













GRI REFERENCE TABLE

Corporate Citizenship confirms that in its view, GAR's Sustainability Report 2010 meets the requirements of Application Level B.

COLOUR KEY		ABBREVIATIONS	
	Organisational Profile Disclosures		Fully Meets GRI Detailed Requirements
	Management Approach Disclosures		Addresses But Does Not Fully Meet GRI Detailed Requirements
	Core Performance Indicators		
	Additional Performance Indicators		
		<i>AR2010</i>	GAR Annual Report 2010
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GRI G3 Guidelines		Level of Reporting	Comment
1.1	Statement from the CEO		Pages 2-3 <i>SR2010</i>
1.2	Description of key impacts, risks and opportunities		Note 4 <i>Financial Risks Management</i> pages 28-31 <i>Consolidated Financial Statements AR2010</i> For non-financial risks, see <i>Risk Factors</i> pages 40-41 <i>SMART Annual Report 2010</i> . The following risks are discussed: 1. Fluctuations in the pricing of our products 2. Revocation or restriction of land rights granted by the Indonesian Government 3. Poor weather conditions 4. Dependency on retaining key personnel and attracting additional qualified persons
2.1	Name of reporting organisation		Golden Agri-Resources Ltd
2.2	Primary brands products and/or services. The reporting organisation should indicate the nature of its role in providing these products and services, and the degree to which it utilises outsourcing		Pages 16-18 <i>AR2010</i> <i>Meeting Consumer Needs</i> page 50 <i>SR2010</i>
2.3	Operating structure of the organisation including major divisions, operating companies, subsidiaries and joint ventures		Note 44 <i>Group Companies</i> pages 70-80 <i>Consolidated Financial Statements AR2010</i>
2.4	Location of organisation's headquarters		c/o 108 Pasir Panjang Road, #06-00 Golden Agri Plaza Singapore 118535
2.5	Number of countries where the organisation operates, and names of countries with either major operations or that are specifically relevant to the sustainability issues covered in the report		Note 44 <i>Group Companies</i> pages 70-80 <i>Consolidated Financial Statements AR2010</i>
2.6	Nature of ownership and legal form		Limited company incorporated in Mauritius
2.7	Markets served (including geographical breakdown, sectors served, types of customers/beneficiaries)		<i>Customer Relations</i> pages 47-48 <i>SR2010</i>
2.8	Scale of reporting organisation, including number of employees, net sales (for private sector organisations) or net revenues (for public sector organisations; total capitalisation broken down in terms of debt and equity (for private sector organisations) and quantity of products and services provided. Companies are encouraged to provide further information, such as: total assets; breakdowns by country/region of sales/revenues that make up 5% or more of total revenues and employees		Information throughout pages 14-18 <i>AR2010</i> Charts throughout <i>About GAR</i> pages 5-7 <i>SR2010</i> Charts regarding <i>Employees</i> page 29 <i>SR2010</i> Chart <i>Revenue by Country</i> page 48 <i>SR2010</i> <i>Corporate Profile</i> page 1 <i>AR2010</i> for information on capacity
2.9	Significant changes during the reporting period regarding size, structure or ownership, including: the location of, or changes in operations including facility openings, closings and expansions; and changes in the share capital structure and other capital formation, maintenance and alteration operations		Not relevant as this is GAR's first report

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2.10	Awards received in the reporting period		GAR did not receive any awards in 2010, but SMART received the following four: 1. Primaniyarta 2010 Award given by the Indonesian Ministry of Trade to exporters for their achievements in increasing non-oil and gas exports 2. Award for processing and marketing of agriculture products 2010 awarded by the Indonesian Department of Agriculture 3. Indonesian Most Admired Knowledge Enterprises ("MAKE") Award 2010 4. Award for special recognition for accomplishment in creating a learning organisation
3.1	Reporting period for information provided		Calendar year 2010
3.2	Date of most recent report if any		None, 2010 is the first sustainability report
3.3	Reporting cycle		<i>Reporting Cycle</i> inside Front Cover <i>SR2010</i>
3.4	Contact point for questions regarding the report and its context		Inside Back Cover <i>SR2010</i>
3.5	Process for defining report content, including determining materiality, prioritising topics within the report and identifying stakeholders the organisation expects to use the report. Include an explanation of how the organisation has applied the <i>Guidance on Defining Report Content and the associated principles</i>		<i>Reporting Standards, Inclusivity, Materiality and Responsiveness</i> inside Front Cover <i>SR2010</i>
3.6	Boundary of the report (e.g. countries, divisions, subsidiaries, leased facilities, joint ventures, suppliers) See GRI Boundary Protocol for further guidance		<i>Scope</i> inside Front Cover <i>SR2010</i>
3.7	State any specific limitations on the scope of the report. If boundary and scope do not address the full range of material economic, environmental, and social impacts of the organisation, state the strategy and the projected timeline for providing complete coverage		All material issues addressed
3.8	Basis for reporting on joint ventures, subsidiaries, leased facilities, outsourced operations, and other entities that can significantly affect comparability from period to period and/or between organisations		<i>Scope</i> Inside Front Cover <i>SR2010</i>
3.9	Data measurement techniques and the bases of calculations, including assumptions and techniques underlying estimations applied to the compilation of the indicators and other information in the report. Explain any decisions not to apply, or to substantially diverge from, the GRI Indicator Protocols		No estimated data
3.10	Explanation of the effect of any re-statements of information provided in earlier reports, and the reasons for such restatement (e.g. mergers/acquisitions, change of base year/periods, nature of business, measurement methods)		None as this is the first sustainability report
3.11	Significant changes from previous reporting periods in the scope, boundary or measurement methods applied in the report		None as this is the first sustainability report
3.12	GRI Context Index Table identifying the location of the Standard Disclosures in the report. Identify the page number or weblinks where the following can be found: Strategy and analysis 1.1-1.2; Organisational profile 2.1-2.10; Report parameters 3.1-3.13; Governance, commitments and engagement 4.1-4.17; Disclosure of management approach per category; Core performance indicators; Any additional GRI indicators that were included; Any GRI sector supplement indicators included in the report		This is the table
3.13	Policy and current practice with regard to seeking independent assurance for the report. If not included in the assurance report accompanying the sustainability report, explain the scope and basis of any independent assurance provided. Also explain the relationship between the reporting organisation and the assurance provider(s)		<i>Assurance</i> inside Front Cover <i>SR2010</i>

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GRI G3 Guidelines		Level of Reporting	Comment
4.1	Governance structure of the organisation, including committees under the highest governance body responsible for specific tasks such as setting strategy or organisational oversight. Describe the mandate and composition (including number of independent members and/or non-executive members) of such committees and indicate any direct responsibility for economic, social and environmental performance		See <i>Corporate Governance</i> pages 26-32 AR2010 <i>The Management of Sustainability</i> page 12 SR2010
4.2	Indicate if the Chair of the highest governance body is also an executive officer and if so their function within the organisation's management and the reasons for this arrangement		The Chairman is also CEO. The reasoning behind this is given on page 28 AR2010
4.3	For organisations that have a unitary board structure, state the number of members of the highest governance body that are independent and/or non-executive directors. State how the organisation defines 'independent' and 'non-executive'. This element applies only for organisations that have unitary board structures.		See table on page 27 AR2010. For definition of independent see top of page 28 AR2010
4.4	Mechanisms for shareholders and employees to provide recommendations or direction to the highest governance body. Include reference to processes regarding: the use of shareholder resolutions or other mechanisms for enabling minority shareholders to express opinions to the highest governance body, and informing and consulting employees about working relationships with formal representation bodies such as organisation level work councils and representation of employees in the highest governance body. Identify topics related to economic, environmental and social performance raised through these mechanisms during the reporting period.		Under the Company's Constitution, any shareholder or shareholders holding not less than one-tenth of the issued share capital of the Company may call a member's meeting.
4.5	Linkage between compensation for members of the highest governance body, senior managers and executives (including departure arrangements) and the organisation's performance (including social and environmental performance)		See <i>Remuneration Committee</i> pages 31-32 AR2010
4.6	Processes for the highest governance body to ensure conflicts of interest are avoided		The Board is also governed under the Constitution of the Company, which disallows a director to vote or be counted in the quorum, in respect of any proposal in which that director has any interest, whether direct or indirect. Such proposals extend to Interested Person Transactions, involving directors and their associates where the "interested director" is debarred from voting at the shareholders' meeting held to seek shareholders approval. Further, under the Company's code of corporate governance, a director is not to be involved in the decision of his own remuneration. The directors are also required to disclose to the Board of Directors, their interest in any transaction/proposed transaction; as well as any other office/position which might create conflicts with their duties as a director.
4.7	Process for determining the qualifications and expertise of the members of the highest governance body for guiding the organisation's strategy on economic, environmental and social topics		The Company's code of corporate governance has stipulated board composition. Further, the Board reviews its size annually and, during that time, has the opportunity to examine its composition. It also conducts an annual review of the Board's performance, and the contribution of each director to the Board's effectiveness.
4.8	Internally developed mission and values statements, codes of conduct, and principles relevant to economic, environmental, and social performance and the status of their implementation. Explain the degree to which these: are applied across the organisation in different regions and department/units; and, relate to internationally agreed standards		<i>Corporate Vision, Values and Governance</i> pages 9-10 SR2010 <i>International Stakeholders and Global Standards</i> page 11 SR2010

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4.9	Procedures of the highest governance body for overseeing the organisation's identification and management of economic, environmental and social performance, including relevant risks and opportunities, and adherence or compliance with internationally agreed standards, codes of conduct and principles. Include frequency with which the highest governance body assesses sustainability performance		<i>The Management of Sustainability</i> page 12 SR2010
4.10	Processes for evaluating the performance of the highest governance body, particularly with respect to economic, environmental and social performance		Page 29 AR2010
4.11	Explanation of whether and how the precautionary approach or principle is addressed by the organisation. Article 15 of the Rio Principles introduced the precautionary approach. A response to 4.11 could address the organisation's approach to risk management in operational planning or the development and introduction of new products		The principle is accepted
4.12	Externally developed economic, environmental and social charters, principles, or other initiatives to which the organisation subscribes or endorses. Include date of adoption, countries/ operations where applied, and the range of stakeholders involved in the development and governance of these initiatives (e.g. multi-stakeholder, etc). Differentiate between non-binding, voluntary initiatives and those with which the organisation has an obligation to comply		<i>International Stakeholders and Global Standards</i> page 11 SR2010
4.13	Significant memberships in associations (such as industry associations) and/or national/international advocacy organisations in which the organisation: has positions in governance bodies, participates in projects or committees, provides substantive funding beyond routine membership dues or views membership as strategic		<i>Engagement with Trade and Similar Associations</i> page 11 SR2010
4.14	List of stakeholder groups engaged by the organisation. Examples of stakeholder groups are communities, civil society, customers, shareholders and providers of capital, suppliers, and employees, other workers and their trade unions		<i>Multi-stakeholder Engagement – Establishing a Common Ground</i> page 3 SR2010 <i>Stakeholder Engagement</i> pages 14-15 SR2010
4.15	Basis for identification and selection of stakeholders to engage. This includes the organisation's process for defining its stakeholder groups, and for determining the groups with which to engage and not to engage		<i>Multi-stakeholder Engagement – Establishing a Common Ground</i> page 3 SR2010 <i>Engagement with Trade and Similar Associations</i> page 11 SR2010 <i>Stakeholder Engagement</i> pages 14-15 SR2010
4.16	Approaches to stakeholder engagement, including frequency of engagement by type and by stakeholder group. This could include surveys, focus groups, community panels, written communication, management/union structures, and other vehicles. The organisation should indicate whether any of the engagement was undertaken as specifically as part of the report preparation process		<i>Proactive Multi-stakeholder Engagement</i> pages 37-38 AR2010 <i>Stakeholder Engagement</i> pages 14-15 SR2010 <i>Engaging Customers Affected by the Greenpeace Campaign</i> page 48 SR2010 <i>Multi-stakeholder Approach to Conflict Resolution</i> page 42 SR2010 <i>Indigenous Peoples</i> page 42 SR2010
4.17	Key topics and concerns that have been raised through stakeholder engagement, and how the organisation has responded to those key issues and concerns, including through its reporting		<i>Multi-stakeholder Engagement – Establishing a Common Ground</i> Page 3 SR2010 <i>Stakeholder Engagement</i> pages 14-15 SR2010 <i>Multi-stakeholder Approach to Conflict Resolution</i> page 42 SR2010

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


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















GRI G3 Guidelines		Level of Reporting	Comment
Economic Management Approach			The economic approach is aimed at sustaining a business profitable for investors, beneficial to the countries of operation and employees. This has to be done by acting in a manner that is sustainable. <i>Supplier Relations</i> for indirect impact page 44 SR2010
EC1	Direct economic value generated and distributed, including revenues, operating costs, employee compensation, donations and other community investments, retained earnings and payments to capital providers and governments (core)		<i>Distribution of GAR Indonesia's Revenue by Stakeholder Group in 2010</i> Page 8 SR 2010 Note 6 Revenue pages 34-35 Consolidated Financial Statements AR2010 Note 7 Cost of Sales and Notes 8 and 9 Expenses page 35-36 Consolidated Financial Statements AR2010
EC3	Coverage of the organisation's defined benefit plan obligations (core)		Note 37 Post Employment Benefits Liability and Share-Based Payment pages 60-61 Consolidated Financial Statements AR2010
EC4	Significant financial assistance received from government (core)		Our Singapore trading company enjoys a concessionary tax rate of 5% on qualifying trade income under the Global Traders Programme ("GTP"). We do not receive any significant financial assistance from the Singapore government other than this concessionary tax rate. <i>Note: GTP encourages global trading companies to use Singapore as their regional or global base to conduct activities along the total trade value-add chain from procurement to distribution, in order to expand into the region and beyond.</i>
EC6	Policy, practices and proportion of spending on locally based suppliers at significant locations of operation (core)		<i>Spending on Upstream Suppliers</i> page 44 SR2010
Environmental Management Approach			The nature of GAR's business means that it faces a very distinctive set of environmental challenges particularly with regard to land use and the proper stewardship of forest land. The background issues are addressed in <i>Palm Oil in Context</i> and <i>The Scope of Our Environmental Responsibility</i> page 17 SR2010. How these challenges are systematically addressed is explained in the following section <i>Managing Sustainability in Our Plantations</i> pages 18-24 SR2010
EN3	Direct energy consumption by primary energy source (core)		<i>Reducing Greenhouse Gas Emissions</i> page 22 SR2010
EN4	Indirect energy consumption by primary source (core)		<i>Reducing Greenhouse Gas Emissions</i> page 22 SR2010
EN8	Total water withdrawn by source (core)		<i>Water Use</i> page 22 SR2010
EN11	Location and size of land owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas (core)		<i>The IUCN Red List of Threatened Species for Indonesia Identified in Our Concessions</i> page 20 SR2010
EN12	Description of significant impacts of activities, products and services on biodiversity in protected areas and areas of high biodiversity value outside protected areas (core)		<i>High Conservation Value Areas and Biodiversity in Indonesia and Our Plantations</i> pages 19-21 SR2010
EN14	Strategies, current actions, and future plans for managing impacts on diversity (additional)		<i>High Conservation Value Areas and Biodiversity in Indonesia and Our Plantations</i> pages 19-21 SR2010
EN15	Number of IUCN Red List species and national conservation list species with habitats in areas affected by operations, by level of extinction risk (additional)		<i>The IUCN Red List of Threatened Species for Indonesia Identified in Our Concessions</i> page 20 SR2010
EN16	Total direct and indirect greenhouse gas emissions by weight (core)		<i>Reducing Greenhouse Gas Emissions</i> page 22 SR2010
EN22	Total amount of waste by type and disposal method (core)		<i>Waste Management</i> page 22 SR2010

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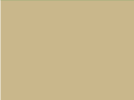





GRI G3 Guidelines		Level of Reporting	Comment
EN28	Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with environmental laws and regulations (core)		There are no significant fines or sanctions for non-compliance with environment laws and regulations.
Labour Practices and Decent Work: Management Approach			This is comprehensively covered in the <i>Labour Relations</i> pages 29-35 SR2010
LA1	Total workforce by employment type, employment contract and region (core)		Chart on <i>Labour Relations</i> page 29 SR2010
LA3	Benefits provided to full-time employees that are not provided to temporary or part-time employees, by major operations (additional)		<i>Permanent Workers</i> page 31 SR2010 <i>Casual Labour</i> page 32 SR2010
LA4	Percentage of employees covered by collective bargaining agreements (core)		<i>Freedom of Association and Trades Union Membership</i> page 33 SR2010
LA7	Rates of injury, occupational diseases, lost days and absenteeism and number of work related fatalities by region (core)		<i>Fatalities</i> page 33 SR2010
Human Rights: Management Approach			GAR, through SMART, is a signatory of the UN Global Compact. The most significant Human Rights issues faced are those relating to employment. These are fully covered in the <i>Labour Relations</i> pages 27-35 SR2010
HR5	Operations identified in which the right to exercise freedom of association and collective bargaining may be at significant risk, and actions taken to support these rights (core)		<i>Freedom of Association and Trades Union Membership</i> page 33 SR2010
HR6	Operations identified as having significant risk for incidents of child labour, and measures taken to contribute to the elimination of child labour (core)		<i>Minimum Age of Employment</i> page 30 SR2010
HR7	Operations identified as having significant risk for incidents of forced or compulsory labour, and measures to contribute to the elimination of forced or compulsory labour (core)		<i>Labour Practices</i> pages 29-30 SR2010
HR8	Percentage of security personnel trained in the organisation's policies or procedures concerning aspects of human rights that are relevant to operations (additional)		<i>Security</i> page 35 SR2010
HR9	Total number of incidents of violations involving rights of indigenous people and actions taken (additional)		<i>Multi-stakeholder Approach to Conflict Resolution</i> page 42 SR2010 <i>Indigenous Peoples</i> page 42 SR2010
Society: Management Approach			GAR's approach is based upon strict and respectful adherence to law and a recognition that good relations with the community are mutually beneficial. They are central both to the business and to the Company's aspiration of contributing to the economic and social development of Indonesia.
SO1	Nature, scope and effectiveness of any programmes and practices that assess and manage the impacts of operations on communities, including entering, operating and exiting (core)		Throughout <i>Social Affairs</i> pages 37-42 SR2010
SO6	Total value of financial and in-kind contributions to political parties, politicians and related institutions by country (additional)		There are no such contributions.
SO7	Total number of legal actions for anti-competitive behaviour, anti-trust and monopoly practices and their outcomes (additional)		<i>KPPU's Charge of SMART Breaching Competition Law</i> page 51 SR2010

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SO8	Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with laws and regulations (core)		There are no such fines other than the KPPU case mentioned above which is still pending.
Product Responsibility: Management Approach			The approach is to deliver high quality product with integrity at a reasonable price
PR4	Total number of incidents of non-compliance with regulations and voluntary codes concerning product and service information and labelling, by type of outcomes (additional)		None for operations within the scope of report
PR7	Total number of incidents of non-compliance with regulations and voluntary codes concerning marketing communications, including advertising, promotion, and sponsorship by type of outcomes (additional)		None for operations within the scope of report
PR8	Total number of substantiated complaints regarding breaches of customer privacy and losses of customer data (additional)		None for operations within the scope of report
PR9	Monetary value of significant fines for non-compliance with laws and regulations concerning the provision and use of products and services (core)		None for operations within the scope of report