

**Roundtable on Sustainable Palm Oil Certification  
R S P O**

**[ ✓ ] Surveillance**

Name of Management Organisation : Manggala Palm Oil Mill – PT Tunggal Mitra Plantation subsidiary of SIME  
 Organisation : DARBY Plantation Bhd  
 Plantation Name : PT Tunggal Mitra Plantation (Manggala 1 Estate, Manggala 2 Estate, and Manggala 3 Estate)  
 Location : Village of Pujud, Sub District of Pujud, District of Rokan Hilir, Province of Riau, Indonesia  
 Certificate Code : MUTU-RSPO/002  
 Date of Certificate Issue : 25 November 2015      Date of License Issue : 25 November 2018  
 Date of Certificate Expiry : 24 November 2020      Date of License Expiry : 24 November 2019

Assessment	Assessment Date	PT. Mutuagung Lestari Auditor	Reviewed by	Approved by
ASA-1.3	17 to 21 September 2018	M. Rinaldi (Lead Auditor), Rizliani Aprianita, Dwi Haryati, Haikal Ramadhan Kharismansyah	Ardiansyah	Octo HPN Nainggolan

Assessment	Approved by MUTUAGUNG LESTARI on:
ASA-1.3	30 November 2018

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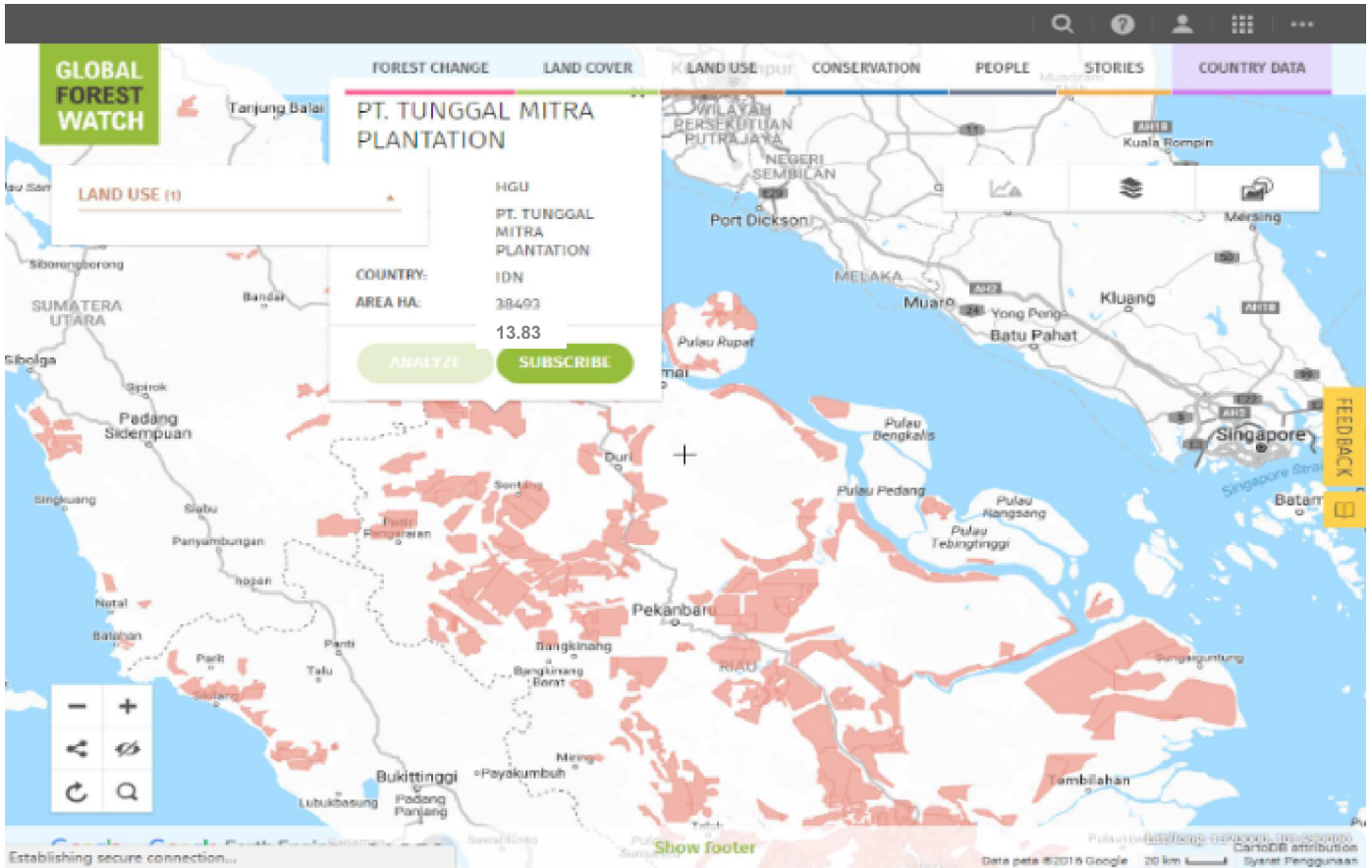
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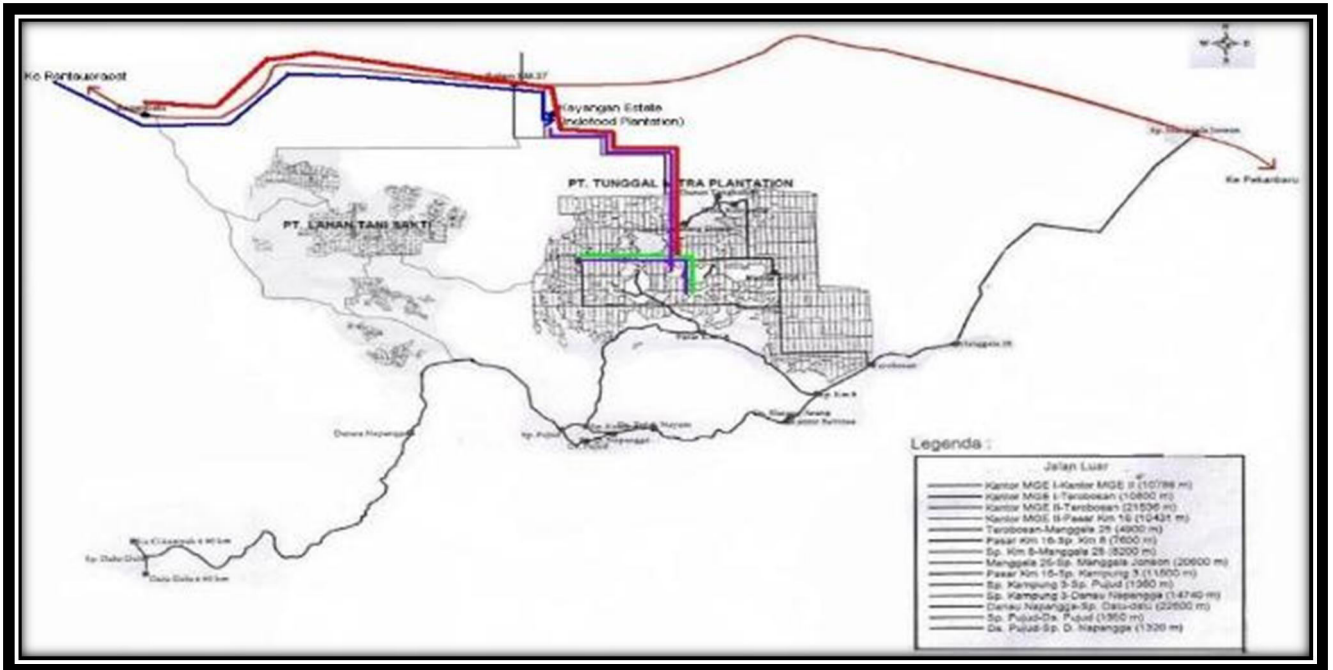
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Figure 1. Location Map of PT Tunggal Mitra Plantation



**Figure 2. Operational Map of PT Tunggal Mitra Plantation**



**Abbreviations Used**

AMDAL	:	<i>Analisis Mengenai Dampak Lingkungan</i> (Environment Impact Assasment)
ASA	:	Annual Surveillance Assasment
B3	:	<i>Bahan Berbahaya dan Beracun</i> (hazardous and toxic materials)
BAPP	:	<i>Berita Acara Penyelesaian Pekerjaan / Work Settlement Minutes</i>
BHCV WG	:	Biodiversity & High Conservation Value Working Group
BOD	:	Biological Oxygen Demand
BOB	:	Barn on Box
BMS	:	Block Manuring System
BSS	:	Block Spraying System
BPJS	:	<i>Badan Penyelenggara Jaminan Sosial</i> (Social Security Agency)
BPJS TK	:	<i>BPJS Ketenagakerjaan</i>
BPJS Kes	:	<i>BPJS Kesehatan</i>
BPN	:	<i>Badan Pertanahan Nasional / National Land Agency</i>
CH	:	Certificate Holder
CR	:	Collection Road
CPO	:	Crude Palm Oil
CSR	:	Corporate Social Responsibility
EFB	:	Empty Fruit Bunch
EIA	:	Environment Impact Assasment
ESH	:	Enviromental Safety and Health
FFA	:	Free Fatty Acid
FFB	:	Fresh Fruit Bunch
FPIC	:	Free, Prior, Informed and Consent
GCAD	:	Group Corporate Audit Department
GM	:	General Manager
GHG	:	Green House Gases
GIS	:	Geographic Information System
HCV	:	High Conservation Value
HGU	:	<i>Hak Guna Usaha</i> (Land Use Permit)
HIRAC	:	Hazard Identification Risk Assesament and Control
HPI	:	Head Plantation Indonesian
HPO	:	Head Plantation Operation
HR	:	Human Resources
IK	:	<i>Instruksi Kerja</i> (Work Instruction)
IPM	:	Integrated Pest Management
IUP	:	<i>Izin usaha perkebunan</i> (Plantation Business License)
KAN	:	<i>Komite Akreditasi Nasional / National Accreditation Committee</i>
Kasie	:	<i>Kepala Seksi</i>
KER	:	Kernel Extraction Rate (Rendemen Kernel)
LB3	:	<i>Limbah Bahan berbahaya dan beracun</i> (hazardous and toxic materials)
LC	:	Land Clearing
LCC	:	Legume Cover Crop
LK3P	:	<i>Lembar Kertas Kerja Kesimpulan Pemeriksaan</i> (Working Conclusion Summary Sheet)
LSU	:	Leaf Sampling Unit
LTA	:	Lost Time Accident
LUCA	:	Land Use Change Analysis
MGE 1	:	Manggala Estate 1
MGE 2	:	Manggala Estate 2

MGE 3	:	Manggala Estate 3
MGF	:	Manggala Factory
MKS-IKS	:	<i>Minyak Kelapa Sawit – Inti Kelapa Sawit / Crude palm oil – Palm Kernel</i>
MMCM	:	Monthly Management Committee Meeting
MSDS	:	Material Safety Data Sheet
MR	:	Main Road
MRC	:	Minamas Research Center
OER	:	Oil Extraction Rate
OHS	:	Occupational Health and Safety
P2K3	:	<i>Panitia Pembina Keselamatan dan Kesehatan Kerja (OHS Committee)</i>
PK	:	Palm Kernel (Inti Sawit)
PKS	:	<i>Pabrik Kelapa Sawit (Palm Oil Mill)</i>
PMPB	:	<i>Pedoman Managemen Perkebunan Berkelanjutan (sustainable management of plantation guidelines)</i>
PSQM	:	Plantation Sustainability Quality Management
POME	:	Palm Oil Mill Effluent
PPE	:	Personal Protective Equipment
PSD	:	Plantation Services Department
PUK	:	<i>Pimpinan Unit Kerja / Head of the Work Unit</i>
RKL	:	<i>Rencana kelola lingkungan (Environment Management Plan)</i>
RPL	:	<i>Rencana pemantauan lingkungan (Environment Monitoring Plan)</i>
RTE	:	Rare Threatened Endangered
SAP	:	System Application & Product in data Prossessing
SCCS	:	Supply Chain Certification System
SGM	:	Senior General Manager
SIA	:	Social Impact Assessment
SIUP	:	<i>Surat Ijin Usaha Perkebunan/ Letter of Plantation Business Registration</i>
SPUP	:	<i>Surat Pendaftaran Usaha Perkebunan / Letter of Plantation Business Registration</i>
SM-HR BP	:	Senior Manager-Human Resource Bussiness Planning
SOP	:	Standart Operating Procedure
SOU	:	Strategic Operating Unit
SPSI	:	<i>Serikat Pekerja Seluruh Indonesia (Labour Union)</i>
SPUP	:	Surat Pendaftaran Usaha Perkebunan
TBM	:	<i>Tanaman Belum Menghasilkan (Immature Plants)</i>
TLB	:	Tractor Loader Backhoe
TMP	:	Tunggal Mitra Plantation
TPSA	:	<i>Tempat Pembuangan Sampah Akhir / Landfill</i>
WTP	:	Water Treatment Plant
WWTP	:	Waste water Treatment Plant

<b>1.0</b>	<b>SCOPE of the CERTIFICATION ASSESSMENT</b>		
<b>1.1</b>	<b>Assessment Standard Used</b>	<ul style="list-style-type: none"> <li>• <i>Indonesian Nasional Interpretasi Principle and Criteria RSPO 2013 for Indonesia Juli 2016, approved RSPO Governors 30 September 2016.</i></li> <li>• <i>RSPO Supply Chain Certification Standard For organizations seeking or holding certification Adopted by the RSPO Board of Governors on 21 November 2014 revised on 14 June 2017 (Module D / E for CPO Mill)</i></li> <li>• <i>RSPO Certification System for Principles and Criteria, 14 June 2017</i></li> </ul>	
<b>1.2</b>	<b>Organisation Information</b>		
1.2.1	Organisation name listed in the certificate	<b>PT Tunggal Mitra Plantation subsidiary of SIME DARBY Plantation Bhd</b>	
1.2.2	Contact person	Mohamad Pirabaharan	
1.2.3	Organisation address and site address	RSPO registered company: No 2, Plantation Tower, PJU 1A/7Street Petaling Jaya, Malaysia 47301  Liaison Office: The Plaza Office Tower, 36 <sup>th</sup> Floor Jl. MH Thamrin Kav. 28-30, Jakarta 10350	
1.2.4	Telephone	+62-21-29926000	
1.2.5	Fax	+62-21-29922686	
1.2.6	E-mail	<a href="mailto:mohamad.pirabaharan@sime-darbyplantation.com">mohamad.pirabaharan@sime-darbyplantation.com</a>	
1.2.7	Web page address	<a href="http://www.sime-darby.com">www.sime-darby.com</a>	
1.2.8	Management Representative who completed the application for certification	Mohamad Pirabaharan	
1.2.9	Registered as RSPO member	1-0008-04-000-00 – 7 September 2004	
<b>1.3</b>	<b>Type of Assessment</b>		
1.3.1	Scope of Assessment and Number of Management Unit	Manggala Mill and 3 Estate, It's consists of Manggala 1 Estate, Manggala 2 Estate and Manggala 3 Estate.	
1.3.2	Type of certificate	Single	
<b>1.4</b>	<b>Locations of Mill and Plantation</b>		
1.4.1	Location of Mill		
	<b>Name of Mill</b>	<b>Location</b>	<b>Coordinate</b>
			<b>Latitude</b> <b>Longitude</b>
	Manggala Mill	Village of Pujud, Sub District of Pujud, District of Rokan Hilir, Province of Riau, Indonesia	N 01° 31' 16"      E 100° 43' 40"
1.4.2	Location of Certification Scope of Supply Base		
	<b>Name of Supply Base</b>	<b>Location</b>	<b>Coordinate</b>



		Latitude	Longitude
Manggala 1 Estate	Village of Pujud, Sub District of Pujud, District of Rokan Hilir, Province of Riau, Indonesia	N 01° 32' 07"	E 100° 43' 48"
Manggala 2 Estate	Village of Pujud, Sub District of Pujud, District of Rokan Hilir, Province of Riau, Indonesia	N 01° 31' 54"	E 100° 38' 38"
Manggala 3 Estate	Village of Pujud, Sub District of Pujud, District of Rokan Hilir, Province of Riau, Indonesia	N 01° 28' 23"	E 100° 45' 32"

<b>1.5</b>	<b>Description of Area Statement</b>		
1.5.1	Tenure		
	• State	13836.00	Ha
	• Community	-	Ha
1.5.2	<b>Area Statement</b>		
	• Total area	13836.00	Ha
	• Mature area	7852.42	Ha
	• Immature area	2942.40	Ha
	• Mill	15.26	Ha
	• Emplishment & Infrastructure	491.37	Ha
	• Others area	11.72	Ha
	• Nursery	29.23	Ha
	• Occupation	2472.40	Ha
	• HCV	21.20	Ha

<b>1.6</b>	<b>Planting Year and Cycles</b>				
1.6.1	Age profile of planting year				
	Planting Year	Hectarage (Ha)			
		Manggala-1	Manggala-2	Manggala-3	Total
	1990	216.41	-	32.71	249.12
	1991	38.69	-	530.85	569.54
	1992	1408.70	246.27	208.13	1863.10
	1993	52.27	-	49.57	101.84
	1994	-	193.00	101.00	294.00
	1996	-	61.10	-	61.10
	1997	-	220.30	119.58	339.88
	1998	-	392.79	46.96	439.75
	1999	-	440.39	-	440.39
	2000	-	372.20	96.93	469.13
	2004	-	50.64	-	50.64



2006	-	48.48	-	<b>48.48</b>
2013	223.45	-	671.94	<b>895.39</b>
2014	395.42	243.00	331.82	<b>970.24</b>
2015	428.85	274.99	355.98	<b>1059.82</b>
<b>Sub Total Mature</b>	<b>2763.79</b>	<b>2543.16</b>	<b>2545.47</b>	<b>7852.42</b>
2015	368.90	-	59.84	<b>428.74</b>
2016	28.55	397.31	383.79	<b>809.65</b>
2017 (period 16/17)	199.73	-	406.66	<b>606.39</b>
2017 (period 17/18)	177.22	384.40	-	<b>561.62</b>
2018 (period 17/18)	139.57	277.67	118.76	<b>536.00</b>
<b>Sub Total Immature</b>	<b>913.97</b>	<b>1059.38</b>	<b>969.05</b>	<b>2942.40</b>
<b>TOTAL</b>	<b>3677.76</b>	<b>3602.54</b>	<b>3514.52</b>	<b>10794.82</b>

1.6.2	New Planting area after January 2010	-	Ha
1.6.3	Planting Cycle	2 <sup>nd</sup> Cycle	

**1.7 Description of Mill and Supply Base**
**1.7.1 Description of Mill**

Name of Mill	Capacity (tonnes/ hour)	FFB Processed (tonnes/year)	CPO		Palm Kernel	
			Out put (tonnes)	Extraction (%)	Out put (tonnes)	Extraction (%)
Manggala Factory	60	185330.32	40438.02	21.82	8710.53	4.70

\*Production data source from September 2017 to August 2018

**1.7.2 Description of Certification Scope of Supply Base**

Name of Estate	Total Area (Ha)	Planted Area (Ha)	FFB (tonnes/year)	Yield (tonnes/ha/year)	Supplied to Mill	
					FFB (tonnes/year)	%
Manggala-1	4,919.00	3677.76	66385.31	18.05	66385.31	100
Manggala-2	4,922.00	3602.54	57913.48	16.08	57913.48	100
Manggala-3	3,995.00	3514.52	61294.87	17.44	61294.87	100
<b>TOTAL</b>	<b>13836.00</b>	<b>10794.82</b>	<b>185593.66</b>	<b>17.19</b>	<b>185593.66</b>	<b>100</b>

\*Production data source from September 2017 to August 2018

**1.7.3 FFB description from other source**

Name of sources/Organisation (RSPO certified / non-certified)	Type of Organisation	number of smallholders	Production Area (Ha)	Supplied to Mill	
				FFB (tonnes/year)	
-	-	-	-	-	-
-	-	-	-	-	-
-	-	-	-	-	-
-	-	-	-	-	-
<b>TOTAL</b>					

\*PT Tunggal Mitra Plantation doesn't receive FFB from other source

1.7.4	Product categories	FFB, CPO, PK						
<b>1.8</b>	<b>Tonnage of Product</b>							
1.8.1	Past Annual Claim Certified Product	Last Year Projected Certified Volume (MT)		Last Year Actual Certified Volume (September 2017 to August 2018) (MT)				
	FFB Processed	186716		185330.32				
	CPO Production	41565		40438.02				
	Palm Kernel (PK) Production	8735		8710.53				
1.8.2	Product selling							
	Type of selling product	Actual selling product for for last year September 2017 to August 2018 (MT)						
	CSPO sold as RSPO certified product	0						
	CSPK sold as RSPO certified product	8550.77						
	CSPO sold under other scheme	0						
	CSPK sold under other scheme	0						
	CSPO sold as conventional	38565.00						
	CSPK sold as conventional	114.35						
1.8.3	Estimate of Certified FFB Claim							
	<b>Name of Estate(s)</b>	<b>Total Area (Ha)</b>	<b>Planted Area (Ha)</b>	<b>FFB (tonnes/year)</b>	<b>Yield (tonnes/ha/year)</b>			
	Manggala-1	4919.00	3677.76	69704	18.95			
	Manggala-2	4922.00	3602.54	60809	16.88			
	Manggala-3	3995.00	3514.52	64359	18.31			
	<b>TOTAL</b>	<b>13836.00</b>	<b>10794.82</b>	<b>194872</b>	<b>18.05</b>			
	<i>*Projected FFB production for 12 months of certificate (25 November 2018 to 24 November 2019)</i>							
1.8.4	Estimate of Certified Palm Product Claim							
	<b>Name of Mill</b>	<b>Capacity (tonnes/ hour)</b>	<b>FFB Processed (tonnes/year)</b>	<b>CPO</b>		<b>Palm Kernel</b>		<b>Supply Chain Module</b>
				<b>Out put (tonnes)</b>	<b>Extraction (%)</b>	<b>Out put (tonnes)</b>	<b>Extraction (%)</b>	
	Manggala POM	60	194872	42872	22	9744	5	IP
	<i>*Projected CSPO and CSPK production for 12 months of certificate (25 November 2018 to 24 November 2019)</i>							
<b>1.9</b>	<b>Other Certifications</b>							
	ISO 9001:2008			-				
	ISO 14001: 2004			-				
	OHSAS 18001:2007			-				
	ISCC			-				
	Others			ISPO certificate with No. SGS-ID-ISPO-0014 on 04 April 2017 with validity until 03 April 2022 by PT SGS Indonesia				
<b>1.10</b>	<b>Time Bound Plan</b>							

1.10.1 Time Bound Plan for Other Management Units							
Management Unit		Supply Base	Time Bound Plan	HGU on Process		Location	Status
Mill	Time Bound Plan			Ha	Time Bound Plan		
INDONESIA							
Sekunyir. PT. Indotruba Tengah	2010	Sekunyir	2010			Seruyan and West Kotawaringin District – Central Kalimantan	Certified
		Seruyan	2010				Certified
Manggala. PT. Tunggal Mitra Plantations	2010	Manggala 1	2010			Rokan Hilir District – Riau	Certified
		Manggala 2	2010				Certified
		Manggala 3	2010				Certified
Bukit Ajong PT. Sime Indo Agro	2010	West	2010	1,652	2019	Sanggau District – West Kalimantan	Certified
		East	2010				Certified
		Sei Mawang	2018				-
		East Plasma	2010				Certified
		West Plasma	2010				Certified
Teluk Siak. PT Aneka Inti Persada	2011	Teluk Siak	2011	421.31	2020	Pekanbaru, Siak District – Riau	Certified
		Pinang Sebatang	2011				Certified
		Aneka Persada	2011				Certified
Sungai Pinang. PT. Bina Sains Cemerlang	2012	Sungai Pinang	2012	308.25	2020	Musi Rawas District – South Sumatera	Certified
		Bukit Pinang	2012				Certified
Pematang. PT. Teguh Sempurna	2011	Pematang	2011			Seruyan and East Kotawaringin District – Central Kalimantan	Certified
		Kawan Batu	2011				Certified
		Hatan Tiring	2011				Certified
		Batang Garing	2011				Certified
Alur Dumai. PT Lahan Tani Sakti	2011	Alur Dumai	2011			Rokan Hilir District – Riau	Certified
Teluk Bakau. PT. Bhumireksa Nusa Sejati	2011	Teluk Bakau	2011			Indra Giri Hilir District – Riau	Certified
		Nusa Perkasa	2011				Certified
		Nusa Lestari	2011				Certified
Mandah PT. Bhumireksa Nusa Sejati	2014	Mandah	2011			Indra Giri Hilir District – Riau	Certified
		Rotan Semelur	2011				Certified
Angsana Mini*) PT Sajang Heulang	2011	KKPA-1 PT.SHE	2013			Tanah Bumbu District – South Kalimantan	Certified
		Pantai Bonati	2011				Certified
Angsana. PT	2011	Angsana	2011			Tanah Bumbu District – South Kalimantan	Certified
		Gunung Sari	2011				Certified

Ladangrumpun Suburabadi		KKPA-4 PT.SHE	2013				Certified
Mustika. PT Sajang Heulang	2013	Mustika				Tanah Bumbu District – South Kalimantan	Certified
		KKPA-2 PT.SHE	2013				Certified
		KKPA-3 PT.SHE	2013				Certified
		KKPA-5 PT.SHE	2013				Certified
		SAP 1	2020				ST-2
Gunung Aru. PT Bersama Sejahtea Sakti	2011	Gunung Aru	2011	765	2020	Kotabaru District – South Kalimantan	Certified
		Gunung Kemasan	2011				Certified
		Laut Timur	2011				Certified
		Pantai Timur	2011				Certified
		KKPA BSS	2020				-
Bebunga. PT. Langgeng Muaramakmur	2011	Sungai Cengal	2011	1,162	2020	Kotabaru District – South Kalimantan	Certified
		Bebunga	2011				Certified
		KKPA Sungai Cengal	2014				Certified
Sukamandang PT Kridatama Lancar	2011	Sukamandang	2011			Seruyan and East Kotawaringin District – Central Kalimantan	Certified
		Sapiri	2011				Certified
		Barasdanum	2011				Certified
		Kuala Kuayan	2011				Certified
Pondok Labu. PT Paripurna Swakarsa	2012	Binturung	2012	1,120	2020	Kotabaru District – South Kalimantan	Certified
		Pondok Labu	2012				Certified
		Rampa	2012				Certified
		Sesulung	2012				Certified
Selabak *) PT Swadaya Andhika	2012	Selabak	2012	63	2020	Kotabaru District – South Kalimantan	Certified
		Randi	2012				Certified
		Sangkoh	2012				Certified
		Lanting	2012				Certified
Rantau. PT Laguna Mandiri	2012	Rantau	2012			Kotabaru District – South Kalimantan	Certified
		Matalok	2012				Certified
Betung. PT Laguna Mandiri	2014	Betung	2012			Kotabaru District – South Kalimantan	Certified
		Sekayu	2012				Certified
Ungkaya. PT Tamaco Graha Krida	2012	Ungkaya	2012			Morowali District – Sulawesi Tengah	Certified
		Plasma TGK	2015				Certified
Ladang Panjang. PT Bahari Gembira Ria	2012	Ladang Panjang	2012	1,639	2020	Muaro Jambi District - Jambi	Certified
		Plasma BGR	2020				
Rantau Panjang. PT Guthrie	2012	Rantau Panjang	2012	4,133	2020	Musi Banyuasin District – South Sumatera	Certified
		Bumi Ayu	2012				Certified
		Karang Ringin	2012				Certified

Pecconina Indonesia		Napal	2012				Certified
		Mangun Jaya	2012				Certified
		Sungai Jernih Estate and GPI KKPA	2017				-
Blang Simpo. PT Perkasa Subur Sakti	2013	Tamiang (PT PPP)	2013	1,286	2020	Aceh Tamiang and East Aceh District – Nanggroe Aceh Darussalam	Certified
		Batang Ara (PT PSK)	2013				Certified
		Blang Simpo-01	2013				Certified
		Blang Simpo-02	2013				Certified
MAS. PT Mitra Austral Sejahtera	2020	MAS 1	2018			Sanggau District – West Kalimantan	-
		MAS 1	2018				-
		MAS 1	2018				-
		Plasma MAS	2020				-
Lembiru. PT Sandika Nata Palma	2014	Lembiru	2014			Ketapang District – West Kalimantan	Certified
		Awatan	2014				Certified
		Karya Palma	2018				-
		KKPA SNP	2020				-
		Pelanjau (PT BAL)	2018				-
		Sungai Putih (PT BAL)	2018				-
		Baturus (PT BAL)	2018				-
		KKPA BAL	2020				-
<b>MALAYSIA</b>							
Sg Dingin SOU 1	2010	Bukit Hijau	2010			Kerangan, Kedah	Certified
		Padang Buluh	2010				Certified
		Bukit Selangor	2010				Certified
		Sg Dingin	2010				Certified
		Jentayu	2010				Certified
		Anak Kuli	2010				Certified
		Somme	2010				Certified
Chersonese SOU 2	2011	Chersonese	2011			Kuala Kurau, Perak	Certified
		Holyrood	2011				Certified
		Kalumpang	2011				Certified
		Tali Ayer	2011				Certified
Elphil SOU 3	2011	Kinta Kellas	2011			Sg Siput, Perak	Certified
		Elphil	2011				Certified
		Kamuning	2011				Certified
Flemington SOU 4	2011	Flemington	2011			Teluk Intan, Perak	Certified
		Bagan Datoh	2011				Certified
		Sabak Bernam	2011				Certified
		Sg Samak	2011				Certified
Seri Intan SOU 5	2011	Seri Intan (Main Division)	2011			Teluk Intan, Perak	Certified
		Sabrang	2011				Certified
		Sg Wangi	2011				Certified
		Sogomana (Main Division)	2011				Certified
Selaba	2011	Seri Intan (Selaba Division)	2011			Teluk Intan, Perak	Certified

SOU 5		Sogomana (Cashwood & Sg Beruas Division)	2011				Certified
		Bikam	2011				Certified
		Clumy	2011				Certified
Tennamaram SOU 6	2011	Tennamaram	2011			Bestari Jaya, Selangor	Certified
		Sungei Buloh	2011				Certified
		Bkt Talang	2011				Certified
Bkt Kerayong SOU 7	2011	Bkt Kerayong	2011			Kapar, Selangor	Certified
		Bkt Cherakah	2011				Certified
		Bkt Rajah	2011				Certified
		Bkt Lagong	2011				Certified
		Elmina	2011				Certified
East SOU 8	2010	East	2010			Carey Island, Selangor	Certified
		Dusun Durian	2010				Certified
		Sepang	2010				Certified
West - SOU 9	2010	West	2010			Carey Island, Selangor	Certified
Bukit Putri - SOU 10	2011	Bukit Putri	2011			Raub, Pahang	Certified
Kerdau SOU 11	2011	Kerdau	2011			Temerloh, Pahang	Certified
		Jentar	2011				Certified
		Mentakab	2011				Certified
		Sg Mai	2011				Certified
		Chenor	2011				Certified
Jabor - SOU 12	2011	Jabor	2011			Kuantan, Pahang	Certified
Labu SOU 13	2011	Labu	2011			Nilai, Negeri Sembilan	Certified
		New Labu	2011				Certified
		Bradwall	2011				Certified
Tanah Merah SOU 14	2010	Tanah Merah	2010			Port Dickson, Negeri Sembilan	Certified
		Sua Betong	2010				Certified
		Bukit Pelandok	2010				Certified
Sua Betong SOU 15	2014	Salak	2014			Port Dickson, Negeri Sembilan	Certified
		Sengkang	2014				Certified
		Siliau	2014				Certified
		PD Lukut	2014				Certified
		Sungai Baru	2014				Certified
		Tampin Linggi	2014				Certified
Kok Foh SOU 16	2011	Bukit Pilah	2011			Bahau, Negeri Sembilan	Certified
		Kok Foh	2011				Certified
		Muar River	2011				Certified
		St. Helier	2011				Certified
		Pertang	2011				Certified
		Sg Gemas	2011				Certified
		Sg Sebalang	2011				Certified
		Sg Senarut	2011				Certified
Kempas	2010	Kempas	2010			Jasin, Melaka	Certified

SOU 17		Kemuning	2010				Certified
		Tangkah	2010				Certified
Diamond Jubilee SOU 18	2011	Bukit Asahan	2011			Jasin, Melaka	Certified
		Diamond Jubilee	2011			Certified	
		Serkam	2011			Certified	
Pagoh SOU 19	2014	Pagoh	2014			Muar, Johor	Certified
		Lanadron	2014			Certified	
		Pengkalan Bukit	2014			Certified	
		Welch	2014			Certified	
Chaah SOU 20	2010	North Labis	2010			Chaah, Johor	Certified
		Cha'ah	2010			Certified	
		Sg Simpang Kiri	2010			Certified	
Gunung Mas SOU 21	2010	Gunung Mas	2010			Kluang, Johor	Certified
		Kempas Klebang	2010			Certified	
		Bukit Paloh	2010			Certified	
		Yong Peng	2010			Certified	
Bukit Benut SOU 22	2011	Bukit Benut	2011			Kluang, Johor	Certified
		CEP Niyor	2011			Certified	
		Lambak / Elaeis	2011			Certified	
Ulu Remis SOU 23	2011	Pekan	2011			Layang-layang, Johor	Certified
		Sembrong	2011			Certified	
		Tun Dr. Ismail	2011			Certified	
		Ulu Remis	2011			Certified	
		Bukit Badak	2011			Certified	
		Cenas	2011			Certified	
Hadapan SOU 24	2011	CEP Rengam	2011			Layang-layang, Johor	Certified
		Kulai	2011			Certified	
		Layang	2011			Certified	
		Seri Pulai	2011			Certified	
Sandakan Bay SOU 26	2008	Tun Tan Siew Sin	2008			Sandakan, Sabah	Certified
		Tunku	2008			Certified	
		Tigowis	2008			Certified	
		Sentosa	2008			Certified	
		Saguliud	2008			Certified	
Melalap SOU 27	2011	Melalap	2011			Tenom, Sabah	Certified
		Sapong	2011			Certified	
Binuang SOU 28	2009	Ting kayu	2009			Kunak, Sabah	Certified
		Sungang	2009			Certified	
		Jelata Bumi	2009			Certified	
		Binuang	2009			Certified	
Giram SOU 29	2009	Mostyn	2009			Kunak, Sabah	Certified
		Giram	2009			Certified	
Merotai SOU 30	2009	Imam	2009			Tawau, Sabah	Certified
		Merotai	2009			Certified	



			Table	2009				Certified
			Tiger	2009				Certified
Lavang SOU 31	2011		Belian	2011			Bintulu, Serawak	Certified
			Kelida	2011				Certified
			Lavang	2011				Certified
			Lavang (SE)	2011				Certified
			Rasan	2011				Certified
Rajawali SOU 32	2011		Rajawali	2011			Bintulu, Serawak	Certified
			Samudera	2011				Certified
			Semarak	2011				Certified
			Bayu	2011				Certified
Derawan SOU 33	2011		Takau	2011			Bintulu, Serawak	Certified
			Damai	2011				Certified
			Derawan	2011				Certified
			Sahua	2011				Certified
Pekaka SOU 34	2011		Chartquest	2011			Bintulu, Serawak	Certified
			Dulang	2011				Certified
			Peroh	2011				Certified
			Pekaka	2011				Certified
			Ruai	2011				Certified
<b>LIBERIA</b>								
Grand Cape Mount	2017		Matambo (2,500 Ha)	2017			Grand Cape Mount, Liberia	NPP May 2011
			Grand Cape Mount (2,372 Ha)	2017				NPP May 2011
			Zodua (264)	2017				NPP May 2011
			Bomi (3,128 Ha)	2017			Bomi, Liberia	NPP May 2011
			Lofa (2,254 Ha)	2017				NPP May 2011
<b>P &amp; G (New Britain Palm Oil)</b>								
Poliamba	2012		Kara	2012			Kevieng, New Ireland Province, P&G	Certified
			West Coast	2012				Certified
			Nalik	2012				Certified
			Noatsi	2012				Certified
			Madak	2012				Certified
			North	2012				Certified

		(Smallholders)					
		South (Smallholders)	2012				Certified
		West (Smallholders)	2012				Certified
	Tetere	Tetere	2011			Gudaicanal, Slomon Island	Certified
		Ngalimbiu	2011				Certified
		Mbalisuna	2011				Certified
		West Zone (Smallholders)	2011				Certified
		Central Zone (Smallholders)	2011				Certified
		MBA East (Smallholders)	2011				Certified
		MBA West (Smallholders)	2011				Certified
	Sangara, Sambiripa & Mamba	Sangara	2013			Higaturu, Popondetta, Oro, P&G	Certified
		Sumberipa	2013				Certified
		Ambogo	2013				Certified
		Embi	2013				Certified
		Mamba	2013				Certified
		Sorovi (smallholders)	2013				Certified
		Igora (smallholders)	2013				Certified
		Saiho (smallholders)	2013				Certified
		Aeka (smallholders)	2013				Certified
		Ilimo (smallholders)	2013				Certified
	Gusap	Dumpu	2010			Madang, P&G	Certified
		Surinam	2010				Certified
		Jephcott	2010				Certified
		Gusap	2010				Certified
		Paddox	2010				Certified
		Ngaru	2010				Certified
		Madang VOP (smallholders)	2010				Certified
		Morobe VOP (smallholders)	2010				Certified
	Hagita	Giligili	2013			Milne Bay, P&G	Certified
		Hagita	2013				Certified

			Waigani	2013			Certified
			Sagarai	2013			Certified
			Padipadi	2013			Certified
			Mariawatte	2013			Certified
			East Gurney	2013			Certified
			West Gurney	2013			Certified
			East Sagarai	2013			Certified
			West Sagarai	2013			Certified
		2008	Bebere	2008		West New Britain	Certified
			Kumbango	2008			Certified
			Togulo	2008			Certified
			Dami	2008			Certified
			Waisisi	2008			Certified
			Kautu	2008			Certified
			Karausu	2008			Certified
			Moroa	2008			Certified
			Bilomi	2008			Certified
			Loata	2008			Certified
			Haella	2008			Certified
			Garu	2008			Certified
			Daliavu	2008			Certified
			Sapuri	2008			Certified
			Malilimi	2008			Certified
			Rigula	2008			Certified
			Nomundo	2008			Certified
			Navarai / Karato ME	2008			Certified
			Volupai . Lotomgam / Natupi / Goruru	2008			Certified
			Lolokoru	2008			Certified
			Silovoti	2008			Certified
			LSS Hoskin (1,877 Smallholders)	2008			Certified
			VOP East (1,815 Smallholders)	2008			Certified
			VOP Central (1,958 Smallholders)	2008			Certified
			VOP West (1,277 Smallholders)Kaulong / Akamie / Pusiki / Repamira / Sakapei / KDC ME (21 large smallholders)	2008			Certified
			LSS Kapiura (847 Smallholders)	2008			Certified

		VOP Kapiura (551 Smallholders)	2008				Certified
<p>Sime Darby has achieved 34 management units in Malaysia, 24 management units in Indonesia, 10 management units in Liberia that RSPO certified. Total management unit in Sime Darby Plantation Bhd are 34 in Malaysia, 25 in Indonesia and 10 in Liberia. In the year of 2017 there are two Mill that are no longer operating, and for the supplying base (Estate) is diverted to a mill that is still operating and has been certified RSPO.</p> <p>A new mill will be set up in Liberia and planned for commissioning in February 2016. Preparation to undergo the RSPO Certification process is in progress and Sime Darby Plantation Bhd targets to undergo RSPO Certification by end 2017. RSPO NPP process has been completed in 2011. Internal assessment against the draft Liberia NI has been completed and closing of gaps is in progress.</p> <p>There was change of the Time Bound Plan under Sime Darby on 15 April 2016 cause the Sime Darby postpone the others certification process. Change of the Time Bound Plan explanation: PT Mitra Austral Sejahtera. There are social issue still unresolved from the Serikat Petani Kelapa Sawit (SPKS) Sanggau, however the improvement are in progress. Sime Darby has informed the Time Bound Plan progress, MUTU has consider that Sime Darby still comply with the RSPO requirement for partial certification.</p>							
<b>1.10.2</b>	<b>Progress of Associated Smallholders and Outgrowers for Certifiable Standard</b>						
	PT Tunggal Mitra Plantation does not have a cooperation scheme with smallholders and Outgrower						

<b>2.0</b>	<b>ASSESSMENT PROCESS</b>
<b>2.1</b>	<b>Assessment Team</b>
<b>ASA-1.3</b>	<ol style="list-style-type: none"> <li><b>Muhammad Rinaldi (Lead Auditor)</b>. Indonesian citizen, Diploma of Oil Palm Plantation. He has experience 4 years working as Assistant Agronomy since 2007. He has attended training RSPO Lead Auditor, SCCS training, training of Auditor ISPO, training of Lead Auditor ISO 9001-2008, training of ISO 14000, training of HCV identification, training of OHS system management, training of potential and conflict resolution and SA 8000. Experienced in auditing in relevant scheme (ISPO) since 2014 with the aspects of land legality, environmental, social, occupational health and safety, Best Management Practices, Conservation and worker welfare. During the assessment he assigned to verify legal, land dispute and SCCS.</li> <li><b>Rizliani Aprianita Hsb (Auditor)</b>. Indonesian Citizen. Bachelor and Magister of Agribusiness, Faculty of Agriculture. She had followed training such as RSPO Lead Auditor Training, SCCS training, lead Auditor ISO 9001;2008, ISO 14001;2004, ISPO Auditor training and followed several IHT related to environment, BMP, SA 8000, etc. She has been involved in several audit activities related to sustainable palm oil certification since 2015 covering social aspect, health and safety aspect, worker welfare and waste management aspect. During the assessment she assigned to verified environmental management, GHG, HCV and social aspect.</li> <li><b>Dwi Haryati (Auditor)</b>. Indonesian citizens. Bachelor of Agriculture Department of Agriculture – Program study: Agronomy. She has experienced on Palm Oil Plantation as Sustainability staff. Training have been followed include: Training Auditor ISPO, Quality Management ISO 9001-2008, ISO 14001 Environmental Management, ISO 17021 &amp; 17065, HCV, General Health Safety Expert, Health Safety Management System, Workshop GHG by the ISPO Commission, IHT Palm Oil Mill Processing, Awareness RSPO, IHT Best Practice in Peat Management, Mapping Potential and Conflict Resolution in Production Forest and SA 8000. RSPO audit experience since March 2015 and ISPO since May 2014. During this assessment she was observed and audit on Transparency, Occupational Health and Safety, and Worker Welfare.</li> <li><b>Haikal Ramadhan Kharismansyah (Auditor Trainee)</b>. Indonesian citizen, Bachelor of Agriculture department of plant and pest disease (Agro technology). He has 3 years experiences as an Agronomy Staff in private oil palm plantation in Indonesia. Training which had attended including Basic Management Development Program Agronomy, Integrated Urban Pest Management, Integrated Pest Management, ISO 9001 : 2015, Auditor ISPO, RSPO awareness, ISO 22000 awareness, SA 8000, and ISO 14000. Did some audit RSPO scheme with aspects Best management practices, OHS, and worker welfare. During this audit, he support to verified best management practice and long-term plan.</li> </ol>
<b>2.2</b>	<b>Assessment Methodology, Assessment Process and Locations of Assessment</b>
<b>2.2.1</b>	<b>Figure of person days to implement assessment</b>
<b>ASA-1.3</b>	<p>Number of auditors : 3 auditors and 1 auditors in trainee</p> <p>Number of days for <b>ASA-1.3</b> at site : 4 days</p> <p>Number of working days for <b>ASA-1.3</b> at site : 16 Working days</p>
<b>2.2.2</b>	<b>Assessment Process</b>
<b>ASA-1.3</b>	<p>The assessment was conducted by measuring the sufficiency of implementation with the consistency done by the PT Tunggal Mitra Plantation to the requirements of Indonesian National Interpretation of RSPO Principles and Criteria 2013 by INA-NITF, July 2016 (Endorsed by the RSPO Board of Governors meeting on 30<sup>th</sup> September 2016 for Sustainable Palm Oil Production and RSPO Supply Chain Certification Standard For organizations seeking or holding certification Adopted by the RSPO Board of Governors on 21 November 2014 revised on 14 June 2017 (Module D for CPO Mill)</p> <p>The assessment was conducted in three methods: (1) document review, aiming to observe the sufficiency of types or</p>

substances from required documents; (2) *interview*, aiming to obtain more detailed information and cross check the information; and (3) field observation, aiming to observe directly the sufficiency of implementation on site.

Some opportunities for improvement of the results **ASA-1.3** delivered by the MUTU auditor to the management unit and the results are the subject will be verified at the next assessment phase **ASA-1.4**.

Improvement of findings from main assessment findings were observed by auditors at this **ASA-1.3** assessment. All information obtained was recorded in Check List of PT Mutuagung Lestari (MUTU) and part of **ASA-1.3**

The assessment program please find Appendix 2

2.2.3	Locations of Assessment
ASA-1.3	<p><b>Manggala 1 Estate</b></p> <ul style="list-style-type: none"> <li>• <b>Block E34 division 4.</b> Circle and Path Spraying. (6 pesticide applicator). Observation and interview related handling on pesticide, OHS, PPE, and Block Spraying System.</li> <li>• <b>Block E11 division 3.</b> Manuring. (6 worker). Observation and interview related Block Manuring System, OHS, PPE, and handling on agrochemical.</li> <li>• <b>Block F008</b> EFB Application. Observation related EFB application and dosage use.</li> <li>• <b>Block E10 dan E11.</b> Replanting. Observation related implementation of zero burning policy in replanting area</li> <li>• <b>Block G007.</b> Subsidence pole. Observation related peat management</li> <li>• <b>Daycare (Division 1).</b> Observation and interviews related to employee welfare facilities, wages, employment and domestic waste management.</li> <li>• <b>Block Spraying System (BSS) Warehouse.</b> Observation the conditions PPE of warehouse and PPE handling.</li> <li>• <b>Clinic.</b> Observation and interview with paramedic about first aid mechanism, medical waste management and work accident record monitoring.</li> <li>• <b>Land application block E011.</b> Observation for waste water management and nutrient cycle strategy</li> <li>• <b>Landfill. Division II-III block 18.</b> Observations related to handling domestic waste and garbage conditions in landfills.</li> <li>• <b>Workshop.</b> Observation and interviews related to the competence of workers, implementation OHS (including medical check-up), employment, waste management and complaint mechanism.</li> <li>• <b>Fertilizer storage.</b> Observation and interviews related to hazardous management, waste management and implementation OHS.</li> <li>• <b>Chemical storage.</b> Observation and interviews related to chemical and pesticide storage area, hazardous waste management, employment, and implementation OHS.</li> <li>• <b>Housing division 1.</b> Observation of the availability of infrastructure such as employee housing facilities, water facilities, educational facilities, religious facilities, health facilities and sports facilities</li> <li>• <b>Hazardous Waste Storage.</b> Observation and interviews related to hazardous waste management, OHS implementation, employment and complaint mechanism.</li> <li>• <b>Fire Fighter Warehouse.</b> To observe completeness and readiness of fire fighter equipment.</li> <li>• <b>Fuel and Lubricant Storage.</b> Observation related to implementation of OHS</li> </ul> <p><b>Manggala 2 Estate</b></p> <ul style="list-style-type: none"> <li>• <b>Block J005.</b> Observation of legal boundary conditions No TMP 64.</li> <li>• <b>Block J004.</b> Observation of legal boundary conditions No TMP 65.</li> <li>• <b>Block E07.</b> Observation related to occupation area</li> <li>• <b>Block J003.</b> Observation related to boundary with occupation area</li> <li>• <b>Block A01 division 4.</b> Observation related to riparian zone of Bangko River</li> <li>• <b>Landfill block C005.</b> Observations related to handling domestic waste and garbage conditions in landfills.</li> <li>• <b>EFB application block E001.</b> Observation related to EFB application</li> </ul> <p><b>Manggala 3 Estate</b></p> <ul style="list-style-type: none"> <li>• <b>Housing Emplacement Pondok 2 (3 workers).</b> Observations related to hygiene facilities include sanitation, clean air, domestic waste management and complaints if any.</li> </ul>



- **Daycare. (3 workers).** Observation related to given facility, emergency response facilities and interviews with employees in relation to work hours, wages, and access to daily needs, policies, protection of reproductive rights for women workers.
- **Block Spraying System (BSS) & Block Manuring System (BMS).** (1 worker). Observation and interview regarding of hazardous waste (pesticide) and PPE Spray storage.
- **Warehouse complex (Agrochemical and Fertilizer Storage).** (2 workers). Observation and interview related to wages, training, PPE, work accident, and complaint mechanism.
- **Workshop (3 workers).** Observations and interviews with workers related to the management and implementation of health safety, first aid box and social worker and hazardous waste management.
- **Hazardous Waste Storage (1 worker).** Observation and interviews related to hazardous waste management, OHS implementation, employment and complaint mechanism.\
- **Landfill (2 workers).** Observation about domestic waste management.
- **Block K05 Division III. Manuring.** Observation and interview related Block Manuring System, OHS, PPE, and handling on agrochemichal.
- **Block L08 and Block K03. Subsidence Pole.** Observation and interview related peat land management
- **Block L17. Inlet on peat management.** Observation and interview related peat land management
- **Block H12 and Block I0055. Water Level.** Observation and interview related peat land management

#### Manggala Factory

- **Weighbridge Station.** Observation of supply chain procedure. (1 person)
- **Security.** Observation related to the acceptance of FFB. (2 person)
- **Workshop.** Observations and interviews with workers related to the management and implementation of health safety, and social worker and hazardous waste management. (2 person)
- **Hazardous waste temporary warehouse.** Field observations related to the fulfillment of the attributes health and safety, recording, and the implementation of compliance requirements hazardous waste temporary warehouse. (2 person)
- **Chemical storage.** Observation and interview on environmental aspect, OHS implementation, management of chemical and understanding of working procedure.
- **Hydrant simulation (4 worker).** Observations related the use of fire prevention facilities that can be used at any time.
- **Boiler (1 worker).** Observation and interview with operator related personnel understanding over the applicable SOP, infrastructure in mill, medical examination, trainings from company, OHS license and worker welfare.
- **Clarification (1 worker).** Observation and interview with operator related PPE, the applicable SOP, the implementation of occupational health and safety, work accident, trainings from company and worker welfare.
- **Press (2 worker).** Observation and interview with operator related personnel understanding over the applicable SOP, infrastructure in mill, the implementation of occupational health and safety, PPE, complaints procedure, trainings from company and worker welfare.
- **Sortation (3 worker).** Observation and interview related criteria of FFB, PPE, OHS, and working hour.
- **Sterilizer (1 worker).** Observation and interview related personal understanding on the SOP.
- **Engine room (1 worker).** Observation and interview with operator related personnel understanding over the applicable SOP, infrastructure in mill, the implementation of occupational health and safety, PPE, complaints procedure, trainings from company and worker welfare.
- **Kernel station (1 Worker).** Observation and interview with operator related PPE, the applicable SOP, the implementation of occupational health and safety, work accident, trainings from company and worker welfare
- **Water intake.** Observation for POM water intake condition
- **Waste Water Treatment Plant.** Field observations and interviews with WWTP operators regarding waste water management.
- **WTP.** Observations and interviews related to water management, recording of water use, health checks, PPE and waste management.
- **Empty Bunch Area.** Observation related to solid waste.



<b>2.3</b>	<b>Stakeholder Consultation and Stakeholders Contacted</b>
<b>2.3.1</b>	<b>Summary of stakeholder consultation process.</b>
<b>ASA-1.3</b>	<p>The public consultation with stakeholders to PT Tunggal Mitra Plantation done through:</p> <ul style="list-style-type: none"> <li>• Conduct a public announcement on the CB website (<a href="http://www.mutucertification.com">www.mutucertification.com</a>) on 03<sup>rd</sup> September 2018.</li> <li>• Conduct consultation via email questionnaire with stakeholders (Labour Agency, BPN, Environment and Plantation Agency, Rokan Hilir District, Province of Riau) on 13<sup>th</sup> September 2018</li> <li>• Conduct consultations via email questionnaire to NGOs (International Animal Rescue Indonesia, WALHI, Sawit Watch, and Aliansi Masyarakat Adat Nusantara) on 12<sup>th</sup> September 2018.</li> <li>• Conducting visits and direct interviews with stakeholders (Local Communities) on 18<sup>th</sup> September 2018.</li> <li>• Conducting Interviews with the Cooperative Employees, local contractor, Gender Committee, Labor Union on 18<sup>th</sup> September 2018.</li> </ul>
<b>2.3.2</b>	<b>Stakeholder contacted</b>
	<i>Please find appendix 1</i>
<b>2.4</b>	<b>Determining Next Assessment</b>
	The next visit ASA-1.4 will be determined one year after this <b>ASA-1.3</b> (September 2019).

**3.0 ASSESSMENT FINDINGS**

**3.1 Summary of Assessment Report of the RSPO Certification**

MUTUAGUNG LESTARI has conducted an assessment of **Manggala POM – PT Tunggal Mitra Plantation, Sime Darby Bhd** operation consisting of one (1) mill and three (3) oil palm estates.

During the assessment, there were one (1) nonconformity were assigned against Major Compliance Indicators and three (3) nonconformities against supply chain requirement for CPO mill and ten (10) opportunities for improvement were identified.

Further explanation of the non-conformities raised and corrective actions taken by the company are provided in section 3.5. The company has already prepared and implemented the corrective actions that had been reviewed and accepted by Auditors in form of documentation evidences. Those corrective actions taken that consist of one (1) Major non-conformity and three (3) nonconformities against supply chain requirement for CPO mill had been closed out and shall be verified during next assessment.

MUTUAGUNG LESTARI found that Manggala POM – PT Tunggal Mitra Plantation, Sime Darby Bhd complied with the requirements of Indonesian National Interpretation of RSPO Principles and Criteria 2013 by INA-NITF, July 2016 (Endorsed by the RSPO Board of Governors meeting on 30<sup>th</sup> September 2016 for Sustainable Palm Oil Production and RSPO Supply Chain Certification Standard For organizations seeking or holding certification Adopted by the RSPO Board of Governors on 21 November 2014 revised on 14 June 2017 (Module D for CPO Mill)

Therefore MUTUAGUNG LESTARI Recommends RSPO Certification of compliance is **continued**

Ref Std.	VERIFICATION RESULT of MUTU-Certification
<b>PRINCIPLE #1 COMMITMENT TO TRANSPARENCY</b>	
<b>1.1 Growers and millers provide adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.</b>	
<p><b>1.1.1, 1.1.2</b>            Company has SOP Response of stakeholders contained in SOP Request Information No. revision 03 dated September 18, 2016. This procedure describes the communication of stakeholders. In the document described the procedures for communicating with staff and outsiders. The procedure request information can be detailed, among others, all the incoming information request letter will go into the operational unit and will be studied and made the answer by the Manager of the operational unit and all letters of answers to the information requested to be sent to parties must be signed by the Manager Operational Unit.            The Company has listed of stakeholders (99) including contractors / contractors, district and village government, schools, hospitals / clinics / <i>puskesmas</i>, bank, BPJS office and police.            Based on interview with community of Pemantang Genting and Sukamulya Village, if they need information they will submit a letter to the company. According to them, the company always responds each letter submitted.</p> <p>The company was documented all of incoming and outgoing letter from another party. Based on document verification of incoming letter and the respond by the company, for example for MGE-1 there is a letter regarding the application for the collection and utilization of oil palm seeds from replanting by Labour Union. The company responded with no approval and was conveyed directly that the rules in the PT TMP were not allowed to be used.            The company was respond these requested and the documentation of response was showed.            Based on the results of document verification, it is known that there are officers (<i>kasie</i>) appointed to renew the list of stakeholders every month according to incoming / outgoing mail.</p>	

The Company has presented records related to SOP socialization and stakeholder information held in June, 29 2018 with participants as many as 21 people consisting of Village Pemantang Genting, Staff and Employees of Manggala Estate as well as communities surrounding the estate.

**Status : Comply**

**1.2**

**Management documents are publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.**

**1.2.1**

The company has listed a list of documents available to the public. List of documents that can be provided in accordance with no. Letter 002 / SOU-16 / XI / 2016 dated September 19, 2016. The available documents that can be opened by the management unit include the wide LC, TBM and infrastructure, payment labor social assurance, payment of medical treatment, employee document, students document, employee public facility data, pest and disease data, light vehicle and heavy equipment data, supporting machine data, CSR data, bridge data, road length data, building work data, building data general, school building data, type of fertilizer used and type of agrochemical used.

The Company has a letter dated 28 April 2014 regarding publicly available documents provided by a legal section signed by the SOU 16 I Putu Endra and can only be issued with the approval of legal parts such as HGU, SIUP / IUP, Licensing, HCV, SIA, Waste / Applications, AMDAL, RKL / RPL, P2K3, Employee data, FFB production data, Production data of MKS-IKS, B3 waste data, Specification of factory machinery, vehicle specifications and sustainable management of plantation guidelines.

Based on interviews with the villages of Sukamulya and Pemantang Genting, they explained that they knew the types of documents they could access such as CSR data, light vehicle data and heavy equipment etc. This is related to the company's assistance program to surrounding villages.

**Status : Comply**

**1.3**

**Growers and millers commit to ethical conduct in all business operations and transactions.**

**1.3.1**

Company has a policy of standard business of conduct that explains fair business practices, prohibition of corruption, bribery, fraud in the use of funds and resources as well as the disclosure of information in accordance with prevailing regulations. The policy contained in the Company Policy no. 440/HRM-COC/07 on 24 May 2007. The policy is available in Bahasa. The policy is communicated to workers in accordance with the results of interviews with them. Based on interview with contractor of FFB transport, it is known that company has been disseminated the policy of standard business of conduct.

The Company has shown socialization related to Code of Ethics SOP on June 29, 2018. The socialization was attended by community leaders, employees, head of community, community unit and community. Based on the result of document verification, it is known that the socialization is available in Bahasa Indonesia.

**Status : Comply**

**PRINCIPLE #2 COMPLIANCE WITH APPLICABLE LAWS AND REGULATIONS**

**2.1**

**There is compliance with all applicable local, national and ratified international laws and regulations.**

**2.1.1**

Certificate holder consistently applies legislation relating to plantation and palm oil mill. The last update of laws and regulations list was conducted on August, 31 2018. The Certification Unit has shown compliance with laws and regulations, for example:

**Environment Aspect**

**1. EIA Document :**

- EIA documents of PT Tunggal Mitra Plantation approved by the Ministry of Agriculture in accordance with the Minister of Agriculture No. RC. 220/950 / B / V / 1994 dated May 28, 1994 regarding the Approval of EIA PT Tunggal Mitra Plantation. In this document the scope of the study covers an area of 18,000 hectares and a capacity of mill will be built by 60 ton FFB / hour.

- PT Tunggal Mitra Plantation's RKL / RPL document was approved by the administration Department of Agriculture Agency No. 001 / RKL-RPL / BA / VI / 94 dated June 24, 1994.
  - The Revised RKL / RPL document was approved by the Regency Head of the Rokan Hilir Regional Environmental Impact Management Agency (BAPEDALDA) in accordance with Letter No. 666.1 / AMDAL-BAPEDALDA / 2006/12 dated August 23, 2006.
2. Land Application Permit based on the Decree of the Head of the Environmental Agency of Rokan Hilir Regency No. 49 / DLH / 2017 regarding Permit for the Utilization of Palm Oil Mill Waste Water on the land of PT TMP dated December 4, 2017.
3. Hazardous waste storage Permit as outlined in the Decree of the Head of the Environmental Impact Management Agency of Rokan Hilir District No. 54 / BPD L / 2015 dated 27 November 2015 regarding hazardous Waste Management Permits for PT TMP which are valid until 5 years.

**OHS**

- Has P2K3 structure and P2K3 report in accordance with Minister of Labor Regulation No. 4 year 1987. The company need to consider following up on operator permits and extending the appointment of General OSH Experts. **OFI**.
- Has boiler operators, welders and heavy equipment operators certified in accordance with the regulations.

**Best Management Practices**

- Reducing the use of WHO 1A and 1B pesticides and not using paraquat
- Using registered pesticides that are permitted by the government in accordance with regulations.

**Worker welfare**

The Certification Unit has comply with minimum wage referring the decree of Riau Governor No. 373/V/2018 (refer to indicator 6.5.1). Fulfillment of minimum wages, payroll systems such as overtime provisions, and worker protection (*BPJS Ketenagakerjaan* and *BPJS Kesehatan*).

**Legal Aspect:**

The Company already has documents of land tenure and concession in the document:

- Certificate of Land Use (HGU) No. 2 of 1999 in accordance with the letter of Measure No. 16/1998 dated July 28, 1999. The concession area covers 13 386 Ha, the Land Use Permits valid up to July 28, 2034.
- Plantation business permit in the form of Letter of Plantation Business Registration (SPUP) No. 202 / Menhutbun - VIII / 2000 dated March 10, 2000, 13 836 Ha area and plant with a capacity of 45 ton FFB / hour.

**2.1.2; 2.1.3 and 2.1.4**

To ensure compliance to regulations, company has procedure No. 021/TMP-PUUP//16, rev 01, January 1 2016. This document explaining who have responsibility to update the regulation and law, identification and inventory, evaluation and monitoring Information of regulation from national, provincial and district regulatory bodies, and renewal of any changes to prevailing laws and regulations and monitoring of expired regulations/licenses.

A list of regulatory identifications ranging from Laws, Government Regulations, Presidential Decrees, Ministerial Regulations, Ministerial Decrees, Regional Regulations, and the ratification of the ILO. Internal audits have been conducted continuously and are documented and reviewed in the management review activities conducted August 2018

**Status : Comply**

**2.2**

**The right to use the land is demonstrated, and is not legitimately contested by local people who can demonstrate that they have legal, customary or user rights.**

**2.2.1**

There is no change om document of land use legalities that have by The PT Tunggal Mitra Plantation, consist of :

- Certificate of Land Use (HGU) No. 2 of 1999 in accordance with the letter of Measure No. 16/1998 dated July 28, 1999. The concession area covers 13 386 Ha, the Land Use Permits valid up to July 28, 2034.

- Plantation business permit in the form of Letter of Plantation Business Registration (SPUP) No. 202 / Menhutbun - VIII / 2000 dated March 10, 2000, 13 836 Ha area and plant with a capacity of 45 ton FFB / hour.

**2.2.2**

The procedure about boundary pole maintenance of PT Tunggal Mitra Plantation does not change with previous assessment listed on Standard Operating Procedure Maintenance of Boundary Poles (Document: PDKK number, valid since July 4, 2010). These procedure as guidance for maintenance periodically the boundary stone. Based on field observation, entire boundary poles were located in it coordinate even some of them located inside the village.

Based on the last Monitoring of Poles Maintenance that conducted in September 2018, it is known that in Manggala 3 Estate there are 2 main poles and 40 auxiliary poles in the occupational area, Manggala 2 Estate has 3 main poles and 12 auxiliary poles, and Manggala 1 Estate has 1 main pole.

The company shows the Minutes of BPN Poles Evaluation dated September 19, 2018 which explains that the HGU Poles there are only 6 of 88 BPN poles because other poles are in the occupational area/community area.

The company is encouraged to ensure and consult with BPN related to the boundary poles coordinate in accordance with the Situation Revision Map No. 16/1992. **OFI**

**2.2.3, 2.2.4, 2.2.5**

There were no changes to the conflict resolution procedure listed in the Occupational Land Acquisition Procedure (343 / PSD-OKUP / 11) and there was a Memorandum recording from Head Plantation Upstream Indonesia on June 22, 2012.

Based on the Statement Area, it is known that the company did not extend the area and there were no land disputes. The company has shown the entire compensation process in the previous assessment, for example in 1997, an area of 301.60 hectares in the Tanah Putih sub-district.

Based on interviews with Suka Mulya and Pematang Genting Villages, it was known that there is no dispute area in the company. All areas that cannot be controlled by the company have been discussed with affected parties and there has been measurement of the enclave area on November 9, 2015.

**2.2.6**

The company had policy Sime Darby Responsible Agriculture Charter, 2016. These Policy related to Prohibition of Contractually Army using, The main point was explained in these policy, consist of point that the company will not using of Contractually Army in conflict resolution and will not tolerance of anarchism in conflict resolution process.

Based on field visit observation during the audit process, stakeholder consultation with village head, informal leader and community in Suka Mulya and Pematang Genting, there is no indication of Contractually Army using in PT Tunggal Mitra Plantation.

	<b>Status : Comply</b>	
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**2.3**

**Use of the land for oil palm does not diminish the legal rights, or customary rights, of other users, without their free, prior and informed consent.**

**2.3.1, 2.3.2, 2.3.3, 2.3.4**

There is no change in the FPIC SOP listed in the Occupational Land Acquisition Procedure (No. 343 / PSD-OKUP / 10) which explains that the land acquisition process must go through the stages of negotiation between the company and the party claiming the land.

Based on a document review of the area of the statement and interviews with the villages of Sukamulya and Pematang

Genting, it is known that the company did not extend the area and there were no land disputes, so there was no compensation for new land.

The company has shown the entire compensation process in the previous assessment, for example in 1997, an area of 301.60 hectares in the Tanah Putih sub-district. The compensation documentation is consist of Minutes of Compensation Handover, Statement of Compensation, Proof of receipt of compensation, Statement of land owner, Land Situation Map.

**Status : Comply**

**PRINCIPLE #3 Commitment to long-term economic and financial viability**

**3.1**

**There is an implemented management plan that aims to achieve long term economic and financial viability.**

**3.1.1 & 3.1.2**

Certificate holder shows the Long Term Business Plan for PT Tunggal Mitra Plantation for the period of 2016/2017 – 2020/2021 which was approved by the Head Plantation Operation which explained the budget for seed use, FFB production, OER, Production Costs, Estimated CPO Prices, Revenues, Replanting programs, and CPO production. For example in year 2019/2020 projected to produce a number of CPO amount 40,560 Ton.

There are planned operational costs for the Manggala Factory as follows:

- Forecast mill intake, (FFB), processing cost, Admin cost, Training cost, Environment cost, Health cost, Transport cost, etc.
- The cost of managing the environment has also been allocated for the manufacture, installation and maintenance of OHS and non-OHS announcement boards, the cost of laboratory analysis, and waste to outside parties.
- Projection of production in the next 5 years until 2019/2020

Certificate Holder also has a replanting plan whose information can be seen in both the Monthly Management Committee Meeting and the Long Range Replanting Program. Manggala-2 replanting plans are available for the 2013/2014 period to 2023/2034.

Replanting activities that have been realized at PT Tunggal Mitra Plantation in 2017/2018 (June to July) are :

Estate	Land Preparation		Planting	
	Program	Actual	Program	Actual
MGE-1	376.01	316.79	376.01	316.79
MGE-2	277.67	277.67	277.67	277.67
MGE-3	279.15	229.09	279.15	229.09

Based on field visits to blocks E10 and E11 Manggala-1 are known to be replanting activities in accordance with the established procedures, for example there are legume cover crop planting and making terraces for certain slope areas. In the peat area, trenches are made which function to carry out water management.

**Status : Comply**

**PRINCIPLE #4 Use of appropriate best practices by growers and millers**

**4.1**

**Operating procedures are appropriately documented and consistently implemented and monitored.**

**4.1.1**

Certificate holder has procedures of Estate operational start from Land Clearing until Harvesting in Agricultural Reference Manual of Oil Palm Planting No. 110/EST-ARM/13 dated September 1, 2013 signed by Head Plantation Upstream of Indonesia. The company also has a reception process procedure of FFB until to the *dispatch* of CPO and kernel, in a palm oil mill engineering guidelines Parts I and II, Minamas Plantation on April 30, 2007. SOP document has been distributed on September 16, 2013 to all unit head of estates and mills. Block Spraying System Procedure dated March 4, 2009 described how to apply pesticide in the field, how to mixed pesticide, how to handle spraying equipment, and PPE. Pictorial OHS procedure in mill (723/PSQM-PSS/12) and estate (722/PSQM-PSS/10) described safety working with the use of PPE, sign board, safety working, and handling emergency response.



Other than that the certificate holder also has Procedure of product identification and traceability at POM number RSPO/66/SCCS/15-TMP dated April 26th 2015. The procedure has adjusted from the SCCS standard on November 2014. The person in charge of the POM operational are the Factory Manager, Assistant of PSQM, Laboratory Foreman/Assistant and Assistant /Sr. Assistant /Manager of Bulking. The FFB transport procedure is contained in document No. Policy: 14x / PTK-TRP / 2004, No. Index XIV / 01. It separate from ARM

Based on field observation to Manggala-1 Estate block E34 division 4 on circle and path spraying known workers have understood working in accordance with established procedures. For example, before being taken to the field, pesticides have been mixed first at the BSS house, the responsibility to use PPE, the responsibility to wash and store PPE after work, and the application of pesticides in accordance with the specified target and the right dose.

Field visit to Manggala POM for example in sortation and grading station; boiler, and sterilizer station workers has able to explain their daily work and understanding of OHS.

**4.1.2 & 4.1.3**

Daily routine supervision is carried out by supervision levels ranging from foremen, division assistants, senior assistants, to estate managers. Monthly supervision of the quality of work is carried out by PSQM staff every month. Regular supervision by the internal auditor team (GCAD) is carried out at least every six months

In addition, there is also the Estate Performance Index for the 2017/2018 Period by Head Plantation Operation. Assessment parameters such as harvest quality, OER, FFA, and plant maintenance quality. Based on information from the Estate Manager and the PSQM staff, it was known that the plantation was given 2 weeks to compile an analysis of the root cause of the problem, Corrective action, and the date of implementation of the improvement. For progress improvement is given 6 months.

Internal audit results include the implementation of Internal Audit. Examples of internal audits that have been carried out (inspection period July - December 2018; Date of inspection 14 to 17 August 2018) for example:

**Review on Replanting RO RUA (Region Office Riau Utara)**

- The 2017/2018 Replanting Program at PT TMP (MGE-1 and MGE-3) was not achieved according to plan. It reaches 90.86% and the area of 108.78 is delayed (MGE-1: 59.21 Ha; MGE-3: 49.57 Ha)
- MGE-1: Replanting delayed 59.21 Ha or 9,474 oil palm due to lack of seedlings due to allocation to the road side and the center road, soccer field, flooded area, quarry, along the boundaries, and insert in Immature 2016 & 2017
- MGE-3: Replanting delayed 49.57 Ha or 7,931 oil palm due to lack of seedlings due to allocation of planting to the road side and center road
- Completion of the program is planned in 2018 (July - December) waiting for available seeds to be planted in the field. Currently the age of seeds are still 6.5 months with a total of 23,009 as of August 14, 2018

**Group Corporate Assurance Report on June 19, 2018**

- Solid and liquid sampling equipment in MGF is not standard. Root cause analysis: There is no standardized sampling tool. Corrective actoin: Make a standard for sampling tools and make them immediately. Implementation on March 31, 2018

**4.1.4**

Based on the information from the grading officer and FFB report processing of Manggala Factory, it is known that there are no FFB from third parties or suppliers. FFB processed comes from the owned estate

**Status : Comply**

**4.2**

**Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.**

**4.2.1**

Certificate Holder shows the procedures for managing soil fertility in the Minamas Plantation Agricultural Reference



Manual document in the manuring section. The company also conducted soil and leaf analysis as one way to monitor soil fertility and as a basis for preparing manuring recommendations.

Based on field visits and interviews with the BMS team in block E11 division 3 MGE-1 and block K05 division 3 MGE-3 it was known that workers had known about the dosage and type of fertilizer used. For example for MOP using a dose of 2.5 Kg / oil palm. In order for the application dosage in accordance with the recommendations, a calibrated measuring bowl is used

**4.2.2 & 4.2.3**

Manuring record can be seen from the monthly report of MMCM PT Tunggal Mitra Plantation. Fertilization records for the period June 2017 to July 2018 are as follows

**MGE-3**

Fertilizer	Program (Ton)	Realization (Ton)	Fertilizer/Ton FFB
HGFB	0.023	0.023	0.000400288
ZNSO4	19.08	19.08	0.00032793
CuSO4	16.98	16.98	0.000291837
CCM 44	1637.82	1637.82	0.028149401
MOP	392	392	0.006737349
RP	56.34	56.34	0.000968322

\*Production 58,183.12 Ton

**MGE-1**

Fertilizer	Realization (Ton)	Pupuk/Ton TBS
HGFB	0.02	3.1739E-07
ZnSO4	9.28	0.000147269
CuSO4	11.155	0.000177024
NPK44	1798.013	0.028533548
Rp	166.26	0.002638461
MOP	214.17	0.003398769

\*Production 63,014 ton

In an effort to maintain and manage soil fertility, the company also conducts fertilization programs' Fertilization is carried out based on recommendations from the MRC. The MRC team developed fertilizer recommendations based on the results of leaf analysis and soil analysis. In accordance with Policy No. I-04 / MRC-SOP / 10 dated April 1, 2010 concerning Preparation of Fertilization Recommendations, it is known that soil sampling is carried out every five years while leaf sampling is carried out every year

• **LSU**

**Manggala-2**

16 May 2018 -% Dry weight ASH; P; K; Mg; Ca; N and PPM dry weight of Be, Fe, Cu, Zn. Performed by Minamas Research Center Laboratory Services

**Manggala-3**

July 25 2018 - based on letter No: MRC / MgrAgr / Mgr.Lab / 042 / VI / 2018 dated June 5, 2018

Semi Detail Soil Survey and Feasibility Study for 2015-2020 period conducted by GNNS, GIS and Soil MRC Survey includes soil test parameters such as the content of C-Organic, Boron, and soil PH conditions.

**4.2.4**

The recycling strategy carried out by the company is with EFB and POME applications. In addition, the remaining trees from replanting are also part of the nutrition cycle strategy. Certificate holder has monitoring and recording of the implementation of the nutrient recycling strategy for example:

- EFB production during the period July 2018 by Manggala POM is 7,425 tons. Field applications amount to 7,325 tons
- POME application for the period June 2018 with a total application of 9,619 m<sup>3</sup> and application area of 23.65 Ha

Based on the field observation to block F008 Manggala-1, it was found that the EFB application was carried out in one layer with a dose between 250-300 Kg / oil palm

**Status : Comply**

**4.3**

**Practices minimize and control erosion and degradation of soils.**

**4.3.1 & 4.3.2**

Information about the soil condition of PT Tunggal Mitra Plantation is listed in a semi-detailed soil survey document for the 2015-2020 period made by the MRC team in collaboration with the Minamas Plantation GIS team. Based on the document, it is known that land suitability for the area of management is S2 (suitable) to S3 (moderate suitable). The marginal area identified is peat land with a total of 38.16% of the total area of PT TMP. Estate that has the widest peat area is MGE-2. The map scale used is 1: 45,000

Management strategies for planting on sloping land including by making terraces and contour roads and making individual stack. Besides that as an effort to conserve soil and water, the company also applies:

- Legume Cover Crop Planting
- Selective spraying
- Land cover with *Nephrolepis bisserata*
- EFB Application
- Fond stacking with U-shape method
- Making of water catchment

Identification of steep areas that are suitable or not suitable for planting have been found in land slope maps which can be seen in semi-detailed land survey. In this document the slope class of PT Tunggal Mitra Plantation is between 0 – 12°. As stated in the Part-4 Oil Palm Planting SOP (Land Preparation) areas with slopes > 6° to 20° are made with a terrace. Areas with a slope of > 20° should not be planted.

**4.3.3**

The road maintenance program is contained in the Annual Work Plan which is detailed into a Monthly Work Plan and realized into a daily work plan. Road maintenance is done either manually or by using heavy equipment such as graders and TLB. Realization of road maintenance for example:

**Manggala-2 (Period July 2017 – June 2018)**

Budget (Meter)	Actual (Meter)
151,824	39,240

- **Manggala-3**

up to July 2018 is realized 2016 Ha road maintenance and 434 box culverts/bridges

- **Manggala-1**

The 2017/2018 road maintenance plan is 84,000 meters long. Realization until June 2018 is 48,835 meters

During the field visit activities the condition of the road is good. There is a water rope on the right and left of the road. Overall road conditions are easily passed by vehicles.

**4.3.4 & 4.3.5**

The peat management procedure is contained in the Minamas Plantation Agriculture Reference Manual section 10 which includes explaining the water level management and measuring the decline in peat surface. Records of peat monitoring and management that have been implemented include:

- **Rainy Day (September).** Until September 19, 2018 there were 10 days of rain with 88.2 mm of rainfall
- **Subsidence Pole and Water Level :**  
**Manggala-1 :**
  - Subsidence pole on block G007 Installation early 2014. Until the second measurement on September 10, 2018 there was a total decline of 3 cm.
  - Water level : The results of the field visit showed a figure of 20 cm. The high water level is caused by moderate rainfall. The Certificate Holder has opened the water gate at the outlet and closed part of the watergate inlet to

reduce the water level.

**Manggala-2 :**

- Water level measurements in the September period show results between 60 - 70 cm. piezometer installation for example on blocks D005; C006; and B007 division III

**PT Tunggal Mitra Plantation Peat land Drainability Study 2017 by statistical data processing Minamas Research Center.**

In the technical conclusions the results of the assessment stated that from the results of drainability assessment of peat land in PT Tunggal Mitra Plantation generally entered into the class **"Not Critical Drainage"**. Groundwater level, soil acidity, and soil decomposition are still in sufficient condition (not damaged). It can be concluded that the requirements for replanting have met

**4.3.6**

Marginal land management strategies conducted by PT Tunggal Mitra Plantation include:

- EFB application
- POME application (Manggala-1 Estate)
- Selective spraying (letting nephrolepis grow)
- Preparation of frond with U-shape systems
- Making of culvert

Based on field observation in the replanting area (Block E10 and E11) there is planting using a terrace system in a spotting area. Besides that there are LCC planting and EFB applications. In the peat area (Block L08, K03, L17, and L18) a trench has been made and routinely carried out water level measurements (every one week) and observation of peat surface degradation every 6 months.

**Status : Comply**

**4.4**

**Practices maintain the quality and availability of surface and ground water.**

**4.4.1**

CH has identified water sources, consist of water bodies, artificial trenches, natural trenches and rivers. CH has implemented water management plans as indicated by documentary evidence along with field visits, for example:

- Conduct river water quality management by not carrying out the application of chemicals and fertilizers along the river with a distance of 50 meters and allowing the border to be in natural / shrub conditions.
- Perform river water quality testing every six months.
- Testing of surface water quality (canals) every 6 months.
- Testing the quality of ground water every 1 year.
- Testing the quality of well water in residential areas every 6 months.
- Making water bodies in the plantation area
- Monitoring the decrease of peat soil and groundwater level.
- Etc

**4.4.2**

CH has SOP Water Management (RSPO / 4.4 / WM) approved by the estate manager. This SOP contains procedures for measuring the water gate level and the water gate monitoring process regularly.

CH has made efforts to protect water flows and wetlands, for example;

- Determination of the Bangko River Border Area as HCV area 1.
- Marking the border of the river border 50 meters Right Left Bangko river in the form of border board installation.
- Planting bamboo species and others in the border area of the river.
- Do not apply chemicals in the river border area.
- Installation of warning boards / prohibitions on cutting trees in the river border area.

The company also has a policy of protecting river borders, for small river borders 50 meters from the right and left of the river.

In addition, CH also conducts water quality testing of the river every 6 months contained in the RKL-RPL implementation report. The results of testing the quality of river water based on Government Regulation No. 82 year 2001 for Class III as follows:

Test Parameters	Standard	Results	
		Upstream	Downstream
TSS	Max. 400	20	24
pH	6 – 9	5.79	6.2
BOD	Max. 6	2.819	8.556
COD	Max. 50	28.75	81.63
Nitrit	Max. 0,06	<0.017	<0.041
Oil and Fat	Max. 1000	<100	<100

Based on the test results, it is known that there are parameters that exceed the standard, namely BOD and COD. This is because the PT TMP area is indeed part of the peat area. For information, mill effluent discharged to plantation land as land applications. Waste water quality testing document review shown for 2017 – June 2018 all of waste water testing parameters are compliant to the standards quality. And Based on visits in the area of WWTP and LA there is no indication of leakage of liquid waste. The follow-up of management plan is to continue to manage river borders and ensure that there is no runoff of waste water to the environmental agency.

**4.4.3**

Mill effluent produced by Manggala POM processed at Waste Water Treatment Plant (WWTP) before it discharged to plantation land as land applications based on Decree of the Head of the Environmental Agency of Rokan Hilir Regency No. 49/DLH/2017 dated 4 December 2017 and valid until 5 years.

Waste water quality testing document review shown for 2017 – June 2018 all of waste water testing parameters are compliant to the standards quality, and all of waste water management and monitoring has been reported to related institutions for regular basis every 3 month. Field visit results in the block E011, it was known that waste water has been flowed to the block in accordance with Land Application license owned. In addition, based on visits in the area of WWTP and LA there is no indication of leakage of liquid waste.

**4.4.4**

Water usage monitoring was done periodically and recorded, for example on August 2018 FFB processed 15,835.29 mt, water usage 18,500 m<sup>3</sup>, and water usage efficacy was 1.35 m<sup>3</sup>/tonne FFB processed. Observations on Manggala POM water treatment plant found monitoring for raw and process water usage was done by officer periodically.

The results of the field visit found that there were 3 flow meters for process and domestic activities. From the results of the field visit, it was known that the flow meter in good condition.

**Status : Comply**

**4.5**

**Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management techniques.**

**4.5.1 & 4.5.2**

IPM program listed in the annual work plan which is then detailed into a monthly work plan and daily work plan. The IPM emphasizes the Early Warning System which prioritizes detection and census activities. Based on the summary crop protection issued by the MRC team, known potential pests whose presence is always monitored include Palm Leaf Eating Caterpillar, rat, Oryctes, Ganoderma and termite.

In principle, the application of IPM is expected to reduce the use of pesticides. One ingredient whose use is reduced is brodifacoum. As the information contained in PT TMP pesticide use recap, there was no use of brodifacoum

(Rodenticides) in the 2018 period. The use of rodenticides could be reduced along with the increase in BOB occupation at PT TMP

In normal conditions pesticides are not applied prophylactically. However, in certain conditions, for example in the area of replanting the cypermetrin application for controlling oryctes, it is possible without waiting for the results of the census. This is because there is an EFB application in the replanting area which increases the possibility of becoming a breeding ground for oryctes

Summary crop protection The August 2018 period states the following:

**MGE-1**

- Nettle Caterpillar : up to August 2018 there is nettle caterpillar infested in 232.18 Ha with an average intensity of 2.8 larvae / frond. Control using cypermetrin 116 liters
- Bag worm : The area of attack up to August 2018 is 10 Ha with an intensity of attacks of 0.3 larvae / frond. Control using 20 Kg asefat.
- Rat : The intensity of the rat infested in August <5%. So that campaign baiting is not carried out
- Ganoderma : No infested were found

Based on the summary crop protection above, it is known that the average attack rate of nettle caterpillars and bagworms is actually still below the control threshold. Control measures using pesticides are carried out in the G007 block G13 and G14 fields where the intensity of attacks is 7.5 larvae / frond (control threshold is 5 larva / frond)

The Certificate Holder also conduct biological controls using beneficial plants and natural predators. Monitoring in August 2018 includes informing the following:

**Barn Owl Box**

- Manggala -2 Broken: 3; Good: 36; Adults 16; fly poult 5 (up to 3 September 2018)
- Manggala-1 63 units. 85% occupancy rate

**Benefecial Plant up to July 2018**

**Manggala-2**

Variety	Quantity (Meter)	
	MR	CR
Turnera	16,592	22,510
Cassia	21,912	26,911
Antigonon	3,900	5,778

**Manggala-1**

Variety	Quantity (Meter)
Turnera	9,710
Cassia	13,129
Antigonon	3,803

Based on field observation to block E34 MGE-1 and block H12 MGE-2 were found beneficial plant of the type of turnera and cassia planted along the right and left of the CR or MR road. While the types of antigonon are planted at crossroads by making a place to grow

The realization of IPM training has been described in 4.8.1 & 4.8.2

**Status : Comply**

**4.6**

**Pesticides are used in ways that do not endanger health or the environment**

**4.6.1**

Certificate holder has a policy on the use of chemicals in the ARM section 15 and 16 about plant protection. Selective use of products is found in SOP for plant protection, for example Cypermetrin to control Palm Leaf Eating Caterpillar and Oryctes while glyphosate is used to control both broadleaf weeds and narrow leaf weeds.

Steps included to avoid the development of resistance include:

1. Using census and monitoring methods to determine the type of control that will be carried out. The use of pesticides is the last alternative if from the results of the study it turns out that there is evidence that the intensity of pest attacks has exceeded the threshold and threshold of control
2. Pesticides that are applied on target, right dose, and on time
3. Integrating physical, chemical, biological and mechanical (IPM) control method

Based on interviews with the circle and path spraying workers in the block E34 division 4 Manggala-1 was found that the spraying was in accordance with the procedure. For example using glyphosate active ingredients combined with methyl metsulfuron. Pesticide mixing is carried out at BSS houses. So that the pesticides brought to the field are not pure ingredients and are ready to use

#### 4.6.2

Records of pesticide use are documented in monitoring the use and toxicity of pesticides of PT Tunggal Mitra Plantation, for example the period June 2017 to July 2018 for Manggala-2 and Manggala-1 Estate as follows:

#### Manggala-2

Trademark	UoM	Usage	Application (Ha)	a.i	a.i/Ha
Kencepat	Kg	5721	5527.62	4145.715	0.75
Basta	Ltr	2263	913.96	339.45	0.371406
Ken UP 480 SL	Ltr	6601	3677.77	3168.48	0.861522
Kenly 20 WG	Kg	167	3677.77	44.255	0.012033
Trendy	Kg	298	3677.77	143.04	0.038893
Kenlon 480 EC	Ltr	626	2763.81	300.48	0.108719
Sidametrin 50 EC	Ltr	5166	913.96	258.3	0.282616
Sentrin 50 EC	Ltr	4153	913.96	207.65	0.227198

#### Manggala-1

Trademark	a.i	UoM	Usage	a.i	Application (Ha)	a.i/Ha
Kencepat 75 Sp	Achepate	Kg	6.86	5.145	12608.87	0.000408
Dejavu 288 EC	Fluroxypyr Amonium	Ltr	302.35	87.07968	5896	0.014769
BASTA 15 KEN-UP 480 SL	Glufosinat	Ltr	10.23	1.5345	2268	0.000677
KENLY 20 WG	Glyphosate Methyl	Ltr	7.24	3.4752	25152	0.000138
TRENDY KENLON 480 EC	Metsulfuron Methyl	Kg	182	36.4	191855	0.00019
LANCER 75 SP	Metsulfuron	Kg	93.2	18.64	5896	0.003161
SIDAMETHRIN 50 EC	Triclophyr	Ltr	2214.2	1062.816	191855	0.00554
Capture 50 EC	Asefat	Kg	260	195	25152	0.007753
Centrin 50 EC	Sipermetrin	Ltr	13676	6838	2268	3.014991
	Sipermetrin	Ltr	100	50	2268	0.022046
	Sipermetrin	Ltr	10676	5338	25152	0.21223

\* LD50 information is found on each MSDS product



Based on verification to the pestisida.id site owned by the directorate general of the facilities and infrastructure of the ministry of agriculture, it is known that all pesticide used by the company has a valid distribution permit

#### **4.6.3**

Certificate holder implemented the IPM program start from Early Warning System method (by detection and census). Census results are used as a reference to determine the control actions to be taken.

The implementation of the IPM program is always monitored regularly by the MRC team and described in summary crop protection. Pests that are identified as the potential pest include rat, oryctes and Palm Leaf Eating Caterpillar. In principle, the application of IPM is expected to reduce the use of pesticides. Based on pesticide usage data for the period June 2017 - July 2018 PT TMP is known to have reduced use of pesticides including rodenticides such as brodifacoum and warfarin. In the period June 17 - July 18 there was no use of pesticides with the active ingredient. Besides that, pesticide-active pesticides are also not used by the company

The use of pesticides for pest and disease control is based on the results of the census. If the census results show a number above the threshold of control, a new pesticide application is carried out. There are uses of pesticides to control palm-leaf-eating caterpillars, for example in the G007 G13 block and G14 block. The ingredients used are sipermetrin at a dose of 300-500ml / ha. The infested area by the palm leaf eating caterpillar up to August 2018 is 30 hectares with the amount of material used as much as 1.5 liters. The last application was carried out on 30 August 2018. Subsequent spraying was carried out 2 weeks after the application and the control effectiveness observation was carried out 1 week after the last spray application. Block G13 and G14 status per September 2018 are below the threshold (<5 larvae / frond) so the application of pesticides is stopped.

#### **4.6.4**

Certification holder has a complete list of WHO 1A and 1B pesticides as indicated by the OHS expert of PT Tunggal Mitra Plantation. List contained in annex 2 Procedure of Management Sustainability No. Policy 724/TQEM-SPMS/09. The Sime Darby Responsible Agriculture Charter (September 2016) document outlines that it will implement an integrated pest management program by not using paraquat or chemicals belonging to WHO 1A group. Group 1B WHO will be gradually reduced in accordance with the conventions of Rotterdam and Stockholm.

There is a Sime Darby Responsible Agriculture Charter document (September 2016) which outlines that it will implement an integrated pest management program by not using paraquat or chemicals that belong to WHO 1A class. WHO Group 1B will be gradually reduced according to the Rotterdam and Stockholm conventions.

During the period June 2017 - July 2018 there was no WHO class 1A and 1B pesticide use. Based on field visits to the central warehouse where pesticides are stored, physical stock is in accordance with what is recorded on the warehouse card.

#### **4.6.5**

The Company has SOP on Management of Hazardous Waste which describes the chemical classification, responsible person, person in charge, supply of MSDS through suppliers, chemical storage, chemical handling, action against leaks and spills, first aid to training programs.

Pesticide applicators are special people who have received regular training and joined the Block Spraying System team. Based on interviews with the BSS team in block E34 MGE-1 workers have been able to demonstrate an understanding of the hazards and risks to the chemicals used. Workers are able to explain the border spraying area, how to mix ingredients, application dosage and target pests or weeds. Records of training implementation are explained in indicator 4.8.2

The PPE provided is in accordance with the risk analysis made such as carbon masks, boot shoes, face shields, rubber gloves, and helmets. Before leaving for the field, PPE and work tools are always checked by the foreman and assistant division alternately.

The PPE used has referred to MSDS such as the use of respiratory mask, gloves and face shields. MSDS Kenlon, Ken-Up, and Basta (herbicides that are routinely applied) not regulate the specifications for the mask. As stated in the MSDS, Masks with cartridges and filters are used for insecticide applications such as sipermetrin. The mask of the pest spray team is in accordance with the MSDS.



**4.6.7**

The Company has Pictorial OHS Palm Oil guidance (No.722/PSQM-PSS/10 dated December 13, 2010) that describes the work instructions of pesticide applications governing applicable PPE, warning signs, spray training courses, emergency response, Spray labor facility (BSS house) for equipment storage, PPE and mixing place up to storage of used jerry cans in hazardous waste storage

Based on interviews with spraying workers at Manggala-1, Manggala-2, Manggala-3 it was explained that the workers had been trained and the workers could explain the safety of spray activities, such as the applicable PPE, the pesticide mixing activity was done in a special place (BSS house) and after Spray activity is finished the PPE and spray equipment must be cleaned and stored in special place (house of BSS).

**4.6.8**

Based on information received from spraying team, upkeep foreman, division assistants, to the estate manager, it was known that there had never been a pesticide application carried out by air. Field visits to the warehouse of chemicals were also found in the fact that there were no facilities and infrastructure for applying pesticides through the air.

**4.6.9**

Information regarding the handling of pesticides includes the product MSDS and PT Tunggal Mitra Plantation pesticide management. In addition there are regular socialization, for example in formal muster morning or training such as:

- Spraying training on July 23, 2018 at the MGE-2 office attended by 9 BSS teams and one foreman. Speakers are MGE Senior Assistants and PSQM staff
- BSS MGE-3 training on 18 July 2018 was attended by 17 participants
- BSS & BMS MGE-2 training on 20 June 2018. Followed by 20 participants

The training minutes of meeting inform the material provided at the time of the training including the implementation of spray procedures, how to store and handle chemicals, and how to work safely both for themselves and for the environment.

The results of the interview with the BSS team on the E34 MGE-1 found out that the spraying team had understood and could explain the method of handling and application of pesticides. There are no smallholder in PT Tunggal Mitra Plantation.

**4.6.6 & 4.6.10**

CH has SOP for Pesticide packaging storage revision 01 on February 21, 2018 and has been approved by each estate manager. Based on interviews and field visits at chemical warehouses, chemicals are placed in special warehouses arranged according to size, type and have been equipped with MSDS, spill kits, first aid boxes, cleaning place etc. Warehouse in and out access is held only by the warehouse responsible. Any interested to enter the storage warehouse must be accompanied by the responsible warehouse. All storage pesticide used are stored in Warehouse Temporary Hazardous Waste that has licensed from related agency. Hazardous waste will be delivered to the licensed hazardous waste collecting and transporter. The results of observations at the housing workers not found pesticide used for other purposes such as water storage.

The certificate holder shows evidence of proper disposal of waste disposal such as the hazardous waste handover to the collector and waste transporter of PT Amindy Barokah, for example Minutes of handover of hazardous waste on August 1, 2018.

**4.6.11**

The company have a medical examination for pesticide operator. Management unit of Estate has a list of the latest pesticide operator as many as 29 workers. All workers spray has examined health through inspection types of *cholinesterase*, to ascertain the condition of workers in good health. The last examination was conducted in August-September, 2018 for all units. Examination results stating that all workers spray are in a healthy condition (normal result). Based on interview with pesticide operator and chemical warehouse clerk in MGE-3 that the results of medical

examinations are known to workers. From field observation are also not identified any complaints of skin disease or itching.

**4.6.12**

Policy about restrictions for women worker that pregnant or breastfeeding in jobs related to chemicals is still the same as the previous assessment contained in SOP Clinic No. Policy RSPO / 5.3 / PLB3 & BB3.

Based on interview with pesticide operator, it is known that there was neither pregnant nor lactating female personnel who work with pesticide. Moreover, company conducts pregnancy test and examination every month. Audit team also got information that the personnel have understood that female personnel cannot work with chemical material if they are pregnant or lactating.

**Status : Comply**

**4.7**

**An occupational health and safety plan is documented, effectively communicated and implemented.**

**4.7.1**

The company has a policy of occupational safety and health available in Indonesian language. The policy has been legalized and updated on December, 2011 by Head Plantation Upstream Indonesia. The company's commitment on the implementation of occupational health and safety within company's operation. This policy is designed to control hazards in every activity that is in the working environment to prevent accidents and occupational diseases. It has been disseminated on the activities of the safety briefing before doing the work. Management have work program of occupational.

This policy is designed to control hazards in every activity that is in the workplace to prevent accidents and occupational diseases. It has been disseminated on the activities of the safety briefing before doing the work. Management have work program of occupational health safety every year. Realization of the program of work will be monitored through regular meetings Guiding Committee of Occupational Safety & Health every month. This work program applies generally to all workers in the workplace. If the plans have been made yet on target then will be evaluated in the management review to assess effectiveness.

Interviews were conducted to warehouse clerk and workshop in MGE-3. Based on the results of interviews can be concluded that workers understand the OHS policy and it's recognized that every morning meeting is always affirmed about the importance of safety and the use of PPE in work.

**4.7.2**

The company has an HIRAC document that was reviewed in July 2018 and has covered all operational activities in the estate and mill. The HIRAC compilation refers the SOP of OHS identification guidance (Policy Number 7301/PSQM-ESH/11) was legalized on July 7th 2011

Based on the work accident recapitulation report for the last 12 months, there was 1 work accident in October 2017 (MGE-1) and 1 work accident in 2018 (MGF).

The document is composed to conduct identification and analysis of hazard potential that is probably happened at workplace and the recommendation to reduce the potential of work accident. According to the result of document review and field visit to mill and estate, the management unit has socialized the risk analysis document to all workers. Based on interview with the workers in Manggala Estate and mill, obtained information that the employee has known the potential of dangers that could occur at workplace.

Based on site observation at workshop and agrochemical warehouse in MGE-3 it was clearly confirmed that workers had been aware related potential risk and hazards in the work place. Following up on this, the company has been reduce the potential risk by providing PPE and OHS signboard are available in workplace.

**4.7.3**

The company has been conducting training of safe work and recorded in the form of photos, the minutes, attendance and certificate/operator license. For example:

- Training of first aid handling dated April, 5 2018.
- Socialization of PPE use to all workers during muster morning.

- Records of the realization of coaching training and health safety techniques (OHS) in the form of operator licenses and certificates for example OHS Certificate of heavy equipment.
- Safety town hall 7.0 dated 6 to 21 August 2018.

In generally the Company has provided PPE is in accordance with HIRAC. Based on interviews with harvesters, it is known that workers can explain the safe workings of harvesting, such as determine a safe working distance for cutting fresh fruit bunches (FFB).

Based on field observations its known of the employees has been using PPE in accordance with risk analysis, specified hazard identification and MSDS, for example the sprayer using personal protective equipment in accordance with specified hazard identification and risk analysis like apron, google, hand glove and safety shoes.

PPE can be replaced immediately if damaged. This is evidenced by shown the recording of PPE distribution documents to the workers and the workers recognition from interviews also confirmed it.

In addition, the company shows provisions related to PPE in procedure No.21 / TMP-PSQM-ESH / 16 rev.00 which describes the types, specifications and standards of PPE for estate and mill operations.

Based on field visits by the auditor, the company has shown evidence of PPE supply while working but there are some indiscipline in the use of PPE by workers. This was informed by the assistant that monitoring was running every morning during the safety briefing but this made improvements for the company to ensure effective monitoring of PPE use (Observation). **OFI.**

#### 4.7.4

Certificate holder has identified those responsible for implementation of OHS program formed in P2K3 structure Estate and Mill. P2K3 that owned has been approved by Labour Agency of Riau Province with No. No. KEP.57/Disnakertrans-PK/SK-P2K3/III/2018 dated 12 March 2018 for Mill (MGF), and No. KEP.56-59/Disnakertrans-PK/SK-P2K3/III/2018 dated 12 March 2018 for for Estate (MGF 1,2 and 3). Secretary of P2K3 who is an OHS Expert in accordance with the applicable regulation has certificate of OHS Expert from Labour of Minister RI. Besides that, meeting related OHS has been done on every month by P2K3 personnel, example meeting on July 2018 in Estate and Mill with the agenda of discussion on OHS problems, PPE usage for workers and contractor, safe working practices etc.

#### 4.7.5

SOP on handling accidents and emergencies unchanged from the previous assessment, for example: SOP of Occupational Accident Handling (RSPO/4.7/KKS dated 01 July 2016) & (RSPO/4.7/KKM dated 01 July 2016) is contained about handling, reporting and evaluation of accident. The procedure is available in Indonesian language.

Established procedures has included the identification of fires, chemical spills, work accidents, natural disasters (floods) etc. Simulation was performed to know the preparedness of emergency response equipment in the POM. The simulation was performed on hydrants located in Manggala Factory and the result of the simulation was concluded that the hydrant tool is ready for use.

Manggala Mill and Estate has already licensed first aid officers and there was first aid internal training conducted on 12 September 2018 in MGE-3 which was attended by 48 participants (Mill and estate). Management unit also has a first aid kit in each unit and based on observations, it's concluded that the contents in the first aid box are sufficient according to the regulations. There is also a checklist of observations of the contents of first aid boxes routinely performed every month by first aid officers.

#### 4.7.6

The company has provided the employees with insurance to cover accident in accordance with the provision set by the government (*BPJS Ketenagakerjaan and BPJS Kesehatan*). Such insurance is named *BPJS Ketenagakerjaan*, which is routinely paid every month. Meanwhile, for medical insurance, PT TMP has registered its entire personnel in *BPJS Kesehatan*. Based on interview with some personnel, it is known that the entire personnel have been registered in *BPJS Ketenagakerjaan and BPJS Kesehatan*.

In the period 2017 until July 2018, the company did not submit a claim for a work accident related to BPJS Ketenagakerjaan. This can be explained and verified by the auditor that work accidents in October 2017 and July 2018 have been covered by accident insurance. Workers have been treated, covered by medical expenses and can work again. Work accident investigations have been carried out as corrective actions from the company so that work accidents do not recur in the future.

Besides that, interview with contractor representative, it is known that the accident insurance for contractor's workers is covered by the head of contractor itself.

In addition the company has also shown evidence that any work accidents have been reported to the relevant agencies.

**4.7.7**

Work accident is documented on the work accident recapitulation report and provided the lost time accident matrix in it. The matrix describe the number of work accident, working days lost, working time lost, and the number of lost cost. The matrix is attached on the guiding committee of occupational health and safety report.

Based on the work accident recapitulation report for the last 12 months, there was 1 work accident in October 2017 (MGE-1) and 1 work accident in 2018 (MGF).

The company has been monitoring statistic work accidents until July 2018 and analyze the lost time due to accidents. Calculation of LTA for estate and Mill, namely MGE-1 in October 2017 (SR = 169, FR = 9), MGE-2., MGE-3. Whereas in July 2018 there was 1 work accident in MGF with lost days = 8 (SR = 249 and FR = 31). Monitoring of work accidents performed every month and reported to the relevant agencies with regular reports of P2K3.

**Status : Comply**

**4.8**

**All staff, workers, smallholders and contractors are appropriately trained.**

**4.8.1**

**Training**

<b>Program</b>	<b>Participants</b>	<b>Facilitator</b>	<b>Realization</b>	<b>Number of Participants</b>
Harvesting Technique	Foreman & Harvester	EM/SA/ASST	20-Jan-18	26
Integrated Pest Management and Leaf Sampling Unit	Upkeep worker	EM/SA/ASST	21-Agu-17	24
Manuring Technique	BMS team	EM/SA/ASST	19-Okt-17	9
Spraying Technique	BSS team	EM/SA/ASST	15-Nov-17	10
FFB Sortation	Sortation team, Harvester clerk	EM/SA/ASST	04-Sep-17	10
Fire Emergency Response	Worker representative	EM/SA/ASST	16-Feb-17	37
Pollution Prevention	Worker, Housing residence	EM/SA/ASST	12-Dec-17 ; 12-Agu-2017 ;	71
OHS	Worker & contractor	EM/SA/ASST	14 -Jan-2018	78
First Aid	EM/SA/ASST	EM/SA/ASST	05-Apr-18	10
Electrical OHS	EM/SA/ASST	EM/SA/ASST	07-Mar-18	6
Emergency Response	EM/SA/ASST	EM/SA/ASST	16-Feb-18	37
OHS Management	EM/SA/ASST	EM/SA/ASST	10-Feb-18	12

- RSPO awareness by PSQM :
  - a. MGE-2 : 23 March 2018; 87 participants
  - b. MGE-1 : 22 March 2018; 74 participants
  - c. MGE-3 : 21 March 2018; 112 participant

Awareness participants ranging from employees, foremen, to contractor representatives. From the minutes of the activity it can be seen that there have been discussions of the PnC especially in the aspects of BMP, Social, Environmental Management and HCV.

**Mill**

<b>Program</b>	<b>Plan</b>	<b>Information</b>	<b>Participant</b>
SCCS	Agu-18	On Schedule	14
Proses	Mar-18	On Schedule	9
Maintenance	Apr-18	On Schedule	8
Analyst/QC	Jun-18	On Schedule	4
HIRAC	Agu-18	On Schedule	16
First Aid	Agu-18	On Schedule	12
Emergency Response	Jun-18	On Schedule	16
OHS Awareness	Feb-18	On Schedule	9

Before creating a training program, the HR department and representatives of the plantations and factories compile identification of training needs. Based on interview with BMS and BSS team, Harvester, Upkeep worker, staff and assistant known that the company has routinely provided training and socialization in order to improve the competence and understanding of workers

**4.8.2**

The HR section is assisted by document control and PSQM keeps a history of training that has been carried out. The frequency of training in accordance with the identification of needs is divided into three types, namely annual, semester, and quarterly

Records of the training realization have been explained in 4.8.1 with the following example:

**MGE-3**

- MGE-3 BSS team training on 13 September 2018 attended by 13 participants. The material is the introduction of pesticide MSDS, safe working methods, how to handle pesticide, how to mix ingredients, and storage of PPE after work
- Integrated Pest Management Training on February 27, 2018 was attended by 6 participants. The material includes the introduction of potential pests in oil palm, the method of detection and census and OHS

**MGE-1**

- The MGE-1 BSS training team on 11 September 2018 was attended by 12 participants. The material is the introduction of pesticide MSDS, safe working methods, how to handle pesticide, how to mix ingredients, and storage of PPE after work
- Integrated Pest Management Training on April 16, 2018 was attended by 8 participants. The material includes the introduction of potential pests in oil palm, the method of detection and census and OHS

**Mill & Contractor**

RSPO awareness on February 2018 attended by 9 participants

**Status : Comply**

**PRINCIPLE #5 Environmental responsibility and conservation of natural resources and biodiversity**

**5.1**

**Aspects of plantation and mill management, including replanting, that have environmental impacts are identified, and plans to negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continuous improvement.**

**5.1.1**

CH has an environmental impact assessment document, as follows:

- EIA documents of PT Tunggal Mitra Plantation approved by the Ministry of Agriculture in accordance with the Minister of Agriculture No. RC. 220/950 / B / V / 1994 dated May 28, 1994 regarding the Approval of EIA PT Tunggal Mitra Plantation. In this document the scope of the study covers an area of 18,000 hectares and a capacity of mill will be built by 60 ton FFB / hour.



- PT Tunggal Mitra Plantation's RKL / RPL document was approved by the administration Department of Agriculture Agency No. 001 / RKL-RPL / BA / VI / 94 dated June 24, 1994.
- The Revised RKL / RPL document was approved by the Regency Head of the Rokan Hilir Regional Environmental Impact Management Agency (BAPEDALDA) in accordance with Letter No. 666.1 / AMDAL-BAPEDALDA / 2006/12 dated August 23, 2006.
- Study of the Effect of Environmental and Social Replanting, PT Tunggal Mitra Plantation, Estate Manggala 1, 2 and 3 Rokan Hilir Regency, Riau Province. The study was conducted by Consultant in January 2012

**5.1.2 & 5.1.3.**

CH has had applied environmental management aspects in accordance with matriks of RKL-RPL, among others :

- Erosion and sedimentation
- Air quality and noise
- River water quality
- Quality of liquid and solid waste
- Fire potential
- Flora and fauna
- Damage to the access road
- Declining environmental health and public health
- Public unrest.
- Management of environmental and social impacts due to replanting.

Implementation of environmental management has been conducted in accordance with the matrix environmental management plan (RKL) and has included the impact of replanting activities. The environmental management plan has identified (PIC) the person who is responsible that is in accordance with their respective parts and fields and is responsible to their respective Managers.

Based on the results of the field visit, it is known that the company has carried out environmental management activities, such as:

- Make rorak and fortress (pit bund) on undulating land with a degree of slope of 8°-15°
- Planting Legume Cover Crop plants in the area of immature plants
- Conducting greening around the factory and improving safety for employees by using PPE and carrying out regular machine inspections.
- Management of wastewater to meet quality standards before flowing to land applications
- Make a special team to monitor, prevent, and provide firefighting equipment, monitoring equipment and patrols for fire prevention.
- etc

CH also has conducted environmental monitoring as outlined in the Report of the Environmental Management and Monitoring for regular basis. These report described realization of monitoring and management of the environment in accordance with environmental parameters in the RKL/RPL. Based on the document review, there has been an evaluation of the results of environmental monitoring and management described in the RKL-RPL Report. It also explained the follow-up of activities from the results of monitoring that are not in accordance with the standard.

Based on document verification and field visits, it is known that the company has conducted environmental monitoring, such as:

- Monitoring of erosion-prone areas
- Conduct emissions testing
- Conduct air and ambient quality testing.
- Conduct water quality testing
- Monitoring the quality of liquid waste



- etc

Status : Comply

**5.2**

**The status of rare, threatened or endangered species and other High Conservation Value habitats, if any, that exist in the plantation or that could be affected by plantation or mill management, shall be identified and operations managed to best ensure that they are maintained and/or enhanced**

**5.2.1.**

Still the same as the previous assessment, the identification for protected species, rare, or endangered, and the habitats with high conservation value had been done in 2009 by in cooperation with the third parties. The assessment of HCV has been included the identification of protected area, flora and fauna, and also the status of its preservation (indicator 5.2.2). The HCV assessment method has been considered adequate and referred to the tool kit of RSPO HCV in 2008. The evidence of public consultation has been done on 8 January 2010. HCV area is 21.20 Ha such as Bangko Riparian area. CH also has a complete and adequate HCV location map that shows the distribution of HCV locations throughout the PT. TMP. HCV maps are available in each estate of PT. TMP.

**5.2.2; 5.2.3 & 5.2.4**

To provide protection against RTE species, management unit has made the hunting ban signboard, patrolling, doing rehabilitation of riparian as habitats. CH also conducted a periodically monitoring every month for HCV areas, and species monitoring by assistant who is also a HCV officer. CH has shown records of monitoring of fauna, for example: fauna identification found by officers conducted on August 18, 2018, seen several species such as *Ardea purpurea*, *Bubulcus ibis*, *Alcedo meninting*, *Macaca fascicularis*, *Macaca nemestrina*, *Paradoxurus hermaphroditus*, and *Prionailurus bengalensis*.

CH has issued a policy to protect endangered species as outlined in the Memorandum of SOU Chairman 16 Manggala No. 001 / SOU-16 / XI / 2015 dated November 1, 2015. Based on interview with management and document review known that there is no violation of the policy. And based on field observation and document review of the HCV monitoring known that HCV area condition is well maintained and there is no interference against HCV.

CH has socialized the HCV area as indicated by :

- Record of HCV socialization by giving brochures to students on 11 April 2018 (attached attendance and photos).
- The company showed documentation of socialization related to HCV (wildlife management, conservation forest management, animal protection, buffer zone management) on June 14, 2018 which was attended by 52 participants.
- HCV training record to the workforce on February 2, 2018 which was attended by 14 participants

In addition, the results of interviews with workers such as harvester, spraying team it is known that workers understand the protection of wildlife and protection of other HCV areas.

CH has work programme of HCV that is available for every year. Based on field visits and document review, it was discovered that CH had realized an HCV management plan, for example:

- Socializing HCV locations through pamphlets
- Conducting enrichment in the HCV area by planting forest and bamboo plants around the river border such as waru, mahogany and angkana
- Monitoring HCV areas including protected animals.
- Record of HCV socialization by giving brochures to students on 11 April 2018 (attached attendance and photos).

CH has evaluated HCV management plans every month based on HCV monitoring results. It contained in the document PT TMP HCV Area monitoring report.

**5.2.5**

Based on field visits and interviews with village communities (Sukamulya and Pematang Genting), there were no community areas that overlapped with the HCV area.

**Status : Comply**

**5.3**

**Waste is reduced, recycled, re-used and disposed of in an environmentally and socially responsible manner.**

**5.3.1**

The certificate holder has identified waste and pollution products from the activities of the plantation and factory, which includes the identification of the source of waste from each activity in the plantation and mill, for example: POME, EFB, fiber and shell, contaminated packaging, domestic waste etc.

**5.3.2 & 5.3.3**

The hazardous waste has been stored at the hazardous waste temporary warehouse which has already gotten the permit of hazardous waste storage based on the Decree of the Head of the Rokan Hilir Regency Environmental Impact Management Agency No. 54 / BPD L / 2015 dated 27 November 2015 concerning Hazardous Waste Management Permit for PT TMP which are valid for up to 5 years.

Based on field observations in the hazardous waste storage and interviews with workers, known that certificate holders saving and dispose of chemical containers in licensed hazardous waste temporary warehouse and are collected for transport by licensed hazardous waste collectors and transporter. Based on the observation, also known waste stored in the hazardous Waste Temporary Storage Site has been stored in accordance with the requirements in accordance with applicable regulations, such as: eyewash or shower, emergency response such as APAR, first aid box, symbols and labels of hazardous waste, in flood-free areas, etc.

CH shows documents for storing and handling hazardous waste such as hazardous waste logbook, waste balance, minutes of hazardous waste handover, hazardous waste manifest as well as hazardous waste reporting report. For example minutes of hazardous waste transportation dated 1 August 2018 collected by licensed collector. Agreement between company and third party which collect the hazardous waste showed by the document of agreement No. 252/TMP-ABS/SPK-LB3/IV/2018 dated April 2, 2018. The third party already has permit related to collection and transportation of hazardous from related agency.

For the management of medical waste, CH cooperates with other third parties as showed by a cooperation agreement letter with No. 060/RSC-TJS-ABS/SPK-LB3/II/2018 dated January 16, 2018 and is valid for up to 1 year1.

For liquid waste, CH utilizes POME on the application land, it is accordance with the permit to utilize wastewater for PT TMP with number 49/DLH/2017 covering an area of 199 ha located in Pematang Damar Village. This decision is valid for 5 years from 4 December 2017. In addition, based on visits in the area of WWTP and LA there is no indication of leakage of liquid waste.

For shells and fiber, the company utilizes the solid waste for boiler fuel. As for domestic waste at housing complex, it will be transported at least 2 times a week to be disposed of in the landfill.

Ensuring the management of plastic from waste ex fertilizer (**Observation**)

**Status : Comply**

**5.4**

**Efficiency of fossil fuel use and the use of renewable energy is optimised.**

**5.4.1**

CH has calculated the use of fossil fuel in September 2017 - August 2018 period with average fossil fuel consumption of 22,787.33 liters with average CPO for the Sept 2017-August 2018 period totaling 3,203.17 mt. So that the average use of fossil fuel usage efficiency is 8.09 per CPO.

CH shown commitment to reducing fossil fuel by renewable energy usage came from fiber and shell. Shell and fiber usage have been monitored per month. During September 2017 - August 2018, fiber and shell usage for boiler resulting average energy efficiency are 0.64 MT/ton CPO for fiber and 0.28 MT/CPO for shell..

Status : Comply

**5.5**

**Use of fire for waste disposal and for preparing land for replanting is avoided except in specific situations, as identified in the ASEAN guidelines or other regional best practice.**

**5.5.1 & 5.5.2**

PT TMP's no-burning policy is contained in the SOP for Agronomy Reference Manual Section 4 on Land Preparation. In the SOP, describe that company not allowed to burn in an effort to prepare land either replanting or for land clearing.

The Company has implemented a land clearing policy without burning. For example, the results of field observations on replanting area showed that there is no indication of burning activities in the replanting process.

Status : Comply

**5.6**

**Plans to reduce pollution and emissions, including greenhouse gases, are developed, implemented and monitored.**

**5.6.1; 5.6.2**

The certificate holder has identified waste and pollution products from the activities of the plantation and factory, which includes the identification of the source of waste from each activity in the plantation and mill, for example: POME, EFB, fiber and shell, contaminated packaging, domestic waste etc. CH has also identified the source of emissions generated from the operations of the plantations and mill.

CH has also conducted an assessment of activities that cause pollution or emissions for period semester 1 year 2018, for example:

- Liquid Waste quality testing
- air quality testing
- testing of emissions of boilers and generators
- noise testing
- and vibration testing

The results of air quality are based on the parameters set out in Labor Ministry Regulation No.13 / MEN / X / 2001. Thresholds of emissions refer to: Environmental Ministry regulation No.7 year 2007. Thresholds for noise levels referring to Environmental Ministry Regulation No.48 / 1996, vibration level refers to Environmental Ministry Regulation No.49 / 1996 and thresholds Liquid Waste quality testing referring to Decree of the Head of the Environmental Agency of Rokan Hilir Regency No. 49/DLH/2017 dated 4 December 2017. Based on the tests performed, it is known there are no test results that are exceed the quality standard

**5.6.3**

Mangala POM conduct GHG calculation and its monitoring using RSPO palm GHG calculator v 3.0.1 . Summary of GHG emmision for Mangala POM are listed as follows :

1.	RSPO PalmGHG	Ver 3.0.1
2.	Site	PT Tunggal Mitra Plantation
3.	Certificate validity	25 November 2015 – 24 November 2020
4.	Certificate Registration no	MUTU-RSPO/002
5.	CB	Mutu Certification International
6.	Audit date	17 – 20 September 2018
7.	Data set	Jan – Dec 2017

Summary of Net GHG Emissions

Emission per product	tCO <sub>2</sub> e/tProduct
CPO	7.46
PK	7.46

Production	t/yr
FFB processed	167700.17
CPO produced	35922.478
PK produced	8075.503

Extraction	%
OER	21.42
KER	4.82

Land use	Ha
Planted area	10794.82
Planted on peat	3724.7365
Conservation Area	21.2

Summary of field emission and Sinks

Description	Own crop		Group		3 <sup>rd</sup> party	
	tCO <sub>2</sub> e	tCO <sub>2</sub> e/tFFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e/tFFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e/tFFB
Land conversion	100718.16	0.6	0	0	0	0
CO <sub>2</sub> emission from fertilizer	19697.13	0.12	0	0	0	0
NO <sub>2</sub> emissions	35776.88	0.21	0	0	0	0
Fuel consumption	3397.4	0.02	0	0	0	0
Peat oxidation	203370.81	1.21	0	0	0	0
Sinks						
Crop sequestration	-67930.43	-0.41	0	0	0	0
Sequestration in Conservation area	194.4	0	0	0	0	0
Total	294835.55	1.76	0	0	0	0

Summary Oil Mill Emissions and Credits

Remarks	tCO <sub>2</sub> e	tCO <sub>2</sub> e/t FFB
Emissions sources		
POME	31882.69	0.19
Fuel consumption	1368.73	0.01
Grid electricity	0	0
Credits		
Export of grid electricity	0	0
Sales of PKS	0	0
Sales of EFB	0	0
Total	33251.42	0.2

Palm Oil Mill Effluent (POME) Treatment

Divert to compost (%)	0
Divert to anaerobic digestion (%)	100

POME Divert to Anaerobic Digestion

Divert to anaerobic pond (%)	100
Divert to methane capture (flaring) (%)	0
Divert to methane capture (electricity generation) (%)	0

**Status : Comply**

**PRINCIPLE #6 Responsible consideration of employees and of individuals and communities affected by growers and mills**

**6.1**

**Aspects of plantation and mill management, including replanting, that have social impacts are identified in a participatory way, and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate the continuous improvement.**

**6.1.1; 6.1.2; 6.1.3 & 6.1.4**

Still the same as the previous assessment, the management unit of PT Tunggal Mitra Plantation has document of Social Impact Assessment. The assessment process was done on January 2010. The assessment and reported was carry out by Pollito Consultant. These document was explained of negative and positive impact of plantation and mill operation to social aspect and the recommendation for negative impact reduction and increasing of positive impact. Evidence of the implementation of a social impact assessment has been included in the attachment to the SIA document. The study activities and mapping activities in the field were carried out from November 8 to November 15, 2009. The company also has document of Social and Environment Impact of Replanting. The study was done by AKSENTA Consultant on 2012, it is aim to knowing environment and social impact of replanting.

CH has a social impact management plan for the period 2018-2019 based on the participation of the affected parties as indicated by the signature of the surrounding village. The plan includes aspects of health, education, economy, social and community empowerment. As for some social impact management plans, such as:

- Implementation of *posyandu*
- Scholarship program
- Provision of educational facilities
- Provision of heavy equipment for road maintenance
- Provision of adequate information related to work in the company
- Provision of special officers who handle community complaints
- Provision of employment opportunities for residents around the plantation
- Etc

In addition, in the RKL-RPL Report also explained aspects of social impact as the impact of company operations and submitted to relevant agencies every semester.

Evaluation of social impact management plans is carried out by the company every year. The company has evaluated the social impact management program for the period of July 2017 - Jun 2018 which was conducted on July 5, 2018 and has involved the affected parties, that are the villages around the company. Evidence of the involvement of the affected party in the evaluation of the social impact management program is shown in the form of signatures of the village / headman around the company. Based on the evaluation results, there is a management plan that has not been realized. CH also showed evidence of realization of the implementation of the social impact management program.

Ensure the realization of social impact management from replanting activities for all affected parties (**Observation**)

**6.1.5**

Result of verification of documents and interviews with management, it is known that PT. Tunggal Mitra Plantation does not have a plasma scheme.

**Status : Comply**

**6.2**

**There are open and transparent methods for communication and consultation between growers and/or millers, local communities and other affected or interested parties.**

**6.2.1, 6.2.2, and 6.2.3**

The company has a communication SOP / consultation with the community No. The revised RSPO / 6.2 / KKM document was dated 1 August 2016. The SOP explained the guidelines for communicating and consulting with the community. It has been shown list of stakeholder of PT Tunggal Mitra Plantations which is as much as 99 stakeholders and consists of local government, contractors, schools, hospitals, insurance, banking, community leaders, buyers, BPJS, and taxes. The company has an SOP to respond to stakeholders, namely the Request for Information procedure, which is valid from April 4, 2009, every request for information from stakeholders is sorted according to the group of information requested to be submitted to the relevant section. Each request for information / assistance is then recorded in the Information Request Register Book, and then followed up by giving a response, and stored by the Head of the Plantation and factory administration.

Management of TMP has Personnel in Charge which is appointed to communicate with stakeholders. PIC which is appointed to respond the stakeholders is section head of each estate and mill. Management unit have shown decree stipulation letter appointing officer of communication and consultation number 273B/MGE-SK/IX/2016 on September 1, 2016 such as :

1. Benny Arisda Tarigan ( MGE-1)
2. Julianto (MGE-2)
3. Ade Zulfachry (MGE-3)
4. Hasan basri (MGF).

The communication officer is still actively working in the operational unit PT Tunggal Mitra Plantation.

Based on interview with community of Pemantang Genting and Sukamulya Village, if they need information they will submit a letter to the company. According to them, the company always responds each letter submitted. The company has responded well to any existing communication processes, the preparation of SOP has been take into consideration of suggestions from the public and other affected parties.

Based on interview with local community of Pemantang Genting and Sukamulya village, management of TMP has socialized SOP communication/consultation with communities.

**Status : Comply**

**6.3**

**There is a mutually agreed and documented system for dealing with complaints and grievances, which is Implemented and accepted by all affected parties.**

**6.3.1**

The company have mechanisms and complaint handling system is described in Procedure of Public Complaints Handling (PKM, Rev. 01, and 1st August, 2016) which are equipped with Flow Chart Redress Society. There was also available of procedure of Complaints Handling of Employee (RSPO / 6.5 / PKK, dated July 28, 2009) and also was completed with Employee Complaints Handling Flow Chart. These procedure was explained that the company will protect the whistleblower and there are no sanction for them. When the cases did not handled enough in estate unit, the cases will continue to next level of management, including to jurisdiction level or another way, based on the agreement each parties. These procedure was added with flow chart in form of Complaint Handling Data. If the community not satisfied with the



response from the company, they can continue the complaint through the complaints system RSPO (Point 5.9) Grievances included anonymous and whistleblower cases can be submitted through the suggestion box, suggestion boxes checked by officer in charge.

**6.3.2**

Based on verification on complaint document and information by management unit representative, known that in period of one year until ASA-1.3, there was no dispute among the company and the other parties. Based on stakeholder consultation with external stakeholders consisting related agency in Rokan Hilir District, community adjacent the plantation area (Pematang Genting Village) local Contractor, internal stakeholder (Gender Committee and Workers Union), there was no significant complaint from related parties.

**Status : Comply**

**6.4**

**Any negotiations concerning compensation for loss of legal or customary rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.**

**6.4.1, 6.4.2 & 6.4.3**

There is no change in procedures to identify the legality listed in the Occupational Land Release Procedure (No. 343/PSD-OKUP/10). The Procedure explains that the settlement of land dispute was conducted through the negotiation phase between the company and the party claiming the land and witnessed by various parties.

Based on a document review of the area of the statement and interviews with the villages of Sukamulya and Pematang Genting, it is known that the company did not extend the area and there were no land disputes, so there was no compensation for new land.

The company has shown the entire compensation process in the previous assessment, for example in 1997, an area of 301.60 hectares in the Tanah Putih sub-district. The compensation documentation is consist of Minutes of Compensation Handover, Statement of Compensation, Proof of receipt of compensation, Statement of land owner, Land Situation Map.

**Status : Comply**

**6.5**

**Pay and conditions for employees and for employees of contractors always meet at least legal or industry minimum standards and are sufficient to provide decent living wages.**

**6.5.1**

The company shows Payroll List that explains workers' basic wage, overtime and premiums. The Company may show the list in August 2018. Wages for overtime payment details contained in the document of Overtime structure Letter and List of Overtime Hours. Based on these documents, it is known that the payment of wages in accordance with the regulations. Workers and Worker Unions also explained that the company had been paid wages in accordance with the regulation and worker can explain how the calculation of overtime in accordance with the regulations.

CH has work agreement for permanent worker and temporary daily worker which explain about the wages, work hour, duty and responsibility, and other provisions. The wages is in accordance with Riau Governor Decree No. Kpts.373/V/2018 about minimum wage for Riau Province year of 2018.

Besides, the company have Intern Office Mail General Manager HRM No. No.050/HRM-i3/IV/2018 about Wage for daily permanent worker and monthly permanent worker. The wage for contract worker is set in the work agreement. Based on interview with worker in Estate and Mill, they received the payslip document and the amount is in accordance with the applicable regulation. Based on field observation and interview with workers (nursery workers, manuring workers, and harvester), they get the wage accordance with the wage minimum regulation.

**6.5.2**

Labor laws that explain payments and working conditions contained in the Collective Labour Agreement (CLA) from 2015 to 2017 made between the company and Worker Unions, and was approved by Decree Letter of the Director General of Industrial Relations and Social Security Labor, with No. Kep.88/PHIJSK-PKKAD/PKB/2015 on June 18, 2015 with 2 years validity period. According to interview with board of workers union, they were explain about CLA extension are on progress

in Province Riau Level, next meeting will be conducted end of October 2018.  
 The company has informed the contain of CLA while copy of CLA give to all worker who explain the working hour, overtime, sickness, holiday, maternity leave, dismissal and period of notice.

**6.5.3**

Interviews with several workers in Mill and Estates and workers union board, explained that the house is given by each family worker. In such housing have been provided electricity, reservoir for water needs, and the company clinic. Additionally, in housing complex available educational facilities in the form of elementary school and middle school. Based on the field visit to employee housing at MGE-3, there are some buildings that are still not permanent and the company has shown the progress of the improvement of employees' houses into permanent buildings. This has made the opportunity for improvement for the company to monitor the employee's home improvement program in the Manggala Estate (MGE-1, MGE-2, and MGE-3). **OFI.**

**6.5.4**

The company shows and explains some of the efforts that have been made by the company related to compliance the basic needs of employees' lives, such as:

- Provision of in kind in the form of rice as part of the component of salary provided in the form of staples worthy of consumption.
- Road access that is easily traversed by workers to buy basic necessities from nearby villages or the nearest market center.
- There is no prohibition on the sale and purchase of basic needs in the plantation housing area.

**Status : Comply**

**6.6**

**The employer respects the right of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.**

**6.6.1**

Management Unit has a policy that respects the rights of all employees to form and join a community of Labour Unions which is contained in the Sustainable Plantation Management Manual SOP number: Policy 724/TQEM-SPMS/09 dated on August 27, 2010. The result of the policy is formation of Labour Unions in PT TMP which is recorded in manpower agency, for example: worker union MGF unit No. 02/SP-rohil/DTK/VI/2002 period 2014-2019 was submitted to Man Power Agency.  
 Based on the results of interviews with workshop, warehouse worker and boiler operators in Palm Oil Mill it is known that workers have understood that the company had implemented policies by giving freedom to all workers and join the desired worker unions.

**6.6.2**

There are meeting record between Labour Union and Management unit and also meeting record between Labour union and its member, such as:

- Minutes of meeting of companies with PUK SPSI MGE-3 dated August 23, 2018 which was attended by 20 participants about BPJS services.
- Minutes of meeting of companies with PUK SPSI both HRM dated February 3, 2018 about employee bonus early retirement.

**Status : Comply**

**6.7**

**Children are not employed or exploited.**

**6.7.1**

Based on the review of employee listing documents, the auditor verifies that there are no workers working under the minimum age requirements (the youngest age is still above the minimum age requirement).  
 The results of field observations during the assessment activities at the PT TMP plantation and factory units found no

children who worked or were forced to use force (force majeure).

**Status : Comply**

**6.8**

**Any form of discrimination based on race, caste, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation, or age, is prohibited.**

**6.8.1**

Management Unit has a SOP Sustainable Plantation management Guideline no. Policy 724/TQEM-SPMS/09 which was approved by CEO in chapter Policies and Objectives, Sub Chapter Policies Plantation Upstream Indonesia regarding Social Policy on point 1 that says that all staff / employees should be treated properly and fairly in matters relating to recruitment, advancement, conditions and job description, regardless of race, degree, ethnicity, gender, color, imperfections (defects), sexual orientation, membership organizations, political views, religion and age.

Based on the document workers and interview, the workers come from different regions and ethnics for example batak, javanese, malay, nias, minang etc. Company provides opportunities and equal treatment in employment. This can be seen in document workers (Master document of workers) PT. TMP listed sexuality (male and female), job title, place / date of birth, nationality (Javanese, Batak, Minang, Malay, Nias), status (married / not) and religion.

**6.8.2**

According to interviews with workers, committee gender, labour union and local community there is no discrimination by the company. Company provide equal treatment and opportunities of workers in employment. For example implementation of the policy; based on field observation to MGE-1 and MGE-3, there is a spray forewoman which is majority done by man.

In addition, there are no complaints submitted related to allegations of discrimination. Logbook of complaint contains fixes for worker housing and has been respond and also fixed by company.

Based on interviews with local contractors and plantation workers and factories which are local communities, said that community members around the company interviewed explained that the company had provided equal opportunities to local communities and migrants in receiving employees according to their respective skills.

**6.8.3**

Recruitment and promotion of workers in PT TMP based on skills, capabilities, and qualities. Based on interview with management, workers and labour union, a candidate will be tested just like written examination, interview, or practical examination. The candidates who can pass the test will be hired or promoted by company. All the recruitment and promotion document are kept by the company.

**Status : Comply**

**6.9**

**There is no harassment or abuse in the work place, and reproductive rights are protected.**

**6.9.1, 6.9.2 & 6.9.3.**

Company has the Policy to prevent sexual harassment and abuse on Policy No. 724/TQEM-SPMS/09 dated 27th August 2010), which develops and enforces policies to protect women workers from crimes and sexual harassment and to protect rights related to reproduction. Documents are presented in an easily understandable Indonesian format and available at the audit site.

These policies are documented, implemented and communicated to all levels of workers. For example, at MGE-2 date January, 8 2018 followed by 14 participant.

Gender Committee has been formed with the organizational structure, namely Chairman, Vice Chairman, Clerk, Treasurer, Secretary, and Section (maternal & child health, occupational safety, domestic violence, women's role, socio-economic & community).

There are regulations concerning female menstruation leave as much as 2 days/month (first and second day) with a medic examination, as well as maternity leave 1.5 months before giving birth and 1.5 months after birth with the calculation of a doctor's examination. The CH's procedure of Handling of Complaints and Grievances assured the anonymity of the reporting and the revealer of the case. The determination for the start date of maternity leave (H2) should be on the recommendation

of the company doctor based on the estimated day of birth calculated referring to the last menstrual day and ultrasound examination of the obstetrician. The gender committee stated that there is also known that there is no issue or complaint related to sexual harassment on the workplace, and there is no complaint from them.

The company has an H1 leave policy as a form of protecting reproductive rights for women. However, based on interviews with gender committees and women workers, information was obtained that the policy of giving H1 leave had not been applied to all female workers. **Non Conformity 2018.01 with Major category**

**6.9.2 Status: Non Conformity 2018.01 with Major category has been closed**

**6.10**

**Growers and mills deal fairly and transparently with smallholders and other local businesses.**

**6.10.1 & 6.10.2**

Until the ASA 1.2 assessment Manggala Factory only processed FFB from its own estate. There is no purchase of FFB from outside parties. Therefore, there is no need to have Employment Agreement Letter No: MGE-3 / SPK-LKL / 2018 / VII / 01-TBS Transport between PT Tunggal Mitra Plantation and Donner Manullang dated 02/07/2018 valid until 31 August 2018 a mechanism regarding pricing of FFB.

**6.10.3 & 6.10.4**

Until the ASA 1.2 assessment PT Tunggal Mitra Plantation only processed FFB from its own estate and did not purchase FFB from outside parties. Job contracts that currently include transportation of FFB. For example :

- a. Work Agreement No. 003 / Vehicle Rental-Lkl / TMP-MGE-2 / VII / 2018 between PT Tunggal Mitra Plantation and Sugiat dated 02/07/2018 valid until 31 October 2018
- b. Employment Agreement Letter No: MGE-3 / SPK-LKL / 2018 / VII / 01-FFB Transport between PT Tunggal Mitra Plantation and Donner Manullang dated 02/07/2018 valid until 31 August 2018

Based on interviews it is known that both parties have understood the contents of the agreement letter. In addition, each party also holds a signed copy of the agreement letter so that the information obtained in the agreement is equally known.

Payments to local contractors are made through Bank transfers, as stated in the contract (Article 9 paragraph 5), that Payments are made through the bank Mandiri. Documentation of contractor payment transactions is stored in the form of Minutes of Payment Check which explains the calculation of FFB transport payments

As approved in the employment agreement, payment for the results of work is done through Bank transfer. For example:

- Bank Voucher Expenditure No 16 /MGE3/VIII/2018 dated August 20 2018 for July payment for Donner Simanullang. Transfers are carried out on August 23, 2018 through Bank Mandiri.
- Payment for Sugiat, through transporting FFB and EFB from 01/07/2018 to 31/07/2018. Transfers are carried out through an independent bank dated August 1, 2018

Payments made by the company are in accordance with the amount of billing billed by the FFB and EFB Transport services provider. Based on an interview with the contractor, it was explained that payments were always made on time in accordance with the employment agreement

**Status: Comply**

**6.11**

**Growers and millers contribute to local sustainable development wherever appropriate.**

**6.11.1**

Local development needs and priorities have been identified in consultations conducted with local communities, namely by sending proposals to companies regarding the needs of the community at that time.

The company shows several proposals submitted by several villages around the company as a form of the company's contribution to local development and its realization documentation.

Realization of the CSR program in 2017/2018 for example in health programs (*posyandu* and mass circumcision), education (scholarships, educational facilities, student internship programs), economic, social and community

empowerment (provision of heavy equipment for road maintenance, washing village trenches, provision of fire fighting teams to extinguish fires around the company, giving sacrificial animals, etc.).

Community members from Pemantang Genting and Sukamulya Villages interviewed by the auditor explained that the community around the company was pleased with the results of the company's consultations related to CSR. In addition, the company has also provided work opportunities openly to local communities. This can be seen from the list of employees, some of whom are residents of villages around the company.

**6.11.2**

Based on the results of the examination of documents and interviews with the management representatives it is known, that the company did not carry out plantation development activities with a plasma scheme.

**Status: Comply**

**6.12**

**No forms of forced or trafficked labour are used.**

**6.12.1, 6.12.2, and 6.12.3**

Based on field observation in sample location during this audit, auditor found that there is no evidence for forced or trafficked labor, and contract substitution is used. The CH's covered policy related prohibits forced or bonded labor or debt bondage and take steps to prevent it. The procedures related to human resources management shows that every worker has a work agreement that describe specific job description.

Based on employee list, field observation and interview with workers, Labor Unions, and Manpower Agency known that there is no migrant workers, forced labor. Every worker has a work agreement that describe specific job description, there is no substitution of contract without prior consultation and agreement from the worker. Based on the results of interviews with harvest labor, spray, fertilizer and operators in Palm Oil Mill it is known that there's no worker who assist by the family (*family gank*).

**Status: Comply**

**6.13**

**Growers and millers respect human rights**

**6.13.1**

PT TMP has a human rights related policy that is a company's commitment to safeguarding every Human Rights contained in the Memorandum with Number 067 / SOU-16 / VIII / 2015, known and approved by SOU-16 Manggala Chairman on August 24, 2015.

The company has a recording related to the socialization of human rights policy held in May 2017 with participants as many as 90 people consisting of Village Apparatus, Mill and Estate Staff Manggala, Mill Employees and Manggala Estate as well as communities surrounding the Estate. This policy is submitted by the staff of Manggala Estate.

Based on interviews with workers known that the company has socialized company policies regularly including policies on human rights. Socialization is done by sticking to the policy in offices, socializing in the housing and socialization to workers during the morning briefing before the activities started.

**Status: Comply**

**PRINCIPLE #7 Responsible development of new plantings**

**7.1**

**A comprehensive and participatory independent social and environmental assessment is undertaken prior to establishing new plantings or operations, or expanding existing ones, and the results incorporated into planning, management and operations.**

**7.1.1 & 7.1.2**



Up to the current audit, PT TMP did not expand the new plantation. There is only replanting activity that began in 2012.

**Status: Comply**

**7.2**

**Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.**

**7.2.1 & 7.2.2**

Certificate Holder does not carry out activities to expand operational areas. The activities carried out are replanting. In the PT Tunggal Mitra Plantation semi-detailed soil survey for the 2017-2022 period made by the MRC, it is known that land suitability classes for the company's operational area are S2 to S3

**Status: Comply**

**7.3**

**New plantings since November 2005, have not replaced primary forest or any area required to maintain or enhance one or more High Conservation Values.**

**7.3.1; 7.3.2; 7.3.3; 7.3.4 and 7.3.5.**

Up to the current audit, PT TMP did not expand the new plantation. There is only replanting activity that began in 2012.

Sime Darby Plantation has sent Land Use Change Analysis (LUCA) is sent to the RSPO Secretariat on August 28, 2016 with the attachment of the letter included the calculation LUCA PT Tunggal Mitra Plantation (CH) and has received responses from RSPO Secretariat on May 27, 2016.

Based on document review PSQM Department attending BHCV WG Meeting and the WG has agreed this NCR will be closed by RSPO Secretariat, that means growers are given graces period for a year to close the issue RSPO Secretariat will inform all CBs soon on this matter (the email on 09 August 2017).

Sime Darby resubmitted LUCA to the RSPO secretariat on August 27, 2018. Sime Darby also sent an e-mail dated September 5, 2018 stating that "Meantime we have not received LUCA review of outcomes for the 5 completed submissions (as per the updates in the email below), and we have all the remaining shape files to RSPO office (on 27 Aug 2018)". However, there has been no response to LUCA that has been submitted.

Ensuring progress of LUCA (OFI)

**Status: Comply**

**7.4**

**Extensive planting on steep terrain, and/or on marginal and fragile soils, is avoided.**

**7.4.1 & 7.4.2**

Up to the current audit, PT TMP did not expand the new plantation. There is only replanting activity that began in 2012

**Status: Comply**

**7.5**

**No new plantings are established on local peoples' land without their free, prior and informed consent, dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.**

**7.5**

Until now PT Tunggal Mitra Plantation does not opened or expanded new areas, only replanting activities have been carried out since 2012.

**Status: Comply**

**7.6**

**Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their free, prior and informed consent and negotiated agreements.**



<b>7.6</b>	Until now PT Tunggal Mitra Plantation does not opened or expanded new areas, only replanting activities have been carried out since 2012.	
	<b>Status: Comply</b>	
<b>7.7</b>	<b>Use of fire in the preparation of new plantings is avoided other than in specific situations, as identified in the ASEAN guidelines or other regional best practice.</b>	
<b>7.7.1 &amp; 7.7.2</b>	Up to the current audit, PT TMP did not expand the new plantation. There is only replanting activity that began in 2012.	
	<b>Status: Comply</b>	
<b>7.8</b>	<b>New plantation developments are designed to minimise net greenhouse gas emissions.</b>	
<b>7.8.1 &amp; 7.8.2</b>	Up to the current audit, PT TMP did not expand the new plantation. There is only replanting activity that began in 2012.	
	<b>Status: Comply</b>	
<b>PRINCIPLE #8 Commitment to continuous improvement in key areas of activity</b>		
<b>8.1</b>	<b>Growers and millers regularly monitor and review their activities and develop and implement action plans that allow demonstrable continuous improvement in key operations.</b>	
<b>8.1</b>	<p><u>Social Impact</u> The CH has conducted a Social Impact Assessment in each of the management units . The Company has implemented identifiable social impact management plan. Evaluation of the implementation of social impact management plan is done at least annually involving the surrounding communities.</p> <p><u>Environmental Impacts</u> The CH has undertaken environmental management and monitoring activities in accordance with its environmental document matrix.</p> <p><u>Best Management Practices</u> has implemented the IPM and implemented it widely, for example integrating all pest control techniques to be recognized by censuses and monitoring, the use of biological agents such as owls and beneficial plants and agrochemical applications if the pest attack has exceeded the threshold.</p> <p>Internal Audit ISPO &amp; RSPO (by PSQM Departement ; Auditor Trijono dan Agus Joko Santoso) On July 14, 2018</p> <ul style="list-style-type: none"> <li>- ISPO : 5 Nonconformities ; all have been fulfilled</li> <li>- RSPO : 6 Nonconformities; all have been fulfilled</li> </ul>	
	<b>Status: Comply</b>	

**3.2 Summary of Assessment Report of Supply Chain Requirement**

**3.2.1. General chain of custody requirements for the supply chain**

Clause	Requirement
<b>5.1</b>	<b>Applicability of the general chain of custody requirements for the supply chain</b>
5.1.1	The General Chain of Custody requirements of the RSPO Supply Chain Standard shall apply to any organization throughout the supply chain that takes legal ownership and physically handles RSPO Certified Sustainable oil palm products at a location under the control of the organization including outsourced contractors. After the end product manufacturer, there is no further requirement for certification. The mill take legal ownership for all FFB within its scope, as well all phisically handling.
	<b>Status: Comply</b>
5.1.2	Traders and distributors require a license obtained from RSPO Secretariat to sell RSPO certified product but do not themselves require certification. When selling RSPO certified products, a licensed trader and/or distributor shall pass on the certification number of the product manufacturer and the applicable supply chain model. The mill does not use traders and distributors. All of selling certified product has been done by the mill.
	<b>Status: Comply</b>
5.1.3	Either the operator at site level or its parent company seeking certification shall be a member of the RSPO and shall register on the RSPO IT platform. RSPO IT Platform member registration number: <b>RSPO_ PO1000000330</b>
	<b>Status: Comply</b>
5.1.4	Processing aids do not need to be included within an organization’s scope of certification. There is no processing aids in the operational MGF.
	<b>Status: Comply</b>
<b>5.2</b>	<b>Supply chain model</b>
5.2.1	The site can only use the same supply chain model as its supplier or go to a less strict system. Declassification/downgrading can only be done in the following order: Identity Preserved -> Segregated -> Mass Balance. Based on verification document and interview with weighbridge operator, Manggala Factory (MGF) only received and processed FFB from own plantation. The FFB supplied from own estate; consist of Manggala 1 Estate, Manggala 2 Estate and Manggala 3 Estate. Based on explanation above, MGF apply the requirements of SCCS Module D (IP).
	<b>Status: Comply</b>
5.2.2	The site can use one (1) or a combination of supply chain models as audited and certified by the CB. MGF just apply one supply chain models which is Identity Preserved (IP)
	<b>Status: Comply</b>
<b>5.3</b>	<b>Documented procedures</b>
5.3.1	The site shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified.

The Certificate Holder has RSPO SCCS Manual- RSPO Supply Chain Certification Standard No. SCCS-Std/RSPO/PSQM/02 dated on 02 January 2018. The scope of RSPO Supply Chain System: FFB Certificate processing from raw material acceptance to storage and delivery process produces Certified Sustainable Palm Oil (CSPO) and CSPK with module D (IP) both physical and office administration. The summary of this procedure were explain on below points:

- 4.2.1. The procedure is documented
- 4.2.2. Internal audits are conducted at least annually to ensure: the organization complies with RSPO SCCS requirements and RSPO Market Communication & Claim documents. Where the internal audit is done at least 2 months before the external audit. The internal audit results are included in the management review conducted at least once a year.
- 4.3. The Mill ensures the purchase of incoming goods, however the marketing division in Jakarta's is responsible for checking the validity of supplier certificates, licenses for traders and distributors.
- 4.3.2. The Unique code/ unique identification number aims to ensure that products are sold through quality tests and can be traced back to the beginning of the process.
- 4.5. Third party activities (outsourcing)
- 4.6. Sales and goods out  
Units that need to make announcements and trade confirmations in the RSPO IT Platform, this should also include making shipping announcements (each shipment/shipping group by the marketing division). Certified products sold through other schemes or conventional means or in case of lack of production, lost or damaged shall be removed.
- 4.8. Training→ The training plan for RSPO SCCS requirements process should be reviewed continuously/annually.
- 4.9. The record keeping  
The record keeping of all documents are minimum 10 years for financial report documents and transactions; and minimum 2 years for data other than financial documents.
- 4.10 Conversion Factor  
Conversion value is determined by marketing division in Jakarta, based on data sent by Mill on the basis of the resulting of FFB processing, so that the conversion value obtained is the same as the actual obtained by the Mill, and the conversion reference by marketing follows the mill manager monthly report period.
- 4.11. Claim pursuant to RSPO communication and claim.
- 4.12. Complaint  
Stakeholders may complain by email or face directly to the management representative. The complaint should be handled no later than one month after the complaint is received. Especially for complaints related to salary rights, incentive benefits, product complaints, and payments is should be acted upon no later than 14 days after the complaint has been received. All complaints and responses should be recorded.
- 4.13. Management review  
Management review plan is established: after internal audit, before external audit checks and minimally done once in twelve months /one year.  
Input for management review should include information: internal audit results of SCCS requirements, production achievements, customer feedback, preventive and corrective action status, follow up on review management, changes that may affect system management and improvement recommendations.

**Status: Comply**

**5.3.2  
The site shall have a written procedure to conduct annual internal audit**

Internal Audit procedure has been include on SOP of RSPO SCCS Manual- RSPO Supply Chain Certification Standard No. SCCS-Std/RSPO/PSQM/02 dated on 02 January 2018 which describes Internal audits are conducted at least annually to ensure: the organization complies with RSPO SCCS requirements and RSPO Market Communication & Claim documents. Where the internal audit is done at least 2 months before the external audit. The internal audit results are included in the management review conducted at least once a year.

CH can show the result of internal audit conducted on 03 September 2018 In the Audit Report document, it is known that the mill has performed an internal audit using SCCS standard (General COC and Module D). There are 3 non-compliance for

example about agreement of Rent of CPO Tank in Bulking and has been comply on September 2018.	
	<b>Status: Comply</b>
<b>5.4</b>	<b>Purchasing and goods in</b>
<b>5.4.1</b>	The receiving site shall ensure that purchases of RSPO certified oil palm products are in compliance and the following minimum information for RSPO certified products is made available by the supplier
	MGF does not purchase RSPO certified oil palm products. MGF is the producer of RSPO certified oil palm products
	<b>Status: Comply</b>
<b>5.4.2</b>	The site shall have a mechanism in place for handling non-conforming oil palm products and/or documents
	MGF does not purchase RSPO certified oil palm products. MGF is the producer of RSPO certified oil palm products
	<b>Status: Comply</b>
<b>5.5</b>	<b>Outsourcing activities</b>
<b>5.5.1</b>	In cases where an operation seeking or holding certification outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the operation seeking or holding certification shall ensure that the independent third party complies with the requirements of the RSPO Supply Chain Certification Standard. A CPO mill and independent mill cannot outsource processing activities like refining or crushing.
	MGF doesn't outsource refining and crushing activity. The company uses third party contractors for CPO & PK transportation activities.
	<b>Status: Comply</b>
<b>5.5.2</b>	Sites which include outsourcing within the scope of their RSPO Supply Chain certificate shall ensure the following: <ul style="list-style-type: none"> <li>a. The site has legal ownership of all input material to be included in outsourced processes;</li> <li>b. The site has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the site to ensure that certification bodies (CBs) have access to the outsourcing contractor or operation if an audit is deemed necessary.</li> <li>c. The site has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</li> <li>d. d) The site seeking or holding certification shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and any and all information, when this is announced in advance</li> </ul>
	The company uses the contractor for the transportation of CPO and PK from the factory which is equipped with a Work Agreement letter, that is Letter of Work Agreement for Transportation Service No. 010 / Transportation Services of CPO-PK / TMP-MAS / XI / 2017 dated November 1, 2017 concerning the transportation agreement of CPO and PK with CV Mitra Angkutan Sejati from the factory with a validity period until October 31, 2018
	<b>Status: Comply</b>
<b>5.5.3</b>	The site shall record the names and contact details of all contractors used for the processing or physical handling of RSPO certified oil palm products.
	The Certificate Holder has record names and contact details of all contractors on document of "Daftar Transport CPO & PK", such as: CV. Mitra Angkutan Sejati as CPO & PK transporter from mill.
	<b>Status: Comply</b>
<b>5.5.4</b>	The site shall at its next audit inform its CB of the names and contact details of any new contractor used for the processing or physical handling of RSPO certified oil palm products

Based on interview with mill manager and list of contractors, there are only one outsourcers which physical handling of RSPO certified oil palm products. It will be verified on next surveillance, if any new contractor.

**Status: Comply**

**5.6 Sales and goods out**

**5.6.1**

The supplying site shall ensure that the following minimum information for RSPO certified products is made available in document form: The name and address of the buyer

**PK**

Information relating to the sale of CSPK are listed in the document:

- Delivery Order that explains the quantity, quality target, name of the seller and buyer, loading plan. For example DO no. 00203/00202/12/17/L-TMP-IKS dated December 07, 2017 which explained the quantity of 825 tons PK, Moisture and Impurities targets of 16%, sellers is PT TMP, Buyers PT ADEI Plantation & Industry, loaded date December 08-31, 2017.
- "Surat Pengantar Kernel" that explains the name and address of the buyer, quality, the quantity, SCCS model, No. certificate, No. DO. For example "Surat Pengantar Kernel" No. IKS037728DP17/MGF/12/2017 dated December 22, 2017; the number of PK is 18,000 Kg; Supply Chain Identity Preserved model; No. certificate MUTU-RSPO/002; No. Contract 00203/00202/12/17/L-TMP-IKS.

There is no CSPO physically selling.

**Status: Comply**

**5.7 Registration of transactions**

**5.7.1**

Supply chain actors who:

- are mills, traders, crushers and refineries; and
- take legal ownership and/or physically handle RSPO Certified Sustainable oil palm products that are available in the yield scheme of the RSPO IT Platform (Figure 2 and 3, refer Annex 1) shall register their transaction in the RSPO IT platform and confirm upon receipt where applicable

RSPO IT Platform member registration number: **RSPO\_PO1000000330**.

All transaction of RSPO certified oil palm products has been registered in RSPO IT Platform (see indicator SCCS 5.7.2).

**Status: Comply**

**5.7.2**

The involved supply chain actors mentioned in 5.7.1 shall do the following actions in the RSPO IT Platform:

- Shipping Announcement / Announcement: When RSPO certified volume is sold as certified, the volumes of products that are in the yield scheme (Figure 2 and 3, refer Annex 1) shall be registered as a Shipping Announcement / Announcement in the RSPO IT Platform. The declaration time to do Shipping announcement / Announcement is based on members' own standard operating procedures.
- Trace: When RSPO certified volumes are sold as RSPO certified to actors in the supply chain beyond the refinery, the volume shall be traced at least annually. Tracing triggers the generation of a trace document with a unique traceability number. Tracing can be done in a consolidated way at least annually.
- Remove: RSPO certified volumes sold under other scheme or as conventional, or in case of underproduction, loss or damage shall be removed.
- Confirm: Acknowledge the purchase of RSPO certified volume by confirming Shipping Announcements / Announcements.

The MGF has been take action at RSPO IT Platform with the data:

- **Certified CPO sold to each buyer period of 25 November 2017 to 16 September 2018**

Date	Buyer	Volume
------	-------	--------

09/02/18	Book & Claim	5,185
<b>Total</b>		<b>5,185</b>

• **Certified Palm Kernel sold to each buyer period of 25 November 2017 to 16 September 2018**

Date	Buyer	Volume
25/04/18	PT ADEI Plantation & Industry, Mandau Kernel Crushing Plant	794.67
21/03/18	PT ADEI Plantation & Industry, Mandau Kernel Crushing Plant	747.97
22/02/18	PT ADEI Plantation & Industry, Mandau Kernel Crushing Plant	829.21
25/01/18	PT ADEI Plantation & Industry, Mandau Kernel Crushing Plant	798.63
25/01/18	PT ADEI Plantation & Industry, Mandau Kernel Crushing Plant	199.28
16/01/18	PT ADEI Plantation & Industry, Mandau Kernel Crushing Plant	797.13
04/01/18	PT ADEI Plantation & Industry, Mandau Kernel Crushing Plant	698.87
<b>Total</b>		<b>4,865.76</b>

All transactions have been shown in shipping announcement, for example Shipping Announcement no. TR-71c875a8-1702 dated 25 April 2018 related to the sale of Kernel of 794.67 tons to PT ADEI Plantation & Industry, Mandau Kernel Crushing Plant.

Based on data from the Balance Sheet and the registration data on palmtrace on license period (January-September 2018), is known: **Non-Conformity No. 2018.02 with Major Category**

- There are differences in PK sales data, on palmtrace data there are 3,369.76 tons of sales, while on Balance Sheet are 5,470.42 tons sold with RSPO Claim & Conventional.
- There are differences in CPO sales data. In the Balance Sheet data there are 17,605.48 tons of CPO sold with RSPO claims and conventional while in Data Palm Trace there is only Book & Claim registration of 5,185 tons.

This shows that not all sales of certified products have been registered to Palmtrace.

**Status: Non-Conformity No. 2018.02 with Major Category has been closed**

**5.8 Training**

**5.8.1**

The organization shall have a training plan on RSPO Supply Chain Standards requirements, which is subject to on-going review and is supported by records of the training provided to staff

Mill has a SCCS Training Program in 2018 with training types including SCCS SOP training for recipients, processing, contractor, dispatching and staff planned in August 2018.

**Status: Comply**

**5.8.2**

Appropriate training shall be provided by the organization for personnel carrying out the tasks critical to the effective implementation of the supply chain certification standard requirements. Training shall be specific and relevant to the task(s) performed

Based on interviews with Weight Bridge Operator and security, it is known that the personnel have been aware of the duties



and responsibilities related to the implementation of supply chain, for example the weighbridge officer can explain that the mill cannot accept the FFB from other source and all weighing tickets for CPO and Kernel must be given the RSPO stamp.

The company showed proof of SCCS training to MGF employees conducted on September 03, 2018 with a total of 18 employees (mill staff, bulking staff, weighbridge operator, production clerk and security) and training CPO and PK transport contractors has been conduct on September 8, 2018 to 4 contractors.

**Status: Comply**

**5.9 Record keeping**

**5.9.1**

The organization shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO Supply Chain Certification Standard requirements

Based on RSPO SCCS Manual- RSPO Supply Chain Certification Standard No. SCCS-Std/RSPO/PSQM/02 dated on 02 January 2018 which explains that record keeping all of documents are minimum 10 years for financial report documents and transactions; and minimum two years for data other than financial documents.

**Status: Comply**

**5.9.2**

Retention times for all records and reports shall be a minimum of two (2) years and shall comply with legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock

Based on RSPO SCCS Manual- RSPO Supply Chain Certification Standard No. SCCS-Std/RSPO/PSQM/02 dated on 02 January 2018 which explains that record keeping all of documents are minimum 10 years for financial report documents and transactions; and minimum two years for data other than financial documents.

**Status: Comply**

**5.9.3**

The organization shall be able to provide the estimate volume of palm oil / palm kernel oil content (separate categories) in the RSPO certified oil palm product and keep an up to date record of the volume purchased (input) and claimed (output) over a period of twelve (12) months.

Estimates of CPO and PK produced by MGF obtained from the actual data of 12 months before the audit activities and have been described in this ASA-1.3 report, consist of:

FFB: 194,872 ton

CPO: 42,872 ton (OER: 22%)

PK: 9,744 ton (KER: 5 %)

**Status: Comply**

**5.10**

**Conversion factors**

**5.10.1**

Where applicable a conversion rate shall be applied to provide a reliable estimate for the amount of certified output available from the associated inputs. Organizations may determine and set their own conversion rates which shall be based upon past experience, documented and applied consistently. Guidance on conversion rates is published on the RSPO website ([www.rspo.org](http://www.rspo.org)); RSPO Rules for Physical Transition of Oleochemicals and its Derivatives. This is relevant for derivatives of Palm Oil and Palm Kernel Oil, as used in the oleochemical and personal care industries

MGF only performs FFB processing up to CPO and PK. Based on RSPO SCCS Manual, it is explained that the conversion factors of CPO and PK are based on actual extraction.

**Status: Comply**

**5.10.2**

Conversion rates shall be periodically updated to ensure accuracy against actual performance or industry average if appropriate.

<p>MGF only performs FFB processing up to CPO and PK. Based on RSPO SCCS Manual, it is explained that the conversion factors of CPO and PK are based on actual extraction.</p>	
	<b>Status: Comply</b>
<b>5.11</b>	<b>Claims</b>
<p><b>5.11.1</b> The site shall only make claims regarding the use of or support of RSPO certified oil palm products that are in compliance with the RSPO Rules on Market Communications and Claims.</p>	
<p>Based on transaction report documents, all CSPO and CSPK submitted are in accordance with the applied supply chain model that is Identity Preserved.</p>	
	<b>Status: Comply</b>
<b>5.12</b>	<b>Complaints</b>
<p><b>5.12.1</b> The organization shall have in place and maintain documented procedures for collecting and resolving stakeholder complaints.</p>	
<p>Procedure for Receiving and Settlement of Complaints is include on RSPO SCCS Manual- RSPO Supply Chain Certification Standard No. SCCS-Std/RSPO/PSQM/02 dated on 02 January 2018. The person responsible for handling complaints is the Manager or the representative, such as an assistant and administration chief. The response to complain about the product must be followed up at least 14 days.</p>	
<p>The company shows documentation of the product form in the form of e-mail, for example an e-mail from PT Intibenua Perksatama on June 19, 2017 and has been responded to on the same day regarding the CPO quality report sent on June 14, 2017.</p>	
<p>Company has the opportunity to improve the documentation of complaint regarding product. Currently, documentation is only keep in the form of e-mail. <b>OFI</b></p>	
	<b>Status: Comply</b>
<b>5.13</b>	<b>Management review</b>
<p><b>5.13.1</b> The organization is required to hold management reviews annually at planned intervals, appropriate to the scale and nature of the activities undertaken</p>	
<p>The CH has RSPO SCCS Manual- RSPO Supply Chain Certification Standard No. SCCS-Std/RSPO/PSQM/02 dated on 02 January 2018 which explains that management review activity is done at least once a year.</p>	
	<b>Status: Comply</b>
<p><b>5.13.2</b> The input to management review shall include information on:</p> <ul style="list-style-type: none"> <li>• Results of internal audits covering RSPO Supply Chain Certification Standard.</li> <li>• Customer feedback.</li> <li>• Status of preventive and corrective actions.</li> <li>• Follow-up actions from management reviews.</li> <li>• Changes that could affect the management system.</li> <li>• Recommendations for improvement.</li> </ul>	
<p>The CH shows Management Review Minutes conducted on September 05, 2018 with a total of 6 staff discussing the results of internal audits, discussion of operational quality, follow-up from previous review management to discussion of changes that could improve the quality management system.</p>	
<p>Encouraged to involve all relevant personnel in SCCS to participate in Management Review activities. <b>OFI</b></p>	
<p>In Balance Sheet, it is known that there is a return of PK products as much as 12.87 tons in July 2018, but on the results of the Management Review conducted in September 2018, it is explained that in 2018 there were no complaints from buyers.</p>	

<p>This shows that the company has not discussed the return of the product in July 2018 as one of the information in the Customer Feedback section on Management Review activities. <b>Non-Conformity No 2018.03 with Major Category</b></p>	
<p><b>Status: Non-Conformity No 2018.03 with Major Category has been closed</b></p>	
<p><b>5.13.3</b>                  The output from the management review shall include any decisions and actions related to:</p> <ul style="list-style-type: none"> <li>• Improvement of the effectiveness of the management system and its processes.</li> <li>• Resource needs.</li> </ul>	
<p>The CH shows Management Review Minutes conducted on September 05, 2018 with a total of 6 staff discussing the results of internal audits, discussion of operational quality, follow-up from previous review management to discussion of changes that could improve the quality management system.</p>	
<p><b>Status: Comply</b></p>	

3.2.2. Module D – CPO Mills: Identity Preserved Requirements

Clause	Requirement															
D1	Definition															
D.1.1	<p><b>A mill is deemed to be Identity Preserved (IP) if the FFB used by the mill are sourced from plantation/ estates that are certified against the RSPO Principles and Criteria (RSPO P&amp;C), or against the Group Certification scheme. Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Module E is applicable.</b></p> <p>Based on verification document and interview with weighbridge operator, Manggala Factory (MGF) only received and processed FFB from own plantation. The FFB supplied from own estate; consist of Manggala 1 Estate, Manggala 2 Estate and Manggala 3 Estate. Based on explanation above, MGF apply the requirements of SCCS Module D (IP).</p> <p><b>Status: Comply</b></p>															
D.2	Explanation															
D.2.1	<p><b>The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill must be recorded by the certification body (CB) in the public summary of the P&amp;C certification report. For an independent mill, the estimated tonnage of CPO and PK products must be recorded in the RSPO IT platform, supply chain certificate and public summary audit report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report</b></p> <p>Estimates of CPO and PK produced by MGF obtained from the actual data of 12 months before the audit activities and have been described in this ASA-1.3 report, consist of:            FFB: 194,872 ton            CPO: 42,872 ton (OER: 22%)            PK: 9,744 ton (KER: 5 %)</p> <p><b>Status: Comply</b></p>															
D.2.2	<p><b>The mill must also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform).</b></p> <p>The Manggala Factory - PT Tunggal Mitra Plantation has been registered of certified products of RSPO (CSPO and CSPK) with Member ID: RSPO_PO1000000330. The certified Crude Palm Oil (CPO) and Palm Kernel (PK) sold to each buyer are describe in table below.</p> <ul style="list-style-type: none"> <li><b>Certified CPO sold to each buyer period of 25 January 2017 to 15 September 2018 (Period of License on Palmtrace)</b></li> </ul> <table border="1"> <thead> <tr> <th>Date</th> <th>Buyer</th> <th>Volume</th> </tr> </thead> <tbody> <tr> <td>09/02/18</td> <td>Book &amp; Claim</td> <td>5,185</td> </tr> <tr> <td colspan="2"><b>Total</b></td> <td><b>5,185</b></td> </tr> </tbody> </table> <ul style="list-style-type: none"> <li><b>Certified Palm Kernel sold to each buyer period of 25 January 2017 to 15 September 2018 (Period of License on Palmtrace)</b></li> </ul> <table border="1"> <thead> <tr> <th>Date</th> <th>Buyer</th> <th>Volume</th> </tr> </thead> <tbody> <tr> <td>25/04/18</td> <td>PT ADEI Plantation &amp; Industry,</td> <td>794.67</td> </tr> </tbody> </table>	Date	Buyer	Volume	09/02/18	Book & Claim	5,185	<b>Total</b>		<b>5,185</b>	Date	Buyer	Volume	25/04/18	PT ADEI Plantation & Industry,	794.67
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25/01/18	PT ADEI Plantation & Industry, Mandau Kernel Crushing Plant	798.63
25/01/18	PT ADEI Plantation & Industry, Mandau Kernel Crushing Plant	199.28
<b>Total</b>		<b>3,369.76</b>

**Status: Comply**

**D.3 Documented procedures**

**D.3.1**

**The site shall have written procedures and/or work instructions to ensure the implementation of all the elements specified in these requirements. This shall**

- a. Complete and up to date procedures covering the implementation of all the elements in these requirements;**
- b. The role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the site's procedures for the implementation of this standard.**

The Certificate Holder has RSPO SCCS Manual- RSPO Supply Chain Certification Standard No. SCCS-Std/RSPO/PSQM/02 dated on 02 January 2018. The scope of RSPO Supply Chain System: FFB Certificate processing from raw material acceptance to storage and delivery process produces Certified Sustainable Palm Oil (CSPO) and CSPK with module D (IP) both physical and office administration. The summary of this procedure were explain on below points:

- 4.2.1. The procedure is documented
- 4.2.2. Internal audits are conducted at least annually to ensure: the organization complies with RSPO SCCS requirements and RSPO Market Communication & Claim documents. Where the internal audit is done at least 2 months before the external audit. The internal audit results are included in the management review conducted at least once a year.
- 4.3. The Mill ensures the purchase of incoming goods, however the marketing division in Jakarta's is responsible for checking the validity of supplier certificates, licenses for traders and distributors.
- 4.3.2. The Unique code/ unique identification number aims to ensure that products are sold through quality tests and can be traced back to the beginning of the process.
- 4.5. Third party activities (outsourcing)
- 4.6. Sales and goods out  
Units that need to make announcements and trade confirmations in the RSPO IT Platform, this should also include making shipping announcements (each shipment/shipping group by the marketing division). Certified products sold through other schemes or conventional means or in case of lack of production, lost or damaged shall be removed.
- 4.8. Training→ The training plan for RSPO SCCS requirements process should be reviewed continuously/annually.
- 4.9. The record keeping  
The record keeping of all documents are minimum 10 years for financial report documents and transactions; and minimum 2 years for data other than financial documents.
- 4.10 Conversion Factor  
Conversion value is determined by marketing division in Jakarta, based on data sent by Mill on the basis of the resulting of FFB processing, so that the conversion value obtained is the same as the actual obtained by the Mill, and the conversion reference by marketing follows the mill manager monthly report period.
- 4.11. Claim pursuant to RSPO communication and claim.
- 4.12. Complaint  
Stakeholders may complain by email or face directly to the management representative. The complaint should be handled no later than one month after the complaint is received. Especially for complaints related to salary rights, incentive benefits, product complaints, and payments is should be acted upon no later than 14 days after the complaint

has been received. All complaints and responses should be recorded.

**4.13. Management review**

Management review plan is established: after internal audit, before external audit checks and minimally done once in twelve months /one year.

Input for management review should include information: internal audit results of SCCS requirements, production achievements, customer feedback, preventive and corrective action status, follow up on review management, changes that may affect system management and improvement recommendations.

**Status: Comply**

**D.3.2**

**The site shall have documented procedures for receiving and processing certified FFBs**

The procedure about acceptance and processing FFB has include in the RSPO SCCS Manual- RSPO Supply Chain Certification Standard No. SCCS-Std/RSPO/PSQM/02 dated on 02 January 2018. (see D.3.1)

**Status: Comply**

**D.4**

**Purchasing and goods in**

**D.4.1**

**The site shall verify and document the tonnage and sources of certified FFBs received.**

The entire processed FFB in Manggala Factory came from own estate of PT Tunggul Mitra Plantation (Manggala 1 Estate, Manggala 2 Estate & Manggala 3 Estate). The entire processed FFB is 100% **RSPO certified**.

• **Certified and non-certified FFB received period of November 2017 to August 2018**

Month	FFB (Kg)		
	RSPO Certified	Non Certified	Total
November 2017	17,504,820		17,504,820
December 2017	15,757,030		15,757,030
January 2018	16,702,820		16,702,820
February 2018	12,454,620		12,454,620
March 2018	15,515,520		15,515,520
April 2018	14,403,880		14,403,880
May 2018	15,207,700		15,207,700
June 2018	11,738,990		11,738,990
July 2018	16,398,450		16,398,450
August 2018	16,755,190		16,755,190
<b>Total</b>	<b>152,439.02</b>		<b>152,439.02</b>

**Status: Comply**

**D.4.2**

**The site shall inform the CB immediately if there is a projected overproduction of certified tonnage.**

In the previous certified (ASA-1.2) period November 25, 2016 until November 24, 2017, production of CSPO and CSPK does not exceed the RSPO certificate issued.

- CPO: 35,633.91 Ton → Total estimate in certificate is 43,628 Ton
- PK: 8,017.26 Ton → Total estimate in certificate is 8,536 Ton

For this period (ASA-1.3) from November 25, 2017 until September 15, 2018, MGF production of CSPO and CSPK does not exceed the RSPO certificate issued.

- CPO: 32,391.39 Ton → Total estimate in certificate is 33,282 Ton and extend volume 8,282.95 ton



- PK: 6,787.33 Ton → Total estimate in certificate is 6,946 Ton and extend volume 1,788.97 ton.

The company has inform the extend volume to CB on 07 September 2018 with total extend of CPO is 8,282.95 ton and PK is 1,788.97 ton.

**Status: Comply**

**D.5 Record keeping**

**D.5.1**

**The site shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.**

The Manggala Factory – PT Tunggal Mitra Plantation, has a monitoring report for RSPO certified product (CPO & PK).

Month	CPO			
	Production (Kg)		Sold (Kg)	
	Certified	Non-Certified	Certified	Conventional
September 2017	3,250,629			2,053,778
October 2017	3,730,657			792,690
November 2017	3,715,819			6,121,485
December 2017	3,442,278			3,199,332
January 2018	3,618,276			3,850,200
February 2018	2,814,941			2,777,650
March 2018	3,401,095			3,262,090
April 2018	3,137,106			2,899,510
May 2018	3,356,751			3,267,860
June 2018	2,634,013			2,949,860
July 2018	3,691,377			3711190
August 2018	3,645,081			3,679,360
<b>Total</b>	<b>40,438,023</b>			<b>38,565,005</b>

Month	PK			
	Production		Sold	
	Certified	Non-Certified	Certified	Conventional
September 2017	693,734		590,800	
October 2017	820,887		908,880	
November 2017	887,935		971,090	
December 2017	787,958		723,930	
January 2018	851,566		771,380	114,350
February 2018	640,157		536,930	-
March 2018	771,533		657,750	-
April 2018	696,013		749,030	-
May 2018	738,987		772,860	-
June 2018	579,319		480,360	-
July 2018	789,237		731,960	-
August 2018	453,194		655,800	-
<b>Total</b>	<b>8,710,530</b>		<b>8,550,770</b>	<b>114,350</b>

In Balance Sheet, it is known that there are sales of products with RSPO certified claims and conventional sales, but it has not shown the basis for product sales data recapitulation with RSPO certified claims and conventional sales. **Nonconformity No. 2018.04 with Major Category**

	<b>Status: Nonconformity No. 2018.04 with Major Category has been closed</b>
<b>D.6</b>	<b>Processing</b>
<b>D.6.1</b>	<p><b>The site shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm product including during transport and storage to strive for 100% separation.</b></p> <p>The entire accepted and processed product in Manggala Factory comes from RSPO certified own estate. Until now, Manggala Factory does not accept and process FFB from not certified sources.</p> <p>Based on interview weighbridge personnel and security personnel, the worker explained that the Manggala Factory POM just receive FFB from own Estate. All Weighbridge Ticket of FFB form Manggala 1 Estate, Manggala 2 Estate &amp; Manggala 3 Estate has been stamped with RSPO code. The stamp also given for CPO and Kernel weighbridge ticket that sent from the Manggala factory.</p> <p>Re-ensure related storage of CPO in bulking. <b>OFI</b></p>
	<b>Status: Comply</b>

**3.3 Conformity Checklist of Certificate and Trademark Use**

1.	Evidence of permission or approval certificate and trademark from Certification Body which submitted by Client	X or√
ASA-1.3	PT Tunggal Mitra Plantation (Sime Darby Plantation Bhd) do not use RSPO trademark and CB Logo.  Trademark License Number of Sime Darby Plantation Bhd is "RSPO-1106024"	√
<b>Status: Comply</b>		
2.	Implementation of certificate and trademark used by Client comply with size and type (shape) against Guideline of Logo Use	X or√
ASA-1.3	PT Tunggal Mitra Plantation (Sime Darby Plantation Bhd) do not use RSPO trademark and CB Logo.  Trademark License Number of Sime Darby Plantation Bhd is "RSPO-1106024"	√
<b>Status: Comply</b>		
3.	Implementation of Certificate and Trademark is not used on product	X or√
ASA-1.3	PT Tunggal Mitra Plantation (Sime Darby Plantation Bhd) do not use RSPO trademark and CB Logo.  Trademark License Number of Sime Darby Plantation Bhd is "RSPO-1106024"	√
<b>Status: Comply</b>		
4.	Controlling of Certificate and Trademark, including withdrawing inappropriate logo.	X or√
ASA-1.3	PT Tunggal Mitra Plantation (Sime Darby Plantation Bhd) do not use RSPO trademark and CB Logo.  Trademark License Number of Sime Darby Plantation Bhd is "RSPO-1106024"	√
<b>Status: Comply</b>		

**3.4 Summary of RSPO Partial Certification.**

Compliance of the uncertified management units of Sime Darby Plantation Bhd against the rules for partial certification was determined through Self-Assessment in accordance with RSPO Certification System clause 4.2.4. A summary of findings is as stated below

Sime Darby Plantation Bhd Time Bound Plan is explained in table section 1.10. Sime Darby has achieved 34 management units in Malaysia and 24 Management Units in Indonesia that RSPO certified. Total management unit in Sime Darby Plantation Bhd are 34 in Malaysia, 25 in Indonesia and 1 in Liberia. Sime Darby Plantation Bhd has informed the Time Bound Plan progress through representative's office in Indonesia. MUTU has considered that Sime Darby Plantation Bhd is comply with the RSPO requirement for Time Bound Plan. The Time Bound Plan was revised and declared by the Sime Darby Plantation Bhd Indonesian representative on June 16th, 2016 by the Head of PSQM.

MUTU has verified partial certification for un-certified unit's subsidiary of Sime Darby Plantation Bhd based on their Time Bound Plan. MUTU Auditor verified positive assurance against the company internal audit and supporting evidence as well as any information from others sources.

MUTU Auditor has verified company partial certification and concludes that:

- There are significant land conflicts in PT Mitra Austral Sejahtera, there is still an issue that remain unresolved social i.e. from Serikat Petani Kelapa Sawit (SPKS), but improvements are ongoing.
- PT Budidaya Agro Lestari waiting for land title process.
- The company has follow RSPO requirement related to New Planting Procedure and Remediation and Compensation Procedure.
- There is no labour disputes that are not being resolved through an agreed process
- All plantations established since 2005 have been done so in accordance with the applicable laws of the country and that there is no evidence of non-compliance with law in any of the non-certified holdings which has not been declared above

<b>2.1 Un-Certified Units or Holdings</b>		
<b>Section</b>	<b>Requirement</b>	<b>Concerns to Discuss, if any</b>
2.2.1	Did the company conduct an internal audit? If so, has a positive assurance statement been produced?	<p><b>Company Group/Holding Statement:</b> Companies are already doing internal audits. There are internal audit reports for each company.</p> <p><b>Auditor Verification:</b> Internal Audit report available for uncertified management unit for example PT Sandika Natapalma – Karya Palma Estate on 10 February 2017.</p>
i.	No replacement after dates defined in NIs Criterion 7.3 of: <ul style="list-style-type: none"> <li>• Primary forest.</li> <li>• Any area identified as containing High Conservation Values (HCVs).</li> <li>• Any area required to maintain or enhance HCVs in accordance with RSPO criterion 7.3.</li> </ul>	<p><b>Company Group/Holding Statement:</b> HCV assessment has been conducted for uncertified units i.e. PT Mitra Austral Sejahtera (by Aksenta in March 2009) and Sime Darby Plantation Liberia operations (by RSPO approved assessors – Dr SK Yap in 2011).</p> <p><b>Auditor Verification:</b> Sime Darby Plantation Bhd sent disclosure of liability including LUCA analysis to RSPO Secretariat on 2 December 2014 and 2<sup>nd</sup> revision on 24 June 2016. The companies ensuring</p>

		reporting of disclosure of liability progress to RSPO and according to the CB's correspondency with RSPO Remediation and Compensation.
i.	Any new plantings since January 1 <sup>st</sup> 2010 must comply with the RSPO New Plantings Procedure.	<p><b>Company Group/Holding Statement:</b>  A new mill will be set up in Liberia and planned for commissioning in February 2016. Preparation to undergo the RSPO Certification process is in progress and SDP targets to undergo RSPO Certification by end 2017.  RSPO NPP process has been completed in 2011. Internal assessment against the draft Liberia NI has been completed and closing of gaps is in progress.  *Note: RSPO NPP Announcements for SDP can be found at  <a href="http://www.rspo.org/certification/new-planting-procedures/public-consultations/page/14">http://www.rspo.org/certification/new-planting-procedures/public-consultations/page/14</a></p> <p><b>Auditor Verification:</b></p> <ul style="list-style-type: none"> <li>• Karya Palma Estate (PT Sandika Natapalma) and Baturus Estate (PT Budidaya Agro Lestari) any new planting after January 1<sup>st</sup> 2010 and due to not conduct NPP.</li> <li>• RSPO NPP process has been completed in 2011 for a new mill in Liberia.</li> </ul>
ii.	Any Land conflicts are being resolved through a mutually agreed process, e.g. RSPO Grievance procedure or Dispute Settlement Facility, in accordance with RSPO criteria 6.4, 7.5 and 7.6.	<p><b>Company Group/Holding Statement:</b>  Sime Darby (Liberia) Plantation Inc.  Status: Box G - Close for Monitoring  Further details please refer to:  <a href="http://www.rspo.org/members/complaints/status-of-complaints/view/46">http://www.rspo.org/members/complaints/status-of-complaints/view/46</a>  PT Mitra Austral Sejahtera (Sime Darby Bhd)  Further details please refer to:  <a href="http://www.rspo.org/members/complaints/status-of-complaints/view/29">http://www.rspo.org/members/complaints/status-of-complaints/view/29</a></p> <p><b>Auditor Verification:</b>  Auditor has verified the supporting evidence of above the company statement.  There are land conflict in :</p> <ul style="list-style-type: none"> <li>• PT Mitra Austral Sejahtera, this issue are remain being resolved with RSPO dispute settlement facilities</li> <li>• PT Bina Sains Cemerlang, this issue was raise on 22 April 2017 and still being process to resolve.</li> </ul>

**3.5 Identification of Findings, Corrective Action, Observations, Opportunity for Improvement and Noteworthy Positive Components.**

**3.5.1. Identification of Findings, Corrective Actions and Observations at ASA-1.2**

<b>NCR No.</b>	: 2017.01	<b>Issued by</b>	: Trismadi N
<b>Date Issued</b>	: 28 September 2017	<b>Time Limit</b>	: 27 November 2017
<b>NC Grade</b>	: Major	<b>Date of Closing</b>	: 27 November 2017
<b>Standard Ref. &amp; Requirement</b>	: 2.1.1. There is compliance with all applicable local, national and ratified international laws and regulations.		
<p><b>Non-Conformance Description &amp; Evidence observed</b> <i>(filled by auditor):</i>          Found no evidence that all regulation was comply by certification unit.</p> <ol style="list-style-type: none"> <li>MGF has several outsourcing workers from CV Usaha Mandiri in accordance to Work Agreement Number. 002/SPK-LKL/MGF/IV/2017 dated 29 March 2017. However the several clausal were noncompliance with Regulation (13 Year of 2003 about workers). Such as:            Clausal 1. Type of work are main core of production, such as: FFB processing.            Clausal 3. (3) over time counting was no comply with regulation.</li> <li>According to document verification, the OHS Committee structure in MGE-1 was revised, however found no evidence that new OHS Committee structure has signed by relevant agency in accordance to Man Power Regulation (4 year of 1987).</li> </ol>			
<p><b>Root Cause Analysis</b> <i>(filled by organization audited):</i></p> <ol style="list-style-type: none"> <li>Not in accordance with the contents of Outsourcing Work Agreement with the provisions of government regulations on labor outsourcing.</li> <li>The unit regularly reports every 3 months regarding the structure of P2K3 MGE-1 PT. TMP is either a change or not, but when there is a change of Occupational Safety Expert has been reported to the Labor Agency and is awaiting the decree so that the delay in reporting the Change of Structure of P2K3.</li> </ol>			
<p><b>Correction</b> <i>(filled by organization audited):</i></p> <ol style="list-style-type: none"> <li>Unit management will show changes of structure of P2K3 which have been reported and legalized by Labor Agency of Riau Province.</li> <li>The unit management will revise SPK no. 002 / SPK-LKL / MGF / IV / 2017 dated March 29, 2017 with CV Usaha Mandiri.</li> <li>The unit management will conduct mutation of outsourced employee work from process station to compound.</li> </ol>			
<p><b>Corrective Action</b> <i>(filled by organization audited):</i></p> <ol style="list-style-type: none"> <li>The unit management will review and ensure that each issuance of a Working Agreement with a third party refers to government regulations.</li> <li>Unit management will continue to monitor and update the reporting of P2K3 structure to Labor Agency Riau Province (Monitoring attached).</li> </ol>			
<p><b>Assessor Evaluation and Conclusion</b> <i>(filled by auditor):</i>  <b>Verify 4 October 2017</b>  <b>The management unit shows some of the following improvements:</b></p> <ol style="list-style-type: none"> <li>Addendum SPK No. 002 / SPK-LKL / MGF / IV / 2017 between PT TMP and CV Usaha Mandiri dated 29 September 2017 in article 3 (3) regarding overtime wages has been referred to UU No. 13/ 2003.</li> </ol>			



2. SPK No. 62 / SPK-LKL / MG / IX / 2017 dated 29 September 2017 between PT TMP and CV Usaha Mandiri for Building Cleaning work, Warehouse, Night Duty, Gardener (house MGF) and Servant staff. In article 3 (3) has set the overtime pay refers to UU No. 13/ 2003.

**Verify November 27, 2017**

**The Company shows some improvement evidence including:**

1. Inter Office Mail from Mill Manager No. 107 B / MGF / IX / 2017 dated September 29, 2017 Referring to Working Rotation: a.n. Damat Soleh Ritonga (NIK 00020) from Maintenance (Main Processing) to Compound.
2. Inter Office Mail from Mill Manager No. 102 / MGF / IX / 2017 dated September 29, 2017 regarding Working Rotation: a.n. Irfan Rifai Ritonga (NIK 00034) and a.n. Rahmat Hidayat (00033) from Main Processing to Compound.
3. Evidence and receipt of the submission of overtime compensation workforce compound period April - September 2017 consists of 10 employees compound by CV Usaha Mandiri.
4. Evidence and receipt of the delivery of rice servicing (shortage) servant period April - September 2017 consists of 11 employees compound by CV Usaha Mandiri.
5. Decree of the Labor Agency of Riau Province with Number Kep.201 / Disnakertrans-PK / SK-P2K3 / X / 2017 dated October 13, 2017. Approval of the Committee for the Development of Occupational Safety and Health (P2K3) at PT TMP-1 Estate, the composition of Chairman: Wilmar Marpaung, Secretary: Ikhsan Adi Sukma oversees 13 members.

**Auditor's Conclusion:**

Based on the root analysis of the problem, corrections and corrective action have been sent. Then this nonconformity has been met.

**Verified by** : **Trismadi Nurbayuto**

<b>NCR No.</b>	: <b>2017.02</b>	<b>Issued</b>	: <b>Trismadi N</b>
<b>Date Issued</b>	: <b>28 September 2017</b>	<b>Time Limit</b>	: <b>ASA-1.3</b>
<b>NC Grade</b>	: <b>Minor</b>	<b>Date of Closing</b>	: <b>19 September 2018</b>
<b>Standard Ref. &amp; Requirement</b>	: <b>2.1.4. A system for tracking any changes in the law shall be available and implemented.</b>		
<b>Non-Conformance Description :</b>			
A system for tracking any changes in the law were un-implemented. The certification unit has result of legal requirement evaluation dated 16 September 2017, there are 128 relevant regulations. However not all update regulation has evaluated. For example:			
<ol style="list-style-type: none"> <li>1. Agraria and Spatial Plan/National Land Agency Head Number 7 year of 2017 about Land Use Title Appointment.</li> <li>2. Riau Governor Decree Number 120//2017 dated 26 January 2017 about Minimum Wages of Agriculture, Rubber, Oil Palm and Palm Oil Mill Sector Year of 2017.</li> </ol>			
<b>Root Cause Analysis (filled by organization audited):</b>			
The lack of attention of unit management regarding all regulations must be evaluated and followed up.			

**Correction** *(filled by organization audited):*

- Reporting on the utilization of the Cultivation Rights Title area to the National Land Agency Office
- Have made a regulatory evaluation for 2018

**Corrective Action** *(filled by organization audited):*

The PSQM department will evaluate the fulfillment of regulations every time there are new regulations.

**Assessor Evaluation and Conclusion** *(filled by auditor):*

**Evaluation 04 October 2017**

The Company has presented evidence of compliance evaluation of the regulation and its amendment as many as 128 regulations but has not yet mentioned the related regulations of Riau Governor Decree no. 120 / I / 2017 dated January 26, 2017 on the Minimum Wage of Agricultural Sector / Rubber Plantation, Oil Palm and Riau Province Plant Year 2017.

In addition, the company has not been able to show identification of root problem analysis, correction and corrective action. Based on that, the audit team concluded that indicator 2.1.4 has not been fulfilled.

**Evaluation 19 September 2018**

The company shows proof of improvement:

- The Cultivation Rights Title Utilization report sent to the National Land Agency of Rokan Hilir District on September 10, 2018. The report has been received by the National Land Agency with an official stamp on September 14, 2018.
- Evaluation of compliance with the 2018 regulations prepared by PSQM staff on August 31, 2018 which contains 147 regulatory updates, one of which contains:
  1. ATR Ministerial Regulation / Head of BPN No. 7 of 2017 concerning Arrangements and Procedures for Establishing Business Use Rights.
  2. Riau Governor Decree No. 120 / I / 2017 dated January 26, 2017 concerning the Minimum Wage of the Agriculture Sector / Rubber, Palm Oil and Factory Plantations in Riau Province in 2017.
  3. Decree of the Governor of Riau concerning the determination of the minimum wage in 2018.

Based on the evidence of improvements shown, the discrepancies are stated to be closed

**Verified by** : **Dwi Haryati**

<b>NCR No.</b>	: 2017.03	<b>Issued by</b>	: Andi Pratama Pasaribu
<b>Date Issued</b>	: 28 September 2017	<b>Time Limit</b>	: 27 November 2017
<b>NC Grade</b>	: Major	<b>Date of Closing</b>	: 27 November 2017
<b>Standard Ref. &amp; Requirement</b>	: 2.2.1 Legal documents showing legal ownership or leasing, history of ownership, duration and actual land use should be available.		

<p><b>Non-Conformance Description :</b> Progress of resolving occupational cases within the HGU area.</p> <p><b>Description of Non-conformance &amp; Evidence observed (completed by auditor):</b> Until the audit surveillance - 2.1 is implemented, the company has not been able to show the positive progress of the re-enclave area measurement conducted in November 2015.</p>	
<p><b>Root Cause Analysis (filled by organization audited):</b> The absence of answers from the National Land Agency related to the issuance of HGU PT TMP permit result from re-measurement in November 2015.</p>	
<p><b>Correction (filled by organization audited):</b> The unit management will send reminder letter I to the Department of PSD to follow up back to the National Land Agency related to the issuance of the results of PT TMP HGU re-measurement done in November 2015.</p>	
<p><b>Corrective Action (filled by organization audited):</b> Appoint person in charge in Legal Division of TMP focusing on re-measurement results of PT TMP HGU</p>	
<p><b>Assessor Evaluation and Conclusion (filled by auditor):</b> <b>Verify November 27, 2017</b> The management unit shows Letter no. / SOU-16 / XI / 2017 dated November 23, 2017, regarding: progress of repeated measurement of PT TMP enclave area to GM PSD and PSD Manager. However, it can not be shown the answer from the PSD related to the letter.</p>	
<p><b>Verified by</b></p>	<p>: <b>Trismadi Nurbayuto</b></p>

<p><b>NCR No.</b></p>	<p>: <b>2017.04</b></p>	<p><b>Issued by</b></p>	<p>: <b>Satria Adi Putra</b></p>
<p><b>Date Issued</b></p>	<p>: <b>28 September 2017</b></p>	<p><b>Time Limit</b></p>	<p>: <b>27 November 2017</b></p>
<p><b>Grade</b></p>	<p>: <b>Major</b></p>	<p><b>Date of Closing</b></p>	<p>: <b>27 November 2017</b></p>
<p><b>Standard Ref. &amp; Requirement</b></p>	<p>: <b>4.3.4 Peatland subsidies should be minimized and monitored. A documented water management and cover program should be available.</b></p>		
<p><b>Non-Conformance Description &amp; Evidence observed (filled by auditor):</b> Based on the field visit at Blok L08 Manggala 3 Estate it is known that there is re-installation for subsidized pole, based on interview result with the management, it is known that the installation of the pole is done as deep as one meter. This is not in accordance with the SOP of Peatland Decomposition (RSPO / 4.5 / WM) point 5.4.2 which states that the measurement of subsidized benchmarks by means of "insert iron pipe sharpened into the soil up to the mineral soil layer".</p>			
<p><b>Root Cause Analysis (filled by organization audited):</b></p> <ul style="list-style-type: none"> <li>- Non-standard subsidized pads use wooden materials painted with a depth of 1 meter, this is because the old subsidized pole condition is obsolete (Block L04)</li> <li>- Not all personnel in TMP understand the standard installation of subsidence land patent.</li> </ul>			

**Correction** *(filled by organization audited):*

- Replacing old subsidy pole with steel pipe material sharpened into the soil up to mineral soil layers

**Corrective Action** *(filled by organization audited):*

- Disseminating to staff about SOP of Land Subsidy Monitoring in Peat Area
- Monitoring and maintenance of subsidized land patrol by officers in accordance with SOP of Soil Degradation (RSPO / 4.5 / WM) for 6 months.
- Add a monitoring column of the benchmark conditions on the subsidized land subsidence monitoring form to determine whether the condition of the pole is in good condition or need improvement.\

**Auditor's Response October 05, 2017**

- Is there a complete monitoring and replacement mechanism for other standards that are not in accordance with the standards?

**Assessor Evaluation and Conclusion** *(filled by auditor):*

**Evaluation 05 October 2017**

The Company has presented evidence of improvements in the form of:

- Installation of subsidized block in Block L04
- Installation of new subsidized block in Block K003 as deep as 3 meter and until ground to mineral.

Based on evidence of improvements submitted, the auditor team concludes that the company still has the potential to analyze more deeply related to the root of the problem and the corrective action given so that 4.3.4 indicator has not been conformise.

**Verification November 21 November 2017**

The Company has presented evidence of improvements in the form of:

- Installation of subsidized pole in Block G007 with a depth of more than 3 meters
- Installation of subsidized pole substitutes in Block B007
- Installation of new subsidized pole in Block K003 as deep as 3 meter and until mineral ground.
- Preparation of monitoring form (6 months) for peat soil measurements containing block number, starting position of measurement, monitoring measurement date, rate of decrease (in cm) and checking condition of the stakes
- Socialization of SOP Peat Subsiden on 06 November 2017 which was attended by 16 participants consisting of manager and assistant.

Based on the results of identification of root problem analysis, correction and corrective action, the audit team concluded that indicator 4.3.4 has been met.

**Verified by** : **Satria Adi Putra**

<b>NCR No.</b>	: 2017.05	<b>Issued by</b>	: Satria Adi Putra
<b>Date Issued</b>	: 28 September 2017	<b>Time Limit</b>	: 27 November 2017
<b>NC Grade</b>	: Major	<b>Date of Closing</b>	: 27 November 2017
<b>Standard Ref. &amp; Requirement</b>	: 4.6.2 Records of pesticide use (including active ingredients used and LD50 from the active ingredient, treatment area, amount of active ingredient use per ha and number of applications) should be available.		
<b>Non-Conformance Description &amp; Evidence observed</b> <i>(filled by auditor):</i>			
The. Company has listed records of pesticide use, registration number, pesticide class and active ingredient ingredients for Manggala 1 and Manggala 3 Estate, but the data has not yet shown the LD50 of each active ingredient.			
<b>Root Cause Analysis</b> <i>(filled by organization audited):</i>			
The unavailability of special meetings to discuss the list of pesticides used by unit management as well as			

information on LD 50 on the pesticide.
<b>Correction</b> <i>(filled by organization audited):</i> Revise the list of pesticides that management uses by listing LD50 for each active ingredient used.
<b>Corrective Action</b> <i>(filled by organization audited):</i> Include program plan of active pesticide material review (as well as LD 50 information) once every 6 months.
<b>Assessor Evaluation and Conclusion</b> <i>(filled by auditor):</i> <b>Verify 04 October 2017</b> The Company has documented the list of active ingredient ingredients, LD50, and target species of pesticides used in PT TMP. However, the company has not been able to identify the root problem analysis, correction and corrective action. Based on that, the audit team concluded that indicator 4.6.2 has not been conformise.  <b>Verify November 27, 2017</b> The Company has presented the plan for the implementation of the PT TMP pesticide list evaluation meeting as well as the list of active ingredients, LD50, pesticide properties and target species of pesticides used. Based on the results of identification of root problem analysis, correction and corrective action, the audit team concluded that indicator 4.6.2 has been met.
<b>Verified by</b> : <b>Satria Adi Putra</b>

<b>NCR No.</b> :	<b>2017.06</b>	<b>Issued by</b> :	<b>Satria Adi Putra</b>
<b>Date Issued</b> :	<b>28 September 2017</b>	<b>Time Limit</b> :	<b>27 November 2017</b>
<b>NC Grade</b> :	<b>Major</b>	<b>Date of Closing</b> :	<b>27 November 2017</b>
<b>Standard Ref. &amp; Requirement</b> :	<b>4.6.5</b> <b>Handling, use or application of pesticides should be undertaken by persons who have completed compulsory training and should always be applied in accordance with product usability labels. Appropriate security and application equipment shall be provided and used. All precautions attached to the product must be observed, applied and understood by the worker (see Criterion 4.7).</b>		
<b>Non-Conformance Description &amp; Evidence observed</b> <i>(filled by auditor):</i> HIRAC was un implemented. The HIRAC was evaluated year of 2017, however pesticide applicator PPE's specification was un-comply with MSDS. Besides that, according to field observation in chemical spraying (upkeep and insecticide) activity in Block F017, Division 1, MGE-1 and Block J02, MGE-3 known that several workers was no using standard mask in accordance to MSDS.			
<b>Root Cause Analysis</b> <i>(filled by organization audited):</i> - Lack of worker understanding to use standard of PPE's according to available SOP.			
<b>Correction</b> <i>(filled by organization audited):</i> - Conducting briefings and socialization related to the importance of proper use of PPE on pesticide application every morning briefing.			
<b>Corrective Action</b> <i>(filled by organization audited):</i> <b>Verification on 5 October 2017</b> - Create a checklist of PPE every morning to ensure employees use PPE that has been compliant with the			

company's SOP.

- Internal memo from unit management related to additional stock of PPE in the warehouse at the time of procurement of PPE

**Assessor Evaluation and Conclusion** *(filled by auditor):*

**Verify 28 September 2017**

The MGF unit shows recording of the socialization and delivery of PPE to 5 EFB employees from MGE-3.

**Verify November 27, 2017**

The Company shows some evidence of improvements as follows:

1. Report on the submission of a respirator mask to 10 BSS team members at MGE-1 on 29 September 2017; as well as daily monitoring records of BSS PPE team conditions in the form of boots, gloves, respirator masks, and face shields.
2. Report on the submission of respirator mask to 8 BSS team members at MGE-2 on 29 September 2017; as well as daily monitoring records of BSS PPE team conditions in the form of boots, gloves, respirator masks, and face shields.
3. Report of the submission of a respirator mask to 5 BSS / insecticide team members at MGE-3 on 29 September 2017; as well as daily monitoring records of BSS PPE team conditions in the form of boots, gloves, respirator masks, and face shields.
4. Internal Memo from Mill Manager No. 120 / MGF / XI / 2017 dated November 1, 2017 to KTU / Section MGF, Subject PPE purchase procedure is required to submit an excess of 10% of the requirement.
5. Internal Memo from MGE-1; MGE-2; and MGE-3 Manager No. Special date of November 1, 2017 to each KTU / Section MGE-2, Subject PPE purchase procedure is required to submit an excess of 10% of the needs
6. The MGF Unit shows recording of the socialization and delivery of PPE to 5 EFB employees from MGE

**Conclusion:**

Based on root cause analysis, corrective and corrective action have been demonstrated. Then this nonconformity has been met.

**Verified by** : **Satria Adi Putra**

<b>NCR No.</b>	: 2017.07	<b>Issued by</b>	: Trismadi N
<b>Date Issued</b>	: 28 September 2017	<b>Time Limit</b>	: 27 November 2017
<b>NC Grade</b>	: Major	<b>Date of Closing</b>	: 27 November 2017
<b>Standard Ref. &amp; Requirement</b>	: 4.6.11. Annual medical records of pesticide operator, and follow-up treatment of medical results, shall be available.		
<b>Non-Conformance Description &amp; Evidence observed</b> <i>(filled by auditor):</i>			
Annual medical records of pesticide operator, and follow-up treatment of medical results was no available. Pesticides applicators cholinesterase test has been conducted on 11 – 27 September 2017, however found no evidence result of cholinesterase test.			



<p><b>Root Cause Analysis</b> <i>(filled by organization audited):</i> Late arrival of equipment for cholinesterase inspection from Pekanbaru purchasing so that the cholinesterase examination schedule is not on schedule</p>	
<p><b>Correction</b> <i>(filled by organization audited):</i> 1. Conducting cholinesterase examination on employees exposed with chemicals 2. Take immediate action against the results of the examination</p>	
<p><b>Corrective Action</b> <i>(filled by organization audited):</i> It is certain that the cholinesterase examination will be on schedule as the equipment is available.</p>	
<p><b>Assessor Evaluation and Conclusion</b> <i>(filled by auditor):</i> <b>Verify 04 October 2017</b> The Company has shown evidence of improvements including:  <ul style="list-style-type: none"> <li>- Recap Result of Cholinestrace Test of PT TMP and PT LTS Period 2017-2018 which was attended by 47 workers from Kebun Manggala 3, 26 workers from Kebun Manggala 2 and 40 workers from Manggala Estate. The results indicated that there were 2 laborers from Kebun Manggala 1 who identified mild exposure and 1 person from Manggala 3 Estate exposed in a very serious over exposure status.</li> <li>- The Company has demonstrated Follow Up Cholinestrace Employee Test 2017-2018 which contains the recommendation of a 2-person Company Doctor (on behalf of Nur Ainia and Hertina Hutasoid) exposed in the status of Exposure Light and 1 person (on behalf of Saniem) exposed in status Serious Over Exposure. Suggestions related to the exposure of Serious Over Exposure such as: <ul style="list-style-type: none"> <li>a. Re-tested within 2 weeks</li> <li>b. Medical Check Up (Blood Complete, Liver Function, Kidney)</li> <li>c. Working to the free part with organophosphate toxins until the medical check up results show improvement</li> <li>d. Look for the possibility of doing spray activity in another Estate and then ordered to stop doing it</li> </ul> </li> </ul> <p>While for the worker who exposure in the status of Exposure Light it is advisable to:</p> <ul style="list-style-type: none"> <li>a. Do re-test in the next 6 months</li> <li>b. Seeking the possibility concerned sprayed work in another Estate for later suggested to stop it from doing so.</li> </ul> <ul style="list-style-type: none"> <li>- Certificate of transfer of work on behalf of Saniem and a statement that will not spray or use Herbicides and Insecticides made in their own fields.</li> </ul> <p>Based on the root problem analysis, corrective and preventive actions have been sent. Then this discrepancy has been met.</p> </p>	
<b>Verified by</b>	<b>: Trismadi N</b>

<b>NCR No.</b>	<b>: 2017.08</b>	<b>Issued by</b>	<b>: Trismadi N</b>
<b>Date Issued</b>	<b>: 28 September 2017</b>	<b>Time Limit</b>	<b>: 27 November 2017</b>
<b>NC Grade</b>	<b>: Major</b>	<b>Date of Closing</b>	<b>: 27 November 2017</b>
<b>Standard Ref. &amp; Requirement</b>	<b>: 4.7.2. A documented risk assessment shall be available and its implementation shall be recorded.</b>		

**Non-Conformance Description & Evidence observed (filled by auditor):**

HIRAC was un implemented.

The HIRAC was evaluated year of 2017, Based on field observation to MGF sighted that several workers was smoking in Kernel station, empty bunch station. Besides that sighted that several EFB loaders was no use safety shoes in accordance to HIRAC.

**Root Cause Analysis (filled by organization audited):**

- Lack of worker understanding to use standard of PPE's according to available SOP.
- Lack of employee discipline related to smoking ban rules in POM area.

**Correction (filled by organization audited):**

- Conducting briefings and socialization related to the importance of proper use of PPE on pesticide application every morning briefing.
- Conducting briefings and socialization related to the importance of proper use of PPE to JJK employees in Manggala Mill.
- The addition of warning signs Dont Smoke on the station area.

**Corrective Action (filled by organization audited):**

**Verification on 5 October 2017**

- Create a checklist of PPE every morning to ensure employees use PPE that has been compliant with the company's SOP.
- Internal memo from unit management related to additional stock of PPE in the warehouse at the time of procurement of PPE
- Include smoking ban points at the station on safety safety briefings every morning on all POM employees.

**Assessor Evaluation and Conclusion (filled by auditor):**

**Verify 28 September 2017**

The MGF unit shows recording of the socialization and delivery of PPE to 5 EFB employees from MGE-3. And photos of the installation of smoking bans on the workplace dated 27 September 2017.

**Verify November 27, 2017**

The Company shows some evidence of improvements as follows:

1. Report on the submission of a respirator mask to 10 BSS team members at MGE-1 on 29 September 2017; as well as daily monitoring records of BSS PPE team conditions in the form of boots, gloves, respirator masks, and face shields.
2. Report on the submission of respirator mask to 8 BSS team members at MGE-2 on 29 September 2017; as well as daily monitoring records of BSS PPE team conditions in the form of boots, gloves, respirator masks, and face shields.
3. Report of the submission of a respirator mask to 5 BSS / insecticide team members at MGE-3 on 29 September 2017; as well as daily monitoring records of BSS PPE team conditions in the form of boots, gloves, respirator masks, and face shields.
4. Internal Memo from Mill Manager No. 120 / MGF / XI / 2017 dated November 1, 2017 to KTU / Section MGF, Subject PPE purchase procedure is required to submit an excess of 10% of the requirement.
5. Internal Memo from MGE-1; MGE-2; and MGE-3 Manager No. Special date of November 1, 2017 to each KTU / Section MGE-2, Subject PPE purchase procedure is required to submit an excess of 10% of the needs
6. The MGF Unit shows recording of the socialization and delivery of PPE to 5 EFB employees from MGE-3. And photos of the installation of smoking bans on the workplace dated 27 September 2017.
7. The safety briefing record of October 2, 2017 to 60 employees at MGF discusses the use of PPE, the evaluation of treatment processes and the smoking ban K3.

**Conclusion:**

Based on root cause analysis, corrective and corrective action have been demonstrated. Then this nonconformity has been met.

**Verified by** : Trismadi N

<b>NCR No.</b>	: 2017.09	<b>Issued by</b>	: Trismadi N
<b>Date Issued</b>	: 28 September 2017	<b>Time Limit</b>	: ASA-1.3
<b>NC Grade</b>	: Minor	<b>Date of Closing</b>	: 19 September 2018
<b>Standard Ref. &amp; Requirement</b>	: 4.7.5. A procedure for emergency and work accident shall be available in Indonesian Language, and the workers, who have attended First Aids training, are available in the working areas.		
<b>Non-Conformance Description &amp; Evidence observed</b> (filled by auditor): A procedure for emergency and work accident was un-implemented. According to field observation to MGE-1 Harvesting Activity (Block E10, Division 2), Chemical spraying activity (Block F017, Division 4), and Manuring Activity (Block F013, Division 3) found that first aid contains in accordance to Regulation Number 22 year 2009 nor Man Power Regulation Number 15 year of 2008. Besides that, based on field observation to Manuring Activity in MGE-3 Block I04, Division 3 found that just 9 type first aid contain and it un-monitored.			
<b>Root Cause Analysis</b> (filled by organization audited): Lack of understanding about the contents of the first aid box.			
<b>Correction</b> (filled by organization audited): - Conduct first aid training for foremen and supervisors. - Monitored the contents of the first aid box (by checklist)			
<b>Corrective Action</b> (filled by organization audited): Paramedics always check the contents of the first aid box.			
<b>Assessor Evaluation and Conclusion</b> (filled by auditor):  <b>Verification 19 September 2018</b> The company shows proof of improvement in the form of: - First aid training in the workplace held jointly on 12 September 2018 at MGE-3 with the speaker is a company doctor. Attached photo documentation, meeting attendance list and material presented. The training participants were 48 representatives from MGE-1,2 and 3. - Checklist of first aid box contents in accordance with the regulations for first aid box officers in the field or room.  <b>Based on the proof of improvement shown, Nonconformity can be closed (Closed).</b>			
<b>Verified by</b>	: Dwi Haryati		

<b>NCR No.</b>	: 2017.10	<b>Issued by</b>	: Trismadi N
<b>Date Issued</b>	: 28 September 2017	<b>Time Limit</b>	: ASA-1.3

<b>NC Grade</b>	: Minor	<b>Date of Closing</b>	: 19 September 2018
<b>Standard Ref. &amp; Requirement</b>	: 4.7.6. All workers shall be provided with medical care, and covered by accident insurance (see criterion 6.5.3)		
<b>Non-Conformance Description &amp; Evidence observed</b> (filled by auditor): Not all workers has covered by accident insurance. Based on document verification and interview with MGF staff, there are 21 outsourcing workers. The certification unit also has shown evidence pay slip of all outsourcing workers on 27 July 2017. However there are found no evidence all of outsourcing workers has registered and paid to Social Workers Insurances (BPJS).			
<b>Root Cause Analysis</b> (filled by organization audited):  Lack of unit management attention to BPJS reporting for outsourced personnel.			
<b>Correction</b> (filled by organization audited):  Pay BPJS to 21 outsourced workers.			
<b>Corrective Action</b> (filled by organization audited):  Keep making payment of outsourcing workers every month according to the law.			
<b>Assessor Evaluation and Conclusion</b> (filled by auditor): <b>Verify 04 October 2017</b> The Company has presented evidence of improvements in the form of: <ul style="list-style-type: none"> <li>- Proof of payment of BPJS against 21 outsourced workers to BPJS with no. Receipt 16118398 amounting to Rp 4,946,785</li> <li>- Card participant jamsostek 15 outsourced workers.</li> <li>-</li> </ul> However, the company has not been able to identify the root problem analysis, correction and corrective action. Based on that, the audit team concluded that the 4.7.6 indicator has not been met.  <b>Verify 19 September 2018</b> The company has shown proof of BPJS payment for the July 2018 period for 20 outsourced workers on July 6, 2018. The number of these employees is in accordance with the list of outsourced workers in July.  Based on the above explanation, this discrepancy is stated to be fulfilled			
<b>Verified by</b>	: Dwi Haryati		

<b>NCR No.</b>	: 2017.11	<b>Issued by</b>	: Trismadi N
<b>Date Issued</b>	: 28 September 2017	<b>Time Limit</b>	: 27 November 2017
<b>NC Grade</b>	: Major	<b>Date of Closing</b>	: 27 November 2017
<b>Standard Ref. &amp; Requirement</b>	: 6.5.1. Documentation of pay and conditions for employees based on the existing manpower regulations shall be available.		

<b>Non-Conformance Description &amp; Evidence observed</b> <i>(filled by auditor):</i>	
Documentation of pay and conditions for employees was noncomply with the existing manpower regulations Based on pay slip of eleven servants (outsourcing workers) in MGF period of August – September 2017, known that daily wages are IDR 95,272/ manday's. It was bellowed of Riau Governor Decree Number 120/II/2017 dated 26 January 2017 about Minimum Wages of Agriculture, Rubber, Oil Palm and Palm Oil Mill Sector Year of 2017.	
<b>Root Cause Analysis</b> <i>(filled by organization audited):</i>	
Basically the Company has provided wages for workers, it's just that there is a misinterpretation of outsourced employee wage payments.	
<b>Correction</b> <i>(filled by organization audited):</i>	
<ol style="list-style-type: none"> <li>1. Calculate changes in the structure of outsourced employee wage payments including rice and overtime to comply with UMSP.</li> <li>2. Conduct payment of wages shortage of outsourced employee wage in accordance with UMSP</li> </ol>	
<b>Corrective Action</b> <i>(filled by organization audited):</i>	
Ensure basic calculation of wage payment of outsourcing employee according to UMSP as stated in SPK.	
<b>Assessor Evaluation and Conclusion</b> <i>(filled by auditor):</i>	
<b>Verification October 5, 2017</b>	
The Company shows some evidence of improvements as follows:	
<ol style="list-style-type: none"> <li>1. Addendum SPK No. 002 / SPK-LKL / MGF / IV / 2017 between PT TMP and CV Usaha Mandiri dated 29 September 2017 in article 3 (3) regarding overtime wages has been referred to UU No. 13/ 2003.</li> <li>2. Letter no. 35 / UM / IX / 2017 ladder September 30, 2017 from CV Usaha Mandiri addressed to MGF leadership, regarding: request for rice and overtime adjustment of April - September 2017.</li> <li>3. Minutes of receipt of delivery of over time compound 10 times compound as much as 10 people for the period of April - September 2017 of Rp. 22,202,466.</li> <li>4. Evidence of giving a shortage of power rice compound as many as 11 people from April to September 2017 of Rp. 3,825,000.</li> </ol>	
<b>Conclusion:</b>	
Based on root cause analysis, corrective and corrective action measures have been demonstrated. Then this unconformity has been met.	
<b>Verified by</b>	: <b>Trismadi N</b>

<b>NCR No.</b>	: 2017.12	<b>Issued by</b>	: Andi Pratama Pasaribu
<b>Date Issued</b>	: 28 September 2017	<b>Time Limit</b>	: 27 November 2017
<b>NC Grade</b>	: Major	<b>Date of Closing</b>	: 28 October 2017
<b>Standard Ref. &amp; Requirement</b>	D.5.1 The site shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a three-monthly basis.		
<b>Non-Conformance Description &amp; Evidence observed</b> <i>(filled by auditor):</i>			

<p>Manggala Factory cannot shown data of FFB received, CPO and PK certified in three-monthly basis including sales data.</p>	
<p><b>Root Cause Analysis</b> <i>(filled by organization audited):</i>  Manggala Factory already has a certified FFB acceptance data but does not have access to CPO and PK certified sales data to the buyer.</p>	
<p><b>Correction</b> <i>(filled by organization audited):</i>  Manggala Factory provides recapitulation of RSPO FFB certified receipts and sales data of CPO and PK certified by RSPO received from Dept Marketing.</p>	
<p><b>Corrective Action</b> <i>(filled by organization audited):</i>  Coordinate every 3 months to the Marketing Dept. for delivery of CPO and PK certified and non certificated sales data from PT TMP.</p>	
<p><b>Assessor Evaluation and Conclusion</b> <i>(filled by auditor):</i>  <b>Verify October 28, 2017</b>  The Company shows some evidence of improvements as follows:</p> <ol style="list-style-type: none"> <li>1. Data for the period of January - August 2017, FFB processing data: 130,351.84 ton, CPO Production: 28,014.03 ton; Production PK: 6,280.92 tons.</li> <li>2. CPO &amp; PK product sales data for January - August 2017 period, based on the data there are only CSPK sales totaling 5,819.34 tons.</li> <li>3. Schedule of CPO &amp; PK RSPO sales data demand in December 2017, March, June and September 2018.</li> </ol> <p><b>Auditor's Conclusion:</b>  Based on root cause analysis, correction and corrective action, non conformity No. 2017.12 has been closed.</p>	
<p><b>Verified by</b></p>	<p>: <b>Trismadi N</b></p>



3.5.2. Identification of Findings, Corrective Actions and Observations at ASA-1.3

<b>NCR No.</b>	: 2018.01	<b>Issued by</b>	: Dwi Haryati
<b>Date Issued</b>	: 20 September 2018	<b>Time Limit</b>	: 19 December 2018
<b>NC Grade</b>	: Major	<b>Date of Closing</b>	: 23 October 2018
<b>Standard Ref. &amp; Requirement</b>	: 6.9.2 A policy to protect the reproductive rights, shall be documented, implemented and communicated to all levels of the workforce		
<b>Evidence observed &amp; Non-Conformance Description</b> (filled by auditor): The company has an H1 leave policy as a form of protecting reproductive rights for women. However, based on interviews with gender committees and women workers, information was obtained that the policy of giving H1 leave had not been applied to all female workers.			
<b>Root Cause Analysis</b> (filled by organization audited): All female workers (especially female workers who are not in the field) do not understand the provision of menstrual leave according to Act No. 13 of 2013.			
<b>Correction</b> (filled by organization audited): - The management of the unit issued a menstrual leave permit memorandum for female workers. - socialization regarding the menstrual leave permit memorandum to female workers.			
<b>Corrective Action</b> (filled by organization audited): - Management of the unit will ensure and monitor the implementation of menstrual leave			
<b>Assessor Evaluation and Conclusion</b> (filled by auditor): <b>23 October 2018</b> The company has shown some evidence of improvement including: <ul style="list-style-type: none"> <li>• Memorandum dated September 20, 2018 related to the Affirmation of Giving Menstrual Leave Permit for female workers explained that workers who felt pain during menstruation were given rest periods by first examination by the Medical team</li> <li>• Socialization of memorandum to all female workers for MGE-1 &amp; MGE-3 conducted on October 10, 2018 and MGE-2 conducted on October 11, 2018.</li> </ul> Based on the explanation above, this nonconformity is stated to be fulfilled and the implementation will be observed in the next assessment.			
<b>Verified by</b>	: Dwi Haryati		

<b>NCR No.</b>	<b>: 2018.02</b>	<b>Issued by</b>	<b>: Muhammad Rinaldi</b>
<b>Date Issued</b>	<b>: 20 September 2018</b>	<b>Time Limit</b>	<b>: 19 December 2018</b>
<b>NC Grade</b>	<b>: Major</b>	<b>Date of Closing</b>	<b>: 28 November 2018</b>
<b>Standard Ref. &amp; Requirement</b>	<b>: General COC 5.7.2</b> The involved supply chain actors mentioned in 5.7.1 shall do the following actions in the RSPO IT Platform: <ul style="list-style-type: none"> <li>• Shipping Announcement / Announcement: When RSPO certified volume is sold as certified, the volumes of products that are in the yield scheme (Figure 2 and 3, refer Annex 1) shall be registered as a Shipping Announcement / Announcement in the RSPO IT Platform. The declaration time to do Shipping announcement / Announcement is based on members' own standard operating procedures.</li> <li>• Trace: When RSPO certified volumes are sold as RSPO certified to actors in the supply chain beyond the refinery, the volume shall be traced at least annually. Tracing triggers the generation of a trace document with a unique traceability number. Tracing can be done in a consolidated way at least annually.</li> <li>• Remove: RSPO certified volumes sold under other scheme or as conventional, or in case of underproduction, loss or damage shall be removed.</li> <li>• Confirm: Acknowledge the purchase of RSPO certified volume by confirming Shipping Announcements / Announcements.</li> </ul>		
<b>Evidence observed (filled by auditor):</b> Based on Balance Sheet and registration data on Palmtrace License Period (January-September 2018) known: <ul style="list-style-type: none"> <li>• There is a difference in PK sales data, on palmtrace data there are 3,369.76 tons of sales, while there are 5,470.42 tons of Balance Sheet data sold with RSPO claims.</li> <li>• There are differences in CPO sales data. In the Balance Sheet data there are 18,310.16 tons of CPO sold with RSPO claims and 9,400.19 tons sold conventionally while in Data Palm Trace there are only Book &amp; Claim registrations of 5,185 tons</li> </ul>			
<b>Non-Conformance Description (filled by auditor):</b>  <i>This shows that not all sales of certified products have been registered with Palmtrace.</i>			
<b>Root Cause Analysis (filled by organization audited):</b> There was no coordination between marketing in Jakarta and unit management regarding the sale of palm products so that Jakarta marketing did not register the selling data on palmtrace.			
<b>Correction (filled by organization audited):</b> <ul style="list-style-type: none"> <li>• Coordinate with marketing in Jakarta regarding CPO / PK sales data so that can be adjusted between physical selling and palmtrace data</li> <li>• Creating balance sheet data that is in accordance with the data on palmtrace.</li> </ul>			
<b>Corrective Action (filled by organization audited):</b> The management unit will ensure and coordinate with Marketing in Jakarta for product sales data, so that the data on Palmtrace is in accordance with existing data on unit management.			

**Assessor Evaluation and Conclusion** (filled by auditor):

**28 November 2018**

The company shows the Balance Sheet 2018 (period January-August 2018) explaining the monthly recapitulation of CPO & PK production & sales data and document of CPO & PK Sales Information period January to August 2018 which explain sales data for each Delivery Order with separation of certified and non-certified sales claims, with the following details:

Month	CPO			
	Production (Kg)		Sold (Kg)	
	Certified	Non-Certified	Certified	Conventional
January 2018	3,618,276			3,850,200
February 2018	2,814,941			2,777,650
March 2018	3,401,095			3,262,090
April 2018	3,137,106			2,899,510
May 2018	3,356,751			3,267,860
June 2018	2,634,013			2,949,860
July 2018	3,691,377			3,711,190
August 2018	3,645,081			3,679,360
<b>Total</b>	<b>26,298,640</b>			<b>26,397,720</b>

Month	PK			
	Production		Sold	
	Certified	Non-Certified	Certified	Conventional
January 2018	851,566		771,380	114,350
February 2018	640,157		536,930	-
March 2018	771,533		657,750	-
April 2018	696,013		749,030	-
May 2018	738,987		772,860	-
June 2018	579,319		480,360	-
July 2018	789,237		731,960	-
August 2018	771,910		655,800	-
<b>Total</b>	<b>5,838,722</b>		<b>5,356,070</b>	<b>114,350</b>

Based on that document, it is known that the recapitulation of Balance Sheet sales data is in accordance with the sales data in the Sales Information document.

In addition, there is registration on palmtrace with the following details:

- For CPO there are credit allocation of 5,185 tons on February 9, 2018, remove stock as much as 17,605.48 tons on October 16, 2018 and remove stock as much as 8,792.41 tons on November 22, 2018 with a total of 31,582.89 tons.
- For PK, there are certified claims of 5,356.07 tons and remove stock of 2,100.66 tons on October 16, 2018 with a total of 7,456.73 tons

Based on the explanation above, this nonconformity is stated to be fulfilled

**Verified by** : **Muhammad Rinaldi**

<b>NCR No.</b>	: 2018.03	<b>Issued by</b>	: Muhammad Rinaldi
<b>Date Issued</b>	: 20 September 2018	<b>Time Limit</b>	: 19 December 2018
<b>NC Grade</b>	: Major	<b>Date of Closing</b>	: 23 October 2018
<b>Standard Ref. &amp; Requirement</b>	<b>General COC 5.13.2</b> The input to management review shall include information on: <ul style="list-style-type: none"> <li>• Results of internal audits covering RSPO Supply Chain Certification Standard.</li> <li>• Customer feedback.</li> <li>• Status of preventive and corrective actions.</li> <li>• Follow-up actions from management reviews.</li> <li>• Changes that could affect the management system.</li> <li>• Recommendations for improvement.</li> </ul>		
<b>Evidence observed (filled by auditor):</b> In Balance Sheet, it is known that there is a return of PK products as much as 12.87 tons in July 2018, but on the results of the Management Review conducted in September 2018, it is explained that in 2018 there were no complaints from buyers.			
<b>Non-Conformance Description (filled by auditor):</b> The company has not conducted discussions regarding product returns in July 2018 as one of the information in the Customer Feedback section on Management Review activities.			
<b>Root Cause Analysis (filled by organization audited):</b> Unit management does not understand that claims and complaints must be included in management reviews			
<b>Correction (filled by organization audited):</b> Re-conduct management review and discuss related claims and complaints.			
<b>Corrective Action (filled by organization audited):</b> - Ensure that management reviews are carried out every year and are ensured to discuss related claims and complaints. - Ensure that all parameters for product quality can be below the target, so there are no claims and complaints.			
<b>Assessor Evaluation and Conclusion (filled by auditor):</b> <b>23 October 2018</b> The Company shows Management Review Minutes conducted on September 24, 2018 which have been discussed with the complaints from buyers. In addition, there was a socialization of the results of the management review to employees on September 26, 2018. The company also showed the Customer Complaints Registration List that explained their complaints and action plans.  Based on the explanation above, this nonconformity is stated to be fulfilled			
<b>Verified by</b>	: Muhammad Rinaldi		

<b>NCR No.</b>	: 2018.04	<b>Issued by</b>	: Muhammad Rinaldi	
<b>Date Issued</b>	: 20 September 2018	<b>Time Limit</b>	: 19 December 2018	
<b>NC Grade</b>	: Major	<b>Date of Closing</b>	: 27 November 2018	
<b>Standard Ref. &amp; Requirement</b>	<b>D.5.1</b> <b>The site shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.</b>			
<b>Evidence observed</b> (filled by auditor): In Balance Sheet, it is known that there are sales of products with RSPO certified claims and conventional sales, but the company can not shown the basis for product sales data recapitulation with RSPO certified claims and conventional sales.				
<b>Non-Conformance Description</b> (filled by auditor): company can not shown the basis for product sales data recapitulation with RSPO certified claims and conventional sales.				
<b>Root Cause Analysis</b> (filled by organization audited): The unit management has not obtained the final data from the marketing regarding the sale of certified and non-certified CPO and Kernel.				
<b>Correction</b> (filled by organization audited): - Request to department marketing for product sales data and balance sheet data to be adjusted back to products claimed by RSPO or conventional. - Making balance sheet data on product sales data Jan-Ags 2018.				
<b>Corrective Action</b> (filled by organization audited): The management unit will ensure and coordinate with Marketing Jakarta for product sales data can be sent to the unit every month, so that data can be monitored every month.				
<b>Assessor Evaluation and Conclusion</b> (filled by auditor): <b>27 November 2018</b> The company shows the Balance Sheet 2018 (period January-August 2018) explaining the monthly recapitulation of CPO & PK production & sales data and document of CPO & PK Sales Information period January to August 2018 which explain sales data for each Delivery Order with separation of certified and non-certified sales claims, with the following details:				
<b>Month</b>	<b>CPO</b>		<b>Sold (Kg)</b>	
	<b>Production (Kg)</b>		<b>Certified</b>	<b>Conventional</b>
	<b>Certified</b>	<b>Non-Certified</b>		
January 2018	3,618,276			3,850,200
February 2018	2,814,941			2,777,650
March 2018	3,401,095			3,262,090
April 2018	3,137,106			2,899,510
May 2018	3,356,751			3,267,860
June 2018	2,634,013			2,949,860
July 2018	3,691,377			3711190
August 2018	3,645,081			3,679,360
<b>Total</b>	<b>26,298,640</b>			<b>26,397,720</b>

Month	PK			
	Production		Sold	
	Certified	Non-Certified	Certified	Conventional
January 2018	851,566		771,380	114,350
February 2018	640,157		536,930	-
March 2018	771,533		657,750	-
April 2018	696,013		749,030	-
May 2018	738,987		772,860	-
June 2018	579,319		480,360	-
July 2018	789,237		731,960	-
August 2018	771,910		655,800	-
<b>Total</b>	<b>5,838,722</b>		<b>5,356,070</b>	<b>114,350</b>

Based on that document, it is known that the recapitulation of Balance Sheet sales data is in accordance with the sales data in the Sales Information document.

Based on the explanation above, this nonconformity is stated to be fulfilled

**Verified by** : **Muhammad Rinaldi**



**3.5.3. Opportunity for Improvement**

No	Ref. Std.	Description
1	2.1.1	Consider following up on operator permits and extending the appointment of General OSH Experts.
2	2.2.2	The company is encouraged to ensure and consult with the National Land Agency related to the point of interest in the boundary marking in accordance with the Revised Map of Situation No. 16/1992 (Observation)
3	4.7.3	Ensuring effective monitoring of PPE use (Observation)
4	5.3.3	Ensuring the management of waste plastic waste fertilizer (Observation)
5	6.1.3	Ensure the realization of the management plan for the impact of replanting in a participatory manner for all affected parties (Observation)
6	6.5.3	Monitor employee home improvement programs in the Estate (MGE-1, MGE-2, and MGE-3)
7	7.3.1	Ensuring the progress of LUCA
8	COC 5.12.1	Opportunities to improve documentation of product-related complaints.
9	COC 5.13	Encouraged to involve all relevant personnel in SCCS to participate in Management Review activities
10	D.6.1	Ensure related storage of CPO in bulking.

**3.5.4. Noteworthy Positive Components**







No	Description Deskripsi
1	Good cooperation and competent team
2	Received the Zero Accident Award for 2015-2017

**3.6 Summary of Arising Issues from Public and Auditor Verification**

Public Issues (Institution/ NGO/Community)	Auditor Verification
<p><b>Suka Mulya Village (Village Official, Public Figures, Previous Land Owner)</b></p> <ul style="list-style-type: none"> <li>• There is no additional land since the first land clearance</li> <li>• Land compensation activities are carried out by negotiation.</li> <li>• Currently, there are no land disputes and customary land.</li> <li>• CSR has been provided by the company in the form of road maintenance, religious activities.</li> <li>• Has known the HCV area</li> <li>• There is villagers that work in the company</li> <li>• The company comes in to village development deliberations</li> <li>• There are issues related to Oryctes pest invasion due to replanting activities in the company</li> </ul>	<p>This is in accordance with the criteria 2.2, 5.1, 5.2, 5.5 and 6.11</p> <p>For issues related to pest invasion, company have shown proof of meetings and planned activities. This issues has become <b>OFI</b></p>
<p><b>Pemantang Genting Village (Village Official)</b></p> <ul style="list-style-type: none"> <li>• There is no additional land since the first land clearance</li> <li>• Land compensation activities are carried out by negotiation.</li> <li>• Currently, there are no land disputes and customary land.</li> <li>• CSR has been provided by the company in the form of road maintenance, religious activities.</li> <li>• Has known the HCV area</li> <li>• There is villagers that work in the company</li> <li>• The company comes in to village development deliberations</li> <li>• There are no issues related to environment or social.</li> </ul>	<p>This is in accordance with the criteria 2.2, 5.1, 5.2, 5.5 and 6.11</p>
<p><b>Worker Union (MGE and MGF)</b></p> <ul style="list-style-type: none"> <li>- Industrial relations both company and workers are still going well in accordance with Collective Labor Agreements.</li> <li>- There has been no reporting of disputes between workers or between companies and Worker union.</li> <li>- The company shows the implementation minimum wage for 2018 are 2,481,000,- and the salary shortage is paid in April 2018.</li> <li>- Calculation of overtime is in accordance with regulations.</li> <li>- There are still outsourcing (servant and compound) workers in MGF with around 20 people.</li> <li>- The Collective Labor Agreement currently used is the period 2017 - 2019 ..</li> <li>- Workers' Union has been registered in the labour agency.</li> <li>- Meetings both worker union and company are carried out according to needs.</li> <li>- There is no special secretariat provided by companies for worker unions.</li> <li>- There is still a wholesale work system in the company, namely the maintenance work with the head of the contractor coming from outside the company.</li> </ul>	<p>Not labor and industrial relations issues.</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<ul style="list-style-type: none"> <li>- The company has provided PPE for workers and can be replaced if there is damage by submitting damaged PPE evidence.</li> <li>- Health services have been provided by companies in the form of a central clinic on MGE-1.</li> <li>- All workers have been registered as labor insurance (BPJS).</li> <li>- The grievance mechanism has been carried out, through the suggestion box, worker unions, and there has been socialization to workers.</li> <li>- Members of the worker Union are all permanent workers at company, membership is voluntary.</li> <li>- Aspiration : related to overtime quota which is limited by the number of overtime rights. There is hope of being able to get overtime policies as in previous years where there are no overtime restrictions.</li> </ul>	
<p><b>Gender Committe PT TMP</b></p> <ul style="list-style-type: none"> <li>- Gender Committee activities are active and endorsing: 2013-2014</li> <li>- Regular program: posyandu every month, Friday clean for all housing, clinics and offices, counseling of sexual harassment, prohibition of pregnant workers for work related to chemicals, reproductive health.</li> <li>- There is no reporting of sexual harassment and violation of reproductive rights.</li> <li>- Providing menstruation leave: 2 days for workers in the field with a clinic check mechanism and a reference from the medical officer to the assistant.</li> <li>- Giving menstruation leave without salary deductions.</li> <li>- Workers in the office have no rights for H1: because it includes light work. But there were no complaints from workers for office workers.</li> </ul> <p>Aspiration: Progress of wooden house repair and rehabilitation becomes permanent housing for all employees.</p>	<p>Regarding the policy of giving H1 leave which has not been applied to all female workers, this is a non-conformity No.2018.01</p>
<p><b>Local Transport Contractor FFB and Empty Bunch (Sukajadi Village)</b></p> <ul style="list-style-type: none"> <li>- Contractual cooperation from 2013 and extended / renewed every month.</li> <li>- There are no problems related to payments</li> <li>- The contractor gets a copy of the contract and given time to study the contract before it is agreed to be signed by both parties.</li> <li>- Articles related to OHS and employment are listed in the Work Agreement.</li> <li>- The unit has 4 trucks and there are 4 drivers.</li> <li>- Provision of PPE (helmet, shoes) and BPJS is paid by the contractor. However, it is constrained by the problem of a very short work agreement period (every 1 month).</li> <li>- Aspiration:</li> <li>- The contractor hopes that the work agreement term can be longer in duration (count year not month) so that the</li> </ul>	<p>This is in accordance with criterion 6.10.</p>

<b>Public Issues (Institution/ NGO/Community)</b>	<b>Auditor Verification</b>
<p>status of contractor workers is more fixed.</p> <ul style="list-style-type: none"> <li>- The company has provided opportunities for local contractor development but has not been maximized from the company.</li> </ul> <p><b>Local Contractor Transport CPO and kernel (representative of Dumai)</b></p> <ul style="list-style-type: none"> <li>- Contractual cooperation from 2013 and established cooperation for companies in Minamas Group.</li> <li>- Not getting socialization related to SCCS ..</li> <li>- In the process of transporting CPO, it is permitted to replace transport units for different company units.</li> <li>- The number of CPO transport units is approximately 140 units.</li> <li>- There is no payment problem with the company, it can still be communicated well between the two parties.</li> <li>- Contractor workers have been registered with BPJS and provided PPE while working.</li> <li>- Socialization by the company: OHS, Code Of Conduct every month with a briefing to the driver in stages.</li> </ul>	

4.0	<b>CERTIFIED ORGANISATION'S ACKNOWLEDGEMENT OF INTERNAL RESPONSIBILITY</b>		
4.1	<b>Formal Sign-off of Assessment Findings</b>		
	<p>Hereunder sign by management representative from inspected company to acknowledge a field assessment and agree for all content explained in this assessment report, included of non-compliance findings.</p> <p style="text-align: center;">Signed on behalf of:</p> <table style="width: 100%; border: none;"> <tr> <td style="width: 50%; vertical-align: top; padding: 20px;"> <p style="text-align: center;">PT Tunggal Mitra Plantation Head of PSQM Minamas Plantation, Sime Darby Plantation Sdn Bhd</p>  <p style="text-align: center;"><b><u>Mohamad Pirabaharan</u></b> Thursday, 29 November 2018</p> </td> <td style="width: 50%; vertical-align: top; padding: 20px;"> <p style="text-align: center;">Mutuagung Lestari Lead Auditor</p>  <p style="text-align: center;"><b><u>Muhammad Rinaldi</u></b> Thursday, 29 November 2018</p> </td> </tr> </table>	<p style="text-align: center;">PT Tunggal Mitra Plantation Head of PSQM Minamas Plantation, Sime Darby Plantation Sdn Bhd</p>  <p style="text-align: center;"><b><u>Mohamad Pirabaharan</u></b> Thursday, 29 November 2018</p>	<p style="text-align: center;">Mutuagung Lestari Lead Auditor</p>  <p style="text-align: center;"><b><u>Muhammad Rinaldi</u></b> Thursday, 29 November 2018</p>
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**Appendix 1. List of Stakeholder Contacted in the RSP0 Certification Process**

No	Institution/NGO/Community	Address	Phone/Email	Form of Communication	Date of Contact	Response	
						Yes	No
1	Labour Agency Of Rokan Hilir Sistrict	Rokan Hiir District, Riau province		questionnaire	September 13, 2018		√
2	National Land Agency of Rokan Hilir District	Rokan Hiir District, Riau province		questionnaire	September 13, 2018		√
3	Environment Agency of Rokan Hilir District	Rokan Hiir District, Riau province		questionnaire	September 13, 2018		√
4	Plantation Agency of Rokan Hilir District	Rokan Hiir District, Riau province		questionnaire	September 13, 2018		√
5	International Animal Rescue Indonesia	Jakarta		questionnaire	September 13, 2018		√
6	WALHI	Jakarta	informasi@walhi.or.id	questionnaire	September 13, 2018		√
7	Sawit Watch	Jakarta	info@sawitwatch.or.id	questionnaire	September 13, 2018		√
8	Aliansi Masyarakat Adat Nusantara	Jakarta	rumahaman.cb n.net.id	questionnaire	September 13, 2018		√
9	Local Communities  Suka Mulya Village (Village official, Public Figures, Previous land owner)  Pemantang Genting Village (Village official, Public Figures, Previous land owner)	Rokan Hiir District		Interview	September 18, 2018	√	
10	Local Contractor  FFB and EFB (Sukajadi Village)  Transport CPO and Kernel (Representative of Dumai)	Rokan Hiir District		Interview	September 18, 2018	√	
11	Gender Committee PT TMP	Rokan Hiir District		Interview	September 18, 2018	√	
12	Labour Union (MGE and MGF)	Rokan Hiir District		Interview	September 18, 2018	√	
13	Internal Stakeholder  Manggala Factory <ul style="list-style-type: none"> <li>• 3 grading officer</li> <li>• 1 loading ramp officer</li> <li>• 1 press officer</li> <li>• 1 engine operator</li> <li>• 1 boiler operator</li> <li>• 1 WTP officer</li> <li>• 1 warehouse officer</li> <li>• 2 mechanic</li> </ul>	Rokan Hiir District		Interview	September 18, 2018	√	



<ul style="list-style-type: none"> <li>• 4 firefighter officer</li> <li>• 3 security</li> <li>• 2 weighbridge officer</li> <li>• 1 logistic clerk</li> </ul> <p>Manggala Estate</p> <ul style="list-style-type: none"> <li>• 6 pesticide applicator</li> <li>• 6 manuring worker</li> <li>• 3 residence on housing</li> <li>• 3 daycare worker</li> <li>• 1 BSS &amp; BMS officer</li> <li>• 3 Workshop worker</li> <li>• 1 Hazardous storage worker</li> <li>• 2 warehouse complex worker</li> </ul>	<p>Rokan Hiir District</p>		<p>interview</p>	<p>September 18 - 19, 2018</p>	<p>√</p>	
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Appendix 2. Assessment Program

DATE	September 17 to 21, 2018	
PLANNED TIME	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
<b>Monday, September 17, 2018</b>		
06.00 - 08.00 09.00 - 16.00 16.30 - 17.00	<b>JAKARTA ▯ PEKANBARU</b> Traveling from Pekanbaru to Plantation Site Opening Meeting Review of previous findings Verification of Basic Information Mill and Estate	All Team
<b>Tuesday, September 18, 2018</b>		
08.00 – 12.00	<ul style="list-style-type: none"> <li>Stakeholder Consultation to Related Agencies in Rokan Hilir District by phone</li> <li>Interview with Gender Committee, Worker’s Union, Local Contractor for Mill and Estate (CPO, kernel and FFB transporter), Third Party Supplier (if any), Plasma cooperative (if any).</li> <li>Stakeholder consultation to affected communities (<i>Aparat Desa, Tokoh Masyarakat</i> and <i>pemilik lahan sebelumnya</i>) surrounding the plantations (<i>Desa Teluk Nayang</i> and <i>Desa Pujud</i>)</li> </ul> <p><b>Field Visit to Manggala 1 Estate</b></p> <ul style="list-style-type: none"> <li>Manuring, Spraying, Harvesting, Integrated Pest Management (IPM), and Worker Welfare (payments, complaint mechanism)</li> <li>Legal operational</li> <li>High Conservation Value Area, Empty Fruit Bunch Application, Fragile Soil Management</li> <li>Worker facilities (housing, health clinic, clean water, etc) and Hazardous Waste Material (B3) management, Land Fire facilities, Storage, ect.</li> </ul>	DWH DWH MRD  RAH, HRK
12.00 – 14.00	<b>Break</b>	
14.00 – 17.00	<b>Field Visit to Manggala POM</b> <ul style="list-style-type: none"> <li>Workshop, Chemical Storage, Loading Ramp (Grading), wastemanagement</li> <li>Supply Chain &amp; Operational activities</li> <li>WWTP (IPAL), Land Application (LA), WTP, Hazardous Waste Material (LB3) management</li> </ul>	All Team
<b>Wednesday, September 19, 2018</b>		
08.00 – 12.00	<b>Field Visit to Manggala 2 &amp; Manggala 3 Estate</b> <ul style="list-style-type: none"> <li>Manuring, Spraying, Harvesting, Integrated Pest Management (IPM), and Worker Welfare (payments, complaint mechanism)</li> <li>Legal operational</li> <li>High Conservation Value Area, Empty Fruit Bunch Application, Fragile Soil Management</li> <li>Worker facilities (housing, health clinic, clean water, etc) and Hazardous Waste Material (B3) management, Land Fire facilities, Storage, ect.</li> </ul>	All Team
12.00 – 14.00	<b>Break</b>	
14.00 – 15.00	<ul style="list-style-type: none"> <li>Continue Field Observation and field observation clarification</li> </ul>	All Team
15.00 – 17.00	<ul style="list-style-type: none"> <li>Continue document verification and completing checklist</li> </ul>	
<b>Thursday, September 20, 2018</b>		
08.00 – 12.00	<ul style="list-style-type: none"> <li>Continue Field Observation and field observation clarification</li> <li>Continue document verification and completing checklist</li> </ul>	All Auditor
12.00 – 14.00	<b>Break</b>	

14.00 – 16.00	• Meeting of Auditor Team (Preparation for audit conclusion)	All Auditor
16.00 – 17.00	• Closing Meeting	All Auditor & MR PT TMP
<b>Friday , September 21, 2018</b>		
08.00 -...	Site → Jakarta	All Auditor