. It encompasses environmental, labor, and forestry laws, including statutes, decrees, resolutions, technical standards, and other relevant legal instruments. Each identified norm is assessed for its applicability to the forestry project, considering factors such as project location, forest type, and activities undertaken. The Matrix undergoes periodic review and updates to reflect any changes in Colombian legislation. This is conducted by the company's legal department through consultation of official sources, involvement of legal experts, and review of relevant news and publications. Among the norms included are: - Resolution ICA 071641 of 2020 for the Registration of Commercial Forest Plantations in Colombia. This resolution sets out the requirements and procedures for registering commercial forest plantations and agroforestry systems for commercial purposes with the Colombian Agricultural Institute (ICA). The registration aims to ensure compliance with sanitary and phytosanitary standards for the production and movement of forest products. - Decree 2398 of 2019 from ICA for the Generation of Movement Certificate in Colombia. This decree establishes the requirements for issuing the movement certificate for primary transformation products obtained from commercial forest plantations registered with the ICA. The movement certificate is an official document that certifies the legal and phytosanitary origin of forest products.
(ii) Forest regeneration of harvested areas	
Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ Level B – management system at forest sourcing area level

Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	Refosinu does not perform forest regeneration through stump management. Instead, the company has opted for a more sustainable long-term approach, deferring this practice until the second rotation of the project. This decision is based on implementing a genetic improvement program, which will allow for the cultivation of stronger, more productive, and pest-resistant trees. The scheduling of forest establishment at Refosinu is strategically coordinated with harvest progress. This planning is based on the forest budget, detailing reforestation areas, species to be planted, required plant quantities, allocated financial resources, and the execution schedule. Clone selection: the most suitable tree clones for site conditions are chosen, considering factors such as productivity, resistance to pests and diseases, and market demand. Refosinu has a monitoring program to ensure compliance with establishment activities and alignment with the established schedule. An annual review of these activities is conducted to identify areas for improvement and optimize the process. The indicator used to assess this risk is the annual progress report on activity control and budgets. This document is managed internally.
(iii) That areas designated by international or national law or by the relevant competent authority for nature protection purposes, including in wetlands, grasslands, heathland and peatlands, are protected with the aim of preserving biodiversity and preventing habitat destruction, unless evidence is provided that the harvesting of that raw material does not interfere with those nature protection purposes	
Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	Refosinu's High Conservation Value Attributes (HCV) Identification Plan, coded as PL-MF-02, is presented detailing the proposed methodologies, tools, and procedures for identifying key environmental values, including protected areas referenced in category 1 (HCV 1). Specifically, the existence of protected areas is assessed, and cartographic verification is conducted to ensure that the forest project does not impact wetlands, grasslands, heathland and peatlands, or protected areas designated under Colombia's National System of Protected Areas (SINAP). Category 3 (HCV 3) evaluates threatened ecosystems, such as remnants of tropical dry forest (bs-T). In the first FSC certification cycle, these remnants were recognized as High Conservation Value Attributes (HCV). However, recent analyses on the maintenance and improvement of these HCVs, including annual measurements of growth in permanent plots, have revealed that the floristic diversity of these remnants is comparable to other elements in our conservation area network. Furthermore, comparative monitoring with other protected areas has shown that the fauna diversity in these spaces is not significantly higher than in other elements of our protection area network. These findings

	suggest that these remnants of tropical dry forest should now be fully integrated into the project's conservation area network, as they no longer meet the current criteria to be considered HCV. The indicator used to assess this risk is found in the RSSC v2 monitoring matrix, where the area declared as HCV within the forest management unit previously identified in document PL-MF-02 is established.
(iv) that harvesting is carried out considering the maintenance of soil quality and biodiversity in accordance with sustainable forest management principles, with the aim of preventing any adverse impact, in a way that avoids harvesting of stumps and roots, degradation of primary forests, and of old growth forests as defined in the country where the forest is located, or their conversion into plantation forests, and harvesting on vulnerable soils, that harvesting is carried out in compliance with maximum thresholds for large clear-cuts as defined in the country where the forest is located, and with locally and ecologically appropriate retention thresholds for deadwood extraction and that harvesting is carried out in compliance with requirements to use logging systems that minimise any adverse impact on soil quality, including soil compaction, and on biodiversity features and habitats	
Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	Forest harvesting activities within the forest sourcing area are planned and implemented under a management system designed to maintain soil quality and biodiversity, in accordance with sustainable forest management principles and the requirements of FSC Principle 6. Harvesting operations are conducted exclusively in commercial forest plantations and do not include the extraction of stumps or roots. Likewise, the company does not carry out harvesting in primary forests or old-growth forests, nor does it convert them into plantations. Forest operations are limited to established plantations, and conservation areas are excluded from productive harvesting activities. The company's annual and operational harvesting capacity is primarily determined by logistical conditions and operational availability, including transportation capacity, access conditions, market demand, and the cutting capacity of the harvesting machinery currently in operation. Therefore, the harvested area within a given period is determined by operational planning rather than by a predefined volumetric extraction target. At the national level, there is no specific legal limit regarding the maximum size of clear-cut areas within commercial plantations managed by the company. Harvesting will be conducted guided by Best Management Practices as defined in the FSC FM Management Plan, ensuring that it is operationally planned and environmentally suitable. Consequently, environmental controls and mitigation measures are applied throughout the entire harvesting cycle to prevent adverse impacts on environmental values. The company does not conduct the extraction or commercial utilization of deadwood. Standing dead trees, woody debris, and naturally accumulated dead biomass are not intentionally harvested as part of

	forest operations. Therefore, no deadwood retention threshold is required for operational decision-making. To minimize impacts on soil quality, harvesting systems are selected according to site conditions, accessibility, terrain characteristics, and operational constraints. Implemented measures include planning extraction routes and forest roads to reduce unnecessary traffic, corrective drainage management when required, restricting machinery movement outside designated areas, post-harvest mitigation activities in harvesting and stockpiling areas, and monitoring potential soil alterations through indicator F-GC-45. Potential impacts on biodiversity and habitats are assessed through the Environmental Impact Assessment (EIA) and the associated environmental value management sheets. Control measures include the immediate correction of any impacts on conservation areas, management of invasive species associated with planted commercial species, protection of watercourses and environmentally sensitive areas, and implementation of corrective actions whenever environmental alterations are identified. Together, these procedures and mitigation measures ensure that harvesting activities are conducted in a manner that minimizes adverse effects on soil quality, biodiversity, and surrounding environmental values.
(v) That harvesting maintains or improves the long-term production capacity of the forest.	
Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	Based on the forest project inventories and information collected from the 2454 monitoring plots, it has been calculated that the Annual Mean Increment (MAI) is 27 m³/ha/year. The harvest plan from 2024 to 2031 identifies a total harvest level of 1.637.876 m³, which is far below the projected MAI. This value corresponds to the rotation defined by the forest project, which is 7 years, and the schedule for rotation and reforestation. This calculation indicates that maximum annual production is aligned with the project's principles of environmental, social, and economic sustainability. This approach ensures that forest resource exploitation is carried out in a manner that ensures long-term regeneration and maintenance of forests, thus protecting both the natural environment and the social and economic benefits derived from sustainable forestry activities. Silvicultural management focuses on optimizing the performance of Eucalyptus urograndis plantations obtained from La Riviera Nursery, owned by Reforestadora del Sinú. It begins with land preparation tasks such as cleaning, weed removal, and soil improvement. Planting is carried out using precise forestry techniques to ensure optimal plantation development. Continuous monitoring is established to assess growth, detect issues, and apply necessary

	corrections, thereby ensuring sustainable forest management that promotes long-term productivity. This approach is complemented by a genetic improvement program using clones adapted to specific site conditions, which have been evaluated over years in various environmental conditions, ensuring plantation with optimal genetic materials for establishment within the forest project. To evaluate these indicators, a genetic improvement program supported by statistical data obtained from the forest inventory is used. These documents are managed internally.
(vi)¹ That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs. <i>Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:</i> <i>(a) primary forest and other wooded land and old growth forest, namely forest and other wooded land of native species, where there is no clearly visible indication of human activity and the ecological processes are not significantly disturbed; and old growth forests as defined in the country where the forest is located. If there is no definition of old growth forest at the national level, then the following definition shall apply: A forest stand or area consisting of native tree species that have developed, predominantly through natural processes, structures and dynamics normally associated with late-seral developmental phases in primary or undisturbed forests of the same type. Signs of former human activities may be visible, but they are gradually disappearing or too limited to significantly disturb natural processes.</i>	
Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	All of Refosinu forest areas are under FSC Forest Management certification. Refosinu's forestry activities are taken under continuous improvement measures through compliance with Colombian regulations and the social, environmental, and economic guidelines of Sustainable Forest Management, in accordance with the FSC® framework, which promotes environmentally sound, socially beneficial, and economically viable forest management. The Colombian territory hosts different types of forests. Among these are dry tropical forests, Andean forests, gallery forests, mangrove forests, and the majestic tropical rainforests. All of Refosinu's forest areas are of type tropical dry forest (bosque seco tropical). A study was developed by Refosinu's Cartography Department to verify changes in forest cover on the properties acquired by Reforestadora del Sinú Project. The study reviews forest cover in the area where the Refosinu Project is being developed, based on official information for Colombia available from the Institute of Hydrology, Meteorology, and Environmental Studies (IDEAM), which is responsible for managing scientific, hydrological, meteorological, and environmental characterization information in Colombia. IDEAM periodically identifies forest cover and its distribution across Colombian territory through the digital processing and interpretation of remote sensing images. The Non-Forest Forest Cover layer was overlaid with the company's properties to verify changes in forest cover within the project area. This procedure was performed in cartographic information software, which allows for

visualization and generation of various graphic outputs. After overlaying the information, the areas classified as Natural Forest by IDEAM were identified, delimited, and calculated. After verifying and analysing the information, the results were obtained by preparing Forest and Non-Forest Analysis plans for each core and time period. These plans show the existence or absence of natural forest, as well as the protection and conservation areas established by the company. These areas are considered areas of increased forest cover due to the care, maintenance, and increase in vegetation cover driven by a natural regeneration process, as well as by the planting and reforestation activities with native species that the company has been carrying out in these areas. Biological corridors have been developed to preserve and ensure the maintenance and transit of existing fauna. This study was done based on what existed in the properties acquired since 1994. Refosinu conducts an annual forest inventory of plantations 1 to 7 years old to obtain information that allows for inferring the value of the company's biological asset. Biological corridors have been developed to preserve and ensure the maintenance and transit of existing fauna (Mapa de Red de Áreas de Protección y Corredores Biológicos - Reforestadora del Sinu, 2024). Refosinu has established and monitors (through the PRO-PF-19 Procedimiento de Monitoreo) the areas declared as HCV and, when applicable, as high carbon stocks, within the forest management units previously identified in document PL-MF-02, in the RSSC Monitoring Matrix.

In summary, the risk of Refosinu addressed to this indicator is categorized as low.

Sources, Laws and Regulations applicable: - The Forest Law of 1959: <https://www.minambiente.gov.co/wp-content/uploads/2021/08/ley-2-1959.pdf>

- Decree 2811 of 1974, which adopted the National Code of Renewable Natural Resources (Código Nacional de Recursos Naturales Renovables y de Protección al Medio Ambiente): <https://www.minambiente.gov.co/wp-content/uploads/2021/10/Decreto-2811-de-1974.pdf>

- The 1993 General Environment Law (Ley General Ambiental; Ley 99), which adopted the National Environmental System: [https://www.oas.org/dsd/fida/laws/legislation/colombia/colombia_99-93.pdf](https://www.oas.org/dsd/fida/laws/legislation/colombia/colombia_99-93.pdf)

- Decree 1791 of 1996, which adopted a forest harvesting regime: [https://archivo.minambiente.gov.co/images/BosquesBiodiversidadyServiciosEcosistemicos/pdf/Normativa/Decretos/dec_1791_041096.pdf](https://archivo.minambiente.gov.co/images/BosquesBiodiversidadyServiciosEcosistemicos/pdf/Normativa/Decretos/dec_1791_041096.pdf)

- The National Forestry Development Plan (Plan Nacional de Desarrollo Forestal) published in 2000, which is designed to promote planted

	forests and natural forest management: [https://archivo.minambiente.gov.co/images/BosquesBiodiversidadyServiciosEcosistemicos/pdf/Plan-Nacional-de-Desarrollo-Forestal/553_plan_nal_des_forestal.pdf][https://archivo.minambiente.gov.co/images/BosquesBiodiversidadyServiciosEcosistemicos/pdf/Plan-Nacional-de-Desarrollo-Forestal/553_plan_nal_des_forestal.pdf] - Law 1377 of 2010, which replaced the 1959 forest law and permits the use of planted forests for production purposes: [https://colombia.justia.com/nacionales/leyes/ley-1377-de-2010/gdoc/][https://colombia.justia.com/nacionales/leyes/ley-1377-de-2010/gdoc/] <u>Legislation Enforcement:</u> Natural forests and plantations are supervised by three levels of authorities: the Ministry of Environment and Sustainable Development (MADS), the Ministry of Agriculture and Rural Development (MADR) and the Regional Autonomous Corporation for Sustainable Development (CAR). MADS formulates policy on the environment and renewable natural resources and establishes the broad guidelines, rules and criteria for the environmental regulation of land use, including forestry (in close collaboration with MADR regarding commercial forest plantations). MADR formulate policy, but also guide and direct the formulation of plans, programs and projects for the development of the agricultural, fisheries and rural development sector. According to Law 1377 (2010), MADR is the main regulating authority for commercial plantation forestry. It formulates policies for commercial forest activities and is also responsible for the implementation of the incentive programme (Certificado de Incentivo Forestal) to enhance the commercial forestry value chain. <u>References to legislation compliance and best practices implemented:</u> - Refosinu FSC FM Certificate. - PL-MF-01 - Plan Maestro de Manejo - Reforestadora del Sinú. Version 11, 13/11/2024. - PRO-PF-19 - Procedimiento de Monitoreo Interno - Reforestadora del Sinú. Version 2, 30/05/2022. - Report on verification of changes in forest cover on properties acquired by Reforestadora del Sinú by Refosinu's Cartography Department. - PL-MF-02 -Plan de Identificación de Atributos de Alto Valor de Conservación - Reforestadora del Sinú. 30/06/2022. - Evaluación y Seguimiento de Altos Valores de Conservación 2024- Reforestadora del Sinú. - Mapa de Red de Áreas de Protección y Corredores Biológicos - Reforestadora del Sinú. 06/2024. - Política Integral - Reforestadora del Sinú - El Estándar Nacional de Manejo Forestal Responsable FSC de Colombia FSC-STD-COL-02-2021 ES.
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(vi)² That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs.

Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:

*(b) **highly biodiverse forest** and other wooded land which is species-rich and not degraded, and has been identified as being highly biodiverse by the relevant competent authority, unless evidence is provided that the production of that raw material did not interfere with those nature protection purposes.*

Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	All of Refosinu forest areas are under FSC Forest Management certification. Refosinu's forestry activities are taken under continuous improvement measures through compliance with Colombian regulations and the social, environmental, and economic guidelines of Sustainable Forest Management, in accordance with the FSC® framework, which promotes environmentally sound, socially beneficial, and economically viable forest management. The Colombian territory hosts different types of forests. Among these are dry tropical forests, Andean forests, gallery forests, mangrove forests, and the majestic tropical rainforests. All of Refosinu's forest areas are of type tropical dry forest (bosque seco tropical). A study was developed by Refosinu's Cartography Department to verify changes in forest cover on the properties acquired by Reforestadora del Sinú Project. The study reviews forest cover in the area where the Refosinu Project is being developed, based on official information for Colombia available from the Institute of Hydrology, Meteorology, and Environmental Studies (IDEAM), which is responsible for managing scientific, hydrological, meteorological, and environmental characterization information in Colombia. IDEAM periodically identifies forest cover and its distribution across Colombian territory through the digital processing and interpretation of remote sensing images. The Non-Forest Forest Cover layer was overlaid with the company's properties to verify changes in forest cover within the project area. This procedure was performed in cartographic information software, which allows for visualization and generation of various graphic outputs. After overlaying the information, the areas classified as Natural Forest by IDEAM were identified, delimited, and calculated. After verifying and analysing the information, the results were obtained by preparing Forest and Non-Forest Analysis plans for each core and time period. These plans show the existence or absence of natural forest, as well as the protection and conservation areas established by the company. These areas are considered areas of increased forest cover due to the care, maintenance, and increase in vegetation cover driven by a natural regeneration process, as well as by the planting and reforestation activities with native species that the company has been carrying out in these areas. Biological corridors have been developed to preserve and ensure the maintenance and transit of existing fauna. This study was done based on what existed in the properties acquired since 1994. Refosinu conducts an annual forest inventory of plantations 1 to 7 years old to obtain information that allows for inferring the value of the company's biological asset. Biological corridors have been developed to preserve and ensure the maintenance and transit of existing fauna (Mapa de Red de Áreas de Protección y Corredores Biológicos - Reforestadora del Sinu, 2024). Refosinu has established and monitors (through the PRO-PF-19 Procedimiento de Monitoreo) the areas declared as HCV and, when applicable, as high carbon stocks, within the forest management units previously identified in document PL-MF-02, in the RSSC Monitoring Matrix. In summary, the risk of Refosinu addressed to this indicator is categorized as low. <u>Sources, Laws and Regulations applicable:</u> - The Forest Law of 1959: https://www.minambiente.gov.co/wp-content/uploads/2021/08/ley-2-1959.pdf - Decree 2811 of 1974, which adopted the National Code of Renewable Natural Resources (Código Nacional de Recursos Naturales Renovables y de Protección al Medio Ambiente): [https://www.minambiente.gov.co/wp-content/uploads/2021/10/Decreto-2811-de-1974.pdf](https://www.minambiente.gov.co/wp-content/uploads/2021/10/Decreto-

	2811-de-1974.pdf) - The 1993 General Environment Law (Ley General Ambiental; Ley 99), which adopted the National Environmental System: https://www.oas.org/dsd/fida/laws/legislation/colombia/colombia_99-93.pdf - Decree 1791 of 1996, which adopted a forest harvesting regime: https://archivo.minambiente.gov.co/images/BosquesBiodiversidadYServiciosEcosistemas/pdf/Normativa/Decretos/dec_1791_041096.pdf- The National Forestry Development Plan (Plan Nacional de Desarrollo Forestal) published in 2000, which is designed to promote planted forests and natural forest management: https://archivo.minambiente.gov.co/images/BosquesBiodiversidadYServiciosEcosistemas/pdf/Plan-Nacional-de-Desarrollo-Forestal/553_plan_nal_des_forestal.pdf- Law 1377 of 2010, which replaced the 1959 forest law and permits the use of planted forests for production purposes: https://colombia.justia.com/nacionales/leyes/ley-1377-de-2010/gdoc/<u>Legislation Enforcement:</u> Natural forests and plantations are supervised by three levels of authorities: the Ministry of Environment and Sustainable Development (MADS), the Ministry of Agriculture and Rural Development (MADR) and the Regional Autonomous Corporation for Sustainable Development (CAR). MADS formulates policy on the environment and renewable natural resources and establishes the broad guidelines, rules and criteria for the environmental regulation of land use, including forestry (in close collaboration with MADR regarding commercial forest plantations). MADR formulate policy, but also guide and direct the formulation of plans, programs and projects for the development of the agricultural, fisheries and rural development sector. According to Law 1377 (2010), MADR is the main regulating authority for commercial plantation forestry. It formulates policies for commercial forest activities and is also responsible for the implementation of the incentive programme (Certificado de Incentivo Forestal) to enhance the commercial forestry value chain. <u>References to legislation compliance and best practices implemented</u>: - Refosinu FSC FM Certificate. - PL-MF-01 - Plan Maestro de Manejo - Reforestadora del Sinú. Version 11, 13/11/2024. - PRO-PF-19 - Procedimiento de Monitoreo Interno - Reforestadora del Sinú. Version 2, 30/05/2022. - Report on verification of changes in forest cover on properties acquired by Reforestadora del Sinú by Refosinu's Cartography Department. - PL-MF-02 -Plan de Identificación de Atributos de Alto Valor de Conservación - Reforestadora del Sinú. 30/06/2022. - Evaluación y Seguimiento de Altos Valores de Conservación 2024- Reforestadora del Sinú. - Mapa de Red de Áreas de Protección y Corredores Biológicos - Reforestadora del Sinú. 06/2024. - Política Integral - Reforestadora del Sinú - El Estándar Nacional de Manejo Forestal Responsable FSC de Colombia FSC-STD-COL-02-2021 ES.
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(vi)³ That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs.

Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:

*(d) **highly biodiverse grassland** spanning more than one hectare that is: (i) natural, namely grassland that would remain grassland in the absence of human intervention and that maintains the natural species composition and ecological characteristics and processes; or (ii) non-natural, namely grassland that would cease to be grassland in the absence of human intervention and that is species-rich and not degraded and has been identified as being highly biodiverse by the*

relevant competent authority, unless evidence is provided that the harvesting of the raw material is necessary to preserve its status as highly biodiverse grassland.

Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	All of Refosinu forest areas are under FSC Forest Management certification. Refosinu's forestry activities are taken under continuous improvement measures through compliance with Colombian regulations and the social, environmental, and economic guidelines of Sustainable Forest Management, in accordance with the FSC® framework, which promotes environmentally sound, socially beneficial, and economically viable forest management. The Colombian territory hosts different types of forests. Among these are dry tropical forests, Andean forests, gallery forests, mangrove forests, and the majestic tropical rainforests. All of Refosinu's forest areas are of type tropical dry forest (bosque seco tropical). A study was developed by Refosinu's Cartography Department to verify changes in forest cover on the properties acquired by Reforestadora del Sinú Project. The study reviews forest cover in the area where the Refosinu Project is being developed, based on official information for Colombia available from the Institute of Hydrology, Meteorology, and Environmental Studies (IDEAM), which is responsible for managing scientific, hydrological, meteorological, and environmental characterization information in Colombia. IDEAM periodically identifies forest cover and its distribution across Colombian territory through the digital processing and interpretation of remote sensing images. The Non-Forest Forest Cover layer was overlaid with the company's properties to verify changes in forest cover within the project area. This procedure was performed in cartographic information software, which allows for visualization and generation of various graphic outputs. After overlaying the information, the areas classified as Natural Forest by IDEAM were identified, delimited, and calculated. After verifying and analysing the information, the results were obtained by preparing Forest and Non-Forest Analysis plans for each core and time period. These plans show the existence or absence of natural forest, as well as the protection and conservation areas established by the company. These areas are considered areas of increased forest cover due to the care, maintenance, and increase in vegetation cover driven by a natural regeneration process, as well as by the planting and reforestation activities with native species that the company has been carrying out in these areas. Biological corridors have been developed to preserve and ensure the maintenance and transit of existing fauna. This study was done based on what existed in the properties acquired since 1994. Refosinu conducts an annual forest inventory of plantations 1 to 7 years old to obtain information that allows for inferring the value of the company's biological asset. Biological corridors have been developed to preserve and ensure the maintenance and transit of existing fauna (Mapa de Red de Áreas de Protección y Corredores Biológicos - Reforestadora del Sinú, 2024). Refosinu has established and monitors (through the PRO-PF-19 Procedimiento de Monitoreo) the areas declared as HCV and, when applicable, as high carbon stocks, within the forest management units previously identified in document PL-MF-02, in the RSSC Monitoring Matrix. In summary, the risk of Refosinu addressed to this indicator is categorized as low. Sources, Laws and Regulations applicable: - The Forest Law of 1959: https://www.minambiente.gov.co/wp-content/uploads/2021/08/ley-2-1959.pdf - Decree 2811 of 1974, which adopted the National Code of Renewable Natural Resources (Código Nacional de Recursos Naturales Renovables y de Protección al Medio Ambiente): [https://www.minambiente.gov.co/wp-content/uploads/2021/08/ley-2-1959.pdf]

content/uploads/2021/10/Decreto-2811-de-1974.pdf](https://www.minambiente.gov.co/wp-content/uploads/2021/10/Decreto-2811-de-1974.pdf) - The 1993 General Environment Law (Ley General Ambiental; Ley 99), which adopted the National Environmental System: https://www.oas.org/dsd/fida/laws/legislation/colombia/colombia_99-93.pdf - Decree 1791 of 1996, which adopted a forest harvesting regime: https://archivo.minambiente.gov.co/images/BosquesBiodiversidadYServiciosEcosistemas/pdf/Normativa/Decretos/dec_1791_041096.pdf - The National Forestry Development Plan (Plan Nacional de Desarrollo Forestal) published in 2000, which is designed to promote planted forests and natural forest management: https://archivo.minambiente.gov.co/images/BosquesBiodiversidadYServiciosEcosistemas/pdf/Plan-Nacional-de-Desarrollo-Forestal/553_plan_nal_des_forestal.pdf - Law 1377 of 2010, which replaced the 1959 forest law and permits the use of planted forests for production purposes: https://colombia.justia.com/nacionales/leyes/ley-1377-de-2010/gdoc/ - Legislation Enforcement: Natural forests and plantations are supervised by three levels of authorities: the Ministry of Environment and Sustainable Development (MADS), the Ministry of Agriculture and Rural Development (MADR) and the Regional Autonomous Corporation for Sustainable Development (CAR). MADS formulates policy on the environment and renewable natural resources and establishes the broad guidelines, rules and criteria for the environmental regulation of land use, including forestry (in close collaboration with MADR regarding commercial forest plantations). MADR formulate policy, but also guide and direct the formulation of plans, programs and projects for the development of the agricultural, fisheries and rural development sector. According to Law 1377 (2010), MADR is the main regulating authority for commercial plantation forestry. It formulates policies for commercial forest activities and is also responsible for the implementation of the incentive programme (Certificado de Incentivo Forestal) to enhance the commercial forestry value chain.

References to legislation compliance and best practices implemented: - Refosinu FSC FM Certificate. - PL-MF-01 - Plan Maestro de Manejo - Reforestadora del Sinú. Version 11, 13/11/2024. - PRO-PF-19 - Procedimiento de Monitoreo Interno - Reforestadora del Sinú. Version 2, 30/05/2022. - Report on verification of changes in forest cover on properties acquired by Reforestadora del Sinú by Refosinu's Cartography Department. - PL-MF-02 - Plan de Identificación de Atributos de Alto Valor de Conservación - Reforestadora del Sinú. 30/06/2022. - Evaluación y Seguimiento de Altos Valores de Conservación 2024- Reforestadora del Sinú. - Mapa de Red de Áreas de Protección y Corredores Biológicos - Reforestadora del Sinú. 06/2024. - Política Integral - Reforestadora del Sinú - El Estándar Nacional de Manejo Forestal Responsable FSC de Colombia FSC-STD-COL-02-2021 ES.

(vi)⁴ That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs.

Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:

(e) heathland - Biomass Producer shall use the official definition for Heathland used in the applicable feedstock origin

country. In the absence of such a definition, then the following definition shall be applied: Vegetation with low and closed cover, dominated by bushes, shrubs, dwarf shrubs (heather, briars, broom, gorse, laburnum etc.) and herbaceous plants, forming a climax stage of development (Source: EU Copernicus).

Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	All of Refosinu forest areas are under FSC Forest Management certification. Refosinu's forestry activities are taken under continuous improvement measures through compliance with Colombian regulations and the social, environmental, and economic guidelines of Sustainable Forest Management, in accordance with the FSC® framework, which promotes environmentally sound, socially beneficial, and economically viable forest management. The Colombian territory hosts different types of forests. Among these are dry tropical forests, Andean forests, gallery forests, mangrove forests, and the majestic tropical rainforests. All of Refosinu's forest areas are of type tropical dry forest (bosque seco tropical). A study was developed by Refosinu's Cartography Department to verify changes in forest cover on the properties acquired by Reforestadora del Sinú Project. The study reviews forest cover in the area where the Refosinu Project is being developed, based on official information for Colombia available from the Institute of Hydrology, Meteorology, and Environmental Studies (IDEAM), which is responsible for managing scientific, hydrological, meteorological, and environmental characterization information in Colombia. IDEAM periodically identifies forest cover and its distribution across Colombian territory through the digital processing and interpretation of remote sensing images. The Non-Forest Forest Cover layer was overlaid with the company's properties to verify changes in forest cover within the project area. This procedure was performed in cartographic information software, which allows for visualization and generation of various graphic outputs. After overlaying the information, the areas classified as Natural Forest by IDEAM were identified, delimited, and calculated. After verifying and analysing the information, the results were obtained by preparing Forest and Non-Forest Analysis plans for each core and time period. These plans show the existence or absence of natural forest, as well as the protection and conservation areas established by the company. These areas are considered areas of increased forest cover due to the care, maintenance, and increase in vegetation cover driven by a natural regeneration process, as well as by the planting and reforestation activities with native species that the company has been carrying out in these areas. Biological corridors have been developed to preserve and ensure the maintenance and transit of existing fauna. This study was done based on what existed in the properties acquired since 1994. Refosinu conducts an annual forest inventory of plantations 1 to 7 years old to obtain information that allows for inferring the value of the company's biological asset. Biological corridors have been developed to preserve and ensure the maintenance and transit of existing fauna (Mapa de Red de Áreas de Protección y Corredores Biológicos - Reforestadora del Sinu, 2024). Refosinu has established and monitors (through the PRO-PF-19 Procedimiento de Monitoreo) the areas declared as HCV and, when applicable, as high carbon stocks, within the forest management units previously identified in document PL-MF-02, in the RSSC Monitoring Matrix. In summary, the risk of Refosinu addressed to this indicator is categorized as low. <u>Sources, Laws and Regulations applicable:</u> - The Forest Law of 1959: (https://www.minambiente.gov.co/wp-content/uploads/2021/08/ley-2-1959.pdf) (https://www.minambiente.gov.co/wp-content/uploads/2021/08/ley-2-1959.pdf) - Decree 2811 of 1974, which adopted the National Code of Renewable Natural Resources (Código Nacional de Recursos Naturales Renovables y de Protección al Medio

	Ambiente): https://www.minambiente.gov.co/wp-content/uploads/2021/10/Decreto-2811-de-1974.pdf - The 1993 General Environment Law (Ley General Ambiental; Ley 99), which adopted the National Environmental System: https://www.oas.org/dsd/fida/laws/legislation/colombia/colombia_99-93.pdf - Decree 1791 of 1996, which adopted a forest harvesting regime: https://archivo.minambiente.gov.co/images/BosquesBiodiversidadYServiciosEcosistemas/pdf/Normativa/Decretos/dec_1791_041096.pdf - The National Forestry Development Plan (Plan Nacional de Desarrollo Forestal) published in 2000, which is designed to promote planted forests and natural forest management: https://archivo.minambiente.gov.co/images/BosquesBiodiversidadYServiciosEcosistemas/pdf/Plan-Nacional-de-Desarrollo-Forestal/553_plan_nal_des_forestal.pdf - Law 1377 of 2010, which replaced the 1959 forest law and permits the use of planted forests for production purposes: https://colombia.justia.com/nacionales/leyes/ley-1377-de-2010/gdoc/ - Legislation Enforcement: Natural forests and plantations are supervised by three levels of authorities: the Ministry of Environment and Sustainable Development (MADS), the Ministry of Agriculture and Rural Development (MADR) and the Regional Autonomous Corporation for Sustainable Development (CAR). MADS formulates policy on the environment and renewable natural resources and establishes the broad guidelines, rules and criteria for the environmental regulation of land use, including forestry (in close collaboration with MADR regarding commercial forest plantations). MADR formulate policy, but also guide and direct the formulation of plans, programs and projects for the development of the agricultural, fisheries and rural development sector. According to Law 1377 (2010), MADR is the main regulating authority for commercial plantation forestry. It formulates policies for commercial forest activities and is also responsible for the implementation of the incentive programme (Certificado de Incentivo Forestal) to enhance the commercial forestry value chain. References to legislation compliance and best practices implemented: - Refosinu FSC FM Certificate. - PL-MF-01 - Plan Maestro de Manejo - Reforestadora del Sinú. Version 11, 13/11/2024. - PRO-PF-19 - Procedimiento de Monitoreo Interno - Reforestadora del Sinú. Version 2, 30/05/2022. - Report on verification of changes in forest cover on properties acquired by Reforestadora del Sinú by Refosinu's Cartography Department. - PL-MF-02 -Plan de Identificación de Atributos de Alto Valor de Conservación - Reforestadora del Sinú. 30/06/2022. - Evaluación y Seguimiento de Altos Valores de Conservación 2024- Reforestadora del Sinú. - Mapa de Red de Áreas de Protección y Corredores Biológicos - Reforestadora del Sinú. 06/2024. - Política Integral - Reforestadora del Sinú - El Estándar Nacional de Manejo Forestal Responsable FSC de Colombia FSC-STD-COL-02-2021 ES.
(vi)⁵ That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs. Article 29 (4): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with high-carbon stock, namely land that had one of the following statuses in January 2008 and no longer has that status: (a) wetlands, namely land that is covered with or saturated by water permanently or for a significant part of the year (NOTE: Evidence of verification of wetlands should reflect seasonal changes within a year).	

Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	All of Refosinu forest areas are under FSC Forest Management certification. Refosinu's forestry activities are taken under continuous improvement measures through compliance with Colombian regulations and the social, environmental, and economic guidelines of Sustainable Forest Management, in accordance with the FSC® framework, which promotes environmentally sound, socially beneficial, and economically viable forest management. The Colombian territory hosts different types of forests. Among these are dry tropical forests, Andean forests, gallery forests, mangrove forests, and the majestic tropical rainforests. All of Refosinu's forest areas are of type tropical dry forest (bosque seco tropical). A study was developed by Refosinu's Cartography Department to verify changes in forest cover on the properties acquired by Reforestadora del Sinú Project. The study reviews forest cover in the area where the Refosinu Project is being developed, based on official information for Colombia available from the Institute of Hydrology, Meteorology, and Environmental Studies (IDEAM), which is responsible for managing scientific, hydrological, meteorological, and environmental characterization information in Colombia. IDEAM periodically identifies forest cover and its distribution across Colombian territory through the digital processing and interpretation of remote sensing images. The Non-Forest Forest Cover layer was overlaid with the company's properties to verify changes in forest cover within the project area. This procedure was performed in cartographic information software, which allows for visualization and generation of various graphic outputs. After overlaying the information, the areas classified as Natural Forest by IDEAM were identified, delimited, and calculated. After verifying and analysing the information, the results were obtained by preparing Forest and Non-Forest Analysis plans for each core and time period. These plans show the existence or absence of natural forest, as well as the protection and conservation areas established by the company. These areas are considered areas of increased forest cover due to the care, maintenance, and increase in vegetation cover driven by a natural regeneration process, as well as by the planting and reforestation activities with native species that the company has been carrying out in these areas. Biological corridors have been developed to preserve and ensure the maintenance and transit of existing fauna. This study was done based on what existed in the properties acquired since 1994. Refosinu conducts an annual forest inventory of plantations 1 to 7 years old to obtain information that allows for inferring the value of the company's biological asset. Biological corridors have been developed to preserve and ensure the maintenance and transit of existing fauna (Mapa de Red de Áreas de Protección y Corredores Biológicos - Reforestadora del Sinú, 2024). Refosinu has established and monitors (through the PRO-PF-19 Procedimiento de Monitoreo) the areas declared as HCV and, when applicable, as high carbon stocks, within the forest management units previously identified in document PL-MF-02, in the RSSC Monitoring Matrix. In summary, the risk of Refosinu addressed to this indicator is categorized as low. <u>Sources, Laws and Regulations applicable:</u> - The Forest Law of 1959: https://www.minambiente.gov.co/wp-content/uploads/2021/08/ley-2-1959.pdf - Decree 2811 of 1974, which adopted the National Code of Renewable Natural Resources (Código Nacional de Recursos Naturales Renovables y de Protección al Medio Ambiente): [https://www.minambiente.gov.co/wp-content/uploads/2021/08/ley-2-1959.pdf]

	content/uploads/2021/10/Decreto-2811-de-1974.pdf](https://www.minambiente.gov.co/wp-content/uploads/2021/10/Decreto-2811-de-1974.pdf) - The 1993 General Environment Law (Ley General Ambiental; Ley 99), which adopted the National Environmental System: https://www.oas.org/dsd/fida/laws/legislation/colombia/colombia_99-93.pdf - Decree 1791 of 1996, which adopted a forest harvesting regime: https://archivo.minambiente.gov.co/images/BosquesBiodiversidadYServiciosEcosistemas/pdf/Normativa/Decretos/dec_1791_041096.pdf - The National Forestry Development Plan (Plan Nacional de Desarrollo Forestal) published in 2000, which is designed to promote planted forests and natural forest management: https://archivo.minambiente.gov.co/images/BosquesBiodiversidadYServiciosEcosistemas/pdf/Plan-Nacional-de-Desarrollo-Forestal/553_plan_nal_des_forestal.pdf - Law 1377 of 2010, which replaced the 1959 forest law and permits the use of planted forests for production purposes: https://colombia.justia.com/nacionales/leyes/ley-1377-de-2010/gdoc/<u>Legislation Enforcement:</u> Natural forests and plantations are supervised by three levels of authorities: the Ministry of Environment and Sustainable Development (MADS), the Ministry of Agriculture and Rural Development (MADR) and the Regional Autonomous Corporation for Sustainable Development (CAR). MADS formulates policy on the environment and renewable natural resources and establishes the broad guidelines, rules and criteria for the environmental regulation of land use, including forestry (in close collaboration with MADR regarding commercial forest plantations). MADR formulate policy, but also guide and direct the formulation of plans, programs and projects for the development of the agricultural, fisheries and rural development sector. According to Law 1377 (2010), MADR is the main regulating authority for commercial plantation forestry. It formulates policies for commercial forest activities and is also responsible for the implementation of the incentive programme (Certificado de Incentivo Forestal) to enhance the commercial forestry value chain. <u>References to legislation compliance and best practices implemented</u>: - Refosinu FSC FM Certificate. - PL-MF-01 - Plan Maestro de Manejo - Reforestadora del Sinú. Version 11, 13/11/2024. - PRO-PF-19 - Procedimiento de Monitoreo Interno - Reforestadora del Sinú. Version 2, 30/05/2022. - Report on verification of changes in forest cover on properties acquired by Reforestadora del Sinú by Refosinu's Cartography Department. - PL-MF-02 -Plan de Identificación de Atributos de Alto Valor de Conservación - Reforestadora del Sinú. 30/06/2022. - Evaluación y Seguimiento de Altos Valores de Conservación 2024- Reforestadora del Sinú. - Mapa de Red de Áreas de Protección y Corredores Biológicos - Reforestadora del Sinú. 06/2024. - Política Integral - Reforestadora del Sinú - El Estándar Nacional de Manejo Forestal Responsable FSC de Colombia FSC-STD-COL-02-2021 ES.
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(vi)⁶ That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs.

*Article 29 (5): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land that was **peatland** in January 2008, unless evidence is provided that the cultivation and harvesting of that raw material does not involve drainage of previously undrained soil. For a peatland that was partially drained in January 2008, a subsequent deeper drainage, affecting soil that was not fully drained, would constitute a breach of the criterion.*

Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	All of Refosinu forest areas are under FSC Forest Management certification. Refosinu's forestry activities are taken under continuous improvement measures through compliance with Colombian regulations and the social, environmental, and economic guidelines of Sustainable Forest Management, in accordance with the FSC® framework, which promotes environmentally sound, socially beneficial, and economically viable forest management. The Colombian territory hosts different types of forests. Among these are dry tropical forests, Andean forests, gallery forests, mangrove forests, and the majestic tropical rainforests. All of Refosinu's forest areas are of type tropical dry forest (bosque seco tropical). A study was developed by Refosinu's Cartography Department to verify changes in forest cover on the properties acquired by Reforestadora del Sinú Project. The study reviews forest cover in the area where the Refosinu Project is being developed, based on official information for Colombia available from the Institute of Hydrology, Meteorology, and Environmental Studies (IDEAM), which is responsible for managing scientific, hydrological, meteorological, and environmental characterization information in Colombia. IDEAM periodically identifies forest cover and its distribution across Colombian territory through the digital processing and interpretation of remote sensing images. The Non-Forest Forest Cover layer was overlaid with the company's properties to verify changes in forest cover within the project area. This procedure was performed in cartographic information software, which allows for visualization and generation of various graphic outputs. After overlaying the information, the areas classified as Natural Forest by IDEAM were identified, delimited, and calculated. After verifying and analysing the information, the results were obtained by preparing Forest and Non-Forest Analysis plans for each core and time period. These plans show the existence or absence of natural forest, as well as the protection and conservation areas established by the company. These areas are considered areas of increased forest cover due to the care, maintenance, and increase in vegetation cover driven by a natural regeneration process, as well as by the planting and reforestation activities with native species that the company has been carrying out in these areas. Biological corridors have been developed to preserve and ensure the maintenance and transit of existing fauna. This study was done based on what existed in the properties acquired since 1994. Refosinu conducts an annual forest inventory of plantations 1 to 7 years old to obtain information that allows for inferring the value of the company's biological asset. Biological corridors have been developed to preserve and ensure the maintenance and transit of existing fauna (Mapa de Red de Áreas de Protección y Corredores Biológicos - Reforestadora del Sinu, 2024). Refosinu has established and monitors (through the PRO-PF-19 Procedimiento de Monitoreo) the areas declared as HCV and, when applicable, as high carbon stocks, within the forest management units previously identified in document PL-MF-02, in the RSSC Monitoring Matrix. In summary, the risk of Refosinu addressed to this indicator is categorized as low. Sources, Laws and Regulations applicable: - The Forest Law of 1959: https://www.minambiente.gov.co/wp-content/uploads/2021/08/ley-2-1959.pdf - Decree 2811 of 1974, which adopted the National Code of Renewable Natural Resources (Código Nacional de Recursos Naturales Renovables y de Protección al Medio Ambiente): https://www.minambiente.gov.co/wp-content/uploads/2021/10/Decreto-2811-de-1974.pdf - The 1993 General Environment Law (Ley General Ambiental; Ley 99), which adopted the National Environmental

	System: https://www.oas.org/dsd/fida/laws/legislation/colombia/colombia_99-93.pdf - Decree 1791 of 1996, which adopted a forest harvesting regime: https://archivo.minambiente.gov.co/images/BosquesBiodiversidadYServiciosEcosistemas/pdf/Normativa/Decretos/dec_1791_041096.pdf- The National Forestry Development Plan (Plan Nacional de Desarrollo Forestal) published in 2000, which is designed to promote planted forests and natural forest management: https://archivo.minambiente.gov.co/images/BosquesBiodiversidadYServiciosEcosistemas/pdf/Plan-Nacional-de-Desarrollo-Forestal/553_plan_nal_des_forestal.pdf- Law 1377 of 2010, which replaced the 1959 forest law and permits the use of planted forests for production purposes: https://colombia.justia.com/nacionales/leyes/ley-1377-de-2010/gdoc/<u>Legislation Enforcement:</u> Natural forests and plantations are supervised by three levels of authorities: the Ministry of Environment and Sustainable Development (MADS), the Ministry of Agriculture and Rural Development (MADR) and the Regional Autonomous Corporation for Sustainable Development (CAR). MADS formulates policy on the environment and renewable natural resources and establishes the broad guidelines, rules and criteria for the environmental regulation of land use, including forestry (in close collaboration with MADR regarding commercial forest plantations). MADR formulate policy, but also guide and direct the formulation of plans, programs and projects for the development of the agricultural, fisheries and rural development sector. According to Law 1377 (2010), MADR is the main regulating authority for commercial plantation forestry. It formulates policies for commercial forest activities and is also responsible for the implementation of the incentive programme (Certificado de Incentivo Forestal) to enhance the commercial forestry value chain. <u>References to legislation compliance and best practices implemented</u>: - Refosinu FSC FM Certificate. - PL-MF-01 - Plan Maestro de Manejo - Reforestadora del Sinú. Version 11, 13/11/2024. - PRO-PF-19 - Procedimiento de Monitoreo Interno - Reforestadora del Sinú. Version 2, 30/05/2022. - Report on verification of changes in forest cover on properties acquired by Reforestadora del Sinú by Refosinu's Cartography Department. - PL-MF-02 -Plan de Identificación de Atributos de Alto Valor de Conservación - Reforestadora del Sinú. 30/06/2022. - Evaluación y Seguimiento de Altos Valores de Conservación 2024- Reforestadora del Sinú. - Mapa de Red de Áreas de Protección y Corredores Biológicos - Reforestadora del Sinú. 06/2024. - Política Integral - Reforestadora del Sinú - El Estándar Nacional de Manejo Forestal Responsable FSC de Colombia FSC-STD-COL-02-2021 ES.
(vii) that installations producing biomass fuels from forest biomass, issue a statement of assurance, underpinned by company-level internal processes, for the purpose of the audits conducted pursuant to Article 30(3), that the forest biomass is not sourced from the lands referred to in point (vi).	
Type of Risk Assessment used	☒Level A – proof at national or sub-national level ☐Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	<i>Not applicable, requirement only applies to Level A</i>

LULUCF criteria 29(7)	
Type of Risk Assessment used	☒ Level A – proof at national or sub-national level ☐ Level B – management system at forest sourcing area level
Level A risk assessment description	SBP-endorsed REDII Level A risk assessment for Article 29(7) LULUCF
Level B management system at the level of the forest sourcing area	N/A

Annex 2a: EU RED II Supply Base Evaluation

Annex 3: SBP Processing residues and/or Post-consumer feedstock requirements

☒ Not Applicable (Processing Residues and/or post-consumer feedstock not used)

Verification and monitoring of suppliers

N/A

Feedstock inspection and classification upon receipt

N/A

Supplier audit for processing residues and post-consumer feedstock

N/A

Annex 4: EU RED detailed findings for Trees Outside Forest (TOF) feedstock

NOTE: For “Trees outside forests (TOF) – Urban and landscape feedstock” no EU RED sustainability requirements apply, only the GHG savings criteria apply (SBP EU RED Bridging ID v2.0 Section 1.1). The land use category in this case is neither forest land nor agricultural land. For “Trees outside forests (TOF) – Agricultural land feedstock” the applicable criteria are Article 29 paragraphs (2)-(5).

Not Applicable (RED II TOF not included)

Annex 4a: RED II detailed findings for Trees Outside Forest (TOF) feedstock

NOTE: For “Trees outside forests (TOF) – Urban and landscape feedstock” no REDII sustainability requirements apply, only the GHG savings criteria apply (SBP REDII Bridging ID Section 4.2). The land use category in this case is neither forest land nor agricultural land. For “Trees outside forests (TOF) – Agricultural land feedstock” the applicable criteria are Article 29 paragraphs (2)-(5).