

***Roundtable on Sustainable Palm Oil Certification  
RSPO*****[✓] Surveillance**

Name of Management : Nagasaki POM, PT Buana Wiralestari Mas subsidiary of Golden Agri Organisation Resources Holdings Ltd

Plantation Name : PT Buana Wiralestari Mas : Nagamas Estate; Nagasaki Estate  
PT Ramajaya Pramukti : Ramabakti Estate

Location : Village of Sekijang, Sub District of Tapung Hilir, Kampar Regency, Province of Riau, Indonesia.

Certificate Code : **MUTU-RSPO/012**

Date of Certificate Issue : 13 January 2017      Date of License Issue : 13 January 2020

Date of Certificate Expiry : 12 January 2022      Date of License Expiry : 12 January 2021

Assessment	Assessment Date	PT. Mutuagung Lestari Auditor	Reviewed by	Approved by
ASA 1.3	12, 14, 15, 17,18 October 2019	Moh Arif Yusni; (Lead Auditor); Arif Faisal Simatupang; Dwi Haryati; Steve Mualim	Leonada	Ardiansyah

Assessment	Approved by MUTUAGUNG LESTARI on:
ASA 1.3	11 November 2019

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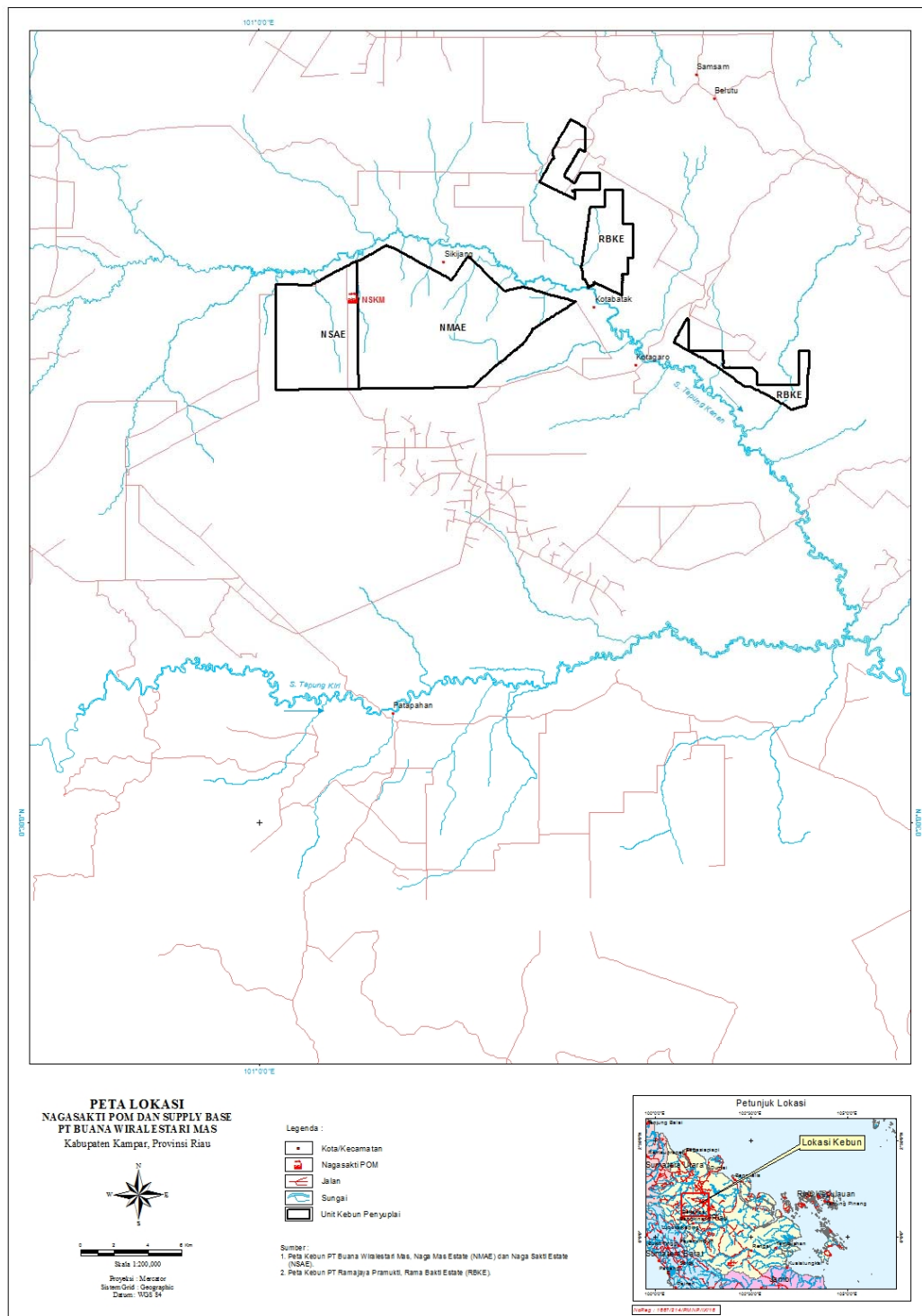
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Figure 1. Location Map of PT Buana Wiralestari Mas & PT Ramajaya Pramukti



Figure 2. Operational Map of Nagamas Estate, Nagasaki Estate, Ramabakti Estate



**Abbreviations Used**

ASA	: Annual Surveillance Assessment	LKUP	: <i>Laporan Kegiatan Usaha Perkebunan</i> (Plantation Activity Report)
BMP	: Best Management Practices	MCMD	: Management Committee for Mill Development
BOB	: Barn Owl Boxes	MoU	: Memorandum of Understanding
BOD	: Biological Oxygen Demand	MSDS	: Material Safety Data Sheet
BWLM	: Buana Wiralestari Mas	MUTU	: Mutuagung Lestari
CB	: Certification Body	NGO	: Non Government Organization
CDP	: Community Development Program	NMAE	: Nagamas Estate
CH	: Certificate Holder	NSAE	: Nagasakti Estate
CITES	: Convention, International, Threatened, Endangered Species	NSAM	: Nagasakti Mill
CPO	: Crude Palm Oil	OER	: Oil Extraction Rate
CSPK	: Certified Sustainable Palm Kernel	OHS	: Occupational Health and Safety
CSPO	: Certified Sustainable Palm Oil	OHSAS	: Occupational Health and Safety Assessment Series
CSR	: Corporate Social Responsibility	P&C	: Principle and Criteria
EFB	: Empty Fruit Bunches	PIC	: Person In Charge
EHS	: Environmental, Health and Safety	PK	: Palm Kernel
EIA	: Environmental Impact Assessment	POM	: Palm Oil Mill
FFB	: Fresh Fruit Bunches	POME	: Palm Oil Mill Effluent
FGD	: Focus Group Discussion	PPE	: Personal Protective Equipment
FR	: Frequently Rate	RBKE	: Ramabakti Estate
FPIC	: Free, Prior and Informed Consent	RC/PC	: Regional Controller / Production Controller
GAR	: Golden Agri resources	RJP	: Ramajaya Pramukti
GHG	: Green House Gases	RSPO	: Roundtable on Sustainable Palm Oil
GRTT	: <i>Ganti Rugi dan Tanam Tumbuh</i> (Land Compensation)	RKL- RPL	: Environment Management and Monitoring Report
GPS	: Global Positioning System	SCCS	: Supply Chain Certification System
HCV	: High Conservation Value	SIA	: Social Impact Assessment
HGU	: <i>Hak Guna Usaha</i> (Land Use Title/Right)	SIO	: <i>Surat Izin Operator</i> (License)
HIRAC	: Hazard Identification Risk Assessment and Control	SMATRI	: Sinar Mas Agri Resources and Technology Research Institute
HRD	: Human Resources Development/Department	SMD Ops	: Senior Managing Directors Operation
IPM	: Integrated Pest Management	SPO	: Sustainability Palm Oil
ISCC	: International Sustainability and Carbon Certification	SOP	: Standard Operating Procedure
ISO	: International Standard Organization	SR	: Severity Rate
ISPO	: Indonesia Sustainable Palm Oil	ST-2	: Stage-2 Assessment/Audit
IUCN	: International Union for Conservation of Nature	SSU	: Soil Sampling Unit
IUP	: Plantation Permit/Licenses	WHO	: World Health Organization
KAN	: Indonesian Accreditation Body	WTP	: Water Treatment Plant
KER	: Kernel Extraction Rate	WWTP	: Waste Water Treatment Plant
KUD	: <i>Koperasi Unit Desa</i> (Cooperative Unit)	VPA /VPM	: Vice President Agronomy / Vice President Manufacture
LD	: Lethal Dosage		



<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>Indonesian National Interpretation of RSPO Principles and Criteria (P&amp;C) 2013 by INA-NITF July 2016, endorsed by the RSPO Board of Governors on September 30th 2016.</li> <li>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)</li> <li>RSPO Certification System for Principles and Criteria, 14 June 2017</li> </ul>							
<b>1.2</b>	<b>Organisation Information</b>								
1.2.1	Organisation name listed in the certificate	PT Buana Wiralestari Mas subsidiary of Golden Agri Resources Holdings Ltd.							
1.2.2	Contact person	Yahya Mustakim							
1.2.3	Organisation address and site address	<b>Head Office:</b> 108 Pasir Panjang Road, #06-00 Golden Agri Plaza, Singapore, Singapore 118535  <b>Indonesia Office:</b> Sinas Mas Land Plaza, 30th Floor JL. MH Thamrin No 51 Kav 22 Jakarta 10350 Indonesia							
1.2.4	Telephone	+62-21 50338899 ext 1184							
1.2.5	Fax	+62-21 50389999							
1.2.6	E-mail	<a href="mailto:yahya.mustakim@sinarmas-agri.com">yahya.mustakim@sinarmas-agri.com</a>							
1.2.7	Web page address	<a href="http://www.goldenagri.com.sg">www.goldenagri.com.sg</a>							
1.2.8	Management Representative who completed the application for certification	Yahya Mustakim (Head Of SPO Certification)							
1.2.9	Registered as RSPO member	1-0096-11-000-00 (31 March 2011)							
<b>1.3</b>	<b>Type of Assessment</b>								
1.3.1	Scope of Assessment and Number of Management Unit	Palm Oil Mill and supply base <ul style="list-style-type: none"> <li>Nagasakti Mill, Nagamas Estate, Nagasakti Estate, Ramabakti Estate.</li> </ul>							
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>	<table border="1"> <thead> <tr> <th colspan="2">Coordinate</th> </tr> <tr> <th>Latitude</th> <th>Longitude</th> </tr> </thead> <tbody> <tr> <td>N 0° 46' 58"</td> <td>E 101° 03' 01"</td> </tr> </tbody> </table>	Coordinate		Latitude	Longitude	N 0° 46' 58"	E 101° 03' 01"
Coordinate									
Latitude	Longitude								
N 0° 46' 58"	E 101° 03' 01"								
	Nagasakti Mill	Village of Sekijang, Sub-District of Tapung Hilir, Kampar Regency, Province of Riau							
1.4.2	Location of Certification Scope of Supply Base								
	<b>Name of Supply Base</b>	<b>Location</b>	<table border="1"> <thead> <tr> <th colspan="2">Coordinate</th> </tr> <tr> <th>Latitude</th> <th>Longitude</th> </tr> </thead> <tbody> <tr> <td>N 0° 46' 13"</td> <td>E 101° 02' 47"</td> </tr> </tbody> </table>	Coordinate		Latitude	Longitude	N 0° 46' 13"	E 101° 02' 47"
Coordinate									
Latitude	Longitude								
N 0° 46' 13"	E 101° 02' 47"								
	Nagasakti Estate	Village of Sekijang, Sub-District of Tapung Hilir, Kampar Regency, Province of Riau.							

	Nagamas Estate	Village of Sekijang, Sub-District of Tapung Hilir, Kampar Regency, Province of Riau.	N 0° 47' 00"	E 101° 06' 15"			
	Ramabakti Estate	Village of Beringin Lestari, Sub-district of Tapung Hilir, Kampar Regency, Province of Riau.	N 0° 50' 33"	E 101° 10' 20"			
1.5	Description of Area Statement						
1.5.1	Tenure						
	• State		13,113.59 Ha				
	• Community		Ha				
1.5.2	Area Statement						
	• Total area		13,113.59 Ha				
	• Mature area		12,622.05 Ha				
	• Mill & emplacement		69.13 Ha				
	• Infrastructure		312.53 Ha				
	• Swamp, river, & ditch		100.49 Ha				
	• Others area		9.39 Ha				
	• HCV (calculated as planted area)		492.51 Ha				
1.6	Planting Year and Cycles						
1.6.1	Age profile of planting year						
	Planting Year	Hectarage (Ha)					
		Nagasakti Estate	Nagamas Estate	Ramabakti Estate	Total		
	1993	773.50	2,277.59	-	3,051.09		
	1994	2,988.01	2,114.79	-	5,102.80		
	1995	1,072.06	-	1,256.48	2,328.54		
	1996	-	-	964.55	964.55		
	1997	-	-	456.45	456.45		
	2001	-	63.35	-	63.35		
	2002	191.90	463.37	-	655.27		
	TOTAL	5,025.47	4,919.10	2,677.48	12,622.05		
1.6.2	New Planting area after January 2010		- Ha				
1.6.3	Planting Cycle		1 <sup>st</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 (%)
	Nagasakti	60	287,747.65	58,642.18	19.97	16,049.92	5.33
*Production data source from 12 months before assessment (October 2018 – September 2019)							
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)	%
	Nagasakti Estate	5,167.22	5,025.47	123,107.68	24.50	121,357.88	98.58
	Nagamas Estate	5,042.58	4,919.10	123,107.68	25.03	117,432.73	95.39
	Ramabakti Estate**	2,903.79	2,677.48	62,765.27	23.44	14,616.82	23.29
	<b>TOTAL</b>	<b>13,113.59</b>	<b>12,622.05</b>	<b>308,980.63</b>	<b>20.66</b>	<b>253,407.43</b>	<b>82.01</b>
<i>*Production data source from 12 months before assessment (October 2018 – September 2019)</i>							
<i>**FFB from Ramabakti Estate partially sent to Libo Mill and Samsam Mill</i>							
1.7.3	FFB description from other source						
	Name of sources/Organisation	Type of Organisation	number of smallholders	Production Area (Ha)	Supplied to Mill		
					FFB (tonnes/year)		
	Kijang Estate (RSPO Certified)	PT Buana Wiralestari Mas	-	2,111.41	33,391.26		
	Kijang Plasma (RSPO Certified)	PT Buana Wiralestari Mas	4,073	8,147.79	948.96		
	<b>TOTAL</b>					<b>34,340.22</b>	
<i>*Production data source from 12 months before assessment (October 2018 – September 2019)</i>							
1.7.4	Product categories			FFB, CPO, PK			
1.8	Tonnage of Product						
1.8.1	Past Annual Claim Certified Product		Last Year Projected Certified Volume (MT) 13 January 2019 – 12 January 2020		Last Year Actual Certified Volume (MT) 01 October 2018 – 30 September 2019		
	FFB Processed		343,860		287,747.65		
	CPO Production		72,210		58,642.18		
	Palm Kernel (PK) Production		19,256		16,049.92		
1.8.2	Product selling						
	Type of selling product		Actual selling product for last year (01 October 2018 – 30 September 2019) (MT)				
	CSPO sold as RSPO certified product		7,452.32				
	CSPK sold as RSPO certified product		15,346.57				
	CSPO sold under other scheme		50,449.02				
	CSPK sold under other scheme		-				
	CSPO sold as conventional		-				
	CSPK sold as conventional		-				
1.8.3	Estimate of Certified FFB Claim						
	Name of Estates	Total Area (Ha)	Planted Area (Ha)	FFB (tonnes/year)	Yield (tonnes/ha/year)		
	Nagasakti Estate	5,167.22	5,025.47	131,700	26.21		
	Nagamas Estate	5,042.58	4,919.10	125,700	25.55		



	Ramabakti Estate	2,903.79	2,677.48	64,800	24.20			
	<b>TOTAL</b>	<b>13,113.59</b>	<b>12,622.05</b>	322,200	25.53			
	<i>*Projected FFB production for 12 months of certificate (13 January 2020 – 12 January 2021)</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 Out put (tonnes)</b>	<b>Extraction (%)</b>	<b>Palm Kernel Out put (tonnes)</b>	<b>Extraction (%)</b>	<b>Supply Chain Module</b>
	Nagasakti	60	322,200	67,700	21	17,700	5.5	IP
	<i>*Projected FFB production for 12 months of certificate (13 January 2020 – 12 January 2021)</i>							
<b>1.9</b>	<b>Other Certifications</b>							
	ISCC			EUISCC-Cert-DE104-07781613.				
	ISPO			MUTU/ISPO-028 issued 09 September 2014 until 08 September 2019				
<b>1.10</b>	<b>Time Bound Plan</b>							
1.10.1	<b>Time Bound Plan for Other Management Units</b>							
	<b>Management Unit</b>		<b>Estate (Supply Base)</b>	<b>Time Bound Plan</b>	<b>Location</b>	<b>Status</b>		
	<b>Mill</b>	<b>Time bound</b>						
	Pangkalan Panji (PT Sawit Mas Sejahteras)	2013	Sawit Mas Estate	2013	South Sumatera	Certified		
	Bumi Sawit Mill (PT Bumi Sawit Permai)	2013	Bumi Sawit Estate	2013	South Sumatera	Certified		
	Muara Kandis Mill (PT Djuanda Sawit Lestari)	2013	Muara Tawas Estate	2013	South Sumatera	Certified		
			Muara Kandis Estate	2013	South Sumatera	Certified		
			Muara Kandis Estate (HGU on progress – 574.58 Ha)	2020	South Sumatera	-		
			Muara Tawas Estate (HGU on progress – 73.78 Ha)	2020	South Sumatera	-		
			Smallholder (KKPA Pandawa)	2020	South Sumatera	-		
	Sungai Rungau Mill (PT Sumber Indah Perkasa)	2013	Sungai Rungau Estate	2013	Central Kalimantan	Certified		
			Sungai Seruyan Estate	2013	Central Kalimantan	Certified		
			Terawan Estate	2013	Central Kalimantan	Certified		
			Tangar Estate	2013	Central Kalimantan	Certified		
			Bukit Tiga Estate	2013	Central Kalimantan	Certified		
	Bukit Perak EMIII (PT Bumi Permai Lestari)	2013	Bukit Perak Estate	2013	Bangka Belitung	Certified		
			Bukit Permata Estate	2013	Bangka Belitung	Certified		
	Tanjung Kembiri Mill	2013	Tanjung Kembiri Estate	2013	Belitung	Certified		

	(PT Forestalestari Dwikarya)		Tanjung Rusa Estate	2013	Belitung	Certified
			Tanjung Rusa Estate (HGU on process 48.81 Ha)	2020		
			Tanjung Rusa KKPA	2020	Belitung	-
	Sungai Buaya Mill (PT Sumber Indah Perkasa)	2014	Sungai Buaya Estate	2014	Lampung	Certified
			Smallholder (KKPA Gedung AJi Lama)	2014	Lampung	Certified
			Smallholder (KKPA Mesuji)	2014	Lampung	Certified
	Sungai Merah Mill (PT Sumber Indah Perkasa)	2014	Sungai Merah Estate	2014	Lampung	Certified
			Smallholder (KKPA Gedung AJi Baru)	2014	Lampung	Certified
	Kasuari Mill (PT Sinar Kencana Inti Perkasa)	2020	Cendrawasih Estate	2020	Papua	ST-1
			Nuri Estate	2020	Papua	ST-1
			Rajawali Estate	2020	Papua	ST-1
			Mambruk Estate (PT Sumber Indah Perkasa)	2020	Papua	ST-1
	Pekawai Mill (PT Agrolestari Mandiri)	2020	Kayung Estate	2020	West Kalimantan	ST-1
			Pekawai Estate	2020	West Kalimantan	ST-1
			Sungai Kelik Estate	2020	West Kalimantan	ST-1
			Nanga Tayap Estate	2020	West Kalimantan	ST-1
			Smallholder (Kayung Plasma)	2020	West Kalimantan	ST-1
	Kenanga Mill (PT Kencana Graha Permai)	2014	Kencana Estate	2015	West Kalimantan	Certified
			Cendana Estate	2015	West Kalimantan	Certified
			Kenanga Estate (PT Cahaya Nusa Gemilang)	2018	West Kalimantan	Certified
			Delima Estate (PT Kencana Graha Permai)	2020	West Kalimantan	-
			Gaharu Estate (PT Bangun Nusa Mandiri)	2020	West Kalimantan	-
			Smallholder (Gaharu Plasma)	2020	West Kalimantan	-
			Smallholder (Kencana Plasma)	2020	West Kalimantan	-
			Smallholder (Kenanga Plasma)	2020	West Kalimantan	-
	Perdana Mill (PT Binasawit Abadi Pratama)	2020	Perdana Estate	2020	Central Kalimantan	ST-1
			Lenggana Estate	2020	Central Kalimantan	ST-1
			Semandau Estate	2020	Central	ST-1

					Kalimantan	
			Muara Dua Estate	2020	Central Kalimantan	ST-1
	Kuayan Mill (PT Agrokarya Prima Lestari)	2020	Mentaya Estate	2020	Central Kalimantan	ST-1
			Kuayan Estate	2020	Central Kalimantan	ST-1
			Bukit Santuhai Estate	2020	Central Kalimantan	ST-1
			Tajur Beras Estate	2020	Central Kalimantan	ST-1
			Seranau Estate	2020	Central Kalimantan	ST-1
			Sungai Sambon Estate	2020	Central Kalimantan	ST-1
			Smallholder (Sungai Sambon Plasma)	2020	Central Kalimantan	-
			Sapiri Estate (PT Buana Adhitama)	2020	Central Kalimantan	ST-1
			Bukit Dua Estate (PT Buana Adhitama)	2020	Central Kalimantan	ST-1
			Bukit Tunggal Estate (PT Buana Adhitama)	2020	Central Kalimantan	ST-1
	Belian Mill (PT Paramitra Internusa Pratama)	2020	Belian Estate	2020	West Kalimantan	ST-1
			Tengkawang Estate	2020	West Kalimantan	ST-1
			Kenari Estate (PT Bangun Nusa Mandiri)	2020	West Kalimantan	ST-1
			KerANJI Estate (PT Bangun Nusa Mandiri)	2020	West Kalimantan	ST-1
			Muara Tawang Estate (PT Kartika Prima Cipta)	2020	West Kalimantan	ST-1
			Kapuas Hulu Estate (PT Persada Graha Mandiri)	2020	West Kalimantan	ST-1
			Sungai Beran Estate (PT Persada Graha Mandiri)	2020	West Kalimantan	ST-1
			Smallholder (Belian KKPA)	2020	West Kalimantan	-
			Smallholder (Kenari Plasma)	2020	West Kalimantan	-
			Smallholders (Kapuas Hulu KKPA)	2020	West Kalimantan	-
	Sungai Kupang Mill (PT Sinar Kencana Inti Perkasa)	2020	Sungai Kupang Estate	2020	South Kalimantan	ST-2 May 2015
			Sungai Kupang KKPA	2020	South Kalimantan	ST-1

	Sungai Kikim Mill (PT Sawit Mas Sejahtera)	2020	Senakin Estate	2020	South Kalimantan	-
			Sungai Kikim Estate	2020	South Sumatera	-
			Sungai Pangi Estate	2020	South Sumatera	-
			Sungai Musi Estate	2020	South Sumatera	-
			Sungai Saling Estate	2020	South Sumatera	-
			Sungai Enim Estate (PT Bumi Sawit Permai)	2020	South Sumatera	-
			Sungai Lematang Estate (PT Bumi Sawit Permai)	2020	South Sumatera	-
	Tangar Mill (PT Mitra Karya Agroindo)	2020	Sulin Estate	2020	Central Kalimantan	-
			Nahiyang Estate	2020	Central Kalimantan	-
			Katayang Estate	2020	Central Kalimantan	-
			Sungai Nusa Estate	2020	Central Kalimantan	-
			Kajui Estate (PT Agro Lestari Sentosa)	2020	Central Kalimantan	-
			Manuhing Estate (PT Agro Lestari Sentosa)	2020	Central Kalimantan	-
			Sungai Ayawan Estate (PT Aditunggal Mahajaya)	2020	Central Kalimantan	-
	Sungai Magalau Mill (PT Sinar Kencana Inti Perkasa)	2020	Sungai Magalau Estate	2020	South Kalimantan	-
	Jalemo Mill* PT Agro Lestari Sentosa	2020	Balasang Estate	2020	Central Kalimantan	-
			Jalemo Estate	2020	Central Kalimantan	-
	Sako Mill* (PT Adi Tunggal Mahajaya)	2020	Sulin Plasma	2020	Central Kalimantan	-
			Sapiri Plasma	2020	Central Kalimantan	-
			Sako Plasma	2020	Central Kalimantan	-
	Padang Halaban Mill (PT SMART Tbk)	2011	Padang Halaban Estate	2011	North Sumatera	Certified
			Penantian Estate	2011	North Sumatera	Certified
			Adipati Estate	2011	North Sumatera	Certified
			Kanopan Ulu Estate	2011	North Sumatera	Certified
	Batu Ampar Mill (PT SMART Tbk)	2012	Batu Ampar Estate	2012	South Kalimantan	Certified
			Batu Mulia Estate	2012	South Kalimantan	Certified
			Sungai Panci Estate	2012	South Kalimantan	Certified

			Sungai Panci KKPA	2012	South Kalimantan	Certified
Tanah Laut Mill (PT SMART Tbk)	2012		Tanah Laut Estate	2012	South Kalimantan	Certified
			Kinta Pura Estate	2012	South Kalimantan	Certified
Langga Payung Mill (PT Tapian Nadenggan)	2012		Langga Payung Estate	2012	North Sumatera	Certified
			Paya Baung Estate	2012	North Sumatera	Certified
			Normark Estate	2012	North Sumatera	Certified
Hanau Mill (PT Tapian Nadenggan)	2012		Hanau Estate	2012	Central Kalimantan	Certified
			Tasik Mas Estate	2012	Central Kalimantan	Certified
			Tanjung Paring Estate	2012	Central Kalimantan	Certified
			Langadang Estate	2012	Central Kalimantan	Certified
			Medang Sari (PT Satya Kisma Usaha)	2020	Central Kalimantan	-
Semilar (PT Tapian Nadenggan)	2013		Semilar	2013	Central Kalimantan	Certified
			Sei Rindu	2013	Central Kalimantan	Certified
			Mandang	2013	Central Kalimantan	Certified
			Puri	2013	Central Kalimantan	Certified
Jak Luay Mill	2015		Pantun Mas Estate	2015	East Kalimantan	Certified
			Jak Luay Estate	2015	East Kalimantan	Certified
			Jak Luay KKPA	2020	East Kalimantan	-
			Long Buluh Estate	2015	East Kalimantan	Certified
			Bukit Subur Estate	2015	East Kalimantan	Certified
			Bukit Subur KKPA	2020	East Kalimantan	-
Leidong West Mill (PT MP Leidong West Indonesia)	2014		Leidong West Utara Estate	2014	Bangka Belitung	Certified
			Leidong West Selatan Estate	2014	Bangka Belitung	Certified
Muara Wahau Mill (PT Kresna Duta Agroindo)	2014		Muara Wahau Estate	2014	East Kalimantan	Certified
			Gunung Kombeng	2014	East Kalimantan	Certified
Gunung Kombeng Mill (PT Kresna Duta Agroindo)	2020		Gunung Kombeng KKPA	2020	East Kalimantan	-
Rantau Panjang (PT Kresna Duta Agroindo)	2020		Rantau Panjang Estate	2020	East Kalimantan	-
			Rantau Panjang KKPA	2020	East Kalimantan	-
Jelatang Mill (PT Kresna Duta Agroindo)	2014		Bangko Estate	2014	Jambi	Certified
			Tiga Serumpun KKPA	2020	Jambi	-

	Pelakar Mill (PT Kresna Duta Agroindo)	2020	Pelakar Estate	2020	Jambi	ST-2 Sept 2017
			Tiga Serumpun KKPA	2020	Jambi	ST-2 Sept 2017
			Batang Merangin Estate	2020	Jambi	ST-2 Sept 2017
	Langling Mill (PT Kresna Duta Agroindo)	2014	Bangko Estate	2014	Jambi	Certified
			Bangko Plasma	2019	Jambi	-
			Batang Gading Estate	2020	Jambi	-
			Batang Gading KKPA (PT Satya Kisma Usaha)	2020	Jambi	-
	Sungai Bengkal Mill (PT Satya Kisma Usaha)	2015	Sungai Bengkal Estate	2015	Jambi	Certified
			Sungai Bengkal KKPA	2015	Jambi	Certified
			Muara Kilis Estate	2015	Jambi	Certified
			Muara Kilis KKPA	2020	Jambi	-
	Bukit Kapur Mill (PT SMART Tbk)	2020	Bukit Kapur Estate	2020	South Kalimantan	ST-1
			Sungai Cantung Estate	2020	South Kalimantan	ST-1
	Samsam Mill (PT Ivomas Tunggal)	2009	Samsam Estate	2009	Siak-Riau	Certified
			Samsam Estate (HGU on progress – 29.09 Ha)	2020	Siak-Riau	-
			Kandista Estate	2009	Siak-Riau	Certified
			Kandista Estate (HGU on progress – 158.46 Ha)	2020	Siak-Riau	-
			Palapa Estate	2009	Siak-Riau	Certified
	Libo Mill (PT Ivomas Tunggal)	2009	Libo Estate	2009	Siak-Riau	Certified
			Nenggala Estate	2009	Siak-Riau	Certified
			Nenggala Estate (HGU on progress 419.9 Ha)	2020	Siak-Riau	-
			Sei Rokan Estate	2009	Siak-Riau	Certified
			Sei Rokan Estate (HGU on progress – 102.7 Ha)	2020	Siak-Riau	-
	Ujung Tanjung (PT Ivomas Tunggal)	2009	Ujung Tanjung Estate	2009	Siak-Riau	Certified
			Ujung Tanjung Estate (HGU on progress – 557.3 Ha)	2020	Siak-Riau	-
	Naga Sakti Mill (PT Buana Wiralestari Mas)	2010	Naga Mas Estate	2010	Kampar-Riau	Certified
			Naga Mas Estate (HGU on process –	2020	Kampar-Riau	-



			253.39 Ha)			
			Naga Sakti Estate	2010	Kampar-Riau	Certified
			Naga Sakti Estate (HGU on process – 59.79 Ha)	2020	Kampar-Riau	-
			Rama Bakti Estate	2010	Kampar-Riau	Certified
Kijang Mill (PT Buana Wiralestari Mas)	2010		Kijang Mas Estate	2010	Kampar-Riau	Certified
			Kijang Mas Estate (HGU on process – 56.07 Ha)	2020	Kampar-Riau	-
			Kijang Kencana Plasma	2010	Kampar-Riau	Certified
Ramarama Mill (PT Ramajaya Pramukti)	2010		Ramarama Estate	2010	Kampar-Riau	Certified
			Ramarama Estate (HGU on process – 318.76 Ha)	2020	Kampar-Riau	-
			Amartajaya Plasma	2010	Kampar-Riau	Certified
Indra Sakti Mill (PT Meganusa Inti Sawit)	2011		Indra Lestari Estate	2011	Indragiri-Riau	Certified
			Indra Sakti Estate	2011	Indragiri-Riau	Certified
			Indragiri Plasma	2011	Indragiri-Riau	Certified
			Indrasakti Plasma	2011	Indragiri-Riau	Certified
Bumipalma Mill (PT Bumipalma Lestari Persada)	2012		Bumi Lestari Estate	2012	Indragiri-Riau	Certified
			Bumi Palma Estate	2012	Indragiri-Riau	Certified
			Bumi Sentosa Estate	2012	Indragiri-Riau	Certified
			Bumi Palma Estate (HGU on process – 39.21 Ha)	2020	Indragiri-Riau	-
Sawita Mill (PT Sawitakarya Manunggal)	2020		Sawita Estate	2020	South Kalimantan	ST-1
			Pamukan Estate	2020	South Kalimantan	ST-1
			Sawita KKPA	2020	South Kalimantan	ST-1
<p>There are revision of time bound plan, the justification from top management is:</p> <ul style="list-style-type: none"><li>- Pelakar Mill is still process on disclosure &amp; liability by RSPO, while Bukit Kapur Mill doesn't have land use title (HGU), the HGU is still on process.</li><li>- Land use titles for Rantau Panjang Mill and its supply base are still on process</li><li>- Several associate smallholders (plasma) which refuses to follow the RSPO certification, but the management unit is still communicating with the plasma for the implementation of RSPO certification.</li><li>- Sawita Mill had conducted pre assessment RSPO on 2015 and Another entire Management Unit under PT Ivo Mas Tunggal has been RSPO certified.</li><li>- Sawita mill and sawita estate are still in process of HCV RaCP related to land clearing after November 2005 without preceeded HCV identifications.</li><li>- Rantau Panjang Mill and Estate Unit (Rantau Panjang Estate &amp; Rantau Panjang KKPA) are still in the process of HCV Remediation and Compensation Plan (RaCP) related to land clearing above November 2005 without HCV Identifications. In accordance to RSPO requirements, if RaCP proposal not yet approved by RSPO Secretariat. Thus certification target will be postponed by year of 2020.</li><li>- Kilis KKPA as FFB Supplier to Sungai Bengkal Mill are still in the process of HCV Remediation and Compensation Plan (RaCP) related to land clearing above November 2005 without HCV Identifications. In accordance to RSPO requirements, if RaCP proposal not yet approved by RSPO Secretariat. Thus certification target will be postponed by year of 2019</li></ul>						

	<ul style="list-style-type: none"> <li>- PT Kresna Duta Agro (Pelakar Estate, Batang Merangin Estate and Batang Tembesi Estate) was stage -1 audit in 2017. There are problems related to zero liability report to RSPO, with no response by RSPO secretariat. The main assessment is postponed to 2019.</li> <li>- When the stage -1 audit was conducted in May 2015, there were boundary stone issues in PT Sinar Kencana Inti Perkasa (South Kalimantan). Reconstruction of boundary stones will be finished end of this year, the certification target is postponed to 2019.</li> </ul> <p><b>Time bound plan revision</b></p> <ul style="list-style-type: none"> <li>- There is revision of time bound plan on 12 March 2018 made by head of sustainability department for HGU on process in PT Ivomas Tunggal (Samsam Estate 29.09 Ha, Kandista Estate 158.46 Ha, Nenggala Estate 419.9 Ha, Sei Rokan Estate 102.7 Ha, Ujung Tanjung Estate 557.3 Ha); PT Rama Jaya Pramukti (Ramarama Estate: 318.76 Ha); PT Buana Wira Lestari (Naga Sakti Estate 59.79 Ha; Naga Mas Estate 253.39 ha and Kijang Estate 56.07 ha); PT. Forestalestari Dwikarya (Tanjung Rusa Estate 48.81 Ha); PT. Djuanda Sawit Lestari (Muara Kandis Estate 402.41 Ha &amp; Muara Tawas Estate 73.78 Ha). For this area is planned for audit in 2020 because waiting for HGU</li> <li>- Revision on March 22, 2019 regarding HGU on process on PT Sumber Indah Perkasa, Sungai Buaya Mill &amp; Sungai Merah Mill, Lampung province. Covered areas for Sungai Merah estate (241.54 ha) and Sungai Buaya estate (73.71 ha &amp; 26.18 ha). GAR has planned this HGU on process area to be certified in 2020.</li> </ul>
1.10.2	<b>Progress of Associated Smallholders and Outgrowers for Certifiable Standard</b>
	Nagasakti Mill did not receive FFB from estate that has not been RSPO certified.

<b>2.0</b>	<b>ASSESSMENT PROCESS</b>
<b>2.1</b>	<b>Assessment Team</b>
<b>ASA 1.3</b>	<p>1. <b>Moh Arif Yusni (Lead Auditor)</b>. Indonesian citizen. Bachelor of Agriculture, majoring in Plant Protection. Has experience as an operational staff at a private oil palm plantation company in Indonesia on 2010 to 2012. Has attended several trainings, i.e.: ISO 19011, ISO 9001; ISO 14001, SA 8000, RSPO lead auditor, ISPO lead auditor, OHS expert, OHS auditor based on National Government No. 50/2012, SCCS, etc. Has conducting ISPO, RSPO and MSPO audit as an auditor and lead auditor with expertise on best management practices for estate and mill, legality, worker welfare, safety, social, environment, conservation, transparency, long term economic management plan and supply chain for palm oil mill aspects. In this audit he is responsible for assessing the aspects of OHS, Best Management Practices for mill and estate, long term business plan and transparency.</p> <p>2. <b>Arif Faisal Simatupang (Auditor)</b>. Bachelor of Agriculture, from Department of Agriculture Agronomy, Faculty of Agriculture, University of Gadjah Mada. He has successfully completed an RSPO endorsed P&amp;C Lead Auditor Training, RSPO SCCS endorsed Lead Auditor Training, Indonesian Sustainable Palm Oil (ISPO) Lead Auditor Training, Management System Certification ISO 9001-2008 Lead Auditor Training, Environmental Management System ISO 14001 Lead Auditor Training, ISO 17021 and ISO 17065 Awareness Training, Management of High Conservation Value (HCV) Training, Social Accountability SA 8000 Training. He has four years of working experience as a Field Assistant on oil palm Plantation Company in Indonesia. Since 2014, he works as an auditor of RSPO and ISPO in the aspects of legal, social, best management practices of mill and estate, OHS, employment, and environmental. In this audit he is responsible for assessing the aspects of best management practices, and SCCS.</p> <p>3. <b>Dwi Haryati (Auditor)</b>. Indonesian citizens. Bachelor of Agriculture Department of Agriculture – Program study: Agronomy. Has experience on Palm Oil Plantation as Sustainability staff. Training have been followed : 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. RSPO audit experience since March 2015 and ISPO since May 2014. In this audit he is responsible for assessing the aspects of employment and OHS</p> <p>4. <b>Steve Mualim (Auditor)</b>. Indonesia citizen. Master of Environmental and Natural Resources Management. Has experience as an environmental management consultant in 2012 and sustainable palm oil assurance auditor since 2013. Has attended several trainings i.e.: supply chain, palm oil GHG emission, HCV management, ISPO lead auditor, RSPO lead auditor, labor and human rights issues, ISO 19011, ISO 9001:2008, etc. Has conducting several audit for RSPO, ISPO and MSPO scheme with expertise on best management practices, conservation and environmental management. Fluent in Bahasa and Chinese Mandarin. At this time of audit, he has verify environmental management and HCV aspects.</p>
<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 : 4 auditor</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. Buana Wiralestari Mas and PT Ramajaya Pramukti 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 30th September 2016), RSPO P&amp;C Certification System 2017 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>PT Buana Wiralestari Mas (PT BWL) it's a subsidiary of Golden Agri Resources, that consisting of two Mills (Nagasakti Mill and Kijang Mill). The ASA 1.3 Audit of Nagasakti Mill are carried out simultaneously with ASA 1.3 Kijang Mill. This</p>

	<p>is conducted together due to the two certification units are one company (PT BWL), so the documents related legal, social, environmental, CSR, SOP / work instructions and company policy are same. the difference from both certification units are related to the field implementation. in addition, every work agreement with an external party is made on behalf of PT Buana Wiralestari Mas</p> <p>The assessment was conducted in three methods: (1) document review, aiming to observe the sufficiency of types or substances from required documents; (2) <i>interview</i>, 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.</p> <p>Meetings were held with stakeholders to seek their views on the performance of the company with respect to the RSPO requirements and aspects where they considered that improvements could be made. At the start of each meeting, the interviewer explained the purpose of the audit followed by an evaluation of the relationship between the stakeholder and the company before discussions proceeded. The interviewer recorded comments made by stakeholders and these have been incorporated into the assessment findings. The comments made by external stakeholders were also taken into account in the assessment. Public consultations with government institution conducted on 07 October 2019 together with PT Ramajaya Pramukti.</p> <p>Structured worker interviews with male and female workers and staff were held in private at the workplace in the mill and the estates. Fieldworkers were interviewed informally in small groups in the field. In addition, the wives of workers and staff were interviewed in informal meetings at their housing. Company officials were not present at any of the internal or external stakeholder interviews. A list of Stakeholders contacted is included as Appendix I.</p> <p>Commonly, the audit activities went smoothly with good support from the unit management. The presentation of documents is presented quite well by involving related personnel.</p> <p>Some opportunities for improvement of the results <b>ASA 1.3</b> 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. All information obtained was recorded in Check List of PT Mutuagung Lestari (MUTU) and part of <b>ASA 1.3 report</b>.</p> <p>The assessment program please find Appendix 2.</p>
<b>2.2.3</b>	<b>Locations of Assessment</b>
<b>ASA 1.3</b>	<p>The sampling location consider the issue arise from the review documents and stakeholder's consultation that are fundamental and crucial. On this assessment sample locations that visited and respondent that interviewed by team auditor are:</p> <p><b>Nagasakti Mill</b></p> <ul style="list-style-type: none"> <li>- <b>Security Post.</b> Observation related to the acceptance of FFB and employment aspect of securities.</li> <li>- <b>Weighbridge Station.</b> Observation and interview related of supply chain implementation, and weighbridge calibration.</li> <li>- <b>Grading Station.</b> Observations and interviews related to FFB quality, handling of FFB that did not pass the criteria, OHS and employment.</li> <li>- <b>FFB process stations (<i>sterilizer, thresher, digester, press, kernel</i>).</b> Observations and interviews related to best practices, OHS, license, and employment.</li> <li>- <b>Boiler.</b> Observations and interviews related to OHS, understanding of emergency response, and operator licenses</li> <li>- <b>Engine room.</b> Observations and interviews related best practices, OHS, and employment.</li> <li>- <b>CPO storage dan <i>despatch</i>.</b> Observation related CPO storage and despatch.</li> <li>- <b>Kernel Silo.</b> Observation related PK storage and despatch.</li> <li>- <b>Hydrant simulation.</b> Observation related emergency response, readiness of fire fighting equipment.</li> <li>- <b>CPO storage dan <i>despatch</i>.</b> Observation related CPO storage and despatch.</li> <li>- <b>Kernel Silo.</b> Observation related PK storage and despatch.</li> <li>- <b>Chemical warehouse.</b> Field observations and interview related chemical management, OHS, and environmental</li> </ul>

	<p>aspect.</p> <ul style="list-style-type: none"> <li>- <b>Sparepart Warehouse.</b> Field observations and interview related sparepart management, OHS, and environmental aspect.</li> <li>- <b>Hazardous Waste Temporary Warehouse.</b> Field observations and interview related hazardous waste management, OHS and environmental aspect.</li> <li>- <b>Workshop.</b> Field observations and interview related workshop activity, OHS, environmental and worker welfare aspect.</li> <li>- <b>Hydrant simulation.</b> Observation related emergency preparedness</li> <li>- <b>Effluent pond.</b> Observation for palm oil mill effluent management</li> <li>- <b>Water treatment plant.</b> Observation for OHS and water usage monitoring</li> <li>- <b>housing.</b> Observation for OHS and worker facilities</li> <li>- <b>Empty bunch area.</b> Observation for OHS and EFB management</li> </ul> <p><b>Nagasakti Estate</b></p> <ul style="list-style-type: none"> <li>- Domestic Waste Landfill, Block G35. Observation related domestic waste management.</li> <li>- <b>FFB Harvesting, Block E35 and B47.</b> Observation and interviews with foreman and harvester related FFB quality, harvesting round, OHS, and employment.</li> <li>- <b>Barn Owl Box, Block E35.</b> Observation of IPM, related to suppress rat infestation by installing and monitoring barn owl boxes.</li> <li>- <b>Manual Weeding, Block D41.</b> Observation and interviews with workers related manual weeding, OHS, and employment.</li> <li>- <b>EFB Application, Block F36</b> Observations and interviews related to dosage applications, how to work safely and employment.</li> <li>- HGU stone and land demarcation No. 6; 7; 8; 9. Observation of aspect of land demarcation and maintenance of HGU pole, and land dispute potency.</li> <li>- <b>HCV Banal River Riparian Area,.</b> Observation the implementation of management in HCV of riparian area, and boundary marking.</li> <li>- <b>Chemical store.</b> Observation related OHS and material handling</li> <li>- <b>Sparepart store.</b> Observation related OHS and material handling</li> <li>- <b>Fertilizer store.</b> Observation related OHS and material handling</li> <li>- <b>Lubricants store.</b> Observation related OHS and material handling</li> <li>- <b>Diesel fuel tank.</b> Observation related OHS and material handling</li> <li>- <b>Workshop.</b> Observasi related OHS and waste management</li> <li>- <b>Hazardous waste store.</b> Observation related OHS and hazardous material handling</li> <li>- <b>Power house.</b> Observation related OHS and hazardous waste management</li> <li>- <b>Land fire facilities.</b> Observation related land fire facilities</li> <li>- <b>Landfire simulation.</b> Observation for OHS and emergency response team</li> <li>- <b>Land aplikasi block E46.</b> Observation for OHS and pome utilization</li> </ul> <p><b>Nagamas Estate</b></p> <ul style="list-style-type: none"> <li>- <b>FFB Harvesting, Block A22.</b> Observation and interviews with foreman and harvester related FFB quality, harvesting round, OHS, and employment.</li> <li>- <b>FFB Transport, Block A22.</b> Observation and interviews with clerk related FFB transport, traveling time to mill, OHS, and employment.</li> <li>- <b>Peat soil management, Block A32 and A33.</b> Observation peat management including water management (bund off), water level meter, piezometer, subsidence stake, and land cover.</li> <li>- <b>Barn Owl Box, Block A32.</b> Observation of IPM, related to suppress rat infestation by installing and monitoring barn owl boxes.</li> <li>- <b>Spraying Circle &amp; Path, Block A23.</b> Interviews of spraying mechanism, work tools, chemicals used, doses used, medical examinations, extra fooding, PPE, labor aspect and environment.</li> <li>- <b>EFB Application, Block G26 and G27.</b> Observations and interviews related EFB application as nutrient cycle, dosage and method of applications, soil condition, OHS and employment.</li> <li>- HGU stone and land demarcation No. 12; 11/ BWL 370; 10; 6. Observation of aspect of land demarcation and</li> </ul>
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- maintenance of HGU pole, and land dispute potency.
- **HCV Parpadoran River Riparian Area.** Observation the implementation of management in HCV of riparian area, and boundary marking.
- **Central clinic.** Observation for medical waste management, OHS, and worker facilities
- **Housing.** Observation for domestic waste management, OHS, worker facilities
- **Mixing and agrochemical / fertilizer container washing store.** Observation related OHS, and agrochemical waste management.
- **Rinse house for spraying team.** Observation for OHS and spraying team facilities
- **Daycare.** Observation for OHS and worker facilities
- **Landfill block F27.** Observation for OHS and domestic waste

#### Ramabakti Estate

- HGU stone and land demarcation No. 30; 31; 32; 33 Observation of aspect of land demarcation and maintenance of HGU pole, and land dispute potency.
- **HCV Pijar River Riparian Area,** Observation the implementation of management in HCV of riparian area, and boundary marking.
- **Daycare.** Observation and interview with worker related labor aspect and OHS.
- **Diesel Tank.** Observation of OHS, environment aspect, emergency response and fire facilities.
- **Oil and Agrochemicals Warehouse.** Observation related to management of oil and agrochemical material and waste, MSDS, emergency response facilities and the types of pesticides used.
- **Fertilizer warehouse.** Observation related to management of agrochemical material and waste, MSDS, emergency response facilities and the types of fertilizer used.
- **Harvesting Block L3,** Observation and interviews related to work mechanisms in accordance with SOPs, the application of OHS and employment..
- **Manual upkeep** Blok N10, Observation and interviews related to work mechanisms in accordance with SOPs, the application of OHS and employment.
- **Perumahan Karyawan Divisi IV.** Observation and interview with residents about housing facilities, domestic waste management, and complaint mechanism.

#### Consulted Stakeholder

- Plantation Agency of Kampar Regency
- Land Office of Kampar Regency
- Environmental Agency of Kampar regency
- Labour Agency of Kampar Regency
- Safety and Labour Inspector of Riau Province
- Elder (ex-Village Head) of Beringin Lestari Village
- Sub District Head of Tapung Hilir
- Village official of Gerbang Sari
- Village official of Tandan Sari
- Village Official of Kijang Jaya
- Village Head of Sei Kijang
- Official and Members of Panca Warga Plasma Cooperative (29 smallholders) – Kijang Kencana Plasma
- Official and Members of Budi Karya Plasma Cooperative (32 smallholders) – Kijang Kencana Plasma
- Official and Members of Makarti Buana Jaya Plasma Cooperative (29 smallholders) – Kijang Kencana Plasma
- NGO of Bahtera Alam
- Worker Union - SPSI
- Worker Cooperative
- Gender Committee
- Local Contractor of FFB transporter CV Kurnia Jaya Mandiri
- Jikalahari (No respond)
- WWF (No respond)
- Sawit Watch (No respond)



<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>Summary of stakeholder consultation process            Consultation of stakeholders for PT Buana Wiralestari Mas was held by:</p> <ul style="list-style-type: none"> <li>• Public Notification on website on 23 September 2019.</li> <li>• Public consultation meeting with government institution on 07 October 2019 together with PT Ramajaya Pramukti</li> <li>• Public consultation meeting with community(s) including previous land owner 12 October 2019</li> <li>• Public consultation meeting with internal stakeholders and contractor 12 October 2019</li> </ul> <p>Numbers of input from stakeholders were clarified by PT Buana Wiralestari Mas as apart of this report</p>
<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 eight (8) month to twelve (12) month after date of annual license

### 3.0 ASSESSMENT FINDINGS

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

MUTUAGUNG LESTARI has conducted an assessment of Nagasaki POM, PT Buana Wiralestari Mas subsidiary of Golden Agri Resources Holdings Ltd operation consisting of 1 (one) mill and 3 (three) oil palm estates.

During the assessment, there were nil nonconformities were assigned against Major Compliance Indicator, Minor Compliance Indicators, supply chain requirement for CPO mill and there were one (one) opportunity for improvement were identified. Further explanation of the non-conformities raised and corrective actions taken by the company are provided in section 3.5.

MUTUAGUNG LESTARI found that Nagasaki POM – PT Buana Wiralestari Mas, complied with the requirements National Interpretation of RSPO Principles and Criteria (P&C) for the Production of Sustainable Palm Oil – July 2016 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</b>	<b>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>	
<b>1.1.1 and 1.1.2</b>	<p>The Company has procedure and has appointed person in charge in the requests for information from stakeholders. The Company responded to information requests with maximum time of 3 days since mail received. Based on verification document and interview with externals stakeholders, management always responds the information request no longer than 3 working days. Records of information request and response monitoring was summarized in Logbook Form No. F/SMART/UMUM/SADV/004/002. Furthermore records of information and communications request available in the documents <i>"Buku Komunikasi dan Konsultasi"</i></p> <p>The types of documents that can be accessed and given to stakeholders are included in the information list for stakeholders ((F / SMART / GENERAL / SADV / 004/00), such as employee list, wage register, NPWP, local tax payment / levy, environmental documents, certificate of incorporation companies and changes, production area data and fertilizer application, proof of land ownership and <i>HGU</i> certificates, High Conservation Value reports, Social Impact Assessment reports, social activity documents, and work accident reports and <i>P2K3</i> reports, improvement program documents, RSPO audit report documents, documents human rights policy: If the information requested is not included in the information list, then top management consideration is needed first.</p> <p>Based on interview with community of villages, if they need information they will submit a letter to the company. According to them, the company always responds each letter submitted. The entire request of information (verbal and written) is recorded and kept in the logbook which is available in all units both of estates and mill, there was no request for information, but recorded several incoming letters which were entirely the proposals of aid that has been responded by the company. In addition, sighted the evidence of report delivery to relevant agencies, among others : report of environmental management and monitoring, report of employment, waste management and plantation report.</p> <p>Based on interview with government Agencies of Kampar Regency (Manpower and Industrial Agency, National Land Agency, Environment Agency and Plantation Agency), document verifications as well as surrounding community</p>	

representatives from Village, it was known that the CH has considered transparent and cooperative in providing information requested or required, which some were a part of regulation pursuance as well.

### 1.1.2

Communication and Consultation SOP No. SOP / SMART / GENERAL / SADVI / 004, July 1, 2014. Delivery period of advice no later than 1 week after letter received (from Unit Head to Department concerned). Feedback no later than 3 weeks after the letter received.

Requests for information are documented in the communication book. As stated in the communication book there is no incoming letter demanding for information related to the operation of the estate and mill. The results of public consultations with stakeholders obtained information that they never requested information about operational activities. However, if the village community submits requests for assistance, the company always responds quickly.

**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

Procedure No. SOP/SMART/UMUM/SADV/004/005 (Rev. 00) dated July 1<sup>st</sup> 2014 mentioned that company private and confidential (P&C) data and/or information could be accessed through official request, to obtain official approval from the respective Department or Unit. Internal communication and external communication mechanism were described in Point 2.8 and Point 2.10, respectively. Among P&C data are legal documents, finance report and long-term management plan report. For example, land title or rights of tenure and legal data shall be approved and permitted by Plantation Monitoring and Planning Division (PMNP) before accessed or distributed to the proposed parties. Those documents were stored in the respective units on SPO Room where limited to be accessed.

List of informations/documents which could be accessed and/or shared to the stakeholder such as government institutions and NGO was presented in document No. F/SMART/UMUM/SADV/004/003. Up to ASA-13, there were 16 type of documents which could be accessed by stakeholder, e.g. workers data and list of wages, tax payment, retribution payment, environment documents, Company Act and its revision, best management practices report (upkeep activities), land rights documents, HCV report, SIA report, CSR report, OSH Committee (P2K3) report, continuous improvement program report, RSPO audit report, human right policy, conflict resolution procedure, complaint and grievance records, etc.

In the Communication and Consultation SOP it is explained that if the requested information is not included in the list of information in the list of information documents to the stakeholders, consideration is required from the top management first. The Company has conducted dissemination to stakeholders regarding SOP Communication and consultation.

CH also has monitoring and management report, such as OHS implementation report, report of environmental management and monitoring plan. These documents also can be accessed by public through the mechanism which has determined by the company.

Based on interview with government Agencies of Kampar Regency (Manpower and Industrial Agency, National Land Agency, Environment Agency and Plantation Agency), as well as surrounding community representatives from Village of Sekijang, it was known that the CH has considered transparent and cooperative in providing information requested or required, which some were a part of regulation pursuance as well. Furthermore the stakeholders are aware about the type of documents can be access by stakeholder.

**Status: Comply**

## 1.3

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

The CH has business ethic that issued by Regional Controller of Kampar and Kampar-Smallholder on February 2<sup>nd</sup> 2015, which mentioned as follows:

- The company has no tolerance on any form of corruption in any business practise committed by the employee. Sanction / penalty will strongly be given as in accordance with applicable regulations.
- The company has committed to code of conduct of ethic behaviour in any business practical implementation included attitude among personnel, stakeholder and broader communities.

Furthermore the company also have GAR Social and Environment Policy/GSEP signed by Head of Upstream on November 2015. This policy was explained about code of integrity and ethical business. The policy is available in Bahasa Indonesia. The policy is communicated to workers in accordance with the results of interviews with them. Besides that socialization is also done through posters, signboards and banners in strategic locations, for example in the office or emplacement. Based on interview with local contractor of it is known that company has been disseminated the policy of standard business of conduct.

Dissemination of code of integrity and ethical behavior disseminated by specific socialization or morning briefing to all level of workers. Based on interview with workers, labor union, representatives of gender committees know about code of integrity and ethical behavior.

**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 & 2.1.2**

Company has list of updated applicable Indonesian laws/regulations, international laws or conventions which adopted as reference for oil palm estate and processing process activities, and its classified based on several aspects such as land permit, OHS, Environmental, HCV, labor and manpower, social, and etc. Based on document review, it consist of about 172 items of laws and or regulations were related. There were additional regulations on 2 January 2019 such as follows :

- Regulation of the Minister of Environment, PermenLH no 5/2018 regarding competency certification for waste water treatment plant PIC

#### **Labor and manpower**

The Company has applied wages and overtime in accordance with applicable labor regulations. The Company has applied the minimum wage in accordance with SK *Penetapan Upah Minimum* Riau Province 2019.

#### **Legal Aspect**

In term of legal and permit regulation compliance, company are able to shown several documents, such as Location Permit, and Land Tenure or Land Use Right (HGU). Compliance with the regulation on the licensing for plantation business, based on Ministry of Agriculture Regulation No. 98 year 2013 the company can presented:

- Plantation Business Registration Letter from the Director General of Plantations on behalf of the Minister of Forestry and Estate Crops No: 759 / Menhutbun-VII / 2000 dated June 29, 2000. In the permit it is stated that the area is 12,579,196 Ha with the type of oil palm plantations located in Kampar Regency and 2 processing units with a capacity of 120 tons of FFB / Hour and an installed capacity of 120 tons of FFB / Hour, for PT Buanawira Lestari Mas
- Plantation Business License (IUP) of Kampar Regent Decree No. 57 of 2001 dated 18 October 2001. with an area of 2,903.79 hectares, located in the villages of Kampar Regency for Ramabakti Estate

Furthermore, Based on information from estate management, surrounding local communities, as well as review on company hectare statement it could be concluded that there is no expansion and new planting conducted by company. b

The CH has an evaluation document for compliance with regulations and other requirements, which describe compliance with applicable regulations in Indonesia related to palm oil management. Based on the results of the evaluation the CH needs to review the obligations of the provisions in force in the regulation, for example the OHS Chemical Officer /

Chemical of OHS Expert as regulated by Labor Minister Regulation No. 187 of 1999 Concerning Control of Hazardous Chemicals in the Workplace. Its became an OFI

### 2.1.3 & 2.1.4

Mechanism to law register updating and implementation has been established and listed on procedures "*Pemenuhan peraturan & persyaratan lainnya*" (SOP/SMART/UMUM/SADV/II/002). This procedures has describes information of laws and regulations, identification of requirement, updating mechanism, updating PIC, and etc.

SPO team on unit and region has responsibility for updating law register and evaluate company compliance regarding the applicable laws/regulations. The last evaluation / internal audit for regulation compliance were conducted on January 2019, and history for all law register changes from 2018-2019 are available.

**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

The Certificate Holder has had Land Use Right (HGU) No. 2/1995 (7,187.21 Ha); No. 1/1997 (3,016 Ha); No. 146/2001 (805.31 Ha); No. 147/2001 (1,365.41 Ha); No. 148/2001 (733.07 Ha) and HGB No. 2/2004 (6.59 Ha) to showing legal ownership with size 13,113.59 Ha. Scope of permitted area covers Nagasaki Mill, Nagamas Estate, Nagasaki Estate and Ramabakti Estate. Documents showing the actual legal use of the land available in Area Statement.

**Note:** The results of the document review and field visit were found outside the Land Rights Right of 313.18 Ha. Based on the decision of the Director of PT BWL is excluded from the scope of certification and included in the Additional Time Bound Plan for 2020. The progress of land tanure for area that not has HGU was include in partial certification.

### 2.2.2

The Certificate Holder has boundary poles monitoring report periodically every months. The monitoring of poles is based on the procedures "*SOP Pemeliharaan Patok HGU/HGB* (SOP/SMART/CERS-EHSD/SADV/II/004), 1 July 2014". The certificate holder has had list and map of boundary stones from National Land Agency along with a list of coordinates. Based on the data, there are 28 Boundaries poles Naga Sakti Estate, 56 Boundaries Poles in Nagamas Estate and 74 Boundaries poles in Ramabakti Estate. Management unit have conducted monitoring of boundary stones once month. The monitoring results for 2019 showed that all boundary stones in certification scope are in good condition. Besides that, CH also maintaining boundary road or drain, as well as double boundary drain as part of boundary marker

Auditor verifies the 5 Poles in Nagamas Estate, 3 poles in Ramabakti Estate and 4 Nagasaki Estate. Field verifications done by using GPS tool. Based on field observations its know if it was clearly the sighted poles are in well maintained and appropriate with coordinate points. Reference document to compare the coordinate's positions is based on boundaries pole map "*Peta Posisi Patok Area/ PT. Buana Wiralestari Mas*" Scale 1:125,000 and map "*Peta Posisi Patok Area/ PT. Ramajaya Pramukti*" Scale 1:125,000

### 2.2.3; 2.2.4; 2.2.5

According to information gathered during stakeholder consultation with representatives of villages Sekijang and Kijang Jaya, it was confirmed that since PT. Buana Wiralestari Mas has obtained Land Use Right (HGU) in 1995, there is no significant of land conflict is raise. If land conflict is presence. The certificate holder has had mechanism of available land dispute resolution as provided in SOP "*Ganti rugi Tanah/Lahar*" No. SOP/NP/SMART/VII/ D&L002 (dated 1 July 2010) and FPIC procedure "*Penerapan Persetujuan Atas Dasar Informasi Awal Tanpa Paksaan/PADIATAPA*" SOP/SMART/SENS-CSRD/SADV/II/003 (dated 1 July 2014), which contains the PIC, the procedure completion, the documents must be prepared, such as a minutes meeting, attendance list, Payment documents, minutes of payment, map location disputed, receipt of money compensation, etc.

Areal manage PT BWL derived from forest areas. PT BWL has had Forest Release Permit based on decree from Minister of Forestry No.108 / Kpts-II / 1991 concerning the Release of a Part of the 23,312 ha Tapung Kanan River Forest area

located in the Regency of Kampar, Province of Riau For Plantation Cultivation On Behalf Of PT. BWL dated February 20, 1991. All communities around the plantation, are transmigrate communities based on the permit to implement transmigration No. KEP.119 / MEN / 1991 from the Minister of Transmigration of the Republic of Indonesia on September 4, 1991

### 2.2.6

The company has a policy to circumvent instigated violence to maintain peace and order in current and planned operations described in GAR Social and Environmental Policy, issued date 8 September 2015. In section 2.1.2 stated "To refuse the use of confrontation and intimidation in land disputes". Based on field visits and interviews with surrounding communities, it is known that there was no intimidation or use of mercenaries in maintaining peace and order in the company's area.

**Status: Comply**

### 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

PT. Buana Wiralestari Mas is one of long-established plantations company since 1993. In related to the maps of an appropriate scale that showing legal, customary or user right through participatory mapping and copies of negotiated agreements detailing process of FPIC is not applicable. This is due to no longer records dating back to the time of the decision making. The Certificate Holder has developed a mechanism of Implementation of Free Prior Informed Consent / FPIC or PADIATAPA as document No. SOP/ SMART /SENS-CSR/SADV/II/003 (dated 1 July 2014) which describes a process for FPIC included the identification, dissemination, participatory mapping, implementation of the negotiation, compensation formula and implementation of the outcome agreement.

The Certificate Holder has had Land Use Right (HGU) No. 2/1995 (7,187.21 Ha); No. 1/1997 (3,016 Ha); No. 146/2001 (805.31 Ha); No. 147/2001 (1,365.41 Ha); No. 148/2001 (733.07 Ha) and HGB No. 2/2004 (6.59 Ha) to showing legal ownership with size 13,113.59 Ha. Scope of permitted area covers Nagasaki Mill, Nagamas Estate, Nagasaki Estate and Ramabakti Estate.

#### 2.3.4

According to information gathered during stakeholder consultation with representatives of villages Sekijang, it was confirmed that since PT. Buana Wiralestari Mas has obtained Land Use Right (HGU) in 1995, there is no significant of land conflict is raise. Interview and field visit show that land utilization by CH does not destruct local communities' traditional and legal right. Land ownership is entirely belong to individual or belong to state.

**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 and 3.1.2

The CH has Longterm Management Plan of 2018-2022 which presented in document of issued by Director of on 4 June 2018. Management plan has covers projection on production (FFB, CPO and PK), product price, production cost, revenue, peat aspect (drainability, peat subsidence) and replanting. Estate management was able to shows Long Term Replanting Plan of 2018 to 2022. The replanting will be started on 2021 for NMAE and NSAE, and 2022 for RBKE. In Nagasaki Mill there was no supply base from plasma/scheme smallholder.

Mill and Estate Management mentioned long term projections were subjected to be changed and reviewed annually by Estate or Mill Manager, through considering actual trends and dynamic situation which predicted could be changed in the future. Moreover, it was stated that there no plan for expansion on estate operational areas and mill processing capacity.

**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**

There was no change over the procedure for cultivation and processing since Recertification until ASA-1.3. PT SMART as a parent company of CH has documents of SOP Technical of Oil Palm Cultivation starting from land clearing up to harvesting, approved by SMD Ops and entered into force on 12 June 2012. The SOP documents among others about planning of new area planting, replanting plans, nurseries, land clearing, planting, replanting, pest and disease control, weed control, fertilization, maintenance of immature plant, preparation ahead of harvest, harvesting, loading and transportation of FFB. The Oil Mill has SOPs covering all mill operations such as FFB Grading, Sterilization Station, Press Station, Threshing Station, Oil Room, Kernel Plant, Laboratory, CPO & PK Despatch, Engine Room, Boiler Room, Electrical, Workshop as well as Raw and Boiler Water Treatment Plant. The SOPs are available on audit site (Estate office) and are written in a language (Bahasa) that is easily understandable for workers.

Based on field observation and interview with the workers in the Mill and Estate can be concluded that the workers understand the duties and responsibilities of their works in accordance with the applicable SOP.

**4.1.2 and 4.1.3**

The CH has had a procedure of Operational Internal Audit (No. SOP-ISCC/IMT/OIA). The SOP approved by VPA and VPM, entered into force on 1 September 2010. In each SOP, there is page of document control that record the revision if any. Ensuring consistency of procedures implementation, the Certificate Holder routinely conducts operational internal audit, RSPO and SCCS internal audit, as well as Management Review. It is performed by the Department of Operational Internal Audit (OIA) every semester. The records of those audit and Management Review have been documented. Non-compliance records of internal audit have been followed up by management.

**4.1.4**

Nagasakti Mill – PT Buana Wiralestari Mas has no smallholders scheme also not received FFB from smallholders or out growers. FFB reception from the own estates under scope of certificate (NMAE, NSAE and RBKE) and other sources that which are certified, during the field observation and interview with WB operator, described on encoding of FFB supplier:

- Nagasakti Estate / NSAE; Traceability code system: 2021.
- Nagamas Estate / NMAE; Traceability code system: 2020.
- Ramabakti Estate / RBKE; Traceability code system: 2121.
- Kijang Estate / KJGE; Traceability code system: 2022.
- Kijang Plasma/KJNP; Traceability code system: KJNP.

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

The Certificate Holder has had a procedure to manage and maintain soil fertility set in SOP of Manuring (SOP/SMART/MCAR/IX/TA-PPK) dated 12 June 2012. The management strategy to maintain soil fertility, the Certificate Holder conducted manuring activities in accordance with recommendation from research department, POME applications, and maintain cover plant, such as soft fern (*Nephrolepis biserrata*).

**4.2.2**

Based on document verifications, the Certificate Holder has performed fertilization using inorganic fertilizers, POME and FFB mulching application. Recording of fertilization has been conducted well, indicated input from summary up to each fertilizer for each block. The fertilizer used were MOP, TSP, and Urea. At the time of audit, there was no fertilization in the field due to the program has been conducted. Manuring has been observed by EFB mulching application, and POME Land Application. Visual observation known that there is no nutrient deficiency in the frond, indicated sufficient fertilization. It was strengthened by yield of 12 month before audit, shown 22 ton/ha/year for old oil palm phase.

**4.2.3**

The Certificate Holder has routinely monitored the changes on the nutrient status based on the regular analysis of soil sampling unit (SSU) and leaf sampling unit (LSU) to determine fertilizers recommendation. The sampling spot has been determined in each Division routinely by SMART Research Institute (SMARTRI) and it is supported by well-trained census officers in each Estate. SSU is conducted every 5 year for trees with age of 3, 8, 18, and 23, meanwhile LSU was conducted annually. The last LSU of NGSE conducted based on report dated 10 May 2019, meanwhile the SSU dated 20 July 2016. Meanwhile the last SSU of NGME conducted based on report dated 23 Oktober 2014 (SSU of 2019 still in progress), meanwhile the LSU dated 12 August 2016.

**4.2.4**

The nutrient recycle strategy conducted by POME land application dose 750 m<sup>3</sup>/ha/year in Nagasaki Estate to enrich soil fertility, meanwhile EFB application conducted in sandy and low nutrient area with dose of 30 ton/ha/year, as well as chipping of oil palm trunk at replanting area. Based on field observation and document review known that POME land application, EFB mulching application, and chipping of oil palm trunk has been conducted in accordance with procedure.

<b>Status: Comply</b>
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**4.3**
**Practices minimize and control erosion and degradation of soils.**
**4.3.1**

The Certificate Holder showed the semi detail soil survey map in 1:50,000 scale for Naga Sakti, Nagamas, and Rama Bakti Estate. This map indicates unit of soil map, land suitability, limiting factors, and composed by Plantation Monitoring and Planning Division (PMNP) in 2017. Based on this map, it is identified that peat soil areas covered on Naga Sakti Estate covers 627.74 ha, Nagamas Estate covers 1,583.93 ha, meanwhile on Rama Bakti Estate covers 128,79 ha area of peat soil.

**4.3.2**

Based semi detail soil survey of 2017, it shows that area in Rama Bakti Estate and Naga Mas Estate are predominated by flat slope (3% - 9%). Based on field observation during audit on both estates, it is known that the topography is relatively flat, and not required to build contour terrace or individual terrace. However, it was found that land management has been practiced, such as manual upkeep, selective weeding, maintaining soft fern (*Nephrolepis biserrata*), stacking fronds in interrow in the form of "U-Shape". This indicates that soil conservation method has been satisfactory implemented.

**4.3.3**

The CH has had road maintenance program, includes of manual upkeep, mechanical upkeep by heavy vehicles, and hardening road by laterite soil. The program and realization reports includes tables per Estate per month and summary, as well as maps of program and realization. The maps were available. Based on field observations in all Estates, the main and collection roads were in good condition, hardened, able to use for FFB transport or upkeep activities.

**4.3.4**

The Certificate Holder has have implementation for peat management and subsidence based on procedure SMA/MCAR/05/05-07. The procedure covers of management for peat soils, water management, and subsidence referring the RSPO BMP. For example, water table is maintained at an average level between 60 cm (50 cm -70 cm below ground surface in water collection drain).

Based on the procedure, the Certificate Holder also has set up management plan for peat soil management, e.g water table monitoring, subsidence monitoring, weirs and bund off construction, as well as water collection drain cleaning. Field observation of peat area on Nagamas Estate, the management including of bund off/weirs, water level meter, piezometer, subsidence stake, and land cover. The water below the standard due to long dry season. Land cover has been managed by selective weeding. Water level and peat subsidence monitoring has been recorded. The average subsidence was 1 – 1,5 cm / year.

**4.3.5**

Replanting on peat area will be started on 2021, the preparation of drainability assessment has been in progress such as

documentation of peat maps, water level and peat subsidence, maps of sop bund, drain, water flow, etc.

#### 4.3.6

The other fragile area in CH's operational area were sandy areas. Field observation shown that CH has several strategies to manage sandy areas with low organic matter. The strategy, among others was EFB mulching application with a dose of 30 ton/ha/year. Besides that, soft fern (*Neprolephis bisserata*) was maintained to keep soil moisture and minimising the evaporation.

**Status: Comply**

#### 4.4

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

##### 4.4.1

Water sources identification and management plan for NSAE, NMAE, and RBKE are listed on both HCV identifications and HCV management plan 2019 documents. Water management plan for both estate are included water source identification, water quality analysis monitoring, and riparian management. Water source identification shown there is some riverine for examples Kampas riverine (NSAE), Pijar and heloka riverine (NMAE) and Sapaat riverine (RBKE).

Field visit on Parbadoran riverine (NMAE) and Pijar riverine (RBKE) found that certificate holder have implemented water management plan by riparian buffer zone marking on both sides  $\pm 50$  meters on riparian, perform revegetation with bamboo, and signboard/HCV identity placement. All estate also conducted surface water quality testing every semester that listed on regular environment monitoring and management implementation report.

##### 4.4.2

Procedures for riverine and riparian management are listed on procedures SOP/SMART/BCOS-EHSD/SADV/II/004. Certificate holder has identified and shown the maps for catchment areas (including riparian) with 1:50000 scale. Water management plan for both estate are included water source identification, water quality analysis monitoring, and riparian management. Water source identification shown there is some riverine for examples Kampas riverine (NSAE), Pijar and heloka riverine (NMAE) and Sapaat riverine (RBKE).

Field visit on Parbadoran riverine (NMAE) and Pijar riverine (RBKE) found that certificate holder have implemented water management plan by riparian buffer zone marking on both sides  $\pm 50$  meters on riparian, perform revegetation with bamboo, and signboard/HCV identity placement. All estate also conducted surface water quality testing every semester that listed on regular environment monitoring and management implementation report.

##### 4.4.3

Field observation on Nagasaki POM found that palm oil mill effluent are managed on waste water treatment plant before it distributed to NSAE as land application. Related palm oil mill effluent application, company shown land application permit based on Kampar regent capital investment board No 503/DPM-PTSP.PEL/LA/2017/12, valid until 2022. Nagasaki POM shown compliance related this permit application based on current permit for examples regular POME testing and annual soil testing on land application areas. Waste water quality testing document review shown for July-September 2019, all of waste water testing parameters is compliant to the standards quality and mill effluent management and monitoring has been reported to related agency for quarterly basis.

##### 4.4.4

Nagasaki POM are able to show water usage monitoring for period January - September of 2019 with an average use of 0.82 m<sup>3</sup>/ mt FFB process. From these records, it is known that the average use of mill water does not exceed the established budget (0.94 m<sup>3</sup>/ mt FFB process). Data of water usage from January - September 2019 is obtained from daily water usage record by WTP operator through flow meter observation. Observations on Nagasaki POM water treatment plant found monitoring for raw and process water usage was done by officer periodically, and flowmeters at outlet serves normally.

**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**

Integrated pest management plans are contained in Agronomy and Research Management Committee (MCAR) document (SOP/SMART/ MCAR/VII/TA-HPT) which aims as a guide in Integrated Pest Management (IPM) activities as one of the activities in the process of caring for oil palm. The procedure set the early warning system, that is regular census of potential pest and diseases, emphasizing the mechanical and biological control, such are planting of beneficial plants (*Turnera subulata*, *Cassia cobanensis*, and *Antigonon leptosus*), as well as installing and monitoring barn owl boxes to suppress rat infestation. The procedure also set the economical threshold for each pest and disease, so the chemical control only will be conducted if the infestation has been raised the economical threshold. In other related procedure, stated the CH policy to conduct selective weeding, to maintain the biological diversity in order to suppress pest and disease infestation.

Certificate Holder has identified potential pests in the plantation such as leaf eater caterpillar, rats. Regular pest/disease detection has been conducted. Appointed detection/census workers have been regularly trained, the last training conducted in May 2019. Based on field observation on known that the workers can explain and demonstrated the census procedure as well as pest identification.

Based on data and summary of the census of 2019 in Nagasaki and Nagamas Estate, known that there were no pest and disease infestations that exceed the economic threshold. So there were no usage of pesticides for pest and disease control. This is verified by field observation in harvesting activity, visually there is no symptoms of leaf eater caterpillar infestation on the canopy, or the rat's infestation on the FFB collected in the FFB platform.

<b>Status: Comply</b>
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**4.6**
**Pesticides are used in ways that do not endanger health or the environment**
**4.6.1**

The CH has had commitment not to use pesticides that endanger health or environment, based on regulation, and has specific target. The commitment sight on the Procedure of Weed Control, as well as document of Pesticide Recommendation, where shown justification that pesticide used has been registered in Pesticide Commission - Ministry of Agriculture ([pestisida.id](http://pestisida.id) website), identified active ingredient, dosage, WHO class, and target species. The pesticides chosen and used by the CH has been considered that had specific to target species and minimum negative impact on non target species.

**4.6.2**

The routine pesticides application were for weed control in circle and path using a.i of *Glyphosate*, *Metyl metsulfuron*, and *Triklophyr* conducted every four months. CH has conducted monthly documentation of pesticide utilization that record product name, active ingredients, LD50, percentage of active ingredients, total application, total active ingredients, hectare application and active ingredients per ton FFB production. For instance in NGSE in period of September 2019, the utilization of *Glyphosate* were 0,0018 kg of a.i/ton of FFB, *Metyl metsulfuron* were 0,000053 kg of a.i/ton of FFB.

**4.6.3**

The CH has shown evidences that any use of pesticides has been minimized as a part of IPM plan, and there was no prophylactic use. In line with the explanation of criterion 4.5 that IPM has been carried out quite effectively, so that there is no chemical use for pest control, except for routine weed control. The pesticides used are also not preventive pesticides. Based on observation of spraying activities, the application method is not a preventive application, but rather selective for locations that have weeds.

The usage of pesticides has been monitored in monthly of each type of pesticide in per division/cooperative and block. The certificate holder does not use pesticides prophylactically. If the conditions of circle and harvesting path are still quite standard, the weed control will be postponed. Based on observation of spraying activities, the application method is not a preventive application, but rather selective for locations that have weeds.

**4.6.4**

The CH shown evidences that the pesticides categorized in WHO 1A and 1B class, listed in Stockholm and Rotterdam Conventions, and paraquat are not used or minimized. The commitment sight in Director's Memorandum on 21 November 2014. In the memorandum stated that the CH committed to reduce or eliminate the use of pesticides class of WHO 1A and 1B as well as *Paraquat dichloride*. Based on document review, field observation in warehouse, as well as interview with spraying worker, since 2016 the CH did not use pesticide of WHO 1A and 1B class or paraquat.

**4.6.5, 4.6.7, 4.6.9**

During the audit, there were no spraying activities in NGSE and NGME. Spraying activity was postponed due to long dry season. However the auditor has been interviewed the spraying workers that worked in the other upkeep activities, such as manual weeding and loose fruits collecting, as well as observation in PPE and cleaning storage. Based on interview and observation of PPE Storage, the spraying worker were well trained and can explain the spraying activity properly, for example to prevent negative impacts, such as spraying in the direction of the wind, or prohibition of spraying on riparian. The sufficient PPE has been provided and utilized in accordance to product label, such as boots, apron, rubber gloves, mask, safety goggles. The foreman has brought a first aid kit and received first aid training.

The pesticides application has been conducted by methodes that has minimum risk and negative impacts to workers or environmental. Work equipment and PPE were stored in special warehouses, including for mixing pesticides, and washing after work. The rinse solution is stored in a special place and used again as a mixing agent in the next day's activities. Pesticide solution is brought to the field by special vehicles. The spraying activity conducted in selective manner by knapsack sprayer that the nozzle regularly calibrated. Foods were brought in a special storage that was protected from pesticides, as well as provided clean water and soap for washing hands. During breaks, workers ate on blocks that have not been applied by pesticides, and removing aprons and other PPE that are exposed. Overall shown that the workers has been well trained.

**4.6.6**

Implementation for pesticides storing and material handling are done based on material handling procedures SOP/SMART/HESS-EHSD/SADV/I/006 on 2014. Based on field visit in NSAE, NMAE, and RBKE chemical storage shown there are signboards and hazardous symbols for chemical by category, complete series Material Safety Data Sheet, chemical logbook, emergency response manual, first aid kit and personal protective equipment for storage foreman. Field visit on NSAE and NMAE workers housing indicates there is no evidence that ex pesticides/chemical containers were used for flower pots, water containers, or other household purposes.

**4.6.8**

Based on document review, field observation, as well as stakeholder consultation, known that the CH did not applied pesticides aerially.

**4.6.10**

Company have implemented proper ways for waste disposal based on procedure SOP/SMART/LEMS-EHSD/SADV/I002. Training for workers and staff regarding hazardous & toxic material handling has been conducted on January 2019 for NSAE and on March 2019 for RBKE workers. Field visit during audit on NSAE, NMAE, and RBKE shown that agrochemicals containers are disposed based on MSDS i.e cleanly washed (triple rinse) on pesticides optimalization storehouse and regularly submitted to PT Shali Riau Lestari as licensed hazardous waste collector. All evidence for ex agrochemical disposal for examples "*berita acara pengiriman bekas kemasan pestisida*" and related hazardous waste manifest are available and has been explained further on indicator 5.3.2.

**4.6.11**

Certificate holder regularly have a medical examination (every six months) for pesticide operator. The company can show a list of spraying workers in the Nagasaki Estate, Nagamas Estate, and Ramabakti Estate. All workers spray has examined health through inspection types of cholinesterase, to ascertain the condition of workers in good health. This semester examination was conducted in April 2019 for all units. Examination results stating that all pesticide operators are in a healthy condition (levels of cholinesterase in the blood within normal limits). The results of interviews with pesticide operators in estate submitted that all pesticide operators have been checked health periodically six months and workers have known the results of the examination. No worker has an indication of exposure to chemicals such as itching, skin



irritation, poisoning or anything else.

#### 4.6.12

Certificate holder has a policy that prohibits pregnant and breast-feeding personnel working with chemical material. Based on interview with spraying personnel, it is known that there was neither pregnant nor breast-feeding female personnel who work with pesticide. Audit team also got information that the personnel have understood that female personnel cannot work with chemical material if they are pregnant or breast-feeding.

**Status: Comply**

#### 4.7

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

##### 4.7.1

Policy and procedure related OHS still the same as previous assessment, namely OHS policy issued by President Director of PT SMART dated 1 November 2013. Based on interview with workers known that they have been known about the OHS policy, for example workers are required use PPE while working and safe working practices. They also said that EHS Officer perform morning briefing every day before starting work and ensure the completeness of the PPE of all workers. The plan related OHS has been prepared in the OHS Committee program PT BWL of 2019, and the company has realized activities in accordance with the program created.

##### 4.7.2

Certificate Holder shows the document Hazard Identification, Risk Assessment and Determining Control For Estate and Mill has been review of 2019 covering the entire process and operational activities. For example Risk Assessment on spraying activity at estate with odor chemical hazard with risk/impact in the form of respiratory disorders and risk analysis result set moderate level.

Based on work accident monitoring period January – September 2019, there is one work accident in Nagasaki Mill, four accident in NSAE, two accident in NMAE, and 31 accident in RBKE. CH has made the work accident investigation report and also documented it to OHS Committee Quarterly Report. The investigation report describes about chronology of accidents, causes of accidents, suggestions and recommendations of the investigation team to prevent recurrence of accident and follow-up investigations. The risk control that has been done is to conduct regular medical check-up, safe working practices, availability first aid kit and use of PPE accordance to MSDS.

##### 4.7.3

Based on field visit in Estate and Mill, all workers have been using PPE according to risk analysis made and PPE is in good condition and in accordance with its function. Boiler operators at mill using PPE kinds of helmets, ear muff, gloves, mask, and safety shoes. Workers also can explain how to work safely for example in the boiler station, workers can explain the PPE to be used, how to monitor the boiler in order to operate safely, has been given training related firefighters. Boiler operator have attended training and certification OHS, as evidenced by the availability OHS License for OHS Electrician No. Ser.001926/TK3-LIST/XII/2014, valid until May 2021, and certificate welder No: S.612/JL/BINWASK3-PNK3/VIII/2017, welder Class II. Based on documents verification and interviews, it is known that all operators at mill and estate already have license such as boiler operators, welders and electrical technician.

##### 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. KEP.253/Disnakertrans-PK/SK-P2K3/XI/2017 dated November 22, 2017 for Nagasaki Estate
- No. KEP.81/Disnakertrans-PK/SK-P2K3/VI/2019 dated May 6, 2019 for Nagasaki Mill
- No. KPTS.700/DSTK-PHI/2015/006, dated April 26, 2015 for Nagamas Estate
- No. KEP.165/Disnakertrans-PK/SK-P2K3/IX/2019, dated September 23, 2019 for Ramabakti Estate

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 September 12, 2019 in Estate with the agenda of extra food, emergency response for smog condition.



**4.7.5**

Certificate holder has made efforts to deal with emergencies and accidents. The company has procedures related to the handling of emergencies and accident investigation, the procedure is still the same as the previous assessment. CH has emergency facilities and infrastructure such as fire extinguisher, first aid kit, hydrant, water tank, and other supporting equipment. CH has been conducted the training of emergency, for example emergency response training in Mill on September 7, 2019.

The company provides procedures for accidents and emergencies in the SOP handling accidents and occupational diseases (SOP/SMART/HESS-EHSD-10) and SOP Preparedness and Emergency Response (SOP/SMART/GENERAL/SADV/I/005). The procedures cover the main potential causes of emergencies such as fires, chemical spills. Simulation was performed to know the preparedness of emergency response equipment in the estate and mill. Certificate Holder has already licensed first aid officers and there was first aid internal training conducted on August 02, 2019. 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. There is also a checklist of observations of the contents of first aid boxes routinely performed every month by first aid officers. Based on field visits in workshop NSAE known that APAR can function properly and in each fire extinguisher there is checklist of inspection that monitored every month. Based on interviews with the foreman and manual weeding and harvesting workers at Nagasaki Estate. It is known that workers have known emergency response procedures, for example in work accident cases the foreman must do first aid using a first aid kit provided.

**4.7.6.**

The management unit provided accident insurance for personnel based on the applicable regulation. The insurance such as manpower insurance is paid monthly to national social insurance for manpower/ BPJS. Meanwhile, for medical insurance, PT BWL has registered its entire personnel in manpower medical insurance/ BPJS. Based on interview with some personnel, it is known that the entire personnel have been registered in manpower medical insurance/ BPJS. Has been observed the contractor of FFB transport – PT Satrindo Jaya Agropalma has been paid it's workers insurance. Based on interview with some personnel, it is known that the entire personnel have been registered in manpower medical insurance/ BPJS

**4.7.7**

Certificate holder had recorded of work accidents in Work Accident Monitoring Reports that inform the time period, the number of working days, the number of non-effective working days, overtime, hours of work in total, the number of accidents, the number of working days lost, hours of work a year, the number of accidents a year, lost days a year.

The company is still consistent in monitoring the recording of occupational accidents by calculating the lost time accident (LTA). Recapitulation of work accidents with a formula to find the level of severity and frequency of accidents. Calculation of SR and FR is reviewed regularly and monitoring will be evaluated at the monthly meeting of Committee of Occupational Health and Safety. Based on document review and interviews with workers and doctors it was explained that recording and calculating the frequency of work accidents is well documented.

<b>Status: Comply</b>
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**4.8**

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

**4.8.1 and 4.8.2.**

The Certificate Holder has training program 2019 for staff and workers related all aspects of RSPO principles and criteria. The training program for all employees based on identification of needs that prepared by SPO Officer. The annual training program covered all existing estate and mill activities, among others simulation handling chemical spills, first aid, fires simulation, socialization of policies for the protection of reproductive rights, prevention of sexual harassment in the workplace. The training record that shows historical training of each employee are well maintained in place.

Based on observation of operational activities in estate and mill, the workers are known to have received training, and are able to demonstrate safe working practices in accordance with procedures. Interviews with local contractors are also known that contractors have been trained from CH related safe working practices.

The training that held in 2019 has documented in minutes of meeting, list of attendees, and activity photos. Training that has been implemented including : Hazard Identification and Risk Assessment (HIRAC) in January, Emergency response at process station on March, OHS experts on April, First aid on July, Management of Dangerous waste on July, OHS training for high-rise building workers on August, Fire emergency response (Mill) on September, ISPO, RSPO and SCCS on September, Emergency response for chemical poisoning on September, Integrated Pest Control and Weeds in March, HCV training in May, LSU training in February, Combined first aid training on August, Fire emergency response (Estate) in April.

Base on interview with FFB transport contractor and replanting are submitted that the company has provided OHS training for contractor workers for example related to the use of PPE, accidents, safe working practices, etc.

Observation of operational activities in Nagasaki POM and Nagasaki Estate, the workers are known to have received training, and are able to demonstrate safe working practices in accordance with procedures. Interviews with local contractors are also known that contractors have been trained from management unit related safe working practices.

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

Until ASA 1.3 there is no changes related to estate operational areas development, mill capacity expansion, and etc. Aspects of plantation and mill management that caused environmental impacts were identified and listed on EIA document. The Company has environmental documents, covered for nagasaki POM, nagasaki estate, nagamas estate, and ramabakti estate i.e:

- Environmental Impact Assessment (EIA) document for scope Naga Mas Estate; Naga Sakti Estate dan Naga Sakti Mill with area of 7193.80 ha and mill capacity of 60 mt FFB/Hour. The document has been approved by relevant government based on decree No. IRC.220/888/B/V/1994 on May 19/1994.
- Environment evaluation document (DELH) for Naga Sakti Estate covered within area of 3,016 Ha. The document has been approved by relevant government with No. Kpts/BLH/Dok/2011/136 on September 29/2011.
- Environment evaluation document (DELH) for Rama Bakti Estate covered within area of 2.903,79 ha and Plasma area of 5,585 ha. The document has been approved by relevant government with No. Kpts/BLH/Dok/2011/139 on September 29/2011.

##### **5.1.2 & 5.1.3**

Environmental management plan and monitoring plan for company are listed on RKL/RPL document Company also demonstrated environment and social management based on EIA document for examples : surface water quality testing, waste water produced by mill are managed on effluent pond before it distributed to estate as land application, regularly emission testing for boiler, generator emission, boiler emission, and based on local stakeholder interview acquired information that companies often provide assistance to the religious activities, sport activities, education activities, road maintenance and provide workers employment and business opportunities.

Result of monitoring for 1st semester 2019 shown that potential impact caused by operational activities have been reduced meanwhile surface water parameter (for examples O&G) on some outlets sampling point are still exceed standard quality, this caused by natural water ways condition on inlet that are already exceeded standard quality. Review for the monitoring/management plans has been developed on January 2018 and as an output certificate holder has been monitored replanting activities that might causing impact such as pest monitoring and surface water quality.

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

NMAE, NSAE, and RBKE has been conducted HCV assessment for the entire area of operations, done by the RSPO Approved Assessor on 2011. The process of HCV identification conducted by using HCV identification guides in Indonesia on 2008. These identifications indicates there is HCV 1.1, 4.1 presence on NSAE, NMAE, and RBKE. Each HCV areas have been mapped, and covered areas with following details i.e 148,25 ha on NSAE, 231,87 ha on NMAE, and 112,39 ha on RBKE.

The HCV identification was conducted by a competent HCV team and has engaged stakeholders through public consultation on August 2010. HCV identification results also explain there is no presence of Rare, Threatened, or Endangered (RTE) species according updated IUCN-Redlist 3.1 (2017). Based on interview with management, workers representative, and local stakeholders (Sekijang village) acquired information that currently, most often found species surrounding company was *macaca fascicularis* and *varanus salvator* and there is no RTE species present such as of *elephas maximus* and *panthera tigris*.

**5.2.2 & 5.2.3**

HCV identification and interview with relevant stakeholders (sekijang villages and scheme smallholders) shown there is no RTE species present surrounding company. To provide protection against wild species, management unit has established 2019 HCV management plan that consist of : hunting ban signboard placement, HCV area patrolling, rehabilitation of riparian as wild species habitat, and etc. Related to RTE species, company have RTE species protections policy established on 2011 by Managing Director. Evidence for workforce educations related to RTE species are available for examples HCV / RTE socialization on August 2018 for NSAE, NMAE, RBKE workers. Field visit on Workers housing NSAE, RBKE, and NMAE also found there is no RTE / wild species reared by workers. Field visit on Parbadoran riverine (NMAE) and Pijar riverine (RNKE) found that certificate holder have implemented water management plan by riparian buffer zone marking on both sides ±50 meters on riparian, perform revegetation with bamboo, and signboard/HCV identity placement

**5.2.4 & 5.2.5**

Based on field observation, document review, and interviews with Sekijang villages found there is no HCV set-asides that affected local community's rights. Company have established HCV management plan based on 2018 monitoring output. Regularly patrols and monitoring record shown company has been monitored illegal hunting, wild species present, and other illegal activities.

Records for regular patrols are available and verified by auditors. For examples patrols result periods October 2019 on NMAE on Banal riverine found bubut bird, meanwhile signboard and HCV marking zone on this HCV 4 are maintained well. Monitoring for October 2019 on NSAE (Kampas riverine) found *tyto alba* and there is no wild species trap presence during patrols by HCV officer, meanwhile monitoring on RBKE for October 2019 periods indicates Sapaat riparian are covered with natural vegetations and no wild and RTE species present during patrols.

<b>Status: Comply</b>
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**5.3**

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

**5.3.1**

All waste products and sources of pollution have been identified and documented in identification and evaluation of pollution source document issued on 2019. Type of waste been identified for examples are :

- Estates, waste source : chemist activities, waste type : ex pesticides containers (toxic and hazardous waste), managed by stored in optimalization store and sent to related vendors
- Mill, waste source : FFB process, waste type : shell and fiber (non toxic/hazardous waste), managed by renewable energy usage for boiler
- Estates, waste source : pruning activities, waste type : oil palm fornd (organic waste), managed by frond stacking

- Estate, waste source : office and housing activities, waste type : domestic solid waste, managed by landfill

**5.3.2**

Inventory for all chemicals usage and its containers are available on chemicals storehouse / temporary hazardous storage. All ex chemicals containers were kept on pesticides optimalization store, and company (NSAE, NMAE, RBKE, and NSMM) has a permit for all hazardous and toxic waste storage issued by head of environmental agency, Kampar regency based on decree No. 660/BLH-WAS/ILB3/2015/13, valid until 2020. Based on document review and interview with management, shown all ex pesticide containers on estates are managed by triple rinse on pesticides optimalization store and regular submitted to hazardous waste store. Meanwhile, for other toxic hazardous waste including fertilizer inner sack were stored in temporary hazardous waste storage on estate and mill.

Evidence for ex pesticides containers disposal for estate has been verified by auditor. Document review shown that company has disposed all toxic and hazardous waste to PT Shali Riau Lestari (licensed collector by decree of national environmental minister) on August 2019, for examples manifest AA00014328 (NSAE) for 18 kg ex agrochemical container. Observation during audits at temporary hazardous & toxic waste storage shown that all of hazardous waste are compliant with the periods in permit.

**5.3.3**

Certificate holder has implemented waste management /utilization based on management plan. Field visit to NSAM shown that palm oil mill effluent are managed on waste water treatment plant before its distributed to estate as land application; Fiber and shell has been utilized as a boiler fuel, housing waste has been collected in the garbage then disposed to the landfill area. Field visit on land application activities div 3 NSAE shown that company has utilized POME as nutrient cycle based on permit which it belongs. Related to domestic waste, field visit on NSAE & RBKE housing found that All settlements waste are not disposed off using open fire and companies managed settlements/housing domestic waste by provide landfill on each estate.

<b>Status: Comply</b>
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**5.4**

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

**5.4.1**

Company implemented fossil fuel reducing plan by renewable (fiber and shell) energy usage. Certificate holder has assess and estimated the direct energy use such as fuel usages and electricity generated by Mill operational activities for 2019 periods. Shell and fiber usage have been monitored per month and for examples realization of fossil fuel usage during September 2019 are 1215 litre. During January-September 2019, renewable energy usage for boiler resulting average energy efficiency about 83.41 Kwh/mt CPO, meanwhile direct energy usage by fossils fuel are 0.58 l/mt CPO.

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

Field visit during audit and document review indicated there is no replanting / new planting activities on Nagamas and Nagasaki estate. Company already have commitment and policy listed on Golden Agro Resources (GAR) social and environment policies 2015, stated that company do not conduct any land fire for replanting or new development. Company also develop procedure SOP/SMART/MCAR/ IV/ TA-PLB on 2012 regarding zero burning land preparation.

<b>Status: Comply</b>
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**5.6**

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

**5.6.1 & 5.6.2**

To reduce pollution and emissions, the company has identified the source of pollution and greenhouse gases and

measurement to manage them. The efforts made by the management unit to reduce the pollution and GHG emissions through the activities including engine maintenance, effluent management and waste utilization, conduct fertilization according to the doses, conduct pesticide application according to the procedure, etc. Field visits in the mill showed that the shell and the fiber has been used as a boiler fuel, therefore its reducing the use of diesel fuel for electricity. Waste water also has been monitored every months and monitoring period July-September 2019 shown that all of waste water testing parameters is compliant to the standards quality (see indicator 4.4.3). Meanwhile company also conduct regular emission testing for semester basis, 1st semester 2019 testing results indicates boiler emission for examples opacity has been met with standard quality.

### 5.6.3

Monitoring for emission and pollutants (air emission, air ambient, odor, noise, and vibration) from estate and mill was done periodically every 6 month, first semester 2019 testing result indicates all parameters related to emission are still comply with standard quality, except noise level. Regarding this, company shown preventive ways with providing ear muff on high risk station on mill.

Monitoring of fertilizer, pesticide and chemical use was conducted through record of fertilizer, pesticide and chemical use quantity. The monitoring was conducted to evaluate the management plan of which has been done by management unit. Kijang Palm oil ml conduct GHG calculation and its monitoring using RSPO palm GHG calculator V3.0.1 (apply full version) for its supply base. Summary of GHG emmison for Nagasaki POM for January-December 2018 periods are listed as follows :

Emission/ product	tCO <sub>2</sub> e/tProduct
CPO	3.05
PK	3.05

Production	t/yr
FFB processed	299439.97
CPO produced	61608.57
PK produced	16548.61

Extraction	%
OER	20.57
KER	5.53

Land use	Ha
Planted area	14733.46
Planted on peat	2582.05
Conservation (non forested)	296.72

#### Summary of field emission and Sinks

Description	Own crop			Group			Third party
Emissions Sources	tCO <sub>2</sub> e	tCO <sub>2</sub> e/ ha	tCO <sub>2</sub> e/tFFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e/ ha	tCO <sub>2</sub> e/tFFB	tCO <sub>2</sub> e
Land conversion	22839.38	3	0.12	0	0	0	0
CO <sub>2</sub> emissions from fertilizer	15354.8	2.23	0.09				0
NO <sub>2</sub> emissions	28581.82	2.16	0.09				0
Fuel consumption	1329.42	0.11	0				0

Peat oxidation	134392.55	9.57	0.38				0
Crop sequestration	-21648.71	-2.84	-0.11				0
Sequestration in Conservation area	0	0	0				0
Total	180849.26	14.23	0.57				0

#### Summary Oil Mill Emissions and Credits

Remarks	tCO <sub>2</sub> e	tCO <sub>2</sub> e/t FFB
Emissions sources		
POME	57278.52	0.19
Fuel consumption	261.18	0
Grid electricity	92.41	0
Credits		
Export of grid electricity	0	0
Sales of PKS	0	0
Sales of EFB	0	0
Total	57632.11	0.19

#### 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**

There is no change of SIA document. The certificate holder has conducted a survey and Social Impact Assessment (SIA) in 2010 and recorded in Report SIA - "*Laporan Studi Identifikasi Dampak Sosial Perkebunan Kelapa Sawit*", by Sustainability Department. In 2012, SIA document has been revised. After the identification in 2012, then provides annual supervision and evaluation of social impact, and then be reviewed by management once in 2 years. During the Social Impact Assessment (2012), it appears that the assessment also includes stakeholders, community leaders figure, and related government agencies etc. through a public consultation which visible on participant attendance at SIA report. Based on the stakeholder consultations in the villages surrounding, there is no indication of any significant issues from surrounding communities.



**Ramabakti Estate**

The SIA (Social Impact Assessment) for Ramabakti Estate conducted in 2010 and integrated on PT RJP SIA document. SIA document contains evidence of communities / villagers participation in study. Participation was conducted by interviews and focus group involving the village and community leaders, traditional leaders, youth leaders, and etc. Results of the consultation meeting had been summarized in the SIA report. As part of social impact management, company has channeled Corporate Social Responsibility (CSR) by considering the results of the EIA study and Social Impact Assessment. Evidence for participatory way on SIA 2010 were shown by minutes of meeting, focus grup discussion, interview questionnaire with affected parties.

Based on interview with stakeholder obtained information that SIA, as well as management and monitoring plan has been conducted in participatory manner with all affected Village. All social impacts and issue had been identified and managed, among others in aspects of livelihood, health, land tenure, employment, education, economy, social, cultural and religious.

**6.1.3**

The CH established annual management and monitoring plan of social impact based on the impact identified in SIA in participatory manner, to avoid and reduce negative impacts and promote positive impacts. The management plan developed based on review SIA in 2019. Management has plans to reduce the negative impact as a result of the company's operations. The plan also includes time management and monitoring implementation. In addition, the plans to increase the positive impact include the realization of CSR and carry out regular visits and communication with the community. PIC for social management and monitoring are manager in each unit assisted by SPO officer and other related staff. This social management and monitoring plan were develop by affected parties participatory. Evidence of participatory way (minutes of meeting, photo) was verified by auditor team. The results of monitoring are known that all social aspect can be implemented properly, such as: scheme smallholders and socialization of FFB prices, local business development, and local worker acceptance. Realization of CSR programs and etc. Interview with local community obtained informations there is no grievance related to social management that's has been implemented. social impacts and issue had been identified and managed, among others in aspects of livelihood, health, land tenure, employment, education, economy, social, cultural and religious.

**6.1.4**

Review of SIA management plan has been conducted in 2019 for period 2018 and 2017. Result of Social Impact review was explained positive and negative impact, there are consist of road maintenance, river water pollution indication and working opportunities for local community.

**6.1.5**

Scope of Nagasakti POM does not have smallholders scheme, however due to SIA conducted based on company scope, smallholders scheme of PT Buana Wiralestari Mas is under management of Kijang Kencana Plasma. All the impacts has been identified in the SIA document.

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

Documented procedure for communication and consultation with public was established namely Communication and Consultation Procedures No. SOP/SMART/UMUM/SADVI/004, dated 1 July 2014". Communication and consultation has considered differential access to information for male/ female, workers, villagers representative both old and new villagers including ethnics. 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. The procedure was in Bahasa Indonesia that is understood by all surrounding communities. Responsible person for receiving and responding any communication and inquiries is Unit Head / Estate Manager.

Based on interview with community of villages, if they need information they will submit a letter to the company. According to them, the company always responds each letter submitted. The entire request of information (verbal and written) is

recorded and kept in the logbook which is available in all units both of estates and mill, there was no request for information, but recorded several incoming letters which were entirely the proposals of aid that has been responded by the company. In addition, sighted the evidence of report delivery to relevant agencies, among others : report of environmental management and monitoring, report of employment, waste management and plantation report.

Based on interview with government Agencies of Kampar Regency (Manpower and Industrial Agency, National Land Agency, Environment Agency and Plantation Agency), as well as surrounding community representatives it was known that the CH has considered transparent and cooperative in providing information requested or required, which some were a part of regulation pursuance as well

**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

Procedure of complaint and grievance delivery was presented in document No. SOP/SMART/GIMS-SCMD/USDV/II/001 (Rev. 02) dated April 11<sup>th</sup> 2017. The procedure has guarantee the anonymously and whistle-blower. PIC of this procedure was Chief of Administrative (KTU). Based on interview with workers in NSAM, NSAE, NMAE and RBKE, as well as information from Labour Union and Gender Committee of those units, it was known that every complaints and grievances has satisfactory responded by management unit directly or less than one month officially. There is no intimidation and pressure for whistle-blower.

Based on interviews with employees, village representatives, and union leaders, it is known that they have understood the mechanism to complaint. This is effectively implemented where every complaint can be submitted verbally / written through the chairman of the union to be discussed later in bipartite routine meetings. In addition, employees can also convey complaints through direct supervisors or through complaint boxes available throughout the division / estate office.

#### 6.3.2

Complaints and grievances was recorded by Chief of Administration on the Logbook of "*Keluh Kesah*". Based on logbook review in mill and all estate units, it was known that there were no complaint and/or grievances delivered by internal and/or external parties. Based on interview with workers in NSAM, NSAE, NMAE and RBKE, as well as information from Labour Union and Gender Committee of those units, it was known that every complaints and grievances has satisfactory responded by management unit directly, and there were no significant issues that needs to be follow up.

**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

The procedure of "*SOP Ganti Rugi Tanah/Lahan* (SOP/NP/SMART/VII/D&L002, dated 1 Juli 2010)" described the mechanism for identifying legal, customary or user rights and also for identifying people entitled to compensation and determining calculation method to provide fair compensation. Evidence of Procedure Awareness was documented. It was communicated to related parties such as community leaders, and religious figures and youth leaders. While, within the FPIC Procedure No. SOP/SMART/SENS-CSR/SADV/II/003, part 2.4 describes that identification of participatory map related to legal ownership of communities are considering gender, community leader, local or transmigrate communities, ethnic groups or communal land ownership, etc.

#### 6.4.3

All the documents of land compensation is kept by legal department and if there is any inquiry from affected parties or relevant parties, the document can be accessed through officer/management permission. There is no customary people lives surrounding/within the certificate holder plantation. Documents verifications, field visits and interview with stakeholder

obtained informations if there is no land acquisition from the last assessment.

**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

Company has Letter from direction No. 062/CEO RIAU/HR PSM RIAU/04/2019 about minimum wage year 2019. It is said that minimum wage of all workers is based on Governor Decision about Minimum Wage of Riau Province 2019. Company could present the payment receipt of minimum wage as indicated in personnel salary list. Company can show employee salary list of PT BWL - Nagasaki POM and supply base in accordance with the decision of the Governor of Riau on Province of Minimum Wage 2019. Examples of salary documents in September, 2019.

Wage determination in the period of 2019 has been issued by the Governor of Riau No. Kpts.661/III/2019 dated March 25, 2019 concerning about Minimum Wage Agricultural Sector/Rubber Plantation, Coconut, Oil Palm and Mill Riau Province Year 2019, as much as 2,820,000 IDR. Furthermore, through a Joint Agreement between GAPKI and BKS PPS Riau, agreed that the implementation of minimum wage 2019 of Rp. 2,679,000. per month in all districts in Riau Province, and includes the rice allowance for the workers themselves by 15 kg or Rp. 141,000 per month, effective from 01 January 2019.

Based on interview with harvester and management representative obtained information if wage calculation based on harvesting quota, harvesting area and work hours (7 hours a day). For example when low crop season and the workers not obtained the harvesting quota that determined, the workers should finished the harvesting area or work for 7 (seven) hours a day. Meanwhile interview with harvester its known in common day they can obtain harvesting quota after 5 (five) hours) and if there is a excess from quota they get the incentive. Based on that's explanation team auditor considers there is no violating to the wage regulations and force to work.

Based on document review known the company have paid overtime in accordance with that specified in the Collective Labour Agreement (*PKB*). The results of interviews with workers in Nagasaki Mill for example at the process station and Workshop Nagasaki Estate known that the workers have earned wages and overtime has paid in accordance with the applicable regulation. There is no significant obstacles related to employment or violations of wage such as wage deduction.

Observation of field and interview with worker that the company has paid wages to workers in accordance with the provisions of the applicable minimum wage. In addition, Interview with DPC Chairman F.SPMP-SPSI no report of wage payment violation paid, in accordance with prevailing minimum wage.

### 6.5.2

The CH had Collective Labor Agreement in Indonesian language that the content has been in accordance with the regulation and has been disseminated to Labor Union and workers. The current agreement was Collective Labor Agreement of 2015-2017 between Sumatra Plantation Company Cooperation Agency with the Central Board of the Federation of Unions of Agricultural and Plantation Workers Union of Indonesia has been through a decree on behalf of the Labor Minister No. 88/PHIJSK-PPKAD/PKB/VI/2015 on 18 June 2015. This is due to the Collective Labor Agreement of 2018-2020 is still in progress of endorsement of Labor Minister. The Collective Labor Agreement had covered all aspect set in the government regulation related employment, such as recruitment, working hours, wages, contract labor, aid sick days, be absent work, payment of meal, overtime, provisions on premiums, feast day allowance, worker insurance, work equipment and PPE. Field observation and interview has been conducted to verify the implementation of CLA, especially in critical point such as temporary worker in aspects of contractual agreement, minimum wages, insurance, as well as PPE provision.

### 6.5.3

Company provides the facilities for worker welfare such as housing, polyclinic, worship venue, sport yard, and access to electricity and clean water. Based on field observation in Nagamas Estate housing, it is known that the facilities and

infrastructure are in good condition. The availability of electricity comes from the National Electricity Company. Beside education facilities, company also provide school bus to children transportation. Based on the interview with employees and labor union representatives known that whole infrastructures provided by company has been adequate and well deserved.

**6.5.4**

The management unit has been able to demonstrate an effort to improve workers' access to food was decent, fairly and at affordable prices through the provision of employee cooperative activities in the provision of basic needs for employees. In addition to the time payday there are incidentally market. And also base on interview with women workers in estate and mill, they were explain that traditional market are near from housing complex. Based on field observation and interview, it is known that worker buy the staple food to the market in near from the estate.

<b>Status: Comply</b>
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**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 and 6.6.2**

The company have a policy on providing freedom for its personnel to establish and join union is stated in:

- Collective Labor Agreement period 2018-2020 in Article II states that company guarantees the freedom of its personnel to establish and join union.
- Decree from CEO No.045/CEO5-SE/11/2010 on 16<sup>th</sup> November 2010 regarding the freedom to establish and joint union.

Based on interview with chief of labour union, it is known that company has facilitated the establishment of worker union and personnel understand the function of worker union. There is no any intervention by CH to the election of workers representative in labour union. Every worker is free to choose whether or not to become a member of a union. This is also confirmed by the results of interviews with workers in each unit. They are given the freedom to choose whether or not to join the union.

The company has been consistently documenting and implementing the policies related to giving freedom to all workers to form and join unions workers desired. The results of interviews with workers are known the Labor Union within the management unit of Mill and Estate PT Buana Wiralestari Mas namely SPPP-SPSI (*Serikat Pekerja Pertanian Perkebunan-Serikat Pekerja Seluruh Indonesia*). The labor union is held a meeting once a month of if there a issue or complaint from worker and must be discussed. There are meeting documentation such as minutes of meeting of each NSAE, NMAE, and NSAM SPSI PUK in July 2019 with the agenda of the coordination meeting regarding the provision of candied funds to employees is given in the form of groceries to be arranged by each division. Provision of sweets is given in accordance with company policy. Attended by SPSI/management and company representatives.

<b>Status: Comply</b>
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**6.7**

**Children are not employed or exploited.**

**6.7.1**

Certificate Holder have the policy regarding minimum age for worker regulated on GAR's Social and Environmental Policy. It is stated that company won't employ children who are included in the definition of the provisions of ILO conventions, even though there are laws or regulations that would enable state and local and against all forms of child exploitation. Based on field observation in NSAM, NSAE, NMAE and RBKE, there are no worker under 18 years old. Based on public consultation with Manpower and Transmigration Agency of Kampar District, there is no issue regarding child labor in company. Based on field visit on harvesting activity block E35 and B47 Nagasakti Estate there is no harvester accompanied by their child during their work.

<b>Status: Comply</b>
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**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 and 6.8.2**

Policy regarding equal opportunity and treatment for work contained in the document of Environmental and Social Policy issued on September 8, 2015. The policy assured equal opportunities for all workers, and embrace diversity, regardless of ethnicity, religion, disability, gender, political affiliation, sexual orientation, or union membership workers, and ensure that all workers are protected from discrimination in all stages of the employment relationship. The process of selection, recruitment and promotion of workers can be shown that the process has been based on the expertise, capacity, quality and medical health of prospective labor / labor.

The results of interviews with Nagamas Estate worker known that the workers understand the company policy regarding equal opportunity to get a job without distinction of race, religion and gender. Based on the document review there is an example of implementation of the equal opportunity work policy for all workers to ensure that workers are protected from discrimination in all stages of employment relations. For example is the appointment of contract worker into permanent worker based on performance appraisal conducted by the manager. The employees are upgraded to permanent employees based on the Decree of the Manager (No.0024/NSAE/PKWTT/04/2019 dated April, 2019). Appointment of employees based on the results of the assessment conducted periodically every month, with aspects assessed include: Discipline , Quantity of work, Cooperation, Attitude, Responsibility.

**6.8.3**

Based on review of employee list of Mill and Estate, field observation, and interview with the workers, Gender Committee, Labor Unions, it is known that there is no indication of discrimination based on ethnicity, religion, gender, sexual orientation, race and class, or origin. Interview with the Village Head known that the job advertisements are open to the public. The employee selection and promotion are conducted in accordance with the assessment and without any discrimination.

**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 and 6.9.3**

CH has a policy of the prevention of sexual harassment and violence as outlined in Internal memo from Agronomy Unit Head No.001 / CEO5-SE / 02/2009 dated 20 February 2009. This policy is about socialization of prevention and handling of sexual harassment to all employees. In addition, for the protection of reproductive rights is written in the internal letter No. 001 / SE-VPA5 / SPO / 07/2011 dated 8 July 2011. Company has establish gender committee in each unit and its program is conducted socialization to the worker especially female worker, such as policy about reproductive rights, spraying technic, harassment or abuse in the work place complaints mechanism. Complaint mechanism explains that the company could keep the confidentiality of reporter's identity based on the sensitivity of issues, if the case goes public and the risk of revenge and so on.

There are regulations concerning female menstruation leave as much as 2 days/month (first and second day) with a doctor's 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. Based on interview with female worker in NSAM and NSAE they understand about the policy and know how to make a complaint if they found out about harassment issue. They also has their reproductive leave such as menstrual leave or 2 days and maternity leave for 3 months. Based on interview with gender committee, there is no cases of sexual abuse reported in last year. The interview result with women worker in estate and mill shows that the worker has understood the existence of gender committee and the policy regarding women right protection. The administrator of gender committee also stated that the company guarantees 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 no reporting of violations related to the rights of women workers



for H1 and H2 leave, with evidence of the wages of workers being fully paid. CH also has procedure of employee grievance or complaint no. SOP/SMART/SIGS-CSR/SADV/I/003, dated 1<sup>st</sup> July 2014 which explain that the identity of the complainant is not revealed to everyone. Based on interview with the worker, they understand the complaint mechanism and there is no complaint from them.

Based on interview with committee gender, the policies has been socialized to the workers. It is also known that there is no issue or complaint related to sexual harassment on the workplace. CH also form gender committee for handling the harassment issue around female workers. Based on interview with the board of gender committee, the company provides the female worker with pregnant and nursing leave for about 3 months. CH has a circular letter No. 002 / CEO5-SE / 03/2009, 2 March 2009 concerning granting permission for menstruation. In the circular letter states that women workers who experience pain and based on a doctor's examination and notify employers, are not required to work on the first and second days of menstruation, so that each unit applies these provisions effectively.

**Status: Comply**

#### 6.10

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

##### **6.10.1 & 6.10.2, 6.10.3, 6.10.4**

Nagasakti mill has no transaction for FFB purchasing from third party vendors, independent smallholder nor scheme smallholder.

**Status: Comply**

#### 6.11

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

##### **6.11.1**

The company has compiled a CSR budget estimates for the period 2019, categorize into five groups of items, namely: education program, donations, health, infrastructure and development, economic empowerment. In the preparation for CSR program has involved the local community, when company determined CD/CSR priorities

Based on public consultation with local community obtained information that the company has made efforts to develop the surrounding community through CSR programs, acceptance of local workers, local contractor, etc. In addition, it is known that so far the relationship between the company and the community has run quite well and harmoniously. Communication between the company and the village is quite good.

##### **6.11.2**

Scope of Nagasakti POM does not have smallholders scheme, , smallholders scheme of PT Buana Wiralestari Mas is under management of Kijang Kencana Plasma. Up to SA-1.3, it was known that there were no additional smallholders in KJNP or other plasma scheme. KJNP were consist of 8 KUD's (Cooperatives), 197 Smallholder groups and 4,073 members. Registration of smallholders' non plasma members was conducted by FFB Purchasing Department. The company has support operational of plasma through human resources (Manager, Assistant and Foreman of Plasma), daily works monitoring, best management practices and safety training, fire management, hazardous and hazardous waste management, etc.. Organization chart which mentioned personnel from PT BWL was available. Smallholders of those KUD mentioned that the CH has provide training annually, especially on oil palm agronomy technique and safe working practices.

**Status: Comply**

#### 6.12

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

##### **6.12.1; 6.12.2; and 6.12.3**

The Certificate Holder have Environmental and Social Policy 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.

**Status: Comply**

### 6.13

#### **Growers and millers respect human rights**

##### 6.13.1

Certificate holder has GAR of Social and Environmental Policy in point 2.2.3 which stated that the company committed to stand and promote statement of human right of UN for all workers, contractor, customary society, local community in all company operation. Based on interviews with workers and contractors 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.**

The planting have been conducted since 1993, therefore, there was no new planting nor expansion after November 2005.

**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.**

The planting have been conducted since 1993, therefore, there was no new planting nor expansion after November 2005.

**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, & 7.3.5

All RSPO members for GAR has been submit Liability Disclosure on 26 October 2014. The results of document review, field visits and interviews found that CH did not expand or conduct new planting since the last assessment (2018). HCV management plan for existing operational areas are able to seen on criteria 5.2.

**Status: Comply**

#### 7.4

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

The planting have been conducted since 1993, therefore, there was no new planting nor expansion after November 2005.

**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.**

The planting have been conducted since 1993, therefore, there was no new planting nor expansion after November 2005.

**Status: Comply**

#### 7.6

**Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for**

<b>any agreed land acquisitions and relinquishment of rights, subject to their free, prior and informed consent and negotiated agreements.</b>		
The planting have been conducted since 1993, therefore, there was no new planting nor expansion after November 2005.		
	<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>		
The planting have been conducted since 1993, therefore, there was no new planting nor expansion after November 2005.		
	<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>		
Based on documents review, interview and field visits, shown that certificates holders did not expand or develop any new operational area since January 2015 and there is no more land clearing activity since the last assessment (2018). GHG emission calculations for exisiting operational areas result are able to seen on Indicator 5.6		
	<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>		
Documents verifications its known if the certificate holder has ben develop and implement action plans that allow demonstrable continuous improvement in key operations, for example:		
<b>Internal Audit</b>		
The Certificate Holder has been routinely conducting the monitoring of operational activities through Operasional Internal Audit (OIA):		
<b>BMP Aspects</b>		
<ul style="list-style-type: none"> <li>- Application of EFB to improve soil fertility and soil structure in areas as recommended by the research department.</li> <li>- Use of EBS (Empty Bunch Spreader) to tranport and to apply EFB.</li> <li>- Use of kernel and fiber for Boiler energy.</li> <li>- Use of POME (land application) to improve soil fertility</li> <li>- Since 2016 the paraquat herbicide has no longer been used.</li> <li>- Conservation of soft fern(<i>Nephrolepis biserrata</i>) as land covers crops to maintain moisture and to reduce soil erosion and as complex of the natural enemies of insect pest.</li> <li>- Planting beneficial plants such as <i>Turnera subulata</i> and <i>Antijalan koleksi gonon leptosus</i> to prevent the infeststion of the leaf eating caterpillarthel leaf eating caterpillar.</li> <li>- Biological control of rat using predator, namely olw (<i>Tyto alba</i>) by installing Barn Owl Box (BOB) 1 unit per 10 - 40 ha.</li> <li>- Use of grabber in loading FFB into BIN container to be trnsported to POM.</li> </ul>		
<b>OHS and Employment Aspects:</b>		
<ul style="list-style-type: none"> <li>- Giving special marks to palm oil trunks that are close to electricity poles and the use of special harvesting equipment when harvesting these palm oil.</li> <li>- The company provides special buildings as a storage place for harvesting equipment and special transportation to bring harvesting equipment to the field.</li> <li>- The company has not used labor with casual daily workers status and has already promote all casual daily workers to become permanent workers of class 4A (PT4A).</li> </ul>		

**Environment aspect**

Company have performed the used of renewable energy and waste reduction such shell and fiber to reduce fossil fuel usage on Nagasaki mill. Company also conducted GHG calculations and maintained the HCV areas as a part of emission reducing plan.

**RSPO Internal Audit**

The company carried out the RSPO internal audit held on August 6-11 2018 with an internal team of auditors from the Sustainability Policy and Compliance Division. As a follow up to the results of the internal audit, the management unit carried out a management review meeting on September 8, 2018 at the Regional Controller Office.

	<b>Status: Comply</b>	
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**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	<p>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.</p> <p>The Mill was legally under management of PT Buana Wiralestari Mas. The main products were CPO and PK.</p> <p>The CSPK was processed in Rama Rama KCP, whereas the CSPO was delivered to Dumai Bulking by PT Satrindo Jaya Agropalma subsidiary of Golden Agri Resources (RSPO membership), as a CPO transportation services company. This company has had legal ownership and official agreement with PT Buana Wiralestari Mas.</p>
	<b>Status: Comply</b>
5.1.2	<p>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.</p> <p>The Mill was FFB processing mill and produced CPO and PK. The sources of material input was FFB's from the certified and uncertified area from own estates, as well as third party. The Mill did not purchased any CPO/ PK from others suppliers, therefore Mill not include as trader/distributor.</p> <p>The Mill was Certified with Certificate Number No MUTU- RSPO/012 and and also has been registered with member ID RSPO IT Platform member registration number <b>Member id : RSPO_PO1000001061 and License id : CB33598</b></p>
	<b>Status: Comply</b>
5.1.3	<p>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.</p> <p>The parent company of PT Buana Wiralestari Mas was Golden Agri Resources Ltd, member of the RSPO since 31 March 2011 with registration number 1-0096-11-000-00</p> <p>The Mill was Certified with Certificate Number No MUTU- RSPO/012 and and also has been registered with member ID RSPO IT Platform member registration number <b>Member id : RSPO_PO1000001061 and License id : CB33598</b></p>
	<b>Status: Comply</b>
5.1.4	<p>Processing aids do not need to be included within an organization's scope of certification.</p> <p>The Mill did not have any processing aids at site.</p>
	<b>Status: Comply</b>
<b>5.2</b>	<b>Supply chain model</b>
5.2.1	<p>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 -&gt; Segregated -&gt; Mass Balance.</p>

The Mill was certified palm oil mill which implement Identity Preserved using Module D-CPO Mill for its supply chain models.	
The results of the document review and field visit were found outside the Land Rights Right of 313.18 Ha. Based on field observation and interview with management as well as documents verifications its known if the all FFB from blocks whereas separated as certified and uncertified area claimed as non certified FFB. The unit of certifications has been develop the system which automatically turns those blocks into uncertified FFB products and the entire FFB sent to Kijang Mill	
	<b>Status: Comply</b>
<b>5.2.2</b>	
The site can use one (1) or a combination of supply chain models as audited and certified by the CB.	
The Mill was certified palm oil mill which implement one module only, that was Identity Preserved using Module D-CPO Mill.	
	<b>Status: Comply</b>
<b>5.3</b>	<b>Documented procedures</b>
<b>5.3.1</b>	
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.	
<p>Procedure of identity preserve system presented in document of BWL-NSAM-SCCS/SOP/01 revision 3 dated 15 August 2018. This procedure has covers identification and traceability of RSPO certified, as well as responsible person in charge based on identity preserved (certified source). This procedures also mentioned that security, weight bridge clerk, grader, dispatch/kernel officer, production clerk, and etc as critical control point PIC. And this procedures also stated that quarter report calculation was conducted to monitored certified product sales therefore not exceeded claim volume by CB.</p> <p>Based on field observation, acquired information that PIC for SSCS implementation (for examples weight bridge operators, security, and Head of Administration) that training and refreshment (awareness) of supply chain management system were carried out annually. FFB from certified areas were received on weigh bridge with 60 mt capacity. Software program of weighbridge has been used by operator to classified and separate RSPO certified and to reject non-certified source.</p>	
	<b>Status: Comply</b>
<b>5.3.2</b>	
The site shall have a written procedure to conduct annual internal audit	
<p>The Mill has had Procedure of Internal Audit No. F/SMART/UMUM/SADV/009 that has refers to SCCS system and standart of 2014, revised June 2017. The specific statement within the procedure as follow:</p> <ul style="list-style-type: none"> <li>• Objective: Ensuring the process of SPO internal audit in order to acknowledge effectiveness and compliances with applicable certification system requirements.</li> <li>• Internal Audit Program: an internal audit conducting annually (once a year) and possible to perform additional audit in within.</li> <li>• Internal audit has conducted annually. Every findings were discussed into management review meeting. Corrective action is taken if necessary.</li> </ul> <p>Based on RSPO SSCS Internal Audit report of 2019 shown that there is no non-conformity identified related to supply chain management system.</p>	
	<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	
The Mill did not buy any RSPO certified products (CSPO and SCPK) from outsource or traders. All data such as name, address,	

date of transaction, date of issued claim, transport documentation were match without any noncompliance.	
	<b>Status: Comply</b>
<b>5.4.2</b>	
<b>The site shall have a mechanism in place for handling non-conforming oil palm products and/or documents</b>	
<p>The Mill has had Mechanism of Handling of RSPO Certified and Con-Certified Products No. SOP/SMART/CERS-EHSD/SADV/II/003 dated 1 July 2014. The procedure has covers identification and traceability of RSPO certified and non-certified products, as well as responsible person in charge.</p> <p>Based on field observationl, acquired information that PIC for SSCS implementation (for examples weight bridge operators, security, and Head of Administration) that training and refreshment (awareness) of supply chain management system were carried out annually. FFB from certified areas were received on weigh bridge. Software program of weighbridge has been used by operator to classified and separate RSPO certified and reject non-certified source.</p>	
	<b>Status: Comply</b>
<b>5.5</b>	<b>Outsourcing activities</b>
<b>5.5.1</b>	
<p>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.</p>	
<p>The Mill has had SOP of Contractor Handling No. SOP/SMART/UMUM/SADV/II/006 dated 1 July 2014. This procedure was applicable to all outsource/contractors activities to look carefully at sustainability aspects in their operation. CH has mechanism to control and ensure that all contractors complies with the SCCS requirement through internal audit activity that covers scope of contractors. This can be seen from the internal audit report.</p> <p>The CSPK was processed in Rama Rama KCP, whereas the CSPO was delivered to Dumai Bulking by PT Satrindo Jaya Agropalma subsidiary of Golden Agri Resources (RSPO membership), as a CPO transportation services company. This company has had legal ownership and official agreement with PT Buana Wiralestari Mas.</p>	
	<b>Status: Comply</b>
<b>5.5.2</b>	
<p>Sites which include outsourcing within the scope of their RSPO Supply Chain certificate shall ensure the following:</p> <ol style="list-style-type: none"> <li>The site has legal ownership of all input material to be included in outsourced processes;</li> <li>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>The site has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</li> <li>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> </ol>	
<p>The CSPK was processed in Rama Rama KCP, whereas the CSPO was delivered to Dumai Bulking by PT Satrindo Jaya Agropalma subsidiary of Golden Agri Resources (RSPO membership), as a CPO transportation services company. This company has had legal ownership and official agreement with PT Buana Wiralestari Mas for PK transport (No 003/BWL/NSAM/01/2017-PK dated 2 January 2017, valid thru 31 December 2019) and for CPO transport (No 002/BWL/NSAM/01/2017-CPO dated 2 January 2017, valid thru 31 December 2019).</p> <p>Regarding RSPO and SCCS requirements, PT Satrindo Jaya Agropalma as FFB, CPO and PK transporter shown commitment and listed on Statement Letter dated 09 August 2018, stated that PT Satrindo Jaya Agropalma as transporter will provide access</p>	



to CB to their respective operations, systems, and etc.	
	<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 CSPK was processed in Rama Rama KCP, whereas the CSPO was delivered to Dumai Bulking by PT Satrindo Jaya Agropalma subsidiary of Golden Agri Resources (RSPO membership), as a CPO transportation services company. This company has had legal ownership and official agreement with PT Buana Wiralestari Mas for PK transport (No 003/BWL/NSAM/01/2017-PK dated 2 January 2017, valid thru 31 December 2019) and for CPO transport (No 002/BWL/NSAM/01/2017-CPO dated 2 January 2017, valid thru 31 December 2019). Records of name and contact details of outsource and contractor are well maintained.	
	<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	
The contractor of this ASA 1.3 is the same as ASA 1.2, that is PT Satrindo Jaya Agropalma. There is no additional contractor from the previous audit period.	
	<b>Status: Comply</b>
<b>5.6</b>	<b>Sales and goods out</b>
<b>5.6.1</b> 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	
The CSPO from the Mill were sold to Dumai Bulking, whereas CSPK were send to Rama Rama KCP. Supporting document shown were contract agreement, delivery order, delivery ticket, which inform delivery date, description of product and supply chain model, quantity, identification number, certificate number, sender's name and address of the seller.	
	<b>Status: Comply</b>
<b>5.7</b>	<b>Registration of transactions</b>
<b>5.7.1</b> Supply chain actors who: <ul style="list-style-type: none"> <li>are mills, traders, crushers and refineries; and</li> <li>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</li> </ul>	
The Mill was Certified with Certificate Number No MUTU- RSPO/012 and and also has been registered with member ID RSPO IT Platform member registration number Member id : RSPO_PO1000001061 and License id : CB33598	
	<b>Status: Comply</b>
<b>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> </ul>	

- 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.

All transaction has been announced to RSPO IT Platform and confirmed shipped. The Mill has conducted SCCS mechanism such as announcement in Palm Trace of RSPO CSPO and CSPK sold as certified and confirming the shipping announcement, as well as remove of certified stock for products sold as other scheme or as non certified/conventional. However there were CSPK sold as other scheme that had not been removed yet, due to the procedure stated that announcement or removed completely conducted before the license expiration date.

**Status: Comply**

## **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

The Mill shown several SCCS training programme of 2019 listed on SCCS Training Programme of 2019, for examples consists of SCCS refreshment for Mill's PIC. The Mill has been conducted SCCS refreshment training programme on 15 March 2019 for SCCS PIC.

**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

The Mill has been conducted SCCS refreshment training programme on 15 March 2019 for all workers involved in RSPO SCCS implementation.

Based on interviews with security, weighbridge officers and Managers, it is known that key persons in SCCS activities have understood the procedures and can demonstrate how to verify FFB, CPO, PK are certified and not certified.

**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

The Mill has had maintain accurate, complete and up-to-date for the FFB receives, process and CPO & PK production from its supply bases in Mass Balance Report.

**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

The Mill has had SOP of Record and Document Handling No. SOP/SMART/UMUM/SADV/II/001 dated 1 July 2014, stated that all records shall be kept within 10 (ten) years.

Based on document verification, the management unit can shown all recording data for previous two years. Such as contract document, FFB Consignment, CPO Ticket, etc.

**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.

The Mill did not purchased CPO or PK from any sources. The estimate volume of sustainable CPO and PK are recorded in the Annex of certificate.

Product	Last Year Estimate Production of 12 month (MT) 13 January 2019 – 12 January 2020	Actual Production of 12 months (MT) previous audit 01 October 2018 – 30 September 2019	Estimate Production of 12 month (MT) Next License 13 January 2020 – 12 January 2021
FFB	343,860	287,747.65	322,200
CSPO	72,210	58,642.18	67,700
CSPK	19,256	16,049.92	17,700

Note : \* estimate based on increasing approximately 7 % from previous 12 month Estate production (supply bases as stated in certificate only)

Certified and non-certified FFB received period of 01 October 2018 – 30 September 2019 (12 month).

Month	FFB (MT)		
	RSPO Certified	Non Certified	Total
October'18	31,436.30	-	31,436.30
November'18	27,345.66	-	27,345.66
December'18	24,892.24	-	24,892.24
January'19	26,693.86	-	26,693.86
February'19	21,335.92	-	21,335.92
March'19	22,152.06	-	22,152.06
April'19	17,398.52	-	17,398.52
May'19	19,725.46	-	19,725.46
June'19	22,250.08	-	22,250.08
July'19	26,270.84	-	26,270.84
August'19	24,591.29	-	24,591.29
September'19	23,655.41	-	23,655.41
<b>Total</b>	<b>287,747.65</b>	<b>-</b>	<b>287,747.65</b>

Furthermore, The Mill has record and balance of all RSPO CSPO and CSPK, non-certified products produced, as well as its dispatch on a monthly and three monthly basis, presented in the Table bellows:

**CPO production and Dispatch**

Period	All CPO Production (MT)	CSPO Dispatch (MT)			
	CSPO	RSPO	Other Scheme (ISCC, EPA RFS)	As Non Cert	Total CSPO Dispatch
<b>Total</b>	<b>58,642.18</b>	<b>7,452.32</b>	<b>50,449.02</b>	<b>-</b>	<b>57,901.34</b>

**PK production and dispatch**

Period	All PK Production (MT)	CSPK Dispatch (MT)			
	CSPK	RSPO	Other Scheme (ISCC)	As Non Cert	Total CSPK Dispatch
<b>Total</b>	<b>16,049.92</b>	<b>15,346.57</b>	<b>-</b>	<b>-</b>	<b>15,346.57</b>

**Status: Comply**

<b>5.10</b>	<b>Conversion factors</b>
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 ( <a href="http://www.rspo.org">www.rspo.org</a> ); 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
	The Mill only received and processed of FFB's as material input. This mill did not purchase CPO and/or PK from others. Therefore, this mill did not using conversion factors.
	<b>Status: Comply</b>
5.10.2	Conversion rates shall be periodically updated to ensure accuracy against actual performance or industry average if appropriate.
	The Mill only received and processed of FFB's as material input. This mill did not purchase CPO and/or PK from others. Therefore, this mill did not using conversion factors.
	<b>Status: Comply</b>
<b>5.11</b>	<b>Claims</b>
5.11.1	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.
	All certified product claims never using RSPO symbol or logos. A unique identification number, certificate number and supply chain model are available on relevant documents. Also, the CH using RSPO Palm Trace for communication, transaction, confirmation status and shipping announcement. The claim has been referred to RSPO Rules on Market Communications and Claims.
	<b>Status: Comply</b>
<b>5.12</b>	<b>Complaints</b>
5.12.1	The organization shall have in place and maintain documented procedures for collecting and resolving stakeholder complaints.
	Mechanism for handling non-conforming oil palm products and complaints are specific describes within SOP of Grievance and Complaint Handling No. SOP/SMART/SIGS-CSR/SADV/I/003 date 1 Juli 2014. This procedure is general applied to all complaints aspects, including complaints and non-conforming products from customer/buyer.
	<b>Status: Comply</b>
<b>5.13</b>	<b>Management review</b>
5.13.1	The organization is required to hold management reviews annually at planned intervals, appropriate to the scale and nature of the activities undertaken
	Management review was conducted on 24 September 2019 by SPO Region and PC Region. The content of Management Review including follow up internal and external audit finding, customer feedback, process performance and product suitability, and recommendation for improvement.
	<b>Status: Comply</b>
5.13.2	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> </ul>

- Status of preventive and corrective actions.
- Follow-up actions from management reviews.
- Changes that could affect the management system.
- Recommendations for improvement.

Result of Management Review report on 24 September 2019 the following information was discussed:

- ♦ Customer Feedback and Stakeholder Complaints: for 2018-2019, there are no complaints from stakeholder/Customer.
- ♦ Performance of Processing Activity and Conformity of Products: Production of Certified Product, Sales and Goods Out has been appropriate with estimation and supply chain requirements.
- ♦ Any changes of Management System influence: Updating for all sustainability procedures still on progress to be review by management.
- ♦ Internal Audit of Supply Chain and Follow-Up Actions: there is no non compliance found during internal audit
- ♦ External audit RSPO of 2018.
- ♦ Recommendations for Improvement

**Status: Comply**

**5.13.3**

The output from the management review shall include any decisions and actions related to:

- Improvement of the effectiveness of the management system and its processes.
- Resource needs.

Result of Management Review report on 24 September 2019 the following information was discussed:

- ♦ Customer Feedback and Stakeholder Complaints: for 2018-2019, there are no complaints from stakeholder/Customer.
- ♦ Performance of Processing Activity and Conformity of Products: Production of Certified Product, Sales and Goods Out has been appropriate with estimation and supply chain requirements.
- ♦ Any changes of Management System influence: Updating for all sustainability procedures still on progress to be review by management.
- ♦ Internal Audit of Supply Chain and Follow-Up Actions: there is no non compliance found during internal audit
- ♦ External audit RSPO of 2018.
- ♦ Recommendations for Improvement
- ♦ The

**Status: Comply**

**3.2.2. Module D – CPO Mills: Identity Preserved Requirements**

Clause	(Module D) CPO Mills – Identity Preserved Requirements																
D1	Definition																
D.1.1																	
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&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.																	
The Mill was used RSPO supply chain module of Identity Preserved because only received FFB from the estate which has been certified with RSPO.																	
The results of the document review and field visit were found outside the Land Rights Right of 313.18 Ha. Based on field observation and interview with management as well as ddocuments verifications its known if the all FFB from blocks whereas separated as certified and uncertified area claimed as non certified FFB. The unit of certifications has been develop the system which automatically turns those blocks into uncertified FFB products and the entire FFB sent to Kijang Mill																	
	Status: Comply																
D.2	Explanation																
D.2.1																	
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&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																	
Estimated certified product recorded in the certificate annex of last surveillance, and there was extension volume. Actual estimate can be seen in Palm Trace. Actual certified produced has been verified during this ASA 1.3 assessment , as well as the estimates of certified production for the next license period has been set by the Mill, describes in the following table:																	
	<table><tr><th>Product</th><th>Last Year Estimate Production of 12 month (MT) 13 January 2019 – 12 January 2020</th><th>Actual Production of 12 months (MT) previous audit 01 October 2018 – 30 September 2019</th><th>Estimate Production of 12 month (MT) Next License 13 January 2020 – 12 January 2021</th></tr><tr><td>FFB</td><td>343,860</td><td>287,747.65</td><td>322,200</td></tr><tr><td>CSPO</td><td>72,210</td><td>58,642.18</td><td>67,700</td></tr><tr><td>CSPK</td><td>19,256</td><td>16,049.92</td><td>17,700</td></tr></table>	Product	Last Year Estimate Production of 12 month (MT) 13 January 2019 – 12 January 2020	Actual Production of 12 months (MT) previous audit 01 October 2018 – 30 September 2019	Estimate Production of 12 month (MT) Next License 13 January 2020 – 12 January 2021	FFB	343,860	287,747.65	322,200	CSPO	72,210	58,642.18	67,700	CSPK	19,256	16,049.92	17,700
Product	Last Year Estimate Production of 12 month (MT) 13 January 2019 – 12 January 2020	Actual Production of 12 months (MT) previous audit 01 October 2018 – 30 September 2019	Estimate Production of 12 month (MT) Next License 13 January 2020 – 12 January 2021														
FFB	343,860	287,747.65	322,200														
CSPO	72,210	58,642.18	67,700														
CSPK	19,256	16,049.92	17,700														
	Status: Comply																
D.2.2																	
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).																	
The parent company of PT Buana Wiralestari Mas are Golden Agri Resources Ltd member of the RSPO since 31 March 2011 with registration number 1-0096-11-000-00																	
Naga Sakti mill are RSPO certified Mill with Certificate Number No MUTU- RSPO/012 and and also has been registered																	



with member ID RSPO IT Platform member registration number Member id : RSPO\_PO1000001061 and License id :CB33598.

All transaction has been announced to RSPO IT Platform and confirmed shipped. The Mill has conducted SCCS mechanism such as announcement in Palm Trace of RSPO CSPO and CSPK sold as certified and confirming the shipping announcement, as well as remove of certified stock for products sold as other scheme or as non certified/conventional. However there were CSPK sold as other scheme that had not been removed yet, due to the procedure stated that announcement or removed completely conducted before the license expiration date.

	<b>Status: Comply</b>
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<b>D.3</b>	<b>Documented procedures</b>
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**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**

- Complete and up to date procedures covering the implementation of all the elements in these requirements;**
- 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 Mill has had SOP for the implementation of supply chain in the identification procedure and Traceability (No. BWL-NSAM-SCCS/SOP/01 revision 3 dated 15 August 2018). SOP describes the procedure to guarantee the products produced by the mill can be traced to its source and certainly comes from certified sources. The procedure also explains the related officers and the responsibility in the implementation of the requirements.

The results of interviews with Head of Administration and weighbridge operator showed that workers have already known the duties and responsibilities of each in the implementation of SCCS.

	<b>Status: Comply</b>
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**D.3.2**  
**The site shall have documented procedures for receiving and processing certified FFBs**

The Mill has had SOP for the implementation of supply chain in the identification procedure and Traceability (No. BWL-NSAM-SCCS/SOP/01 revision 3 dated 15 August 2018). SOP describes the procedure to guarantee the products produced by the mill can be traced to its source and certainly comes from certified sources. To find the source of FFB comes from the estate that has been certified with RSPO and then it's labeled on the Delivery Note and the unique code of each supply base.

During the verification in Mill, weighbridge operator has checked FFB document to ensuring FFB delivered from certified supply bases. All FFBs received from certified estate, which was all weighbridge slip marked "certified product". "Certified product" or "certified supply base" code has been online authorized in SAP "System Analysis and Programmed".

	<b>Status: Comply</b>
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<b>D.4</b>	<b>Purchasing and goods in</b>
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**D.4.1**  
**The site shall verify and document the tonnage and sources of certified FFBs received.**

Certified and non-certified FFB received period of 12 months :

Month	FFB		
	RSPO Certified	Non Certified	Total
October'18	31,436.30	-	31,436.30
November'18	27,345.66	-	27,345.66
December'18	24,892.24	-	24,892.24

January'19	26,693.86	-	26,693.86
February'19	21,335.92	-	21,335.92
March'19	22,152.06	-	22,152.06
April'19	17,398.52	-	17,398.52
May'19	19,725.46	-	19,725.46
June'19	22,250.08	-	22,250.08
July'19	26,270.84	-	26,270.84
August'19	24,591.29	-	24,591.29
September'19	23,655.41	-	23,655.41
<b>Total</b>	<b>287,747.65</b>	<b>-</b>	<b>287,747.65</b>

**Status: Comply**

#### D.4.2

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

The Mill has had SOP for the implementation of supply chain in the identification procedure and Traceability. This procedure states that in case there is projected overproduction of certified product, then company should inform the Certification Body. The actual production of 12 months before audit did not exceed the license as follows :

Product	Last Year Estimate Production of 12 month (MT) 13 January 2019 – 12 January 2020	Actual Production of 12 months (MT) previous audit 01 October 2018 – 30 September 2019
FFB	343,860	287,747.65
CSPPO	72,210	58,642.18
CSPK	19,256	16,049.92

**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 Mill has record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified product (CPO and PK) on a real time basis as describe on table below.

Certified and non-certified FFB received period of 01 October 2018 – 30 September 2019 (12 month).

Month	FFB		
	RSPO Certified	Non Certified	Total
October'18	31,436.30	-	31,436.30
November'18	27,345.66	-	27,345.66
December'18	24,892.24	-	24,892.24
January'19	26,693.86	-	26,693.86
February'19	21,335.92	-	21,335.92
March'19	22,152.06	-	22,152.06
April'19	17,398.52	-	17,398.52
May'19	19,725.46	-	19,725.46
June'19	22,250.08	-	22,250.08
July'19	26,270.84	-	26,270.84
August'19	24,591.29	-	24,591.29
September'19	23,655.41	-	23,655.41
<b>Total</b>	<b>287,747.65</b>	<b>-</b>	<b>287,747.65</b>

Furthermore, The Mill has record and balance of all RSPO CSPO and CSPK, non-certified products produced, as well as its dispatch on a monthly and three monthly basis, presented in the Table belows:

**CPO production and Dispatch**

Period	All CPO Production (MT)	CSPO Dispatch (MT)			
	CSPO	RSPO	Other Scheme (ISCC, EPA RFS)	As Non Cert	Total CSPO Dispatch
<b>Total</b>	<b>58,642.18</b>	<b>7,452.32</b>	<b>50,449.02</b>	<b>-</b>	<b>57,901.34</b>

**PK production and dispatch**

Period	All PK Production (MT)	CSPK Dispatch (MT)			
	CSPK	RSPO	Other Scheme (ISCC)	As Non Cert	Total CSPK Dispatch
<b>Total</b>	<b>16,049.92</b>	<b>15,346.57</b>	<b>-</b>	<b>-</b>	<b>15,346.57</b>

**Status: Comply**

**D.6 Processing**
**D.6.1**

**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.**

The Mill has had SOP for the implementation of supply chain in the identification procedure and Traceability. The SOP, document review, and field observation shown there was no uncertified FFB process by Mill, as well as separated during transportation.

**Status: Comply**

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

<b>1.</b>	<b>Evidence of permission or approval certificate and Trademark from Certification Body which submitted by Client</b>	<b>X or√</b>
<b>ASA 1.3</b>	The company does not use RSPO trademarks	√
<b>2.</b>	<b>Implementation of certificate and Trademark used by Client comply with size and type (shape) against Guideline of Trademark Use</b>	<b>X or√</b>
<b>ASA 1.3</b>	The company does not use RSPO trademarks	√
<b>3.</b>	<b>Implementation of Certificate and Trademark is not used on product</b>	<b>X or√</b>
<b>ASA 1.3</b>	The company does not use RSPO trademarks	√
<b>4.</b>	<b>Controlling of Certificate and Trademark, including withdrawing inappropriate Trademark.</b>	<b>X or√</b>
<b>ASA 1.3</b>	The company does not use RSPO trademarks	√

### 3.4 Summary of RSPO Partial Certification.

Compliance of the uncertified management units of Golden Agri Resources, Ltd 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

Golden Agri Resources, Ltd Time Bound Plan (TBP) is explained in table 1.10. Golden Agri Resources run forty two (42) mills and one hundred thirty six (136) estates (own and smallholders) in Indonesia and has achieved RSPO certified for twenty eight (28) mills and supply base in Indonesia. Golden Agri Resources, Ltd has informed the TBP progress, MUTU has considered that Golden Agri Resources, Ltd is comply with the RSPO requirement for TBP. The Time Bound Plan was revised and declared by Golden Agri Resources, Ltd on January, 2019 approved by President Director and MO Sustainability Strategic & Stakeholders Engagement.

MUTU has verified partial certification for un-certified unit's subsidiary of Golden Agri Resources, Ltd based on their Time Bound Plan. There are sixteen (16) uncertified management unit of GAR. 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 is no significant land conflicts which have not been declared above
- The company has follow RSPO requirement related to New Planting Procedure and Remediation and Compensation Procedure.
- There is no labor 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

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
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:</p> <ul style="list-style-type: none"> <li>- PT Sinar Kencana Inti Perkasa (Sungai Kupang Mill and supply base)</li> <li>- PT Sinar Kencana Inti Perkasa (Kasuari Mill and supply base)</li> <li>- PT Agrolestari Mandiri (Pekawai Mill and supply base)</li> <li>- PT Binasawit Abadi Pratama (Perdana Mill and supply base)</li> <li>- PT Agrokarya Prima Lestari (Kuayan Mill and supply base), monitoring via SPO Scorecard online.</li> <li>- PT Mitra Karya Agroindo (Tangar Mill and supply base), monitoring via SPO Scorecard online.</li> <li>- PT Paramitra Internusa Pratama (Belian Mill and supply base)</li> <li>- PT Sawit Mas Sejahtera (Sungai Kikim and supply base), monitoring via SPO Scorecard online.</li> </ul>

		<ul style="list-style-type: none"> <li>- PT Sinar Kencana Inti Perkasa (Sungai Magalau Mill and supply base)</li> <li>- PT Agro Lestari Sentosa (Jalemo Mill and supply base), monitoring via SPO Scorecard online</li> <li>- PT Adi Tunggal Mahajaya (Sako Mill) (under construction)</li> <li>- PT Kresna Duta Agroindo (Pelakar Mill and supply base)</li> <li>- PT SMART (Bukit Kapur Mill and supply base)</li> <li>- PT Kresna Duta Agroindo (Rantau Panjang Mill and supply base)</li> <li>- PT Kresna Duta Agroindo (Gunung Kombeng Mill and supply base)</li> <li>- PT Sawitakarya Manunggal (Sawita Mill and supply base)</li> </ul>
i.	<p>No replacement after dates defined in NIs Criterion 7.3 of:</p> <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> GAR and its subsidiaries have been reporting disclosure and zero liability to RSPO by email dated August 29, 2014 and the company has been sent data evidence of LUCA to RSPO by email dated April 11, 2016. Progress result of review LUCA at follow-up via email RSPO dated October 24, 2016 and RSPO answer related LUCA are still in the review process. On April 30 2018, GAR has sent LUCA revision to RSPO. And the latest response for RSPO was on January 8 2019, stated that LUCA are still on progress review.</p> <p><b>Auditor Verification:</b> RaCP Process for:</p> <ul style="list-style-type: none"> <li>- PT Agrolestari Mandiri (Pekawai Mill and supply base)</li> <li>- PT Sinar Kencana Inti Perkasa (Sungai Kupang Mill and supply base)</li> <li>- PT Sinar Kencana Inti Perkasa (Sungai Magalau Mill and supply base)</li> <li>- PT Agro Lestari Sentosa (Jalemo Mill and supply base)</li> <li>- PT Kresna Duta Agroindo (Pelakar Mill and supply base)</li> <li>- PT SMART (Bukit Kapur Mill and supply base)</li> <li>- PT Kresna Duta Agroindo (Rantau Panjang Mill and supply base)</li> </ul> <p>PT Satya Kisma Usaha (Sungai Bengkal Mill and supply base)</p>
ii.	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> There is no new planting.</p> <p><b>Auditor Verification:</b> Based on auditor verification there are some new planting conducted by company, but NPP has been applied these.</p>



		<ul style="list-style-type: none"> <li>- PT Binasawit Abadi Pratama (Perdana Mill and supply base)</li> <li>- PT Agrokarya Prima Lestari (Kuayan Mill and supply base)</li> <li>- PT Mitra Karya Agroindo (Tangar Mill and supply base)</li> <li>- PT Paramitra Internusa Pratama (Belian Mill and supply base)</li> <li>- PT Agrolestari Mandiri (Pekawai Mill and supply base)</li> <li>- PT Kresna Duta Agroindo (Rantau Panjang Mill and supply base) any new planting since January 1<sup>st</sup> 2010 and NPP has been applied these.</li> </ul>
iii.	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> There are no land conflicts. The Company has a land conflict resolution mechanism in accordance with the RSPO criteria 6.4; 7.5; and 7.6. This procedure is outlined in the SOP Social Conflict Management (SOP/SMART/SENS-CSR/SADV/I/02). This procedure regulates social conflict settlement agreed. Conflict resolution can be done in a participatory manner and can also be done by a third party (mediator). The company also has procedures to deal with complaints before they become conflicts. The procedure is SOP/SMART/SIGS-CSR/SADV/I/003. The company handling complaints appropriately and quickly. GAR has been initiated to become a member of RSPO DSF as a category "out growers".</p> <p><b>Auditor Verification:</b> Auditor has verified the supporting evidence of above the company statement. There are no land conflicts for</p> <ul style="list-style-type: none"> <li>- PT Sinar Kencana Inti Perkasa (Sungai Kupang Mill and supply base)</li> <li>- PT Mitra Karya Agroindo (Tangar Mill and supply base)</li> <li>- PT Kresna Duta Agroindo (Pelakar Mill and supply base)</li> <li>- PT SMART (Bukit Kapur Mill and supply base)</li> </ul> <p>There are any land conflicts but was in the process of completion for</p> <ul style="list-style-type: none"> <li>- PT Agrolestari Mandiri (Pekawai Mill and supply base)</li> <li>- PT Sinar Kencana Inti Perkasa (Sungai Magalau Mill and supply base)</li> <li>- PT Sawit Mas Sejahtera (Sungai Kikim and supply base)</li> <li>- PT Agro Lestari Sentosa (Jalemo Mill and supply base)</li> <li>- PT Kresna Duta Agroindo (Rantau Panjang Mill and supply base)</li> <li>- PT Kresna Duta Agroindo (Gunung Kombeng Mill and supply base)</li> </ul>

iv.	Any Labour disputes are being resolved through a mutually agreed process, in accordance with RSPO criterion 6.3.	<p><b>Company Group/Holding Statement:</b> There is no issue of labour disputes in uncertified unit. The company also has procedures to deal with complaints workers before they become conflicts. The procedure is SOP/SMART/SIGS-CSR/SADV/II/003.</p> <p>Procedures related employee issues is arranged in the form of internal grooves for employees included in the category of internal stakeholders. Media that is used to deliver complaint is a formal letter submitted by unions or incorporated into a suggestion box which is provided in a convenient location.</p> <p><b>Auditor Verification:</b> There is complaint case related to labor sipute (<a href="https://askrspo.force.com/Complaint/s/casetracker">https://askrspo.force.com/Complaint/s/casetracker</a>) In uncertified unit (PT Agro Lestari Mandiri), that in a positive progress to the resolution with mediation via the Dispute Settlement Facility.</p>
v.	Any Legal non-compliance is being resolved in accordance with the legal requirements, with reference to RSPO criteria 2.1 and 2.2.	<p><b>Company Group/Holding Statement:</b> Companies comply with the regulations in accordance with the requirements of the RSPO 2.1 and 2.2 where there is no violation of the rules that are relevant to the plantation. The company has a mechanism to evaluate compliance with regulations, namely SOP/SMART/UMUM/SADV/II/002. In SOP describes procedures for compliance, completeness and groove sections which explain in detail to evaluate compliance with the legislation.</p> <p><b>Auditor Verification:</b> Land legal process is still going on and there is a detail update progress documented by the company for each year.</p> <ul style="list-style-type: none"> <li>- PT Paramitra Internusa Pratama (Belian Mill and supply base), still in the process of Committee B and the company has got plantation business permit (IUP)</li> <li>- PT Sinar Kencana Inti Perkasa (Kasuari Mill and supply base), there is a legal non-compliance.</li> <li>- PT Agro Lestari Sentosa (Jalemo Mill and supply base) and PT Adi Tunggal Mahajaya (Sako Mill) doesn't have Land Use Title (HGU).</li> <li>- PT Kresna Duta Agroindo (Pelakar Mill and supply base), there is a difference the concession area between Land Use Title (HGU) and Plantation Business Permit (IUP) and Permits Location.</li> <li>- PT SMART (Bukit Kapur Mill and supply base, doesn't have land use title (HGU), the HGU is still on process.</li> <li>- PT Sawitakarya Manunggal there is an area is still in process for HGU (Committee B meeting).</li> </ul>

	<ul style="list-style-type: none"> <li>- PT Djuanda Sawit Lestari is an area is still in process for HGU Muara Kandis Estate (574.58 Ha)</li> <li>- PT Ivomas Tunggal there is an area is still in process for HGU Samsam Estate (29.09 Ha), Kandista Estate (158.46 Ha), Nenggala Estate (419.9 Ha), Sei Rokan Estate (102.7 Ha), Ujung Tanjung Estate (557.3 Ha)</li> <li>- PT Buana Wiralestari Mas there is an area is still in process for HGU Naga Mas Estate (253.39 Ha), Naga Sakti Estate (59.79 Ha), Kijang Mas Estate (56.07 Ha)</li> <li>- PT Ramajaya Pramukti there is an area is still in process for HGU Rama Rama Estate (318.76 Ha)</li> <li>- PT Sumber Indah Perkasa. there is an area covered 241.54 ha (Sungai Merah estate), 73.71 ha (Sungai Buaya estate), and 26.18 ha (Sungai Buaya estate) are still on HGU process.</li> </ul> <p>Suspicion of bribery allegedly committed by employees of PT Binasawit Abadi Pratama (BAP). Management unit gave response to CB through email on 9 November 2018 that stated PT BAP will cooperate fully with the KPK investigation.</p>
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**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**

<i>NCR No.</i>	:		<i>Issued by</i>	:	
<i>Date Issued</i>	:		<i>Time Limit</i>	:	
<i>NC Grade</i>	:		<i>Date of Closing</i>	:	
<i>Standard Ref. &amp; Requirement</i>	:				
<b>Evidence observed</b> (filled by auditor): During Annual Surveillance Assessment 1.2, Non-Conformities against P&C Standard and Requirement of Supply Chain is absence.					
<b>Non-Conformance Description</b> (filled by auditor):					
<b>Root Cause Analysis</b> (filled by organization audited): -					
<b>Correction</b> (filled by organization audited): -					
<b>Corrective Action</b> (filled by organization audited): -					
<b>Assessor Evaluation and Conclusion</b> (filled by auditor): -					
<i>Verified by</i>	:				

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

<i>NCR No.</i>	:		<i>Issued by</i>	:	
<i>Date Issued</i>	:		<i>Time Limit</i>	:	
<i>NC Grade</i>	:		<i>Date of Closing</i>	:	
<i>Standard Ref. &amp; Requirement</i>	:				
<b>Evidence observed</b> (filled by auditor): During Annual Surveillance Assessment 1.3, Non-Conformities against P&C Standard and Requirement of Supply Chain is absence.					
<b>Non-Conformance Description</b> (filled by auditor):					
<b>Root Cause Analysis</b> (filled by organization audited): -					
<b>Correction</b> (filled by organization audited): -					
<b>Corrective Action</b> (filled by organization audited): -					
<b>Assessor Evaluation and Conclusion</b> (filled by auditor): -					
<i>Verified by</i>	:				

**3.5.3. Opportunity for Improvement**

No	Ref. Std.	Description
1	2.1.2	<p><b>Evaluation of Compliance</b></p> <p>The CH has an evaluation document for compliance with regulations and other requirements, which describe compliance with applicable regulations in Indonesia related to palm oil management.</p> <p>Based on the results of the evaluation the CH needs to review the obligations of the provisions in force in the regulation, for example the OHS Chemical Officer / Chemical of OHS Expert as regulated by Labor Minister Regulation No. 187 of 1999 Concerning Control of Hazardous Chemicals in the Workplace.</p>

**3.5.4. Noteworthy Positive Components**

No	Description
1	The company has commitment in applying the principles of sustainable palm oil management.
2	The company has undertaken the development of plasma plantations to improve the people's welfare.
3	Good teamwork and documents presentation



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

Public Issues	Auditor Verification
<p><b>Land Office of Kampar Regency</b></p> <p>There was a dispute over the community of Group 257, Beringin Lestari Village, Tapung Hilir Sub District, to PT Ramajaya Pramukti related to the demand for the development of plasma/smallholders plantation. This was mediated by the Regional Secretariat of Kampar Regency on 10 October 2018, with the results of an investigation that the company had completed the obligation to develop smallholdings at the time of opening the plantation, and stated that the Group 257 people were not transmigrants, so they were not included in the company's PIR Trans (plasma development to transmigrants) program.</p> <p>There are no other negative issues besides the two problems above.</p>	<p>A mediation document review has been carried out with the mediation between the Regional Secretariat of Kampar Regency and related agencies on 10 October 2018, as well as consultations with the Tapung Hilir Sub-District Head, with the conclusion that the Group 257 people are not transmigrants, so they are not included in the company's PIR Trans (plasma development to transmigrants) program. The company has fulfilled the development of plasma plantations in accordance with SK CPCL (decree of prospective smallholders) from the Regent.</p> <p>The Auditor Team specifically verified the stakeholders, related to information obtained from the internet regarding the issue of the community dispute of Group 257 in PT Ramajaya Pramukti and / or PT Buana Wiralestari Mas. Based on document verification and interviews with Tapung Hilir Sub-District Head and former Village Head of the Beringin Lestari, it was found that the area of the Beringin Lestari Village is in the operational area of the Ramabakti Estate - PT Ramajaya Pramukti, and those issue under scope certification of Libo Mill, PT Ivomas Tunggal. However, this is a note for auditors related to the process that has been carried out by the company, considering that PT RJP, PT BWL and PT Ivomas Tungga are GAR subsidiaries that have the same operating system and procedure.</p>
<p><b>Plantation Agency of Kampar Regency</b></p> <p>There was a dispute over the community of Group 257, Beringin Lestari Village, Tapung Hilir Sub District, to PT Ramajaya Pramukti related to the demand for the development of plasma/smallholders plantation. This was mediated by the Regional Secretariat of Kampar Regency on 10 October 2018, with the results of an investigation that the company had completed the obligation to develop smallholdings at the time of opening the plantation, and stated that the Group 257 people were not transmigrants, so they were not included in the company's PIR Trans (plasma development to transmigrants) program.</p> <p>Companies are advised to pay attention to the community of Group 257 as with CSR empowering programs.</p> <p>There are no other negative issues besides the two problems above.</p>	<p>A mediation document review has been carried out with the mediation between the Regional Secretariat of Kampar Regency and related agencies on 10 October 2018, as well as consultations with the Tapung Hilir Sub-District Head, with the conclusion that the Group 257 people are not transmigrants, so they are not included in the company's PIR Trans (plasma development to transmigrants) program. The company has fulfilled the development of plasma plantations in accordance with SK CPCL (decree of prospective smallholders) from the Regent.</p> <p>The Auditor Team specifically verified the stakeholders, related to information obtained from the internet regarding the issue of the community dispute of Group 257 in PT Ramajaya Pramukti and / or PT Buana Wiralestari Mas. Based on document verification and interviews with Tapung Hilir Sub-District Head and former Village Head of the Beringin Lestari, it was found that the area of the Beringin Lestari Village is in the operational</p>

Public Issues	Auditor Verification
	area of the Ramabakti Estate - PT Ramajaya Pramukti, and those issue under scope certification of Libo Mill, PT Ivomas Tunggal. However, this is a note for auditors related to the process that has been carried out by the company, considering that PT RJP, PT BWL and PT Ivomas Tungga are GAR subsidiaries that have the same operating system and procedure.
<b>Envonmental Agency of Kampar regency</b>  The company has environmental permit documents such as EIA and Environmental Management/Monitoring Plan. Other environmental permits held are still valid today such as Hazardous Waste Temporary Warehouse Permit and Land Application Permit (LA). The company has routinely reported mandatory reports in accordance with their respective periods such as the Environmental Management/Monitoring Plan Report, Hazardous Waste Management Report, and Liquid Waste Management Report. There are no other negative issues.	The company has documents related to environmental permits required by the government, this is further explained in criteria 5.1, 5.3. There were no issues or events related to environmental pollution that occurred in the company's area.
<b>Labour Agency of Kampar Regency</b>  The Mandatory Report on Manpower Reporting is done online and manually by the company due to difficult internet access so the agency recommends that it be done online and manually. The agency carries out routine guidance (3-6 months) to companies related to employment by providing socialization to workers. The company has a wage structure and scale for all workers.	The company has implemented regulations on minimum wages, overtime payment and has a Collective Labor Agreement in accordance with government regulations, this is further explained in the indicators 6.5.1 and 6.5.2
<b>Safety and Labour Inspector of Riau Province</b>  During the past year there were no issues related to human rights violations, sexual harassment, child labor and discrimination that occurred in the operational scope of the company. There are no other negative issues.	Based on the results of document studies and interviews with workers in the field it is known that so far there have been no issues related to child labor, sexual harassment, human rights violations and acts of discrimination that occur in the company activities.
<b>Public figure (ex-Village Head) of Beringin Lestari Village</b>  Related to the community dispute of Group 257, Beringin Lestari Village, Tapung Hilir Sub District, to PT Ramajaya Pramukti about the demand for the development of plasma plantations. Has been mediated by the relevant agencies, with the result that the company has completed the obligation to develop plasma plantations at the time of opening the plantation, and stated that the Group 257 people are not transmigration residents, so they are not included in the company's PIR Trans. The Group 257	A mediation document review has been carried out with the mediation between the Regional Secretariat of Kampar Regency and related agencies on 10 October 2018, as well as consultations with the Tapung Hilir Sub-District Head, with the conclusion that the Group 257 people are not transmigrants, so they are not included in the company's PIR Trans (plasma development to transmigrants) program. The company has fulfilled the development of plasma plantations in accordance with SK CPCL (decree of prospective smallholders) from the


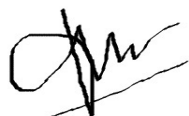
Public Issues	Auditor Verification
<p>people are migrants from the surrounding area but not the transmigration community.</p> <p>There are no other negative issues.</p>	<p>Regent.</p> <p>The Auditor Team specifically verified the stakeholders, related to information obtained from the internet regarding the issue of the community dispute of Group 257 in PT Ramajaya Pramukti and / or PT Buana Wiralestari Mas. Based on document verification and interviews with Tapung Hilir Sub-District Head and former Village Head of the Beringin Lestari, it was found that the area of the Beringin Lestari Village is in the operational area of the Ramabakti Estate - PT Ramajaya Pramukti. However, this is a note for auditors related to the process that has been carried out by the company, considering that PT RJP and PT BWL are Sinarmas Group subsidiaries that have the same operating system and procedure.</p>
<p><b>Tapung Hilir Sub District Head</b></p> <p>Related to the community dispute of Group 257, Beringin Lestari Village, Tapung Hilir Sub District, to PT Ramajaya Pramukti about the demand for the development of plasma plantations. Has been mediated by the relevant agencies, with the result that the company has completed the obligation to develop plasma plantations at the time of opening the plantation, and stated that the Group 257 people are not transmigration residents, so they are not included in the company's PIR Trans. The Group 257 people are migrants from the surrounding area but not the transmigration community.</p> <p>Voice recordings from the mediation have been played to the people of Beringin Lestari Village in the Village Hall, so that the community can understand and not cause confusion of information.</p> <p>There are no other negative issues.</p>	<p>A mediation document review has been carried out with the mediation between the Regional Secretariat of Kampar Regency and related agencies on 10 October 2018, as well as consultations with the Tapung Hilir Sub-District Head, with the conclusion that the Group 257 people are not transmigrants, so they are not included in the company's PIR Trans (plasma development to transmigrants) program. The company has fulfilled the development of plasma plantations in accordance with SK CPCL (decree of prospective smallholders) from the Regent.</p> <p>The Auditor Team specifically verified the stakeholders, related to information obtained from the internet regarding the issue of the community dispute of Group 257 in PT Ramajaya Pramukti and / or PT Buana Wiralestari Mas. Based on document verification and interviews with Tapung Hilir Sub-District Head and former Village Head of the Beringin Lestari, it was found that the area of the Beringin Lestari Village is in the operational area of the Ramabakti Estate - PT Ramajaya Pramukti. However, this is a note for auditors related to the process that has been carried out by the company, considering that PT RJP and PT BWL are Sinarmas Group subsidiaries that have the same operating system and procedure.</p>
<p><b>Official of Gerbang Sari Village</b></p> <p>There is no negative issues in aspects of land tenure, social, employment, and environmental. The land compensation process has been carried out by involving various parties in FPIC manner.</p> <p>The CH has made efforts to develop the surrounding community through CSR programs in participatory</p>	<p>There was no negative issue that need further verification. Based on document review and field observations, there was no disputes related land legality, environmental, and social. As well as has shown land compensation documentary evidence carried out referring to the concept of FPIC. Described in detail in criteria 2.2; 2.3 6.4.</p>

Public Issues	Auditor Verification
manner, the usage of local labor and local contractor, as well as developed smallholders.	
<b>Village Official of Tandan Sari</b>  Tandan Sari villager has good relationship with company. Company has provides a lot of development for local community by scheme smallholder development, regular CSR programme, and local workers recruitment. There is no negative issues in aspects of land tenure, social, employment, and environmental. The land compensation process has been carried out by involving various parties in PADIATAPA process.	There was no negative issue that need further verification. Based on document review and field observations, there was no disputes related land legality, environmental, and social. As well as has shown land compensation documentary evidence carried out referring to the concept of FPIC. Described in detail in criteria 2.2; 2.3 6.4.
<b>Village Official of Kijang Jaya</b>  Kijang Jaya villager has good relationship with company. Company has provides a lot of development for local community by scheme smallholder development, regular CSR programme, and local workers recruitment. There is no negative issues in aspects of land tenure, social, employment, and environmental. The land compensation process has been carried out by involving various parties in PADIATAPA process.	There was no negative issue that need further verification. Based on document review and field observations, there was no disputes related land legality, environmental, and social
<b>Head of Sei Kijang Village</b>  There is no negative issues in aspects of land tenure, social, employment, and environmental. The company has made efforts to develop the surrounding community through CSR programs, recruitment of local workers. local contractors, local goat breeding and fish seed assistance activities. So far the relationship between the company and the community has run quite well. Communication between the company and the village is well established in accordance with applicable procedures.	There was no negative issue that need further verification. Based on document review and field observations, there was no disputes related land legality, environmental, and social. As well as has shown land compensation documentary evidence carried out referring to the concept of FPIC. Described in detail in criteria 2.2; 2.3 6.4.
<b>Official and Members of Panca Warga Plasma Cooperative (29 smallholders) – Kijang Kencana Plasma</b>  The plasma management process is carried out at the level of Cooperative, Farmer Groups, and farmers themselves. The company provides guidance, supervision, and counseling.  So far, the contribution made by the company to plasma has been very good. The price of FFB payments is in accordance with the provisions of Disbun. There are no negative issues such as transparency in payment of results.	The Auditors conduct document review, as well as field observations, concluded there is no issue related legal and operational activity, as well as the payment transparency.  There is no negative issue.

Public Issues	Auditor Verification
There is no negative issue.	
<b>Official and Members of Budi Karya Plasma Cooperative (32 smallholders) – Kijang Kencana Plasma</b>  Budi Karya has good relationship with company. Company has provides a lot of development for scheme smallholders for example by agronomy guidance aspect dan replanting preparation. FFB price for KUD were determined based on Riau province plantation agency price.	There was no negative issue that need further verification
<b>Official and Members of Makarti Buana Jaya Plasma Cooperative (29 smallholders) – Kijang Kencana Plasma</b>  Makarti Buana Jaya has good relationship with company. Company has provides a lot of development for scheme smallholders for example by agronomy guidance aspect dan replanting preparation. FFB price for KUD were determined based on Riau province plantation agency price.	There was no negative issue that need further verification
<b>NGO of Bahtera Alam</b>  Good relationship with company. There is no negative issues in aspects of land tenure, social, employment, and environmental. There is no customary land in the area of PT Buana Wiralestari Mas.	There was no negative issue that need further verification
<b>Labor Union of SPSI</b>  Labor Union have been registered in the labor Agency Kampar District and there has been no change in management until this audit. The meeting between company and the labor union discussed has documented. Salary implementation is in accordance with the provincial sectoral minimum wage in 2019 is equal to 2,820,000 IDR. In addition, payment of salaries has been in accordance with the specified time and through the transfer. There are no labor issues.	There are no negative issues that need further verification, the company has paid salaries in accordance with the regulations described in Principal and Criteria 6.5
<b>Employee Cooperative</b>  Employee cooperatives are engaged in savings and loan business sector. There is a mandatory contribution and a regular contribution of Rp 50,000. The Company has made RATs and revenue sharing in March 2019.	There are no negative issues that need further verification. The company has employee cooperatives in accordance with the regulations. Described in criteria 6.5.4

Public Issues	Auditor Verification
<p><b>Gender Committee</b></p> <p>Gender Committee activities include socialization of sexual harassment, complaints, general health and so on. There are no issues related to sexual harassment.</p> <p>Female workers have the right to get menstruation leave (H1) and maternity leave (H2).</p>	<p>There are no negative issues that need further verification. The company was formed (Gender Committee) in 2010. Described in Criteria 6.9.</p>
<p><b>Local Contractor of FFB transporter CV Kurnia Jaya Mandiri</b></p> <p>Cooperation between the company and the contractor has been carried out since 1995. There has been a clause regarding the OHS and social insurance this has also been socialized to contractors. There are no issues related to the cooperative relationship between the company and the contractor.</p> <p>When payment of work is done on time in accordance with the agreement that has been made. In addition, contractor workers have been given PPE by the contractor in accordance with the risk analysis that has been identified. Contractor workers have also provided health insurance for workers.</p>	<p>There are no negative issues that need further verification. The company has contributed in empowering local communities by collaborating with local contractors. Described in Criteria 6.1 and 6.3.</p>



4.0	CERTIFIED ORGANISATION'S ACKNOWLEDGEMENT OF INTERNAL RESPONSIBILITY
4.1	<p><b>Formal Sign-off of Assessment Findings</b></p> <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>Signed on behalf of:</p> <div style="display: flex; justify-content: space-around; align-items: flex-end;"> <div style="text-align: center;"> <p>PT Buana Wiralestari Mas Management Representative</p>  <p><b><u>Yahya Mustakim</u></b> Friday, 25 October 2019</p> </div> <div style="text-align: center;"> <p>Mutuagung Lestari Lead Auditor</p>  <p><b><u>Moh Arif Yusni</u></b> Friday, 25 October 2019</p> </div> </div>

**Appendix 1. List of Stakeholder Contacted in the RSPO Certification Process**

No	Institution/NGO/Community	Address	Phone/ Email	Form of Communication	Date of Contact	Response	
						Yes	No
1	Land Agency of Kampar Regency	Kampar Regency	-	Direct Interview	7 October 2019	✓	
2	Plantation Agency of Kampar Regency	Kampar Regency	-	Direct Interview	7 October 2019	✓	
3	Envorimental Agency of Kampar regency	Kampar Regency	-	Direct Interview	7 October 2019	✓	
4	Labour Agency of Kampar Regencey	Kampar Regency	-	Direct Interview	7 October 2019	✓	
5	Safety and Labour Inspector of Riau Province	Kampar Regency	-	Direct Interview	7 October 2019	✓	
6	Elder (ex-Village Head) of Beringin Lestari Village	Kampar Regency	-	Direct Interview	12 October 2019	✓	
7	Sub District Head of Tapung Hilir	Kampar Regency	-	Direct Interview	12 October 2019	✓	
8	Village Official of Gerbang Sari	Kampar Regency	-	Direct Interview	12 October 2019	✓	
9	Village Head of Tandan Sari	Kampar Regency	-	Direct Interview	12 October 2019	✓	
10	Village Official of Kijang Jaya	Kampar Regency	-	Direct Interview	12 October 2019	✓	
11	Village Head of Sei Kijang	Kampar Regency	-	Direct Interview	12 October 2019	✓	
12	Previous Land Owner (7 Persons)	Kampar Regency	-	Direct Interview	12 October 2019	✓	
13	Official and Members of Panca Warga Plasma Cooperative (29 smallholders) – Kijang Kencana Plasma	Kampar Regency	-	Direct Interview	12 October 2019	✓	
14	Official and Members of Budi Karya Plasma Cooperative (32 smallholders) – Kijang Kencana Plasma	Kampar Regency	-	Direct Interview	12 October 2019	✓	
15	Official and Members of Makarti Buana Jaya Plasma Cooperative (29 smallholders) – Kijang Kencana Plasma	Kampar Regency	-	Direct Interview	12 October 2019	✓	
16	NGO of Bahtera Alam	Pekanbaru	-	Direct Interview	12 October 2019	✓	
18	Worker Union - SPSI	PT Buana Wiralestari Mas	-	Direct Interview	12 October 2019	✓	
20	Worker Cooperative	PT Buana Wiralestari Mas	-	Direct Interview	12 October 2019	✓	
21	Gender Committee	PT Buana Wiralestari Mas	-	Direct Interview	12 October 2019	✓	
22	Local Contractor of FFB transporter CV Kurnia Jaya Mandiri	Kampar Regency	-	Direct Interview	12 October 2019	✓	
23	Jikalahari (No respond)	Pekanbaru, Riau	jikalahari@indo.net.id	Via Email	4 October 2019		✓
24	WWF (No respond)	Jakarta	supporter-service@wwf.or.id	Via Email	4 October 2019		✓

25	Sawit Watch (No respond)	Jakarta	info@sawitwatch.or.id	Via Email	4 October 2019		✓
26	<b>Nagasakti Mill</b> <ul style="list-style-type: none"> <li>• 2 security</li> <li>• 1 weighbridge operator</li> <li>• 5 grading worker</li> <li>• 8 processing worker</li> <li>• 2 engine room operator</li> <li>• 3 boiler operator</li> <li>• 1 WTP operator</li> <li>• 1 EBA Operator</li> <li>• 2 WWTP operators</li> <li>• 2 store keepers</li> <li>• 1 schedule waste officer</li> <li>• 4 workshop workers</li> </ul>	PT Buana Wiralestari Mas	-	Field observation and direct interview	12 October 2019	✓	
27	<b>Nagasakti Estate</b> <ul style="list-style-type: none"> <li>• 3 harvester</li> <li>• 2 picker</li> <li>• 2 foreman of harvesting</li> <li>• 2 maintenance workers</li> <li>• 1 EFB aplicator</li> <li>• 1 foreman of EFB application</li> <li>• 1 foreman of LA</li> <li>• 1 fire fighter officer</li> <li>• 1 foreman of LA application</li> <li>• 1 warehouse officer</li> <li>• 2 boundaries pole officer</li> <li>• 1 HCV officer</li> </ul>	PT Buana Wiralestari Mas	-	Field observation and direct interview	14 October 2019	✓	
28	<b>Nagamas Estate</b> <ul style="list-style-type: none"> <li>• 2 worker of peat monitoring</li> <li>• 6 spraying worker</li> <li>• 6 of FFB harvester</li> <li>• 1 daycare officer</li> <li>• 1 warehouse officer</li> <li>• 1 doctor</li> <li>• 1 paramedic</li> <li>• 2 boundaries pole officer</li> <li>• 1 HCV officer</li> </ul>	PT Buana Wiralestari Mas	-	Field observation and direct interview	14 October 2019	✓	
29	<b>Ramabakti Estate</b> <ul style="list-style-type: none"> <li>• 4 harvester</li> <li>• 2 warehouse clerk</li> <li>• 4 manual weeding workers</li> <li>• 2 daycare workers</li> <li>• 4 residents of Division 4 housing</li> <li>• 2 PIC of HGU monitoring</li> </ul>	PT Buana Wiralestari Mas	-	Field observation and direct interview	15 October 2019	✓	

**Appendix 2. Assessment Program**

DATE		12 – 18 October 2019	
PLANNED TIME	ACTUAL DURATION	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
<b>Saturday, 12 October 2018</b>			
08.00 – 09.00	08.00 – 09.00	<b>Opening meeting</b> <ul style="list-style-type: none"> <li>Auditee Speech (Introduction of PIC, Profile of Certified Management Unit)</li> <li>Auditor Team Speech (Introduction, Audit Objective, Audit Scope, Audit Plan Discussion, Determine of Audit Sample, Transparency and Confidentiality Clarification)</li> </ul>	<b>All Auditor</b>
09.00 – 12.00	09.00 – 12.00	Interview with Gender Committee, Worker's Union, Worker's Cooperative (if any), Local Contractor (for Mill and Estate), Third Party Supplier PT. Ramajaya Pramukti  Stakeholder consultation to affected communities surrounding the plantations and previous land owner and local NGO	<b>AFS / DHT</b>  <b>MAY / AFS</b>
12.00 – 14.00	12.00 – 14.00	<b>Break</b>	<b>All Auditor</b>
14.00 – 17.00	14.00 – 17.00	<b>Field observation to NAGA SAKTI MILL :</b> <ul style="list-style-type: none"> <li>Supply Chain verification (FFB Receiving, Weighbridge, FFB Sorting, Processing Activity, Despatch CPO)</li> <li>Occupational Health &amp; Safety Aspect (Inspection to Chemical Storage, Hazardous Waste Storage, Fire Control Simulation, POME Pond)</li> </ul>	<ul style="list-style-type: none"> <li><b>MAY</b></li> <li><b>AFS / SMM</b></li> </ul>
<b>Monday, 14 October 2018</b>			
08.00 – 12.00	08.00 – 12.00	<b>Field observation to NAGASAKTI ESTATE &amp; NAGAMAS ESTATE:</b> <ul style="list-style-type: none"> <li>Implementation of Agronomy Aspect (Harvesting &amp; Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application)</li> <li>Implementation of Environmental, Conservation and Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management, HCV Area)</li> <li>Implementation of Occupational Health &amp; Safety Aspect</li> <li>Implementation of Employment Procedure and Mechanism Aspect</li> <li>Implementation of Legal Aspect (Land Ownership, Legal Boundaries)</li> <li>Observation of Workers Facilities (Housing, School, Worship Place).</li> </ul>	<b>All Auditor</b>
<b>Tuesday, 15 October 2019</b>			
08.00 – 12.00	08.00 – 12.00	<b>Field observation to RAMA BAKTI ESTATE</b> <ul style="list-style-type: none"> <li>Implementation of Agronomy Aspect (Harvesting &amp; Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application)</li> <li>Implementation of Environmental, Conservation and Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management, HCV Area)</li> <li>Implementation of Occupational Health &amp; Safety Aspect</li> <li>Implementation of Employment Procedure and Mechanism Aspect</li> <li>Implementation of Legal Aspect (Land Ownership, Legal Boundaries)</li> <li>Observation of Workers Facilities (Housing, School, Worship Place).</li> </ul>	<b>All Auditor</b>
12.00 – 14.00	12.00 – 14.00	<b>Break</b>	<b>All Auditor</b>

DATE		12 – 18 October 2019	
PLANNED TIME	ACTUAL DURATION	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
14.00 – 17.00	14.00 – 17.00	<ul style="list-style-type: none"> <li>Verification of stakeholder consultation result and field visit.</li> <li>Document review and completing audit checklist.</li> </ul>	All Auditor
<b>Thursday, 17 October 2019</b>			
08.00 – 12.00	08.00 – 12.00	<ul style="list-style-type: none"> <li><b>Continue Field Observation to Estate; Mill and Public Consultation to</b> Company surrounded village and community leader (if needed)</li> </ul>	All Auditor
12.00 – 14.00	12.00 – 14.00	<b>Break</b>	All Auditor
14.00 – 17.00	14.00 – 17.00	<ul style="list-style-type: none"> <li>Verification of stakeholder consultation result and field visit.</li> <li>Document review and completing audit checklist.</li> </ul>	All Auditor
<b>Friday, 18 October 2019</b>			
08.00 – 09.30	08.00 – 09.30	Internal discussion by auditor team preparing for Closing Meeting	All Auditor
09.30 – 11.00	09.30 – 11.00	<b>Closing Meeting:</b> <ul style="list-style-type: none"> <li>Presentation of audit findings (Noteworthy Positive Component, Non Conformities, OFI, Timelie of CAR's, Conclusion)/</li> <li>Comments, Responses and Questions</li> </ul>	All Auditor
11.00 – 14.00	11.00 – 14.00	<ul style="list-style-type: none"> <li><b>Traveling from Estate → Pekanbaru</b></li> </ul>	All Auditor
15.00 – 17.30	15.00 – 17.30	<ul style="list-style-type: none"> <li>Return flights Pekanbaru - Jakarta</li> </ul>	