

Roundtable on Sustainable Palm Oil Certification
R S P O

[✓] Surveillance

Name of Management Organisation : **Mulia Oil Mill – PT Sepanjang Intisurya Mulia subsidiary of Genting Plantations**

Plantation Name : **PT Sepanjang Intisurya Mulia : Mulia 1-2 Estate, Mulia 3-4 Estate, Mulia 5-6 Estate**
PT Sawit Mitra Abadi : Sawit Mitra Abadi 1-2 Estate, Sawit Mitra Abadi 3-4 Estate

Location : **Pangkalan Teluk Village, Sub – District of Nanga Tayap, District of Ketapang, Province of Kalimantan Barat, Indonesia**

Certificate Code : **MUTU-RSPO/119**

Date of Certificate Issue : 10 August 2018 Date of License Issue : 10 November 2019

Date of Certificate Expiry : 09 August 2023 Date of License Expiry : 09 August 2020

Assessment	Assessment Date	PT. Mutuagung Lestari Auditor	Reviewed by	Approved by
ASA-1	23 to 26 July 2019	Sandra Purba (Lead Auditor), Rizliani Aprianita Hasibuan, Briyogi Shadiwa, Afiffuddin.	Leonada	Ardiansyah

Assessment	Approved by MUTUAGUNG LESTARI on:
ASA-1	07 November 2019

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Figure 1. Location Map of PT Sepanjang Intisurya Mulia

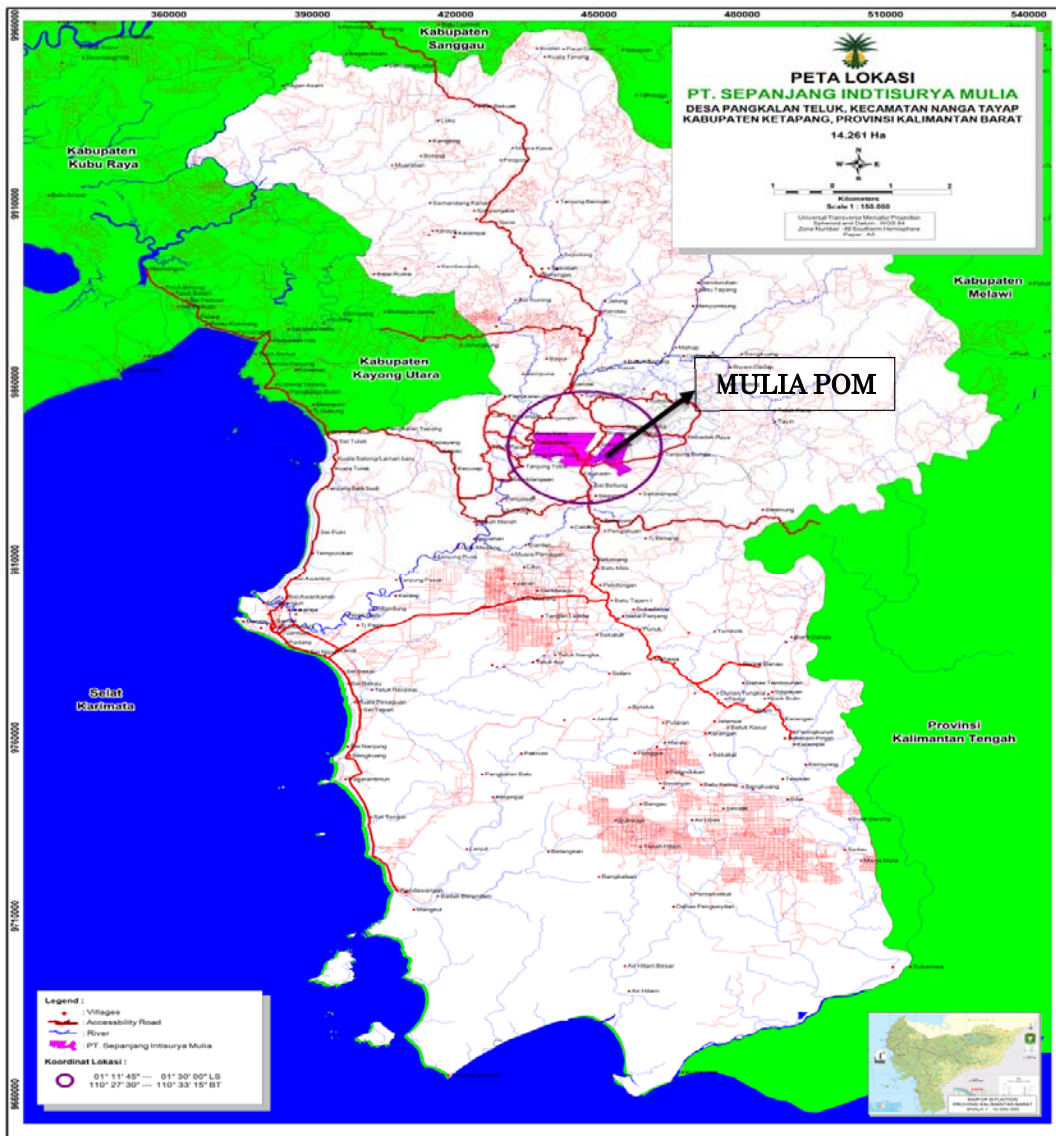


Figure 2. Location Map of PT Sawit Mitra Abadi

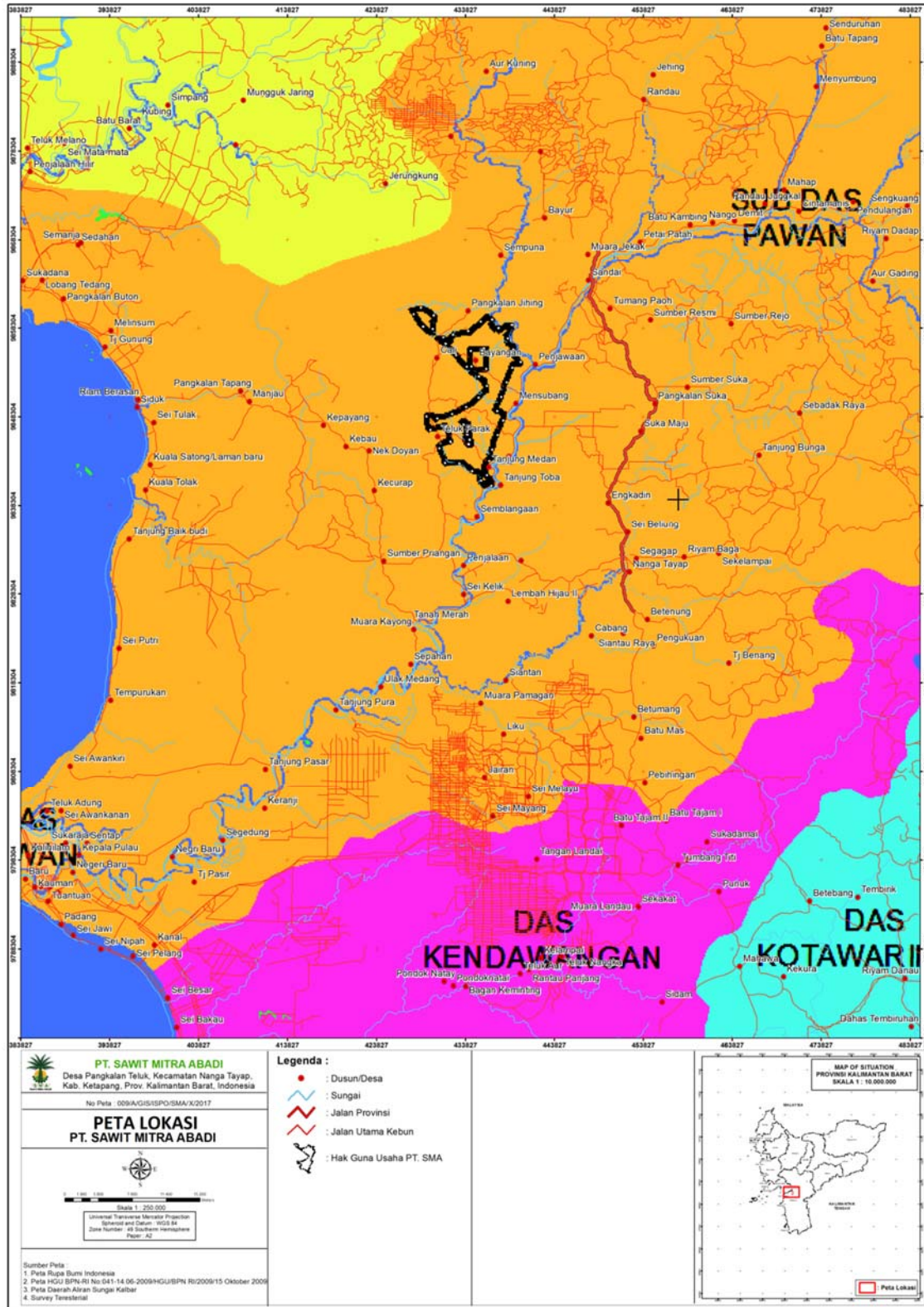


Figure 3. Operational Map of PT Sepanjang Intisurya Mulia

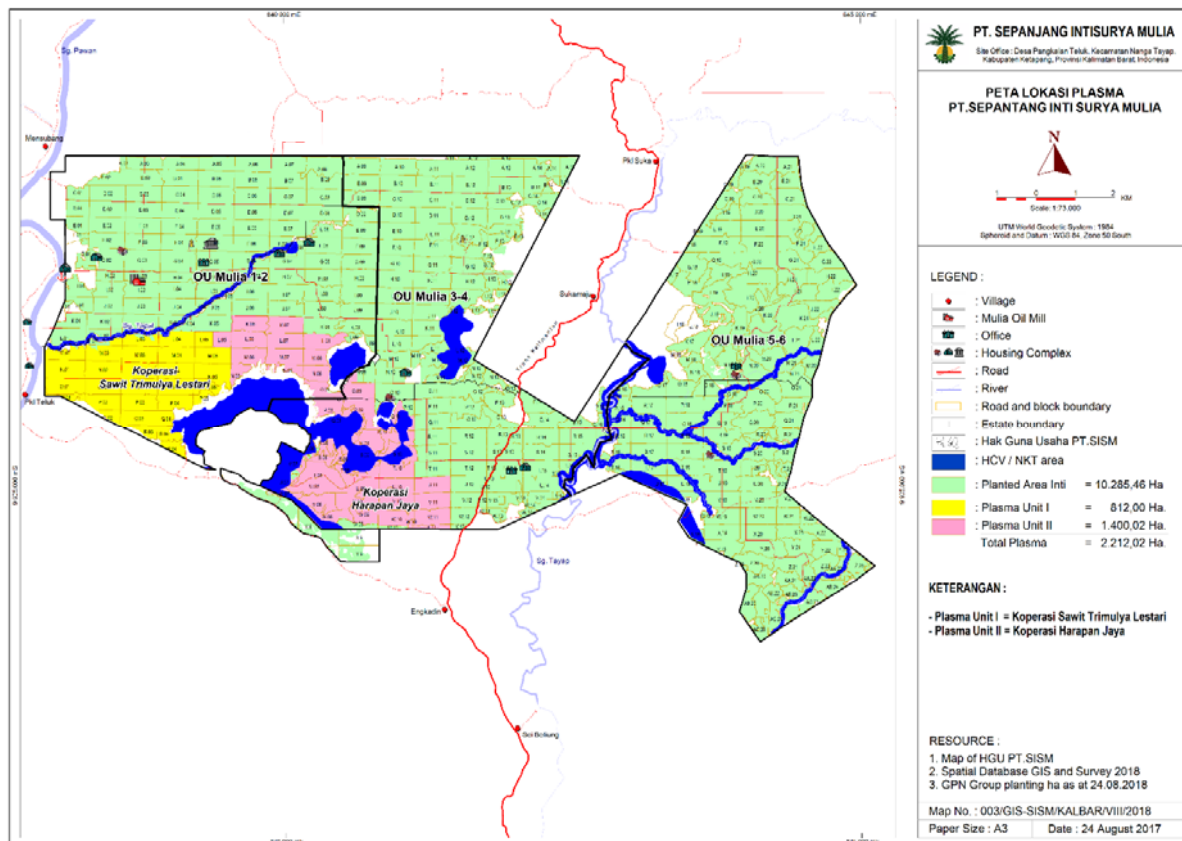
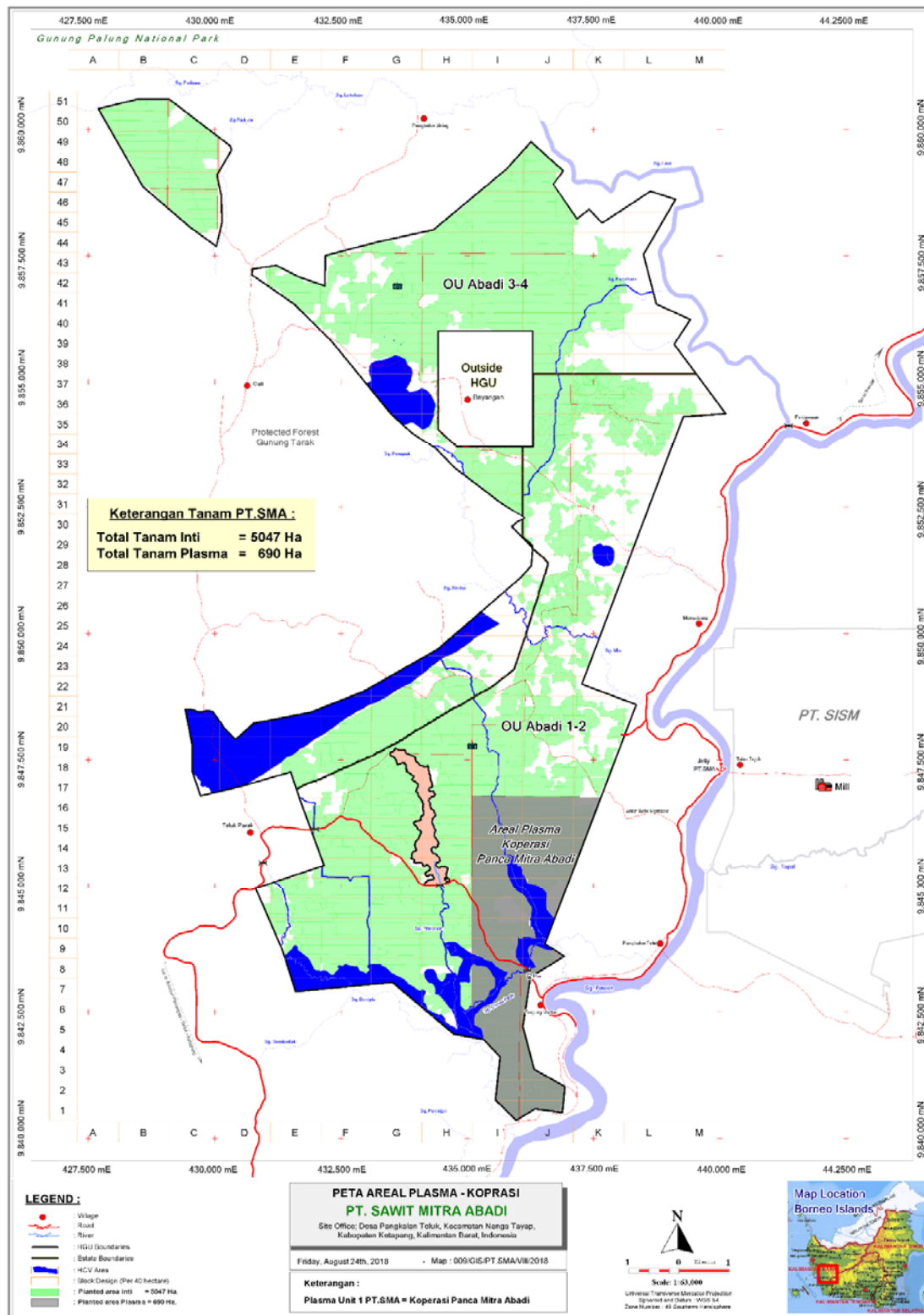


Figure 4. Operational Map of PT Sawit Mitra Abadi



Abbreviations Used

APL	:	Area Penggunaan Lain other land use
B3 Waste	:	Hazardous/schedule waste
BOD	:	Biological Oxygen Demand
BPN	:	Badan Pertanahan Nasional
BAPEDAL	:	Badan Pengendali Dampak Lingkungan
BKSDA	:	Balai Konservasi Sumber Daya Alam <i>Conservation and Natural Resources Board</i>
CD	:	Community Development
COD	:	Chemical Oxygen Demand
CPO	:	Crude Palm Oil
CLA	:	Collective Labor Agreement
CSR	:	Corporate Social Responsibility
CV	:	Commanditaire vennootschap
EFB	:	Empty Fruits Bunch
EIA	:	Environment Impact Assessment
FGD	:	Forum Group Discussion
FFB	:	Free Fruit Bunch
FPIC	:	Free Prior Inform Consent
GHG	:	Green House Gases
GIS	:	Geographic Information System
GPRC	:	Genting Plantation Research Centre
HCV	:	High Conservation Value
HGB	:	Hak Guna Bangunan
HGU	:	Hak Guna Usaha
HRD	:	Human Resources Development
IDR	:	Indeks Dollar Rupiah
IUP	:	Izin Usaha Perkebunan
IPM	:	Integrated Pest Management
IK	:	Instruksi kerja
ISPO	:	Indonesian Sustainable Palm Oil (Perkebunan Kelapa Sawit Berkelanjutan Indonesia)
K3	:	Keselamatan dan Kesehatan Kerja
KER	:	Kernel Extraction Rate (Rendemen Kernel)
LC	:	Land Clearing (Pembukaan Lahan)
LCC	:	Leguminosae Cover Corp
LA	:	Land Application
LD	:	Lettal Dose
LTA	:	Loss time accident
MOM	:	Mulia Oil Mill
NPP	:	New Planting Procedure
NK Mix	:	Nitrogen Kalium Mix
OER	:	Oil Extraction Rate (Rendemen Minyak Kelapa Sawit)
OPM	:	Oil Palm Manual
Permentan	:	Peraturan Menteri Pertanian
PK	:	Palm Kernel
P2K3	:	Panitia Pembina Keselamatan dan Kesehatan Kerja (Occupational Health & Safety Guiding Committee)
PPE	:	Personal Protective Equipment
POME	:	Palm Oil Mill Effluent
RKL/RPL	:	Rencana Kelola Lingkungan/ Rencana Pemantauan Lingkungan

RTRW-K	:	Rencana Tata Ruang Wilayah – Kabupaten
RTRW-P	:	Rencana Tata Ruang Wilayah – Provinsi
SIA	:	Social Impact Assessment
SISM	:	Sepanjang Intisurya Mulia
SOP	:	Standart Operating System
SPMA	:	Serikat Pekerja Mitra Andalan (Workers Union)
SMA	:	Sawit Mitra Abadi
UKL/UPL	:	Upaya Kelola Lingkungan / Upaya Pemantauan Lingkungan (<i>Environmental Management Efforts/ Environmental Monitoring Efforts</i>)
WTP	:	Water Treatment Plant

1.0	SCOPE of the CERTIFICATION ASSESSMENT	
1.1	Assessment Standard Used	<ul style="list-style-type: none"> • Indonesian National Interpretation of RSPO Principles and Criteria 2013 by INA-NITF, July 2016, approved RSPO Governors 30 September 2016. • 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) • RSPO Certification System for Principles and Criteria, 14 June 2017
1.2	Organisation Information	
1.2.1	Organisation name listed in the certificate	PT SEPANJANG INTISURYA MULIA
1.2.2	Contact person	Dr. Faizal Amri Amran (Head of Sustainability Genting Plantation Indonesia)
1.2.3	Organisation address and site address	<p>Head Office 10th Floor, Wisma Genting, Jalan Sultan Ismail Kuala Lumpur 50250 24th Floor, Wisma Genting, Jalan Sultan Ismail, 50250 Kuala Lumpur, Malaysia</p> <p>Liaison Office Jl. Jendral Sudirman Kav. 52-53, Jakarta 12910</p>
1.2.4	Telephone	<p>Malaysian Head Office: Tel: (603) 2178 2288 (603) 2333 2288 Fax: (603) 2161 5304</p> <p>Indonesian Liason Office: 0534-303 6320/21</p>
1.2.5	Fax	(603) 2161 5304
1.2.6	E-mail	faizal.amri@genting.com
1.2.7	Web page address	www.gentingplantations.com
1.2.8	Management Representative who completed the application for certification	Dr. Faizal Amri Amran (Head of Sustainability Genting Plantation Indonesia)
1.2.9	Registered as RSPO member	1-0086-06-000-00, dated 14 November 2006
1.3	Type of Assessment	
1.3.1	Scope of Assessment and Number of Management Unit	Mulia Mill supplied by PT Sepanjang Intisurya Mulia (Mulia 1-2 Estate, Mulia 3-4 Estate, Mulia 5-6 Estate) and PT Sawit Mitra Abadi (Sawit Mitra Abadi 1-2 Estate, Sawit Mitra Abadi 3-4 Estate).
1.3.2	Type of certificate	Single
1.4	Locations of Mill and Plantation	

1.4.1	Location of Mill			
	Name of Mill	Location	Coordinate	
			Latitude	Longitude
	Mulia Oil Mill	Pangkalan Teluk Village, Sub-District of Nanga Tayap, District of Ketapang, Province of Kalimantan Barat, Indonesia	S 01° 23' 00"	E 110° 28' 45"
1.4.2	Location of Certification Scope of Supply Base			
	Name of Supply Base	Location	Coordinate	
			Latitude	Longitude
	PT Sepanjang Intisurya Mulia			
	Mulia 1-2 Estate	Pangkalan Teluk and Mensubang Village, Sub-District of Nanga Tayap, District of Ketapang, Province of Kalimantan Barat, Indonesia	S 01° 22' 52"	E 110° 30' 52"
	Koperasi Sawit Trimulya Lestari (406 members)			
	Mulia 3-4 Estate	Sepakat Jaya Village, Sub-District of Nanga Tayap, District of Ketapang, Province of Kalimantan Barat, Indonesia	S 01° 25' 35"	E 110° 33' 49"
	Koperasi Sawit Harapan Jaya (700 members)			
	Mulia 5-6 Estate	Sepakat Jaya Village, Sub-District of Nanga Tayap, District of Ketapang, Province of Kalimantan Barat, Indonesia	S 01° 24' 16"	E 110° 36' 59"
	PT Sawit Mitra Abadi			
	Abadi 1-2 Estate	Pangkalan Teluk and Mensubang Village, Sub-District of Nanga Tayap, District of Ketapang, Province of Kalimantan Barat, Indonesia	S 01° 42' 28"	E 110° 38' 27"
	Koperasi Jasa Panca Mitra Abadi (597 members)			
	Abadi 3-4 Estate	Pangkalan Teluk and Mensubang Village, Sub-District of Nanga Tayap, District of Ketapang, Province of Kalimantan Barat, Indonesia	S 01° 37' 15"	E 110° 35' 73"
1.5	Description of Area Statement			
1.5.1	Tenure			
	• State		22,934.70	Ha
	• Community		-	Ha
1.5.2	Area Statement			
		Own Estate	Scheme Smallholders	Total
	• Total area	20,032.68	2,902.02	22,934.70 Ha
	• Mature area	15,096.25	2,902.02	17,998.27 Ha
	• Immature area	160.96	-	160.96 Ha
	• Mill	38.40	-	38.40 Ha
	• Infrastructure (Road, Bridge and Ditch)	1,096.36	-	1,096.36 Ha
	• HCV	2,090.63	-	2,090.63 Ha
	• Occupation	1,550.08	-	1,550.08 Ha

1.6	Planting Year and Cycles										
1.6.1	Age profile of planting year										
	Planting Year	Hectarage (Ha)									
		Mulia 1-2 Estate	Koperasi Sawit Trimulya Lestari	Mulia 3-4 Estate	Koperasi Sawit Harapan Jaya	Mulia 5-6 Estate	Abadi 1-2 Estate	Koperasi Jasa Panca Mitra Abadi	Abadi 3-4 Estate	Total	
		2007	1,839.39	19.5	-	19.17	-	-	-	-	1,878.06
		2008	848.63	788.8	1,318.03	1,056.13	-	-	-	-	4,011.59
		2009	14.57	3.7	1,301.59	231.72	2,771.59	756.00	187.71	-	5,266.88
		2010	-	-	267.8	-	726.55	522.00	227.93	-	1,744.28
		2011	57.99	-	19.9	-	-	864.00	217.53	-	1,159.42
		2012	-	-	-	-	-	411.00	40.40	275.00	726.40
		2013	-	-	11.22	93.00	37.23	652.38	16.43	525.57	1,335.83
		2014	-	-	82.95	-	-	54.69	-	1,069.62	1,207.25
		2015	13.05	-	51.46	-	-	56.84	-	547.20	668.55
		2016	2.52	-	100.79	-	57.65	-	-	-	160.96
		TOTAL	2,776.15	812.00	3,153.74	1,400.02	3,593.02	3,316.91	690.00	2,417.39	18,159.23
1.6.2	New Planting area after January 2010				7,002.70 Ha						
1.6.3	Planting Cycle				1 st 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 (%)				
	Mulia Oil Mill	60	384,200.63	85,539.98	22.26	14,579.62	3.79				
	*Production data source from July 2018 – June 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)	%				
	Mulia 1-2 Estate										
	• Own Estate	3,841.64	2,776.15	61,807.13	22.26	61,807.13	100				
	• Koperasi Sawit Trimulya Lestari	812.00	812.00	12,126.14	14.93	12,126.14	100				
	Mulia 3-4 Estate										
	• Own Estate	4,198.39	3,153.74	52,671.03	16.70	52,671.03	100				
	• Koperasi Sawit Harapan Jaya	1,400.02	1,400.02	17,792.44	12.71	17,792.44	100				
	Mulia 5-6 Estate	4,308.53	3,593.02	61,466.71	17.11	61,466.71	100				

	Abadi 1-2 Estate						
	• Own Estate	4,225.51	3,316.91	24,946.24	7.52	24,946.24	100
	• Koperasi Jasa Panca Mitra Abadi	690.00	690.00	8,441.44	12.23	8,441.44	100
	Abadi 3-4 Estate	3,458.61	2,417.39	19,647.20	8.13	19,647.20	100
	TOTAL	22,934.70	18,159.23	258,898.33	14.26	258,898.33	100
	*Production data source from July 2018 – June 2019						
1.7.3	FFB description from other source						
	Name of sources/Organisation (RSPO certified / non-certified)	Type of Organisation	Number of smallholders	Production Area (Ha)	Supplied to Mill		
					FFB (tonnes/year)		
	PT. SAP (Non-certified)	Asociated outgrower - Genting Plantations Group	-	6,825.85	36,940.31		
	PT. CSC (Non-certified)	Asociated outgrower - Genting Plantations Group	-	4,724.99	20,957.30		
	PT. CSC Plasma (Non-certified)	Genting Plantations Group	344	317.30	327.31		
	PT. Agro Abadi Cemerlang (Non-certified)	Asociated outgrower - Genting Plantations Group	-	3,546.88	62,311.36		
	PT. AAC Plasma (Non-certified)	Genting Plantations Group	643	1,029.35	4,098.61		
	PT. Lestari Abadi Perkasa (Non-certified)	Independent Outgrower (non certified)	-	-	667.41		
	TOTAL					125,302.30	
	*Production data source from July 2018 to bJune 2019						
1.7.4	Product categories			FFB, CPO, PK			
1.8	Estimate Tonnage of Certified Product						
1.8.1	Past Annual Claim Certified Product		Previous Certificate Claim 10 August 2018 to 9 August 2019 (tonnes/ year)		Actual certified product 10 August 2018 to 21 July 2019 (tonnes/year)		
	• FFB Production Estate		235,439		195,300.57		
	• FFB Production Scheme		49,018		33,970.21		
	• CPO Production		58,252		51,079.47		
	• Palm Kernel (PK) Production		10,178		8,811.53		
1.8.2	Product selling						
	Tonnage of selling product		Period of actual selling product 10 August 2018 to 21 July 2019				
	• CSPO sold as RSPO certified product		12,913.38				
	• CSPK sold as RSPO certified product		0				
	• CSPO sold under other scheme		0				
	• CSPK sold under other scheme		0				
	• CSPO sold as conventional		37,503.05				
	• CSPK sold as conventional		8,423.84				
1.8.3	Estimate of Certified FFB Claim						

	Name of Estate(s)		Total Area (Ha)	Planted Area (Ha)	FFB (tonnes/year)	Yield (tonnes/ha/year)			
	Mulia 1-2 Estate								
	• Own Estate		3,841.64	2,776.15	64,898	23.38			
	• Koperasi Sawit Trimulya Lestari		812.00	812.00	12,733	15.68			
	Mulia 3-4 Estate								
	• Own Estate		4,198.39	3,153.74	55,305	17.54			
	• Koperasi Sawit Harapan Jaya		1,400.02	1,400.02	18,682	13.34			
	Mulia 5-6 Estate		4,308.53	3,593.02	64,540	17.96			
	Abadi 1-2 Estate								
	• Own Estate		4,225.51	3,316.91	26,194	7.90			
	• Koperasi Jasa Panca Mitra Abadi		690.00	690.00	8,864	12.85			
	Abadi 3-4 Estate		3,458.61	2,417.39	20,630	8.53			
	TOTAL		22,934.70	18,159.23	271,846	14.97			
	*Projected FFB production for 10 August 2019 – 9 August 2020								
1.8.4	Estimate of Certified Palm Product Claim								
	Name of Mill	Capacity (tonnes/ hour)	FFB Processed (tonnes/year)	CPO Out put (tonnes)		Extraction (%)	Palm Kernel Out put (tonnes)	Extraction (%)	Supply Chain Module
	Mulia Oil Mill	60	271,846	59,806	22	10,873	4		MB
	*Projected FFB production for 10 August 2019 – 9 August 2020								
1.9	Other Certifications								
	Others			ISPO (MUTU-ISPO/043) 11 December 2015 – 10 December 2020					
1.10	Time Bound Plan								
1.10.1	Time Bound Plan for Other Management Units								
	Management Unit		Estate (Supply Base)	Time Bound Plan	Location	Status			
	MILL	Time Bound Plan							
	Genting Ayer Item Oil Mill, Johor, Malaysia	2014	Genting Sri Gading Estate	2014	Johor, Malaysia	Certified			
			Genting Sungei Rayat Estate	2014					
			Genting Kulai Besar Estate	2014					
			Genting Tanah Merah Estate	2015					
			Genting Tebong Estate	2015					
		2020	Genting Sepang Estate	2020	Johor, Malaysia	“Extension of Scope” audit due to merger with Genting Tanah Merah Estate.			
			Genting Cheng Estate				“Extension of Scope” audit due to merger with		

					Genting Tebong Estate.
		Genting Selama Estate	To be re-certified in July 2019	Kedah, Malaysia	Voluntary Suspension of the Certificate w.e.f 1 Sept 2017
Genting Sabapalm Oil Mill	2015	Genting Sabapalm Estate	2015	Sabah, Malaysia	Certified
Genting Tanjung Oil Mill	2016	Genting Tanjung Estate	2016	Sabah, Malaysia	Certified
		Genting Tenegang Estate			
		Genting Layang Estate			
		Genting Bahagia Estate			
		Genting Landworthy Estate			
Genting Indah Oil Mill	2019	Genting Indah Estate	2019	Sabah, Malaysia	The remediation and compensation procedures is pending for Genting Kencana Estate, LUCA has been passed. Concept Note (CN) for RaCP has been submitted to RSPO. CN being revised and to be re-submitted in 1Q2019.
		Genting Permai Estate			
		Genting Kencana Estate			
Genting Jambongan Oil Mill	2019	Genting Jambongan Estate	2019	Sabah, Malaysia	Concept note and remediation plan has been submitted to RSPO. RSPO allowed for Genting Jambongan to proceed with its certification programme.
Genting Trushidup Oil Mill	2017	Genting Sekong Estate	2017	Sabah, Malaysia	Certified
		Genting Suan Lamba Estate			
Mulia Oil Mill	2017	Mulia Estate 1	2017	Kalimantan, Indonesia	Certified
		Mulia Estate 2			
		Mulia Estate 3			
		Mulia Estate 4			
		Mulia Estate 5			
		Mulia Estate 6			
		PT SMA Estate 1			
		PT SMA Estate 2			
		PT SMA Estate 3			
		PT SMA Estate 4			
Genting Mewah Oil Mill	2017	Genting Mewah Estate	2017	Sabah, Malaysia	Certified
	2017	Genting Bukit Sembilan Estate	2017	Kedah Malaysia	Certified

Globalindo Oil Mill	2023	Lamunti Barat Estate	2023	Kalimantan, Indonesia	In process of obatinig HGU
		Lamunti Timur Estate I & II			
		Mengkatip Estate I & II			
		Bakuta Estate			
		Plasma Timur & Barat			
		PT UAI 1 & 2	2023		NPP for PT UAI in progress. HCV report being reviewed by HCVRN. In the process of obtaining HGU for UAI.
		UAI Plasma			
Golden Hill Oil Mill	2022	Puroh Estate	2022	Kalimantan, Indonesia	In the process of obtaining Forest Release and Forest Echange prior to HGU application
		Masaha Estate			
		Zircon Hill Estate			
		SP Plasma	2023		
		Waterfall Estate I & II	2022		
		Muhun Estate I & II			
		Talawang Estate I & II			
		KMJ Plasma	2023		
		Golden Hill Estate I	2022		
		Golden Hill Estate II			
		Diamond Hill Estate			
		DWK Plasma	2023		
Citra Sawit Cemerlang Oil Mill*	2021	CSC Estate	2021	Kalimantan, Indonesia	In process of obtaining HGU
SAP Oil Mill*		SAP Estate 1 & 2	2020		In process of obtaining HGU
		SAP Estate 3 & 4			
		SAP Estate 5 & 6			
		AAC 1 & 2			
		AAC 3 & 4			NPP in progress. HCV being reviewed by HCVRN.
Palma Agro Lestari Jaya Oil Mill*	2023	PALJ Estate	2023	Kalimantan, Indonesia	NPP in progress.
		PALJ Plasma			
KIU Oil Mill	2019	KIU 1 & 2	2019	Kalimantan, Indonesia	NPP in progress. HCV report being reviewed by HCVRN.
		KIU 3 & 4			
		KIU Plasma	2022		
*Oil Palm Mill planned for construction.					
There are POM & Plantations is still progrees, consist of:					
1. Genting Indah Oil Mill: The remediation and compensation procedures is pending for Genting Kencana Estate. LUCA has been passed. Concept Note for Remediation and Compensation has been submitted to RSPO.					
2. Genting Jambangan Oil: Concept Note and Remediation Plan has been submitted to RSPO. RSPO Allowed for Genting Jambangan to proceed with its certification programme.					
3. Globalindo Oil Mill: In process of obtaining HGU (Estate: Lamunti Barat, Lamunti Timur, Mangkatip, Bakuta dan Plasma). NPP for PT UAI in process of obtaining HGU for UAI.					

	<p>4. Golden Hill Oil Mill: In the process of obtaining Forest Release and Forest Exchange prior to HGU application. (Estate: Puroh, Masaha, Zircon, Waterfall, Muhun, Talawang, Golden Hill, Diamond, SP Plasma, KMJ Plasma and DWK Plasma).</p> <p>5. CSC Oil Mill: In process of obtaining HGU and Oil Mill planned for construction.</p> <p>6. SAP Oil Mill: In process of obtaining HGU and Oil Mill planned for construction.</p> <p>7. PALJ Oil Mill: NPP in progress. HCV report under review by HCVRN and oil mill planned for construction.</p> <p>8. KIU Oil Mill: In progress to engage consultants to carry out assessments as per NPP requirements.</p> <p>The commitment regarding to the plan of certification proses of uncertified unit has been signed by the management representative.</p>
1.10.2	Progress of Associated Smallholders and Outgrowers for Certifiable Standard
	The smallholder under PT SISMA and PT SMA are included in this certification scope.

2.0	ASSESSMENT PROCESS
2.1	Assessment Team
ASA-1	<p>1. Sandra Purba (Lead Auditor). Graduated from Forestry Faculty Bachelor Degree, majored in Forest Product Technology. Have experience working in industrial forest company, mining and oil palm plantations company for 6 (six) years as EHS and Sustainability Assistant. Has been certified as General OHS Expert, attend and passed the several trainings of management system (OHS, environment and quality management), has been attend the training of waste management, GHG vericator and validator training, and conflict resolution and mapping training. Have been successfully passed the Indonesian Sustainable Palm Oil (ISPO) Lead Auditor training course, RSPO lead auditor training course and auditor of RSPO Next, SCCS LAT and SA8000. Involve in many audit activities of similar scheme (ISPO and MSPO) since April 2013 covering the Legal Aspect, Environmental aspect, Social Aspect, Health and Safety Aspect, conservation and Worker Welfare. On this audit, she assigned to verify HCV, water management, and RSPO Supply Chain.</p> <p>2. Rizliani Aprianita (Auditor). Indonesian Citizen. Bachelor and Magister of Agribusiness, Faculty of Agriculture. She had followed training such as RSPO Lead Auditor Training, SCCS training, lead Auditor ISO 9001:2008, ISO 14001:2004, ISPO Auditor training and followed several IHT related to environment, BMP etc. She has been involved in several audit activities related to sustainable palm oil certification since 2015 covering social aspect, health and safety aspect, worker welfare and waste management aspect. During the assessment she assigned to verified legal and worker welfare.</p> <p>3. Briyogi Shadiwa (Auditor). Indonesian citizens. Diploma 3 of Oil Palm Plantation. He has 7 years working experience since 2009 as Agronomy Assistant and Agronomy Quality Control in several private oil palm plantation companies in Indonesia. The training has been followed include: ISPO Auditor Training by LPP, RSPO Lead Auditor Course by Checkmark Training, Lead auditor ISO 9001: 2015, Awareness SMK3, Lead Auditor ISO 14001: 2015, Awareness OHSAS 18001: 2007 and OHS Expert. During this audit, he assigned to verify Transparency, communication procedure, social and waste management.</p> <p>Afiffuddin (Auditor Trainee). Indonesian citizen, Diploma III majoring Palm Oil Plantation, Bogor Agricultural University. Five years working experience since 2010 at Oil Palm Plantation Company in Indonesia as agronomy operational staff and followed several trainings namely: Basic Plantation Management Program, Auditor Training Indonesian Sustainable Palm Oil (ISPO), Training of RSPO lead auditor, OHS General Expert, OHS System Management based on PP 50 2012 and Management System Certification (ISO 9001-2015/SNI 19011-9001:2015) ISO 17021, ISO 17065, SA 8000 training. He has been involved in several audit activities related to sustainable palm oil certification since 2016 covering Best Management Practices aspect, health and safety aspect and worker welfare aspect. During this audit, He is under supervised of lead auditor in assess the OHS aspect, BMP Agronomy and long term budget</p>
2.2	Assessment Methodology, Assessment Process and Locations of Assessment
2.2.1	Figure of person days to implement assessment
ASA-1	<p>Number of auditors : 3 auditors & 1 Trainee Auditor</p> <p>Number of days for ASA-1 at site : 4 days</p> <p>Number of working days for ASA-1 at site : 12 Working days</p>
2.2.2	Assessment Process
ASA-1	<p>The assessment was conducted by measuring the sufficiency of implementation with the consistency done by the PT Sepanjang Inti Surya Mulia to the requirements of of RSPO Principles and Criteria for Sustainable Palm Oil Production of Sustainable Palm Oil 2013 for Indonesia July 2016, approve RSPO Governors September 30, 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 E for CPO Mill) and RSPO Certification System for Principles and Criteria, 14 June 2017.</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>

Some opportunities for improvement of the results **ASA-1** delivered by the MUTU auditor to the management unit and the results are the subject will be verified at the next assessment phase **ASA-2**.

Improvement of findings from main assesment findings were observed by auditors at this **ASA-1** assessment. All information obtained was recorded in Check List of PT Mutuagung Lestari (MUTU) and part of **ASA-1**.

The assessment program please find Appendix 2

2.2.3 Locations of Assessment

ASA-1

Mulia Oil Mill

- **Chemical storage.** Observation and interview on environmental aspect, OHS implementation, management of chemical and understanding of working procedure.
- **Oil Storage.** Observation related management of oil.
- **Workshop.** According to the result of field observation, there is no oil leakage or spillage, first aid kits are well provided. The Officers have known the source and management for the generated hazardous waste from workshop.
- **Temporary storage of hazardous waste.** Observation and interview related management of hazardous waste.
- **WWTP.** Observation related to waste management and OHS aspect.
- **WTP.** Observation and interview with operator related to technical procedure and OHS aspect.
- **Grading station.** Observation and interviews related to work procedure, OHS and environment aspect.
- **Sterilizer Station.** Observation and interviews related to work procedure, OHS and environment aspect.
- **Press station.** Observation and interviews related to work procedure, OHS and environment aspect.
- **Engine Room Station.** Observation and interviews related to work procedure, OHS and environment aspect.
- **Boiler Station.** Observation and interviews related to work procedure, OHS and environment aspect.
- **Hydrant Test (Boiler Station).** Observation related to emergency response preparedness
- **Land application, block of J3 Div 1 (M1-2)**
- **Security**
- **Weigh-bridge**

Mulia 5 – 6

- **Boundary pole BPN PT. SISM No. 081.** Observation of availability and maintenance of boundary poles.
- **Boundary pole BPN PT. SISM No. 082.** Observation of availability and maintenance of boundary poles.
- **Boundary pole BPN PT. SISM No. 083.** Observation of availability and maintenance of boundary poles
- **Barn Owls Box, block N20 Division 3 Mulia 5.** Observations related to the existence of owl nests that are monitored routinely. Based on observations, owl nests are in good condition and active.
- **Chemical weed control, block N20 Division 3 Mulia 5.** Observation and interviews with employees and foremen regarding safe work procedures, use of PPE, remuneration mechanism, employee rights and obligations as well as complaints mechanism.
- **Weeding Manual, block K21, Division 2 Mulia 5.** Observation of manual weeding activities and interviews related to tasks and responsibilities (job description), work procedures, safe working practices, use of PPE, periodic health checks, remuneration system, Work Accident Insurance, provision of welfare facilities and infrastructure for workers.
- **Fire Tower, block K21 Division 2 Mulia 5.** Observation for emergency responses and facilities
- **Transportation of FFB, Division 2.** Observation and interview with truck drivers carrying FFB contractors, foreman harvest, harvest and loaders related to harvesting/ harvesting work procedures, wage systems, use of PPE as well as complaints mechanism.
- **Manuring, block H20, Division 2 Mulia 5.** Observation of manuring activity and interviews related to tasks and responsibilities (job description), work procedures, dosage of fertilizer application, safe working practices, use of PPE, periodic health checks, remuneration system, Work Accident Insurance, provision of welfare facilities and infrastructure for workers.
- **Harvesting, block E19 Division 1 Mulia 5.** Observation of harvesting and interviews with harvesters and foreman associated with work such as the distribution harvesting plots, crop rotation, criteria and penalties harvest, the wage system tonnage, health insurance and labor protection, safe work practices and use of PPE.

- **Pest Census, block E21 Division 1 Mulia 5.** Observation of termite census activities and interviews related to tasks and responsibilities (job description), work procedures, safe working practices, use of PPE, periodic health checks, remuneration system, Work Accident Insurance, provision of welfare facilities and infrastructure for workers.
- **Workshop.** Observation on OSH and worker welfare aspect
- **Fuel tank.** Observation on OSH, environment and worker welfare aspect
- **Generator set.** Observation on OSH, environment and worker welfare aspect
- **Scheduled waste storage.** Observation on OSH, environment and worker welfare aspect
- **Fire-fighter store.** Observation on emergency response
- **Lubricant storage.** Observation on OSH, environment and worker welfare aspect
- **Fertilizer storage.** Observation on OSH, environment and worker welfare aspect
- **Agrochemical storage.** Observation on OSH, environment and worker welfare aspect
- **Mixing area.** Observation on OSH, environment and worker welfare aspect
- **PPE space.** Observation on OSH and worker welfare aspect
- **Clinic.** Observation on OSH, environment and worker welfare aspect

Mulia 3 – 4

- **Boundary pole BPN PT. SISM No. 094.** Observation of availability and maintenance of boundary poles.
- **Boundary pole BPN PT. SISM No. 093.** Observation of availability and maintenance of boundary poles.
- **Boundary pole BPN PT. SISM No. 096.** Observation of availability and maintenance of boundary poles.
- **Housing of Mulia 3-4 Estate.** Observation and interview related facilities & infrastructure, domestic waste, and others.
- **Block Q19.** Observation related to conservation area.
- **Fire-fighters Store and team.** Observation on emergency response
- **Workshop.** Observation on OSH, environment and worker welfare aspect
- **Clinic.** Observation on OSH, environment and worker welfare aspect
- **Agrochemical storage, mixing area, washing and PPE space.** Observation on OSH, environment and worker welfare aspect
- **Lubricant storage.** Observation on OSH, environment and worker welfare aspect
- **Scheduled waste storage.** Observation on OSH, environment and worker welfare aspect
- **Fuel tank.** Observation on OSH, environment and worker welfare aspect
- **Fertilizer storage.** Observation on OSH, environment and worker welfare aspect
- **Manual Fertilization block T13 Division 2 Mulia 4.** Observation and interview with fertilizers and foremen related to safe work procedures, use of PPE, proper handling of chemicals, remuneration, complaints mechanism and so on.
- **Herbicide application block S13 Division 1 Mulia 4.** Observation and interview with pesticide applicators and foremen related to safe work procedures, use of PPE, proper handling of chemicals, remuneration, complaints mechanism and so on.
- **Manual weeding control block T12 Division 1 Mulia 4.** Observation and interviews with employees related to OHS and employment.
- **Harvesting block O10 Division 3 Mulia 3.** Observation and interviews with employees related to safe harvesting, safety and employment.

Abadi 3-4

- **Boundary pole BPN PT. SMA No.147.** Observation of availability and maintenance of boundary poles.
- **Boundary pole BPN PT. SMA No.141.** Observation of availability and maintenance of boundary poles.
- **Boundary pole BPN PT. SMA No.142.** Observation of availability and maintenance of boundary poles.
- **Block L41.** Observation related to conservation area.
- **Housing complex.** Observations and interviews with housing residents regarding facilities to workers, sanitation, water, electricity, domestic waste management, complaints mechanisms and responses to complaints.

	<ul style="list-style-type: none"> • Chemical weed control, block H43 Division 2 Abadi 3. Observation and interviews with employees and foremen regarding safe work procedures, use of PPE, remuneration mechanism, employee rights and obligations as well as complaints mechanism. • Manuring, block I-H44, Division 2 Abadi 3. Observation of manuring activity and interviews related to tasks and responsibilities (job description), work procedures, dosage of fertilizer application, safe working practices, use of PPE, periodic health checks, remuneration system, Work Accident Insurance, provision of welfare facilities and infrastructure for workers. • Harvesting, block H39 Division 2 Abadi 3. Observation of harvesting and interviews with harvesters and foreman associated with work such as the distribution harvesting plots, crop rotation, criteria and penalties harvest, the wage system tonnage, health insurance and labor protection, safe work practices and use of PPE. • Nursery. Interview with Nursery Officer related to type and age of seeds, nursery management with other related documents. • Terrace blokck H33 Division 3 Abadi 3. Observation of making terraces on the slope area. • Fire Tower, block I43 Division 2 Abadi 3. Observation for emergency responses and facilities • Fertilizer storage. Observation on OSH, environment and worker welfare aspect • Fuel tank. Observation on OSH, environment and worker welfare aspect • Lubricant storage. Observation on OSH, environment and worker welfare aspect • Fire fighter store. Observation on emergency response and facilities • Agrochemical storage. Observation on OSH, environment and worker welfare aspect • Workshop. Observation on OSH, environment and worker welfare aspect • Scheduled waste. Observation on OSH, environment and worker welfare aspect
2.3	Stakeholder Consultation and Stakeholders Contacted
2.3.1	Summary of stakeholder consultation process.
ASA-1	<p>Summary of stakeholder consultation process</p> <p>Consultation of stakeholders for PT SISIM was held by:</p> <ul style="list-style-type: none"> • Public Announcement at Mutuagung website www.mutucertification.com on 5 July 2019 and www.rspo.org on July 2019. • Consultation with Government Agency on July 23th, 2019. • Consultation with local stakeholders (community surround/village) on July 23th, 2019. • Consultation with Internal Stakeholders on July 23th, 2019. • Consultation with Local Contractor on July 23th, 2019. • Consultation with NGO on July 10th, 2019
2.3.2	Stakeholder contacted
	<i>Please find appendix 1</i>
2.4	Determining Next Assessment
ASA-1	The next visit (ASA-2) will be determined eight (8) until twelve (12) months after this assessment

3.0. ASSESSMENT FINDINGS

3.1. Summary of Assessment Report of the RSPO Certification

MUTUAGUNG LESTARI has conducted an assessment of Mulia Oil Mill – PT Sepanjang Intisurya Mulia operation consisting of one (1) mill and five (5) oil palm estates.

During the assessment, there were eight (8) Nonconformities were assigned against Major Compliance Indicators; five (5) nonconformities were assigned against Minor Compliance Indicators ; and two (2) nonconformances against supply chain requirement for CPO mill; and eleven (11) opportunities for improvement were identified.

Further explanation of the non-conformities raised and corrective actions taken by the company are provided in section 3.5. The company has already prepared and implemented the corrective actions that had been reviewed and accepted by Auditors in form of documentation evidences. Those corrective actions taken had been closed out shall be verified during next assessment.

MUTUAGUNG LESTARI found that Mulia Oil Mill – PT Sepanjang Intisurya Mulia complied with the requirements of RSPO Principles & Criteria and National Interpretation, RSPO Principles and Criteria (P&C) for Sustainable Palm Oil Production, Republic of Indonesia – RSPO, April 2013 and Supply Chain Requirement for CPO Mill, November 2014, revised June 2017.

Therefore MUTUAGUNG LESTARI Recommends RSPO Certification of compliance is continued.

Ref Std.	VERIFICATION RESULT of MUTU-Certification
PRINCIPLE #1 COMMITMENT TO TRANSPARENCY	
1.1	Growers and millers provide adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.
1.1.1 & 1.1.2	<p>A list of information that can be accessed by stakeholders is explained in the SOP Information request with document number SISM-CDP-03-00.01 Revision number 0.0 dated June 1, 2015 and SOP request information or document with number SMA-CPD-06-00 No, revision 0.0 effective date March 1, 2015. This procedures explained that the submitted suggestions will be presented by the Head Unit to the relevant departments. The response for external incoming mail not later than two weeks after the letter was received. The Personal in Charge of providing information is PSD (Plantation Service Department).</p> <p>The company can demonstrate list of stakeholders (update 2019) such as: government parties (Sub district, regency, and Province), surrounding village, internal stakeholder, mass media, NGO, and schools. The list of stakeholders will updated once a year or if there is a revision.</p> <p>Based on document review and management interviews, recording information requests can be seen in incoming and outgoing mail documents. All incoming letters including information requests are recorded in the communication form / logbook which records the list of requests and responses from stakeholders is the administration section in accordance with procedure, as well as internal and external complaints.</p> <p>Based on interview with local communities, it is known that they are quite easy to access information. Information can be accessed by submitting requests verbally, e-mail, fax, telephone and direct visits. Based on document review of Logbook Document period 2018/2019, there's no information request from stakeholders.</p>

In addition, the company showed a records of mandatory report that's has been received by related agencies. For examples:

- Report of Monitoring/Management Environment Plan 2nd Semester of 2018 in May 29th, 2019 to Community Housing of Residential Areas and Environment Agency of Ketapang District.
- Quarterly Report of Occupational Health & Safety Guiding Committee Period April to June 2019 in July 15th, 2019 to Labor Agency of West Borneo Province.

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

Company shown list of information for stakeholders listed on List of Information Document (rev. January 1st, No.: GPN-CER-06), among others:

- Confidential documents: Company certificates, maps / areas of statements, best practice management documents, corporate financial statements, internal audit reports and SOP / PI.
- Public Documents: AMDAL Documents, Licensing documents, employment data, scheme smallholder data, job vacancy information, HCV identification, HGU location permits, CSR Reports, Environmental Management Plan/ Environmental Monitoring Plan reports, Medical Institution Reports, report on the development of the plantation business, assessment of plantation business, external audit report.
- Each of Estate Manager create progress report every month. It summary of total FFB production, total cost, total deductions. This report can accessed by board of scheme smallholders cooperative.

Based on interview with local communities, it is known that they are quite easy to access information. Information can be accessed by submitting requests verbally, e-mail, fax, telephone and direct visits.

Status: Comply

1.3

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

1.3.1

PT SISM & PT SMA has a code of ethics and ethical conduct policy in all implementation of operations and transactions authorized on November 1, 2015 by the President Director. Genting plantations are committed to implement the business ethically and with integrity at all times.

This code of ethics policy has been socialized to SISM workers (Harvest, Fertilizer and applicator pesticide) on October 3-5, 2017 and to PT SMA (Harvest, Fertilizer and applicator pesticide) workers on November 9, 2017.

This policy is available in *Indonesian*. Based on interview with worker in estate and mill including worker union officials, it is known that they understand about the ethical conduct of the company. Interview with worker in estate and mill informed that there is no issue about integrity and ethical conduct.

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

There are several nonconformities in the surveillance-1 assessment (NC 2019.01) :

Legality

- Based on the results of interviews with management, document review of areal statement and the HGU certificate, it was found that the company managed an area of 14,560.57 ha and an installed capacity of 90 tons of FFB / hour. PT SISM already has an IUP in accordance with the Decree of the Regent of Ketapang, Number: 518 / DISBUN - D / 2015, July 29, 2015. The document describes that PT Sepanjang Intisurya Mulia, is a company that commits Palm Oil Commodity, area

of 14,485 Ha and the capacity of the processing unit 60 tons of FFB / hour. Related to this, the company has sent an Application for a change in plant area and capacity in PT SISM's IUP No. 53 / SISM / Legal / V / 2018 dated May 23, 2018 and was received by *Dinas Penanaman Modal dan Pelayanan Terpadu Satu Pintu* of Ketapang Regency on May 24, 2018. However, the revised IUP has not yet been issued (already 1 year). Based on the explanation above, it was concluded that the area of management area (HGU) was not in accordance with the Plantation Business Permit owned.

Wage Scale

The company showed the structure and scale of wages according to Decree No. 004 / SISM / HR / SK-U / X / 2017 dated October 1, 2017. However, the structure and scale of wages have not been shown for 2019 in accordance with Minister of Manpower regulations No. 1 of 2017.

Overtime Implementation

- The results of verification of labor documents and field interviews, it was known that the harvest supervisors at PT SISM and PT SMA on June also work on Sundays/holidays. The simulation results of overtime calculations at PT SMA (for example NIK 10011337) and PT SISM (for example NIK 10007741) are known that the calculation of premium / overtime payment is not in accordance with Minister of Manpower regulations No. 102 of 2004. Example of calculation for employees of NIK 10007741 on June (work starts at 06:00 - 17:00 with a break of 1 hour)

Premium / overtime paid:

- There were 8 working days on holidays (wages of Rp. 211,040 / holiday) + daily premium of Rp. 44,000 so that the total premium / overtime on June (holiday) is Rp. 1,968,320.

Minister of Manpower regulations No. 102 of 2004

7 hours $1 \times 2 = 14$ hours

8th hour $\times 3 = 3$ hours

9th & 10th hour $\times 4 = 8$

Total working hours: 25 hours

Total payment: $2,638,000 / 173 \times 25 \text{ hours} \times 8 = 3,049,710$.

- The results of verification of labor documents and field interviews, it was known that the head of security worked 3 shifts (8 working hours) on June (without holidays) and there were 10 holidays (weeks and national in the month). The simulation results of PT SISM's security head overtime calculation show that the calculation of the awarding of premiums / overtime has not been in accordance with Minister of Manpower regulations No. 102 of 2004

Premium / overtime is paid in the form of a fixed premium of Rp. 2,800,000

Minister of Manpower regulations no. 102 of 2004:

Overtime on holidays:

7 hours $1 \times 2 = 14$ hours

8th hour $\times 3 = 3$ hours

Total working hours: 17 hours

Total payment: $2,638,000 / 173 \times 17 \text{ hours} \times 10 = \text{Rp. } 2,592,254$

Overtime on a normal day: $1.5 \times \text{Rp. } 15,280 \times 26 \text{ HK} = \text{Rp. } 595,920$

Total overtime Rp. 3,188,174

OHS and BMP aspect

In the aspect of Occupational Health and Safety, the certificate holder shows evidence of compliance with relevant legal requirements, including Quarter II Guiding Committee of Occupational Safety and Health Report 2019, license of heavy equipment operator, first aid officer at work place, steam boiler operator license, license certificate of mill machinery (including inspection and testing), diesel operators, electrical technicians, doctor hyperkes certificates and fire mitigation officers training. The certification holder has undertaken prevention and control measures as listed in Work Safety Law no. 1 of 1970 Article 3, among others by monitoring the implementation of occupational safety and health, conducting accident investigations, conducting hazard identification risk assessment and risk control (HIRARC), providing appropriate PPE with hazard identification, periodic health checks for workers who work at high risk, machine operation by persons authorized and socialized safe work practices (see criteria 4.7). Based on the results of document review and interviews with mill workers, for example at boiler stations, it is known that boiler operators have licenses to operate boilers in accordance with Minister of Manpower Regulation No. 1 of 1988.

However, the certificate holder need to re-ensure the progress of license of operator who has attend the training, progress in

managing *Surat Tanda Registrasi* paramedic extension at PT SMA and monitoring and supervision of operators who operate heavy equipment. **OFl.**

The certificate holder also shows evidence of compliance with relevant laws and regulations related to Best Management Practices, including use pesticides that have been registered with valid permits. Based on field observation in chemical storage and spraying activities and document review, it is known that the certificate holder has used the pesticide which registered in "*Komisi Pestisida*". This is in accordance with Plantation Act 39/2015. (See criteria 4.6).

Based on interview with Agency of Ketapang Regency, the certificate holder has comply to regulations, for example:

- All heavy equipment operators already have license according to regulations.
- Has been applied minimum wage on 2019
- Mandatory reporting has been done regularly, for examples reporting on the utilization of HGU, Manpower reporting, OHS Committee (P2K3) reporting.
- Has have land use title and plantation business permit.

2.1.2, 2.1.3 & 2.1.4

The person who responsibility to update and evaluate the list of regulation is SHE (Social Health & Environment) Representative. The latest internal audit has been conducted on April 1st, 2019. The types of regulations consist of environment, Employment, OHS, Legality / law and others. For example, there are some regulations that have been documented for example but not limited to:

- Minister of Agriculture Regulation No. 5 of 2018 concerning Land Clearing and/or processing of Plantation without Burning.
- Minister of Labor Regulation No. 5 of 2018 concerning Occupational Safety and Health of the Work Place.
- Minister of Environment Regulation No.5 of 2018 concerning Standards and Certification of Competency of Responsible Operators of Wastewater Treatment and Responsible for Water Pollution Control.

2.1.1 | Status: Non Conformity No. 2019.01 with Major Category

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.

Major 2.2.1

There is no change until the ASA-1 assessment.

PT. Sepanjang Intisurya Mulia and PT. Sawit Mitra Abadi have own land use title and land building title for their entire area. PT SISM has had the land rights in the form of Land Use Title (HGU) for an area of 14,555 ha, Building Use Tittle (HGB) for an area 5.57 ha which consist of 3 certificate HGU and 1 certificate HGB and HGU of PT SMA for an area 8,374.13 ha which consist of 1 certificate HGU. The area of the certification area is 14,560.57 ha for PT SISM and 8,374.13 ha for PT SMA (in accordance with the HGU owned)

The results of verification of legality documents and interviews with representatives of Engkadin Hamlet (Sepakat Jaya Village), Pangkalan Suka Village and Mensubang village are known that the area of PT SISM and PT SMA was formerly community land and was compensated by the company. The compensation process has been through communication and consultation processes. The value of compensation paid is determined by mutual agreement and witnessed by local village and sub-district government officials.

PT. Sepanjang Intisurya Mulia and PT. Sawit Mitra Abadi also have own plantation business permit (IUP). IUP of PT SISM issued of Ketapang Regent in accordance with Decree Letter No. 518/DISBUN – D/2015 dated July 29, 2015 and IUP of PT SMA issued of Ketapang Regent in accordance with Decree Letter No. 519/Disbun-D/2015 dated July 29, 2015 and Decree Letter No. 377/DPMPTSP-D.B/2019 related to change of land area of PT SMA.

Minor 2.2.2

Management unit has map that inform the location of boundary pole. Based on the boundary pole map that is owned, known that PT SISM has 127 boundary poles and PT SMA has 154 boundary poles. Management unit has SOP related maintenance of HGU boundary pole No. SOP/GPN/23 dated November 1, 2016.

Observation results at boundary pole No. 94 at Mulia 3-4 Estate and boundary pole No. 147 at Abadi 3-4 Estate, it was known that these boundary poles were missing (not found). In addition, the company also has not been able to show the monitoring record of HGU boundary pole. Based on this explanation it was concluded that there was not enough evidence that the legal boundaries were indicated by clear boundaries and maintained. **Nonconformity No. 2019.02.**

Minor 2.2.3; Major 2.2.4 & Minor 2.2.5

There is no change until the ASA-1 assessment.

The company has had FPIC Procedure (Document Number: SOP/GPN-S/01) that approved by President Director since May, 1st 2015. There were several step regarding to FPIC as follows:

- Identification of land owners and customary rights
- Identification and engagement with village representative bodies
- Provision of information
- Negotiation process and agreement
- Documentation of the agreement
- Monitoring of agreement
- Conflict resolution mechanism
- Improvement verification

The consultation results with communities (Engkadin hamlet of Sepakat Jaya Village, Pangkalan Suka village and Bayangan hamlet of Mensubang village) and Plantation Agency of Ketapang District known that there was no dispute / conflict of land between the companies and communities. From the interview, it was stated that there was a unilateral claim to the land by the community. However, the people who make the claim cannot show clear ownership rights. The unilateral claims have been resolved by consultation with the village / hamlet apparatus. From the results of the interview it was stated that the management area / HGU area in the area of Engkadin Hamlet, Sepakat Jaya Village had been compensated by the company.

Field visit and document review also shows that there was no dispute / land conflict in operation area of CH. From the verification of the area statement document, there are occupation areas in PT SISM and PT SMA. However, the area is an area that has not been compensated by the company. And there is no compulsion in terms of land compensation.

2.2.6 Major

The policies related to maintaining peace without violence are stated in the social policy which was approved by the President Director on October 20, 2015. The policy is written as follows:

'We do not apply any form of forced labor and do not trade workers in the management unit of our operating unit. We do not use mercenaries and / or paramilitaries to carry out company operations. '

Management has shown documentation of policy socialization in 2016-2017 to affected parties including communities around the company.

The results of stakeholder consultations with the Plantation Agency of Ketapang District, interviews with the head of Pangkalan Suka Village, Pangkalan Suka customary head, Engkadin hamlet head (Sepakat Jaya village) along with 4 previous landowners (PT SISM) and Bayangan hamlet head of Mensubang village and religious leaders who are also Previous land owners, said that in the past land acquisition, there was no coercion by the company. Land compensation is given based on the mutual agreement of both parties without coercion from the company. The process of land acquisition begins with socialization to the community landowners. From the results of interviews with the Head of Pangkalan Suka Village, it was also stated that he was also a member of the land acquisition socialization team consisting of the community, agencies and companies.

2.2.2	Status: Nonconformity No. 2019.02 with Minor Category
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2.3

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

Major 2.3.1; Minor 2.3.2; Minor 2.3.3 & Major 2.3.4

The company has a SOP of Free, Prior and Informed Consent No. Document: SOP / GPN-S / 01, effective from 1 May 2015. In the procedure in point 5.1 Identification of Land Owners and Customary Rights (sub point g) it is explained that participatory mapping will be carried out by considering several things, including: map making made with full awareness and agreement and under the control of the community concerned, as well as community members involved (all generations, men & women, ethnic groups, neighboring communities). Based on HCV Identification Report, there is no customary right inside the HGU's area. The document regarding to land acquisition process such as land owner identification, minutes of meeting, negotiation and photos has been shown.

From the verification of the area statement document, there are occupation areas in PT SISM and PT SMA. However, the area is an area that has not been compensated or cannot be compensated by the company. And there is no compulsion in terms of land compensation.

Payments progress of area compensation in the HGU area of 317 ha in PT SMA (OFI)

The results of interviews with the village apparatus and community leaders in Mensubang Village, revealed that there was an area of 317 ha to be compensated in PT SMA. The interview revealed that the land acquisition process was carried out more than 2 years ago, but there was no agreement on prices. When conducting the ASA-1 audit it was stated that there had been a compensation agreement between the company (PT SMA) and the community and was just waiting for compensation payment. During the audit, it was reported that the area was included in the occupation area (not yet compensated) in the statement area.

The results of stakeholder consultations with the Plantation Agency of Ketapang District, interviews with the head of Pangkalan Suka Village, Pangkalan Suka customary head, Engkadin hamlet head (Sepakat Jaya village) along with 4 previous landowners (PT SISM) and Bayangan hamlet head of Mensubang village and religious leaders who are also Previous land owners, said that in the past land acquisition, there was no coercion by the company. Land compensation is given based on the mutual agreement of both parties without coercion from the company. The process of land acquisition begins with socialization to the landowners. From the results of interviews with the Head of Pangkalan Suka Village, it was also stated that he was also a member of the land acquisition socialization team consisting of the community, agencies and companies.

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.

Major 3.1.1 and Minor 3.1.2

The certificate holder shows the long-term planning documents outlined in the 5 (five) annual planning periods 2019 – 2023. The plan includes annual FFB production, CPO and PK production (tons), estimated prices and financial indicators. Regarding replanting, there are no replanting plans for the next 5 years because the oldest planting year is 2007. That is, when the audit takes place the age of the plant is still 12 years.

The certificate holder also evaluates long-term plans that are broken down into annual and monthly plans each month with an agenda of regular discussions on FFB production, harvesting productivity, receipt and application of fertilizers and others.

The certificate holder shows the results of a company's balance sheet audit by a public accountant. From the audit results, it was concluded through the auditor's opinion that the attached consolidated financial statements present fairly, in all material respects, the consolidated financial position of PT SISM as of December 31, 2018, and the consolidated financial performance and cash flow for the year ended on that date, in accordance with Indonesian financial accounting standards.

Based on the verification of the AMDAL document, HCV Identification, Soil Type Maps and interviews with management and field verification there is no peatland in the PT SISM work area.

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.

Major 4.1.1

Based on the results of the document review and interviews with management regarding the SOP, it is known that there was no change/ revision from the previous assessment. The certificate holder has demonstrated SOPs for estate and mill such as procedure of planting, nurseries, pre-nursery and main nursery, planting preparations, work instructions for logging and manual removal, working mechanical cleaning instructions, working instructions Leguminous Cover Crop cultivation, border survey procedure, road and bridge construction, road construction and bridge construction instructions, working instructions for bridge making, culvert construction, oil palm planting, identification and control of pests and diseases of oil palm plant, Identification work instructions pests and diseases, census and disease pests procedure, Fertilization and others. Safe working practices and application pesticide was included on SOP SIM – AGRI-08-00-00 about immature upkeep and SOP SIM – AGRI-09-00-04 harvesting path weeding. Riparian zone management was included on SOP SISM-ENV 754, wide of buffer zone in accordance to President Decree Number 32 year of 1990.

Mill unit has several procedure, for example: SOP SIM – PKS-03-00-00 Effluent Management. It was included measuring and monitoring mill effluent every month in accordance to regulation. Therefore, safe working practices, permit to work system and PPE's usage procedure were included on each station procedure.

Based on the results of field observations in the Mulia 3-4 Estate and Abadi 3-4 Estate on manual fertilization activities, application of herbicides, manual weeding and harvesting, it is known that these SOPs have been implemented and understood by workers. For example related to spraying work. Based on the results of field observations and interviews with workers, for example in the application of herbicides, it is known that the applicator has understood the procedures for applying pesticides such as the width of the spray, areas that are prohibited from applying chemicals and handling chemicals. The same thing was also found in the factory, where based on the results of interviews with the sterilizer station operator, press station operator and grading officer, the workers could demonstrate their respective duties and responsibilities.

The certificate holder also conducts internal control of the contractor performance to monitor the consistency of the implementation of SOPs in the field, including the following:

- Internal control carried out by the Advisory Visit]
- Internal control carried out by the Foreman, Foreman I, Assistant, Senior Assistant and Manager.
- Field inspection related to the use of PPE for FFB exporters from KUD and CPO transporters.

Minor 4.1.2

During the audit activity, the certificate holder can show the master list of all SOPs. Internal supervision has been carried out, for example by conducting audits by the Internal Audit Department and Plantation Advisory as well as field reviews and inspections conducted by internal supervision from the foreman level to the manager to monitor the consistency of field implementation with the SOP.

The audit is carried out regularly covering all SOPs, such as financial audits carried out by external parties and operational audits carried out by internal parties. Based on interviews with management and review of internal audit report documents, it is known that audit activities are carried out annually for financial audits carried out by external parties and every semester for internal audits of operational activities.

Based on the results of interviews with management, the company will revise its procedures if those procedures are considered irrelevant to the company's actual conditions.

Minor 4.1.3

The certificate holder shows records of the results of measurements and monitoring carried out internally, for example:

- Document of the Internal Audit Department of PT Sawit Mitra Abadi, Abadi 3-4 Estate, dated July 27, 2018.
- Plantation Advisory Group Finding Sheet PT SISM document, visit date 21 – 25 March 2019.

The certificate holder shows a record of corrective actions. For example, based on the results of the Plantation Advisory visit, five discrepancies were found, including the achievement of production that was far from the planned plan. Evaluations have been carried out and implemented.

Records of corrective actions are available at each unit office.

Major 4.1.4

The certificate holder has an SOP for third parties / FFB suppliers listed in the FFB Acceptance Procedure, document number SOM-PRD-02, dated September 14, 2012. The certificate holder shows a list of FFB contractors approved by the company namely PT. SAP, PT. CSC, PT. AAC and PT. LAP.

Based on the results of interviews with sorting officers, it is known that related to sampling, each unit is taken 100 random FFB samples to be graded based on their respective criteria. The treatment is the same between core estate, suppliers or plasma.

The certificate holder also shows the daily and total records for the amount and origin of FFB from contractors received as stated in the FFB / Production Stock & Stock / Dispatch Statement document dated July 23, 2019. The records are kept at the factory office.

Status: Comply

4.2

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

Minor 4.2.1 and Minor 4.2.2

Based on the results of the document review and interviews with management regarding fertilization SOP, it is known that there has been no revision since the previous assessment which is listed in the Fertilization Procedure, document number SISM-

AGR-07-00-00, specifically listed in the Fertilization Work Instructions document, document number SISM- AGR-07-00-04 dated December 1, 2013. The certificate holder shows evidence that the SOP has been implemented and monitored, including Genting Plantation Research Center (GPRC) 2019 Fertilizer Program Mature Mulia 5, which explains the field, planting year, ha, stand / ha, total trees, type of fertilizer, dosage, fertilizer tonnage, number of sacks and date of realization. For example Division 1 field A19, planting year January 2010, covering 4.2 ha, stand / ha 136 trees, total trees 569 trees, NK Mix A fertilizer type, recommended dosage 3 kg / tree, fertilizer tonnage 1.71 tons, total sacks of 34 sacks and the realization date is March 6, 2019.

Supervision is carried out by direct superiors from workers, for example foremen, assistants, managers and so on. Then there are also internal audits both internal audits of plantations operations or sustainability to monitor field implementation consistent with SOP.

Based on the results of field observations in Mulia 3-4 Estate on manual fertilization activities, it is known that the fertilizer used is Kieserite at a dose of 1.25 kg / tree. The foreman shows fertilizer recommendations derived from the results of soil and leaf analysis along with their realization records. Fertilizers also explained that there are areas where chemicals / fertilizers should not be applied, namely around 50 meters of the river border and which have been marked as markers. In addition, the fertilizers also explained the implementation of SOPs in the field, such as how to spread fertilizer.

Based on the explanation described, it can be concluded that the application of fertilizers is in accordance with the recommendations.

Minor 4.2.3

The certificate holder shows the SOP for soil and leaf sampling listed in the document number GPN-AGR-14-00.00 and document number GPN-AGR-13-00.00 dated August 1, 2015, which contains the sampling procedures, work instructions, parameters examined and methods recording in the form specified.

The certificate holder also shows the results of soil and leaf analysis as a basis for the preparation of fertilizer recommendations made by Genting Plantation Research Center (GPRC) Indonesia. Based on interviews with GPRC staff, it is known that leaf sampling is carried out annually and soil sampling is carried out every five years. Based on the results of the document review, the results of soil and leaf analysis are shown as follows:

Soil Analysis

The certificate holder has taken soil samples in November 2015 for each unit with a total of 64 soil samples. Soil sample testing was carried out at PT Panca Surya Garden (First Resources Limited) on 4 – 22 December 2015 with reference number 01 / SS / GPRC-SISM / XI / 2015. The test parameters for the test include: pH, N, C-Organic, P Bray, exchange cation, and texture.

Leaf Analysis

The certificate holder shows the leaf analysis record issued by the Genting Plantation Research Center Indonesia, for example for Mulia 3 Estate on 30 April 2019 with the test report reference number PR / 4/2019. The test parameters for the test include Major Elements (% on D.M.) Ash, N, P, K, Mg, Ca and Minor Elements (mg / kg on D.M.) B, Cu and Zn. For example, Field sampled no. K11, planting year 2008 area of 12 ha Division 3 with the results of testing namely Major Elements (% on DM) Ash 6.31, N 2.68, P 0.164, K 1.47, Mg 0.17 and Ca 0.36 and Minor Elements (mg / kg on DM) B 23, Cu 4 and Zn 13.

Minor 4.2.4

The certificate holder has a nutrition recycling strategy that has been implemented in the estate including EFB and liquid waste. The EFB nutrient recycling strategy is explained in the EFB Application SOP, Document Number SISM-AGR-14-00.00 on December 1, 2013 describes the application of EFB as organic fertilizer and the implementation of applications of EFB to the placement of EFB.

For the POME nutrient recycling strategy, it has been regulated in the Land Application SOP, Document Number SISM-PKS-04-00.00 effective 1 December 2013 explaining how the management and utilization of liquid waste through land application. The certificate holder utilizes liquid waste as organic fertilizer in the field, according to the permit for the utilization of liquid waste, the drainage location is in Mulia 1-2 Estate.

The certificate holder has also shown records of EFB utilization and Land Application every month, including for Land Application for October 2018 20,987 m³, November 2018 22,090 m³ and December 2018 17,620 m³.

The auditor also conduct field observations in block J3 Mulia 1-2 Estate related to the Land Application activity. It is known that the drainage activities are in accordance with company procedures, no indication of environmental pollution was found.

Likewise, the results of field visits in Mulia 3-4 and Mulia 5-6 Estate, where EFB were applied to the field as organic fertilizer.

Status: Comply	
4.3 Practices minimize and control erosion and degradation of soils.	
<p>Major 4.3.1 The certificate holder shows a soil map that explains the distribution of soil types divided into several subgroups of soil types namely Tropudults, Paleudults, Tropohumults, Dystropepts, Haplorthox, and Tropaquepts, which are listed in the PT SISM Soil Type Map with an area of 14,261 ha with a scale of 1: 110,000. The source of the map comes from the PT SISM Work Area Map, the <i>Rupa Bumi Indonesia Map</i> (Geospatial Information Agency) and <i>Peta Sistem Lahan RePPProT</i> 1987.</p> <p>Minor 4.3.2 and Minor 4.3.6 The certificate holder has a management strategy for planting on slopes which includes the identification of steep areas not suitable for planting which are listed in the <i>Penerapan Konservasi Tanah dan Air PT SISM dan PT SMA</i> document, April 2016. In the identification results, it was found that in PT SISM and PT SMA there are five grades of slope classes, namely flat (0 - 8%), sloping (8-15%), rather steep (15-25%), steep (25-40 %) and very steep (> 40%). The certificate holder has a slope planting policy (conservation method), namely vegetative methods and technical methods. Vegetative methods are conservation methods by planting various types of plants such as ground cover plants, terrace reinforcement plants, planting in strips, crop rotation and the use of organic fertilizers and mulch. Whereas the civil technical method is a conservation method by regulating surface run off so that it does not damage the topsoil that is beneficial for plant growth, including contour land management, making mounds, terraces and waterways. In the management of sloping-corrugated slope areas (slope 40%), PT SISM and PT SMA applies several methods, namely manufacturing terraces, planting cover crops, and making <i>rorak</i>. Based on the report, the implementation of SOPs has been implemented such as making <i>rorak</i>, planting and controlling cover crops and making terraces. Based on the auditor's field observations, it is known that the application of SOP has been implemented well, for example in block E19 Division 1 Mulia 5 Estate and in block H33 Division 3 Abadi 3 Estate, it is known that areas with slopes have been made terraces.</p> <p>Minor 4.3.3 The certificate holder shows the road maintenance program in the estate supported by budget and resources. As an example in PT SMA, shown the Budget & Actual Road Maintenance & Road Laterite Abadi 3-4 Estate document for 2018 and 2019 with total planned and used costs. In addition, the certificate holder also shows the road maintenance records. For example, PT SISM Mulia 5-6 Estate shows the <i>Berita Acara Pemeriksaan Pekerjaan/ Minutes of Job Inspection</i> for road graveling activities (3 m x 10 cm) at Mulia 5 Estate 44,797.16 meters and Mulia 6 Estate 27,613.26 meters total 72,410.42 meter, in collaboration with the contractor PT Intika Delta Borneo for the period 26 February – 25 March 2019.</p> <p>Major 4.3.4 and Minor 4.3.5 Based on land type documents, it is known that the types of soil contained in PT SISM & PT SMA include Tropudult, Paleudult, Tropohumult, Haplorthox, Dystropepts and Tropaquepts. Based on this, it is known that the company's area does not have peatlands. Based on field observations at PT SISM and PT SMA, there were no peat areas in the company's operational area.</p>	
Status: Comply	
4.4 Practices maintain the quality and availability of surface and ground water.	
<p>4.4.1, 4.4.2 The company has compiled a water source and water body management program.</p> <p>Records of management implementation can be shown in the reports of semester I year of 2019, such as socialization to employees related to prohibiting the application of chemicals to river riparian areas, installing warning boards and sign boards, rehabilitating river basins and establishing an orangutan and others wildlife task force team. The river water quality monitoring program is carried out by the company in accordance with the matrix and direction of environmental documents, which is done every semester, the company can show the results of the semester 1 year 2019 conducted in collaboration with an accredited lab (LP-001-IDN). Testing parameters refer to PP No. 82 of 2001 class II. There is no parameters which is exceeded the threshold specified in the regulation.</p>	

Based on field observations in the Tayap River (Est M3-4) and Senggilingan River (Est M5-6), there were no indications of disruption to water sources and water bodies, the company has established boundaries for chemical spraying areas and has carried out rehabilitation on the river banks.

4.4.3, 4.4.4

The management of wastewater generated is carried out at WWTP.

The company has measured the quality of wastewater every month before it is applied to the land, sampling is taken from pond 6 (before being applied to LA). Testing is carried out in collaboration with an accredited lab, referring to Minister of Environment Decree No. 29 of 2003. The auditor verifies the report on testing results for the period Jan - May 2019, from these results there are no parameters that exceed the quality standards.

The company has obtained a permit for the utilization of wastewater based on Decree Ketapang Regent no.: 446 / KLH-B / 2015 concerning Permit for the use of wastewater for application to land to PT Sepanjang Intisurya Mulia oil palm plantations covering an area of 490.14 Ha valid for 5 years, starting June 24, 2015.

The company has set a water use budget for the FFB process, which is: <1.50 m3 / tffb. Actual use of water can be shown to the auditor for example for the Jan-June 2019 period, it can be seen that the use of water for process activities is still below the budget set by mill.

Based on field observations to the water treatment station it is known that the company has installed a measuring instrument that works properly.

Status: Comply

4.5

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

Major 4.5.1 and Minor 4.5.2

Based on the results of a document review and interview with management regarding the control of Pest and Disease Plant, it is known that the certificate holder has implemented an Integrated Pest Management (IPM) system. The company also has a SOP for observing and controlling pests listed in the Oil Palm Manual PT Genting Plantation Nusantara, which was published in 2012, Section OPM 05 (Pests and Diseases), which explains in detail the Activities of Controlling Palm Oil Pests and Diseases, including by using chemicals and biological control agents. In this document parameters have been described for each pest and plant disease attack as well as its control.

Based on the results of field observations related to the implementation of SOPs for observing and controlling pests, it is known that the company has carried out pest control in an integrated manner by combining biological and chemical control techniques and implementing an early warning system (EWS) through periodic pest observations.

For biological control, it is found the use of beneficial plants of *Turnera subulata* along the main road of Mulia 3-4 and Mulia 5-6 Estate. In addition, based on the results of document studies and field visits in Mulia 5-6 Estate, it is known that there is an attempt to use owls (*Tyto alba*) to control rat pests by providing owl cages in 5 points, namely in boxes H18, N20, O18, E19 and H17.

The procedure helps in reducing the use of chemicals during certain periods of time. For example the reduction in the use of chemicals compared to the previous year (%) in Mulia 5-6 Estate, for example the use of isopropyl amine glyphosate 480 g / l active ingredient in 2017 480 grams / ha and in 2018 204 grams / ha.

Based on the results of the document review, interviews with management and field observations, it is known that pesticides are not used prophylactically.

The certificate holder shows the document carrying out the pest observation, for example, which is listed in the Pest Census Form document dated July 24, 2019 in Mulia 5 Estate Division 1 block E21, which explains the number of nettle caterpillar pests, bagworms, horn beetles, rats and termites. Based on the census recap, there are no known attacks for nettle caterpillars, bagworms, horn beetles and termites. For rat pests there are 10 new attacks and 15 old attacks from 148 census items. Based on these results, rat pest attacks are categorized below the threshold value of <10%. Based on the results of interviews with census officers, it is known that the person concerned was given training by the Genting Plantation Research Center (GPRC) regarding census methods and sampling. For example, the IPM Training was conducted on April 22, 2019 at Mulia 3-4 Estate which was attended by 14 participants from staff, foremen and employees. IPM Training was also carried out on April 16, 2019 at Mulia 5-6 Estate which was participated by 13 participants from staff, foremen, census officers, warehouse officers and

employees. Census officers can also demonstrate the IPM procedures, including those shown such as the characteristics of pest attacks, the method of determining sample points and the control techniques of each pest.

Status: Comply

4.6

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

Major 4.6.1

The certificate holder has a SOP for Pest and Disease Control referring to the Oil Palm Manual PT Genting Plantation Nusantara issued in 2012 (OPM Section 05 - Pests and Diseases), which among others explains the pest and disease plant control activities using chemicals and biological control agents, specific uses of chemicals and pests targeted.

The certificate holder shows a list of all types of pesticides and species targets and justification for use, for example, the Kenfosat trademark with active ingredients Isopropyl amine glyphosate which is contact and liquid in form of target weeds namely broadleaf weeds and narrow leaf weeds. In addition, there is also the trademark Kenlon 480 EC with the active ingredient Tryclopir butoxy ethyl ester which is contact and liquid in form of target weed that is broadleaf weed.

Based on the results of field observations in block S13 Division 1 Mulia 4 Estate in the application of herbicides, it is known that the trademarks used are Kenfosat and Kenlon 480 EC with target weeds are broadleaf and broadleaf weeds.

Major 4.6.2

Based on the procedure held by the certificate holder, the application of pesticides for pest control is based on the results of the census. If it exceeds the threshold value, control will be carried out using pesticides. For herbicide applications, carried out in rotation. The certificate holder has documented the use of pesticides every day which are recapitulated per month per each type of pesticide. For example in the *Data Pemakaian Racun* 2019 document for Abadi 3-4 Estate and Mulia 5-6 Estate, which explains the active ingredients, trademarks, classes, LD50 Mg / Kg, registration number, expired date, usage, active ingredients (gr), wide application (ha) and active ingredients / Ha (gr / ha).

For example, for the use of active ingredients Isopropyl amine glyphosate 480 g / l, LD50 4230 Mg / Kg, Use until June 2019 600 liters, active ingredients used 288,000 gr, application area 600 ha and active ingredient / 480 gr / ha.

Major 4.6.3

The integrated pest control plan has been explained in the SOP for observing and controlling pests that the use of chemicals and biological control agents has outlined the parameters of each pest and disease attack as well as its control.

Based on the results of field observations related to the implementation of SOPs for observing and controlling pests, it is known that the company has carried out pest control in an integrated manner by combining biological and chemical control techniques and implementing an early warning system (EWS) through periodic pest observations.

The company shows the documents carrying out pest observations and controls if they exceed the set threshold value. There is no prophylactic in the use of pesticides. Application of pesticides for pest control based on census results. If it exceeds the threshold value, control will be carried out using pesticides. For herbicide applications, carried out in rotation. This is explained in the established procedure.

Minor 4.6.4

The certificate holder has a pesticide application policy as stated in memo No. 73 / GPN / 55TA / X / 2016 containing, among other things related to the use of pesticides categorized by WHO type 1A or 1B or registered in Stockholm or Rotterdam and paraquat will be reduced. Proof of certificate holder's commitment to reduce class 1A and 1B pesticides including using owls (*Tyto alba*) from March 2015 to control rat pests. In addition, based on the use of pesticides, for example the use of active ingredients paraquat has experienced a decline in 2017 which is 358 grams / ha and in 2018 331 grams / ha in Mulia 5-6 Estate. The certificate holder must ensure a decrease in the use of paraquat in accordance with Circular Letter No. 73 / GPN / 55TA / X / 2016. OFI.

The certificate holder also shows records of pest control using chemicals with justified census results that exceed the threshold. For example, based on the results of the rat census on March 10, 2019, in Block E20 of Division 1 Mulia 5, the rat census results were found to exceed the threshold of 10.38 %. The certificate holder campaigned the Racumin brand rodenticide application for rotation 1 on April 9, 2019 in the E20 block area of 32.81 ha with 15 kg (100%) material. Then, re-application for rotation 2 was conducted on April 14, 2019 with a percentage of 70% (10 kg). Then, re-application for rotation 3 was carried out on April 20, 2019 with a percentage of 26% (4 kg). Then, the application was re-applied for rotation 4 on April 24, 2019 with a percentage of 18% (3 kg) and then the application was stopped because it was below 20% of the material used.

Based on the results of physical verification in the chemical warehouse in accordance with inventory records / stock.

Major 4.6.5, Minor 4.6.7 and Minor 4.6.9

The certificate holder has a controlling team that has been trained by an authorized institution and approved by a special pesticide commission for the use of limited pesticides which was conducted on September 8, 2015 which was centered on Mulia 1-2 Estate, which was followed by foremen, supervisors and spray employees *Dinas Pertanian dan Peternakan Kabupaten Ketapang* and Vendor (PT CBA). In addition, training was also held again on 11-12 April in collaboration with Vendors (Supretox 276 SL) on limited pesticide training attended by PT SISM, PT SMA and plasma herbicide applicators.

Based on interviews with the herbicide applicator, it is known that workers can explain things delivered in the training such as the obligation to use PPE, poisoning treatment and others. In addition, the foreman also brought MSDS who already spoke Indonesian to the field.

The certificate holder has a special vehicle for transporting pesticide mixtures equipped with hand washing facilities and the vehicle is in good and proper condition.

Based on the results of interviews with the herbicide applicator and field observations in the Abadi 3-4 PPE warehouse, it is known that there is no available place for washing and storing PPE as well as a bath for the herbicide applicator. This has become a non-conformity with indicator 4.7.3.

Major 4.6.6

The certificate holder has SHE 310 Procedure dated June 1, 2013 concerning Handling Procedures (Receipt, Storage and Expenditures) - Chemicals, Fuels and Lubricants. SOPs govern purchases, registers, MSDS, labeling, system labeling, risk assessment, storage, safe work practices, safe equipment and work procedures, use of licensed collection contractors, emergency facilities, maintenance related to chemical spills, training, record keeping, auditing and review inspections and additional requirements for dangerous goods.

Based on field observations it is known that the used pesticide packaging has been stored and disposed of and not used for other purposes, also known that the used pesticide packaging is discarded or used for other purposes such as trash cans, flower pots.

However, the certificate holder needs to ensure that the storage of chemical poisons does not mix with other materials such as spare parts. **OFI**

Major 4.6.8

Based on the results of the document review, interviews with management, field observations and interviews with workers, it is known that there is no application of spraying through the air.

Minor 4.6.10

The certificate holder has a SOP for *SOP Penanganan Limbah Berbahaya dan Beracun*, document number SISM-ENV 551. The procedure, among others, explains the category of hazardous waste including pesticide packaging waste and the waste is stored in hazardous waste temporary warehouse and handling is carried out according to the type and characteristics.

The certificate holder shows proof of the implementation of appropriate methods for the disposal of waste by the company, including having a licensed hazardous waste temporary warehouse, having a work agreement with a third party to handle hazardous waste and having proof of hazardous waste shipment dated May 16, 2019 with details including packaging for pesticide / LB3 0, 28 tons.

Based on interviews with the herbicide applicator, it is known that the workers have understood about waste disposal procedures such as used pesticide packaging returned to the warehouse to be collected at hazardous waste temporary warehouse.

Major 4.6.11

The certificate holder shows records of periodic health checks for types of cholinesterase and spirometry checks in June 2019 for pesticide operators, with the results summarized as follows:

- Mulia 3-4 Estate, 47 workers were examined for cholinesterase and spirometry and there were 5 minor restrictions. These results have been evaluated by company doctors and it is recommended to exercise regularly 3-4 times per week for 30-45 minutes.
- Mulia 5-6 Estate, 51 workers were examined for cholinesterase and spirometry and there were 3 mild restrictions and 1 moderate restriction and mild obstruction as well as 5 workers whose cholinesterase yield exceeded the threshold. These results have been evaluated by company doctors and are recommended for regular exercise 3-4 x per week for 30-45 minutes and mutations to the non-chemical department. Follow-up for mutations to the non-chemical department has been

followed up by issuing a mutation letter, for example fertilization workers Mulia 5, transferred to manual maintenance work and spraying worker Mulia 5, transferred to manual maintenance work.

Based on interviews with the herbicide applicator, it is known that the results of medical check up are only notified to workers who have indicated a decline in their health function.

In addition, based on interviews and field observations, it is also known that there are no indications of skin diseases and itching for workers. The workers also stated that there were no health complaints related to their work as herbicide applicators.

Major 4.6.12

The certificate holder has a policy that states preventing pregnant and lactating women from handling pesticides, which is listed in Internal Office Memo No. 015 / GPN / V / 2014 dated May 10, 2014 from Head of Sustainability. Based on interviews with spray workers at PT SISM and PT SMA, it is known that the mechanism that runs so far is to check for pregnancy every month. The certificate holder shows evidence that pregnant and breastfeeding women are not allowed to handle pesticides, for example PT SMA shows the Pregnancy Test Results Abadi 3-4 Estate for the period January – June 2019, known to 32 workers who were checked, the results were negative.

The results of interviews with spray workers at PT SISM and PT SMA, found that there were no workers who were pregnant or breastfeeding their children.

Status: Comply

4.7

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

Major 4.7.1

The certificate holder has a OHS Policy signed by the President Director of PT Genting Plantation on October 18, 2012 and has been socialized to workers. Workers' understanding of OHS policies and procedures based on interviews with workers including those who work must use PPE prepared and determined by the company. Workers stated that the briefing was delivered through morning briefing or special time of socialization. The certificate holder shows the 2019 Safety, Health and Environment Objective and Management Program document which explains the OHS Objective, program / action plan, program details, targets, time frame, PIC, documents and monitoring period.

The certificate holder shows the realization of the program arranged, for example, regarding a health check. The results of the inspection have been evaluated and followed up by the company. The certificate holder has the opportunity to ensure the follow-up of workers exposed to noise to check with an ENT specialist according to the company's doctor's advice. **OFI.**

Major 4.7.2

Based on the results of the document review, it is known that the certificate holder has documented risk assessments Estate in the Hazard Identification, Risk Assessment and Risk Control (HIRARC) documents, 18 August 2018 and Mill HIRARC, effective 30 July 2018. Based on field observations at the Estate, found activities that have not yet been carried out risk assessment, namely as follows and not limited to:

- Fire monitoring from the fire tower
- Monitoring and maintenance of boundary pole and HCV
- Census and pest control

Based on the results of field observations on the Estate, activities that are not in accordance with the risk assessment are found, which are as follows and not limited to:

- Gas cylinders are standing and not chained and there is no OHS symbol.
- No spill kit available (spill traction / spill) in the oil warehouse
- The droplet reservoir in the fuel tank is broken
- The tower does not have a fence, no warning and free access
- FFB loaders sit on the tractor fender

Based on the explanation above, it was concluded that not all of the company's operational activities have been assessed for risk and danger. In addition, there are activities whose control measures have not been effectively implemented and monitored. This is a **non-conformity No.2019.03.**

Based on the results of field observations in the grading area, were found FFB transport trucks which were overturned due to unfit unit conditions. The certificate holder has the opportunity to evaluate the feasibility of the contractor's FFB transport truck.

OFI.**Major 4.7.3**

Based on interviews with the herbicide applicator at Abadi 3-4 Estate, it is known that 4 out of 6 workers were interviewed using boots that they bought themselves. Likewise with manual weed control workers at Abadi 3-4 Estate, it is known that 6 out of 6 workers were interviewed using boots that they bought themselves. In addition, based on the results of interviews with the herbicide applicator and field observations in the Abadi 3-4 Estate PPE warehouse, it is known that there is not yet a place for washing and storing PPE as well as a place for herbicide applicators.

Based on the above evidence, the certificate holder has not been able to show evidence that workers have been provided PPE by the company in accordance with the results of HIRAC and also have not been provided with a washing and storage of PPE as well as a bath for herbicide applicators.

This is a **non-conformity No.2019.04.**

Major 4.7.4

The certificate holder has identified the person responsible for implementing OHS, for example PT SMA based on the decision of the Head of Labor Inspection of West Kalimantan Province number 35 / WASNAKER / 2018 concerning Ratification of the PT SMA Guiding Committee Of Occupational Safety & Health Membership Composition, on 6 July 2018. Guiding Committee Of Occupational Safety & Health Secretary based on the appointment of OHS Expert No KEP .13595 / NAKER-BINWASK3 / III / 2018, March 5, 2018 for PT Sawit Mitra Abadi. PT SISM has formed a Guiding Committee Of Occupational Safety & Health organization and has been ratified by the West Kalimantan Provincial Manpower and Transmigration Office based on Decree of the Head of the Technical Implementation Unit (UPT) of Labor Inspection in Region I of West Kalimantan Province number 34 / P2K3 / WASNAKER / 2019 concerning Ratification of PT SISM Guiding Committee Of Occupational Safety & Health Membership, May 2, 2019. Guiding Committee Of Occupational Safety & Health Secretary based on the Appointment of PT SISM General OHS Expert number KEP.13596 / NAKER-BINWASK3 / III / 2018).

Meetings between workers and those responsible for OHS are held routinely every month. For example, in May 2019, which explained the preparation of the RSPO audit and the orderliness of the use of PPE.

Minor 4.7.5

Based on the results of the document review and interviews with the foreman in the field, it is known that the First Aid training has been conducted in the work area. However, based on field observations at Abadi 3-4 Estate on herbicide application activities and manual weed control, it was discovered that the foreman was not equipped with first aid facilities.

Based on the results of field observations at Abadi 3-4 Estate in buildings that have been given first aid facilities, there is a lack of contents without monitoring usage, for example in the first aid box hazardous waste temporary warehouse and in the workshop.

Based on field observations in Mulia 5-6 Estate and Abadi 3-4 Estate at fueling stations, fertilizer warehouses and chemical warehouses, there are no MSDS Solar and MSDS pesticide and fertilizers not yet available.

Based on the evidence it is concluded that the certification holder has not been able to show evidence that emergency response procedures have been effectively implemented and monitored for aspects of the availability of first aid equipment at work sites and MSDS for all hazardous and toxic materials.

This is a **non-conformity No.2019.05.**

Regarding emergency response preparedness at the mill, certificate holders have the opportunity to increase monitoring of emergency response equipment preparedness. In addition, the certificate holder also has the opportunity to ensure the fulfillment of fire control infrastructure in accordance with the plan stipulated in reference to Minister of Agriculture Regulation number 5 of 2018. **OFI.**

Minor 4.7.6

PT SMA shows documents including:

- Request for Payment of PT SMA, on May 6, 2019 for the BPJS Employment in April 2019.
- JAMSOSTEK Summary Palmindo Non-Staff & Check roll Employees in April 2019.

PT SISM shows documents including proof of payment of the BPJS Employment for the period June 2019 paid on July 15, 2019 for 1,609 workers and July 4, 2019 for 124 workers, bringing the total number of workers paid by the BPJS for June 2019 to 1,733 workers. The results of verification of PT SISM's labor registration documents in June 2019, found that there were

1,874 workers.

Based on the explanation above, it is concluded that there is not enough evidence available that all employees have been included in BPJS Employment and BPJS Health and proof of payment of contributions.

This is a **non-conformity No.2019.06**.

Minor 4.7.7

The certificate holder has documented work accident records using LTA metrics, which are summarized as follows :

PT SISM

Based on the work accident recap documents, for example in Mulia 3-4 Estate for the period December 2017 – December 2018. Based on these documents known the number of workers 4,642, fatalities 0, the number of major accidents 4, the number of minor work accidents 4, the total time lost (LTI) 26, first aid 12, Accident frequency rate (FR) 0.36 and Accident severity rate (SR) 2.33.

PT SMA

Based on work accident recap documents, for example in PT SMA for the period January – December 2018. Based on these documents, the average number of workers per month is 1,042, fatalities 0, number of major accidents 0, number of minor work accidents 2, total time lost (LTI)) 0, first aid 3, Accident frequency rate (FR) 0 and Accident severity rate (SR) 0.

Major 4.7.2	Status: Non-conformance NC.2019.03 with major category	
Major 4.7.3	Status: Non-conformance NC.2019.04 with major category	
Minor 4.7.5	Status: Non-conformance NC.2019.05 with minor category	
Minor 4.7.6	Status: Non-conformance NC.2019.06 with minor category	

4.8

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

4.8.1.

The company has a training program in 2018-2019. The training program preparation is based on identifying training needs. Identify training needs contained in the Survey on Training Need document. The company has a training program contained in the Genting Plantation Training Calendar 2019. A number of training plans have been realized, and some training has not been realized because some training is planned for semester 2 of 2019. The training explained the training needs, target audience, participant meeting, location, and facilitator and implementation plan. Some training programs such as:

- Fundamental leadership
- Training harvesting
- Manuring
- Spraying
- OHS risk management
- First aid
- Job safety
- General OHS experts
- Fire-fighting socialization
- Plantation ethics and core values
- Maintenance of sprayers and introduction of nozzle prayers
- Employment socialization

4.8.2.

The company has a record of employee training, both individually and in groups. The training records conducted in groups have also informed the names of the participants along with their divisions.

For example:

- Training to Maximize Production (Ton / Ha) which was held on 2 - 3 July 2018 was attended by 36 participants.
- Fire Fighting Training on October 6, 2018 at the Mulia Oil Mill attended by 13 participants

The results of interviews with labor unions and workers such as harvester, spraying team, fertilizer worker, mill worker, said that the company had provided training / socialization regarding the duties and responsibilities of workers. Based on interviews with contractor, known that company also has provide socialization related to occupational health and safety, for example the use

of PPE and work instruction.		
	Status: Comply	
PRINCIPLE #5 Environmental responsibility and conservation of natural resources and biodiversity		
5.1 Aspects of plantation and mill management, including replanting, that have environmental impacts are identified, and plans to negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continuous improvement.		
5.1.1 PT SISM already has Environmental Impact Analysis Document which has been legalized by West Kalimantan Governor pursuant to Decision Letter no. 700 Year 2006 dated October 16, 2006 on the Environmental Feasibility of Plantation Activities (Area Area + 19,800 Ha) and Palm Processing Factory (Plant Capacity 80 Ton/Hour) by PT Sepanjang Intisurya Mulia in Nanga Tayap Subdistrict, Ketapang District, West Kalimantan Province. Based on the verification of management information and legal documents indicate that at the moment PT SISM plans to increase the installed capacity of PKS to 90 Tons/Hours. Beside that, PT SMA has a Environmental Permit in the form of Environmental Impact Analysis Document which has been approved by the Governor of West Kalimantan in accordance with Decision Letter no. No. 108 of 2006 dated April 4, 2006 on the Environmental Feasibility of Plantation Activities (Area Area + 15,800 Ha) and Palm Processing Mill (Plant Capacity 60 Ton TBS / Hr) by PT Sepanjang Intisurya Mulia in Nanga Tayap Subdistrict, Ketapang District, West Kalimantan Province. In addition, there's Environmental Document Addendum in 2018, ratification of the Ketapang Regent Decree No.031 / DPMPTSP-DB / 2018 concerning Environmental Permit Activities Increasing Palm Oil Processing Plant capacity from 60 tons FFB / Hour to 90 tons FFB / Hour by PT Sepanjang Intisurya Mulia located in the Village Pangkalan Teluk Nanga Tayap District, Ketapang Regency on January 23, 2018. 5.1.2 & 5.1.3 Company have plan which includes management and monitoring protocol outlined in the RKL-RPL document and implemented to monitor the effectiveness of the management activities to mitigate negative impact and enhance positive impacts. Results of monitoring are listed on regular environmental monitoring and management report, and monitoring results for examples 2nd semester of 2018 shown environmental management related to waste water, surface water quality, hazardous waste management, noise and etc still comply with regulation and monitoring plan. The company has reviewed the environmental monitoring plan document in 2018 based on Environment Document (Ketapang Regent Decree No. 031/DPMPTSP-D.B/2018). There are change related to mill output capacity to 90 ton/hour. (next review at least on 2020). Based on public consultation with local communities (Head of Hamlet, Religious Figure and Community Figure in Bayangan Hamlet of Mensubang Village and Head of Hamlet and 2 villagers of Engkadin Hamlet of Sepakat Jaya Village) indicate that the company has made environmental management and there is no issue of pollution caused by the company's operational activities.		
	Status: Comply	
5.2 The status of rare, threatened or endangered species and other High Conservation Value habitats, if any, that exist in the plantation or that could be affected by plantation or mill management, shall be identified and operations managed to best ensure that they are maintained and/or enhanced		
5.2.1 PT SISM has carried out a HCV assessment done by YASBI in 2009 and conducted a HCV re-identification by PT Sonokeling Akreditasi Nusantara in 2014. PT SMA carry out a re-identification of HCV in 2014 done by PT Sonokeling Akreditasi Nusantara. The HCV assessment refers to the HCV Identification Guidance in Indonesia published by the Revised HCV Toolkit Consortium Indonesia, 2008. Public consultations have been carried out to the surrounding communities, namely Mensubang village, Teluk Kramat,		

Pangkalan Teluk, Pangkalan Jihing, Pangkalan Suka, Sukamaju Sub-village, Pangkalan Suka village, Plasma Sawit Harapan Jaya Cooperative Unit.

Peer Review was conducted by Comparative Expert Dr. Jarwadi Budi Hernowo in January 2015 with the results as attached to the HCV assessment document. The identification results show that in PT SISM was identified as 1233.13 Ha, while PT SMA was identified as 857.50 Ha.

PT SISM identified as many as 11 species of flora which are protected and endangered species (Appendix 1 CITES) such as *Dendrobium sp*, *Dorio ketejensis*, *Dipterocarpus costatus*, *Shorea palembanica*, *Shorea almon*, *Shorea leprosula*, *Shorea acuminatissima*, *Shorea hopefilia*, *Shoreayphyllenen stilll*, *Eusideroxylon zwageri*, *Shorea almon*, *Shorea acuminatissima* and *Shorea hopefilia*. There are 56 species of birds, 11 species of mammals and 4 types of reptiles, none of which are included in the CR category based on the IUCN Redlist.

In PT SMA there were 8 species of rare / protected birds, 10 species of mammals and 4 species of reptiles identified (according to the 2014 IUCN Red List, CITES 2014 and Government Regulation No. 7 of 1999).

There are plant species with Endangered (EN) status based on IUCN 2014.3, namely *Shorea dasyphylla* Foxw and *Dipterocarpus costatus*. While *Eusideroxylon zwageri* IUCN is included in the Vulnerable (VU) category and based on CITES is in the Appendix II category.

5.2.2, 5.2.3, 5.2.4

PT SISM and PT SMA have developed a HCV and RTE species management program, reporting management and monitoring is done on a semester basis. The auditor verifies the program and management report for Semester I year of 2019:

1. Marking HCV boundaries (river border, cultural / sacred identity and protected area of flora and fauna)
2. Inventory of flora and fauna diversity
3. Dissemination to employees and surrounding communities
4. Conservation education collaborated with the West Kalimantan BKSDA
5. Signboard placement and maintenance
6. Orang utan task force training by YIARI (specifically PT SMA)
7. Patrol orangutan task force (specifically PT SMA)
8. Riparian rehabilitation

Records of management implementation can be shown for example:

- ✓ There is evidence of socialization to employees on the prohibition of chemicals application to river banks
- ✓ Has installed warning boards and other sign boards in HCV areas and other strategic locations, this was seen during field observations to Est M3-4, M5-6 and A3-4.
- ✓ Rehabilitation of riverbanks by planting woody plant species
- ✓ Determination of the orangutan and wildlife task force team at PT SMA on 28 March 2018

The company has collaborated with a number of outside institutions such as Tropenbos, BKSDA and YIARI regarding to management of HCV areas, MoU can be demonstrated for this cooperation. Based on the verification of the results of annual monitoring, it was found that in the PT SISM and PT SMA area there were no species of animals that had potential conflicts with humans such as the Orang Utan (*Pongo pigmaeus*).

An evaluation of the program has been carried out by the company every semester attached in the report on the management and monitoring of HCV and RTE. The evaluation results become input for the preparation of the next period management plan.

Socialization to workers has been carried out by PT SMA and PT SISM routinely during roll-call and through signboards installed in strategic locations (offices and other buildings including employee housing). During the interview, the employees understood the prohibition and sanction policy, and during the field observation to the employee housing there were no employees who caught, injured, killed, owned, nurtured, and traded protected animals and plants. In the of SOP / GPN-S / 02 issued on 9 January 2017, there is an explanation of sanction in the form of layoffs (against employees) and crime in accordance with applicable regulations.

There are no set-aside HCV areas in PT SISM and PT SMA. In accordance with the results of HCV identification and maps it is known that all HCV areas of PT SISM and PT SMA are within the company's HGU, there are areas designated as HCV6 (local cultural values), which areas have been based on agreements with local communities.

	Status: Comply	
5.3 Waste is reduced, recycled, re-used and disposed of in an environmentally and socially responsible manner.		
5.3.1 <p>There is no change of waste source identification.</p> <p>Sources of waste in the POM area among others: generator houses, workshops, chemical storage, laboratories, offices, housing, boilers and WWTP ponds. Sources of waste in the estate area among others: spraying, office, workshop, housing, generator, clinic, fertilization, and chemical storage.</p> <p>Waste management plans among other: storing hazardous waste at hazardous waste storage and delivering it to licensed parties, managing POME on WWTP pools, utilizing POME on land application, testing POME quality and air emissions, disposing of garbage on land fill area.</p>		
5.3.2 <p>The company has a SOP for Hazardous and Toxic Waste Management (Doc. No.: SISM-ENV 551) which explains that used chemical containers are hazardous waste and must be managed in accordance with applicable regulations regarding the management of hazardous waste.</p> <p>However, based on the results of field observations, it is known that the plans for the management of used chemical container waste have not been implemented in accordance with SOPs and regulations, for example:</p> <ul style="list-style-type: none"> • Used pesticide containers are used as droplet container in the solar tank (Mulia Estate 5-6). • Used pesticide packaging is stored in the nursery area. (Abadi Estate 3-4) • Used pesticide containers stored in the Mulia Estate 3-4 washing room. <p>In addition, based on the results of interviews with management, it is known that the company does not have procedures related to hazardous waste utilization and permission to use hazardous waste container. Non-conformity No. 2019.07 with major category.</p>		
5.3.3 <p>The hazardous waste management plan is explained in the SOP for Hazardous and Toxic Waste (Doc. No.: SISM-ENV 551), namely by managing in accordance with applicable regulations, including explaining domestic waste management by placing it in a special labeled trash can and disposing it scheduled.</p> <p>However, based on document review and field observations, it is known that:</p> <ul style="list-style-type: none"> • In the Hazardous Waste Temporary Storage Abadi Estate 3-4, no used oil waste was found, but in the hazardous and toxic waste records (in June 2019) there was a used oil waste stock of 0.606 liters. • On the record of hazardous and toxic waste Mulia Oil Mill does not explain the amount of Hazardous Waste from Hazardous Waste Temporary Storage Mulia Estate on 1-2, 3-4 and 5-6. • There is no record of hazardous Waste for hazardous waste stored in the nursery warehouse (Abadi Estate 3-4). • No records have been found regarding the amount of hazardous waste used and utilized for plantation operations both in Mulia Estate and Abadi Estate. • In the document note on Hazardous and Toxic Waste in Abadi Estate 3-4, no hazardous waste transfer record to Hazardous Waste Temporary Storage Abadi Estate 1-2. Based on interviews with officers related to the transportation of hazardous waste entirely carried out at Hazardous Waste Temporary Storage LB3 Abadi Estate 1-2 • The results of field observations show scattered used oil in the Mulia Estate 3-4 generator house. • The results of field observations showed that used oil drums were used at the Security Post. • Observation to the clinic shows that medical waste is stored in the clinic (Not stored at Hazardous Waste Temporary Storage). • Used oil drums used for water storage in Mulia Estate 3-4 emplacement. • Used Oil is stored in workshop Estate Estate 5-6 (not in Hazardous Waste Temporary Storage). 		

Based on the above evidence, the company has not been able to show evidence that the management of all waste has been carried out in accordance with applicable SOPs and regulations to avoid and reduce pollution. Non-conformity No. 2019.08 with minor category.		
	Status: Non-conformity No. 2019.07 with major category. Non-conformity No. 2019.08 with minor category.	
5.4 Efficiency of fossil fuel use and the use of renewable energy is optimised.		
5.4.1 <p>The company uses shells and fiber as boiler fuel to generate turbine power, which can reduce the use of fossil fuels. In addition, the company has recording the utilization of solid waste over the last 12 months (period 2018), among others, the use of 27,556 tons of shell and 42,840 tons of fiber in the period of January 2018 until December 2018. Ratio of diesel fuel against FFB process are 5.26 kwh/FFB ton</p> <p>Based on field observation and interviews with machine/generator room officers at the factory, it is known that electricity for factory operations uses turbines, while generators are used only at certain times.</p>		
	Status: Comply	
5.5 Use of fire for waste disposal and for preparing land for replanting is avoided except in specific situations, as identified in the ASEAN guidelines or other regional best practice.		
Indicator 5.5.1. & 5.5.2. <p>The company has zero burning policy dated 18 October 2012. According to field observation to several block in Abadi 3-4; Mulia 3-4; and Mulia 5-6 there are no indication open burning during land preparations all of land preparation was conducted by mechanic.</p>		
	Status: Comply	
5.6 Plans to reduce pollution and emissions, including greenhouse gases, are developed, implemented and monitored.		
5.6.1 & 5.6.2 <p>The company has have identification of the main sources of greenhouse gas emissions from plantation and mill activities at PT. SISM & PT SMA with sources of emissions comes from activities:</p> <ul style="list-style-type: none"> • Land clearing • Manuring • Harvesting • Use of diesel • FFB Processing • POME <p>In addition, the Company has shown the results of testing of air ambient, generator sets and boiler emissions carried out in June 2019 with the result that all parameters are in accordance with the quality standards of the regulation.</p> <p>Also, realization of renewable energy have been monitored on monthly report for fiber and shell usage. Waste water has been monitored every months and monitoring periods July 2018 - July 2019 sighted that all of waste water testing parameters is compliant to the standards quality.</p>		
5.6.3 <p>Monitoring for GHG emission and pollutants from estate and mill was done periodically every 6 month, covered on RKL/RPL implementation report and reported to environmental agency periodically. Second Semester of 2018 testing result indicates all parameters related to emission are still comply with standard quality. Calculation of GHG and its monitoring has conducted by company using RSPO palm GHG calculator v 4.0. Summary of GHG emission for Mulia Oil Mill are listed as follows:</p>		

Summary of Net GHG Emissions

Description	tCO ₂ e/tProduct
CPO	7.30
PK	7.30
PKO	0
PKE	0

Extraction	tCO ₂ e/tProduct
OER	22.22
KER	3.86

Land Use	Ha
OP Planted Area	17471.66
OP Planted on peat	0.00
Conservation (forested)	2090.63
Conservation (non-forested)	0.00

Production	t/yr
FFB Processed	262,203
CPO Produced	57,771

Summary of plantation/field emissions and sink

Description	Own			Group			3 rd Party		
	tCO ₂ e	tCO ₂ e/ha	tCO ₂ e/tFFB	tCO ₂ e	tCO ₂ e/ha	tCO ₂ e/tFFB	tCO ₂ e	tCO ₂ e/ha	tCO ₂ e/tFFB
Land conversion	232540.09	19.82	3.22	95853.26	16.71	5.56	0	0	0
CO ₂ emission from fertilizer	4421.95	0.38	0.06	2073.01	0.36	0.12	0	0	0
N ₂ O emission from peat	0	0.00	0.00	0.00	0.00	0.00	0	0	0
N ₂ O Emission from fertilizer	4878.78	0.42	0.07	2897.94	0.51	0.17			
Fuel consumption	3339.83	0.28	0.06	1630.86	0.28	0.09	0	0	0
Peat Oxidation	0	0	0.00	0.00	0	0	0	0	0
Crop sequestration	-	-9.37	-1.52	-	-7.90	-2.63	0	0	0
Sequestration in conservation area	109915.84			45307.42					
Total	-11912.29	-1.02	-0.17	-9478.11	-1.65	-0.55	0	0	0

*1 of 1 3rd party without dataset

Summary of mill emission and credits

Description	tCO2	tCO2e/tFFB
POME	396.05	0.00
Fuel Consumption	502.36	0.01
Grid Electricity Utilization	2.35	0.00
Exports of Excess Electricity to Housing & Grid	-0.26	0
Sale of PKS	-1671.03	-0.02
Sale of EFB	0.00	0.00
Total	-770.52	-0.01

Palm oil mill effluent (POME) treatment

Diverted to compost 0 %

Diverted to anaerobic digestion 100 %

POME diverted to anaerobic digestion

Diverted to anaerobic pond 100 %

Diverted to methane capture (flaring) 0 %

Diverted to methane capture (electricity generation) 0 %

From the results of interviews with management, the officer concerned had understood and was able to demonstrate the filling of the GHG calculator.

Based on document verification shown that accurate data has been put into RSPO Palm GHG Calculator.

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 Major

PT Sepanjang Intisurya Mulia has been conducted SIA assessment on November, 28th to December, 5th 2010 and re-evaluated on December 2016. PT Sawit Mitra Abadi has been conducted SIA assessment on March, 24th to April, 5th 2009 and re-evaluated on December 2016.

Those assessment has covered prior aspect such as:

- Human capital: health, safety, education, knowledge and skill, capacity for work and capacity to adapt.
- Natural Capital: agricultural resources (land and production), water resources, forest resources, and something that is environmentally related and has important value to meet basic needs.
- Financial Capital; savings, credits, grants, wages or income, benefits and pension funds.

- Social Capital: social institutions and socialization, stratification and social differentiation, including dynamics in social relations (formal or informal).
- Physical Capital: facilities and infrastructure for transportation, education, housing, health and safety, energy and communications installations, including technology or materials for agricultural and non-agricultural production (home industry, customary art and culture).

Based on public consultation with village representative from Sepakat Jaya, Pangkalan Suka, Mensubang and Pangkalan Teluk Village during the audit has known that entire issues has been covered in SIA report. All complaint from the villager has been handled well.

6.1.2

SIA assessment in PT Sepanjang Intisurya Mulia using Focus Group Discussion approach. Through the FGD document known that several FGD session as follows:

- FGD session with community in Sub-Village of Pebantan on November, 30th 2016 that attended by 9 participants.
- FGD session with community in Sub-Village of Sungai Beluing on December, 1st 2016 that attended by 17 participants.
- FGD session with community in Sub-Village of Engkadin on December, 1st 2016 that attended by 16 participants.
- FGD session with community in Sub-Village of Sukamaju on November, 30th 2016 that attended by 16 participants.
- FGD session with community in Pangkalan Teluk Village on November, 30th 2016 that attended by 8 participants.
- FGD session with labor representatives on November, 30th 2016 that attended by 16 participants.

PT. Sawit Mitra Abadi also conducted SIA Assessment using FGD approach during December 2016. Through the FGD document known that several FGD session as follows:

- FGD session with community in Pangkalan Teluk Village on December, 4th 2016 that attended by 8 participants.
- FGD session with community in Tanjung Medan Village on December, 4th 2016 that attended by 13 participants.
- FGD session with community in Sub-Village of Bayangan on December, 3rd 2016 that attended by 8 participants.
- FGD session with community in Sub-Village of Teluk Perak on December, 5th 2016 that attended by 8 participants.
- FGD session with community in Sub-Village of Pangkalan Jihing and Cali on December, 5th 2016 that attended by 6 participants.
- FGD session with community in Sub-Village of Mensubang on December, 3rd 2016 that attended by 7 participants.
- FGD session with labor representatives on December, 2nd 2016 that attended by 30 participants.

On the occasion, the respondents were free to give their opinions. The meeting notes are summarized in the 2016 SIA evaluation document.

Based on public consultation result with workers, worker union representative and Gender committee also based on document review, there's record of worker attendant record for forum group disscoussion on 2018 as a basis for social impact document.

6.1.3 & 6.1.4

The company has the latest SIA evaluation document in Social Impact Assessment Report Document of PT Sepanjang Intisurya Mulia and PT Sawit Mitra Abadi which was conducted in May 2019. There's a difference between Social management plan on oldest one with 2019 period especially related to newest issues. There are recommendations for improvements related to the issues that arise in the SIA report, the company has now made a program plan for 2019. Related to issues such as:

- Problems with land compensation in Bayangan Village.
- JPMA Cooperative Dispute with KSTL.
- Land of 190-230 ha of JPMA plasma land that has no oil palm, but management costs are still counted.
- Damaged employee housing facilities.

The company has a timeline and the PIC responsible for resolving these issues. Based on document review and public consultation, all issues has been covered on SIA management plan.

6.1.5

PT Sepanjang Intisurya Mulia has had partnership agreement regarding to development of oil palms plantations with Cooperative of Perkebunan Sawit Trimulya Lestari with area 812 Ha since 2011 and with Koperasi Perkebunan Sawit Trimulya

Lestari with area 1,400 Ha since 2013. PT Sawit Mitra Abadi also had partnership agreement regarding to development of oil palms plantations with Cooperative Jasa Panca Mitra Abadi with area 690 Ha since 2016.

Status: Comply

6.2

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

The company has procedure of Communication with internal and external stake holders number SISM-CDP-05-00.00 dated 1 December 2013 and FPIC procedur number SOP/GPN-S/01/15 dated 1 May 2015. There are internal and external stakeholders list on each unit. Community Development Assistant was appointed as PIC who responsible to manage all issues from stakeholders. Certificate holder have list of stakeholders which consist of government district, head of village, etc. Management unit keeps all communication/consultation or meeting record with stakeholders in mail folder. All records of communication with stakeholders is kept in incoming and outgoing mail folder. Based on document verification, it is known that all incoming mail have been responded by companies on time.

Based on interviews with the surrounding village officials submitted that the Village Head in communication or consultation with management through the Estate Manager. It ensures that stakeholders have been informed the officer in charge of communication and consulting PT SISM and PT SMA.

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

CH already have Complaints SOP with document number SISM-HRD-04-00.00 dated December 1, 2013 and authorized by the Group Manager. The procedure inform about:

- Indirect delivery (by mail)
Each complaint must be submitted in writing using the complaint form or Documentation of Grievance Form (SISM-HRD-04-01.00)
- Direct delivery.
Employees who wish to submit a complaint to the party or their supervisor are also required to fill out a complaint form or Documentation of Grievance Form.
- Bipartite Settlement (SISM-HRD-04-05.00).
- If an employee feels that the answer to his complaint is unsatisfactory or that his employer is considered negligent in responding to the complaint within the specified time and the employee submits an objection, the HR manager is obliged to settle it bipartite and call the employee in writing.

Based on interviews with employees on Mulia Estate 3- 4 (fertilizer, spray team and harvest workers), Mulia Estate 5-6 and Abadi Estate 3-4, it was known that employees knew and understood the procedures for resolving complaints.

6.3.2

From the results of interviews with employees it is known that there are several complaints that have been submitted by employees who have not been recorded in the employee's complaint book, for example:

- Complaints related to emplacement that are still combined with other employees in Mulia Oil Mill Emplacement.
- Complaints related to complaints of broken toilets and leaky roofs in Estate Mulia 3-4 Emplacement.
- Complaints related to damaged houses in the Estate Mulia 5-6 Emplacement.
- Complaints regarding clean water facilities.

And a number of complaints that have been recorded in the employee's complaints book, such as complaints related to a damaged septic tank in Mulia Estate 5-6 (November 30, 2018) have been responded to by the company, but until now there has been no progress record.

Based on the evidence, it is known that the company has not recorded records of the process and results of handling employee

disputes and complaints. Non-conformity No. 2019.09 with minor category.		
Status: Non-conformity No. 2019.09 with major category.		
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.		
Major 6.4.1; Minor 6.4.2 & Major 6.4.3 Company has SOP of Free, Prior and Informed Consent, No. Document: SOP / GPN-S / 01, effective from May 1, 2015, that FPIC process will be conducted through several steps, consisting of: <ul style="list-style-type: none"> • Identification of land owners and customary rights • Identification and Engagement of Representative Bodies • Provision of Information • Negotiation and Consensus Processes • Documentation of the Agreement • Monitoring of the Agreement • Conflict Resolution Mechanism • Verify Approval The document regarding to land acquisition process such as land owner identification, minutes of meeting, negotiation and photos has been shown have been well documented and well stored by Legal Department. <p>The results of stakeholder consultations with the Plantation Agency of Ketapang District, interviews with the head of Pangkalan Suka Village, Pangkalan Suka customary head, Engkadin hamlet head (Sepakat Jaya village) along with 4 previous landowners (PT SISM) and Bayangan hamlet head of Mensubang village and religious leaders who are also Previous land owners, said that in the past land acquisition, there was no coercion by the company. Land compensation is given based on the mutual agreement of both parties without coercion from the company. The process of land acquisition begins with socialization to the community landowners. From the results of interviews with the Head of Pangkalan Suka Village, it was also stated that he was also a member of the land acquisition socialization team consisting of the community, agencies and companies.</p>		
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.		
Major 6.5.1; Major 6.5.2 Minimum wage based on the Decree of West Kalimantan Governor Decree No. 590/Disnakertrans/2018 dated on November 14, 2018 regarding District Minimum Wages and Sectoral Minimum Wages of Ketapang Regency in 2019. Based on this decree, sectoral minimum wage for Ketapang Regency is Rp. 2.638.000. Based on document verification, field observation, interview with workers (manuring workers, spraying team, mill workers) there's no indication about the force labor. In addition, they get the wage accordance with the wage minimum regulation. Based on interview with harvesters, it is known that there is no force labor. If they've got the target, they will get the premium pay. And if they don't get the target and has been working for 7 working hours, they will get daily minimum wage. Interview with Labor Union and Manpower Agency of Seruyan Regency, said that wages are paid in accordance with applicable regulations. <p>OFI</p> <ol style="list-style-type: none"> 1. Ensure harvesters working hours, periodic piece rate evaluations & price agreements with workers. 2. Ensuring the socialization of the determination of Friday and Saturday working days to upkeep workers. <p>Explanation :</p> <ol style="list-style-type: none"> 1. Harvesters' working hours: The results of field observations (harvest activities including harvest supervisors) at PT SMA are known that there are no clear working hours (in or out) for harvest workers. Harvest workers sometimes enter 7, 8 or 9 noon. However, harvesters know that working hours at the company are 7 working hours. For crop supervisors, NC has been issued in indicator 2.1.1. 2. Evaluation of piece rate wages & price agreements: results of interviews with fertilizer workers and simulation of piece rate wages, it was known that piece rate wages are in accordance with the provisions of the 2019 minimum wage and the piece rate wage known still same as 2018. Results of interviews and auditors team simulation, wages for the piece price of 		

fertilizer is still in accordance with the 2019 minimum daily wage. Observation to evaluate the following year's piece rate is in accordance with the minimum wage and in accordance with the agreement with the worker.

3. Socializing the determination of Friday and Saturday. Working days to maintenance workers; In the previous assessment (2018), it was found that the working hours of maintenance workers were limited due to the low price of CPO which affected the company's income and it was already known by the competent authority (the Manpower Agency). When assessing ASA-1 (2019) it was found that this was no longer valid. The results of interviews with maintenance workers both at PT SISM and PT SMA revealed that not all workers had known that the policy to give off day to workers on Friday and Saturday had not valid anymore.

Management unit has Collective Labor Agreement that has been registered in Manpower Agency, as follows :

- **PT Sepanjang Intisurya Mulia** : Decree of the Head of the Manpower and Transmigration Agency of Ketapang Regency No. 42 of 2017 with registration number 08/PKB/TKT-B/IX/2017.
- **PT Sawit Mitra Abadi** : Decree of the Head of the Manpower and Transmigration Agency of Ketapang Regency No. 43 of 2017 with registration number 09/PKB/TKT-B/IX/2017.

The CLA available in bahasa and explained the rights and obligations of employees, for example: Work Relationship, Working Time, Wages, Social Insurance, Occupational Health and Safety, Industrial Relationship, etc. Management unit has socialized the CLA to the workers. It was known from documentation of socialization on April 24 2019, that was attended by 94 participants. Based on onterview with labor union and workers said that CLA has been socialized by companies.

The verification results of the list of workers documents for June 2019 of PT SISM and PT SMA revealed that there were casual workers, for example:

- PT SISM: NIK 10026289
- PT SMA: NIK 10011338 and NIK 10011341

However, the Employee Work Agreement has not yet been shown.

NC No. 2019.10

6.5.3.

The results of field observations and document review, it was known that the company has provided housing G1, G2, G4, G8, electricity, clinics, houses of worship, sports fields, and so on to workers.

Results of observations and interviews in the Mulia 3-4 estate estate, Mill housing, Mulia 5 Estate, known that the condition of some housing is in a damaged condition, toilets are not functioning and water supply difficulties (including Abadi 3-4 Estate). Regarding this matter, the company showed progress in the form of a purchase request along with a recap of the offer for Mulia 6 Estate.

The results of interviews with mill workers revealed that the worker lives with his family and other workers in one house. In addition, the results of a study of housing facilities and infrastructure documents, there are 2 households in 1 house in Mulia 4 Estate.

Based on the explanation above, it is concluded that there is not enough evidence that the company has provided adequate housing facilities and infrastructure for workers. **NC No. 2019.11.**

6.5.4.

The results of observations to the housing and interviews with housing residents found that there are several housing residents who sell basic needs in residential areas. In addition, there are also peddlers who enter the housing area at least every two days with competitive prices.

Major 6.5.2 Minor 6.5.3	Status: Nonconformity No. 2019.10 Status: Nonconformity No. 2019.11	
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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.

Major 6.6.1 and Minor 6.6.2

The freedom of employees to organize is specifically stated in the Social Policy dated on October 20, 2015 signed by the President Director explaining that the Company respects the right of employees and workers to participate or establish a legitimate labor union based on their individual choice and collective bargaining. The policy is available in Bahasa.

As a form of implementation of freedom of association, labor unions have been formed in the company. The labor unions in the company have been registered in the Manpower Agency, as follows:

- PT SISM : registered with no. 146/OP-SPSB/SP-PT.SISM/DFT/2018 dated December 12, 2018.
- PT SMA : registered with no. 78 year 2016 dated April 13, 2016.

OFI

Ensuring the structure and socialization of the existence of labor unions to employees.

Management unit showed several recordings of meetings between labor unions, company and workers, such as:

- Minutes of the Coordination Meeting on the Formation of the new management of Labor Union PT. SISM dated November 13, 2018 in the AVP Plantation meeting room. In the meeting, it was agreed that the new management consisted of the chairman, deputy chairman, secretary, etc. based on the votes of the participants present.
- The meeting on the Amendment to the Management of the Bipartite LKS on May 11, 2019 was attended by 16 participants.

The results of interviews with labor unions and workers said that there was no prohibition on forming labor unions. The results of the interview also stated that there was no intervention in the appointment of representatives of labor unions.

Status: Comply

6.7

Children are not employed or exploited.

Major 6.7.1

The Company showed a Social Policy on October 20, 2015. In the policy described the company employs workers over 18 years old. If the company employs workers aged between 13 and 15 years, then the company has a list of what job functions will be safely performed by the relevant workers without disrupting the development and physical, mental and social health.

The results of verification of the labor list document, known that there are no workers under the age of 18 years. Likewise with field visits, no underage workers were found. Interviews with workers and labor union also stated that the minimum age limit for workers is 18 years.

Status: Comply

6.8

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

Major 6.8.1 ; Major 6.8.2 & Minor 6.8.3

The Company showed a Social Policy on October 20, 2015 its explained that the Company does not discriminate in the recruitment, compensation of training opportunities, promotion decisions, termination or pensions based on race, ethnicity, religion, age, disability, gender or pension based on race, ethnicity, nationality, religion, age, disability, sex, marital status, membership in labor union organizations or political organizations.

The results of interviews with workers and labor union were also conveyed that the company provided equal treatment to each worker and there were no issues related to discrimination against workers or the community in obtaining employment. The results of verification of the labor list document, known that workers come from various province such as West Kalimantan, Southeast Nusa, North Sumatera, West Java, East Java and etc.

The results of interviews with workers and communities arroun (such as Pangkalan Suka Village and Bayangan Hamlet of Sepakat Jaya Village) said that the company had provided opportunities and equal treatment to the local community in obtaining

employment. The company always informs if there are job openings. From the results of the interview, it was also conveyed that the majority of villagers worked in the company.

Management unit has kept the personal file of each worker. Based on interview with management and labor union, the recruitment is conducted based on the company requirement. Worker promotion, mutation or demotion is done through the employee performance assessment. Company has provide the assessment documents, promotions and the employee appointments. For example :

- Promotion Decree No. 006/HR/SISM/PKWTT/III/2019 dated on March,11 2019. Company can show documentation of proposal for appointment, attendance recap report, work performance appraisal form, etc
- Work Agreement No. 015/HR/SISM/PKWT/VII/2019. Company can show documentation of job applications completed with the results of the assessment and the results of the health examination.

	Status: Comply	
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6.9

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

Major 6.9.1

There is no change in policy until the surveillance 1 assessment

The Company showed a Social Policy on October 20, 2015. The policy explained that no form of violence or physical discipline, threats of physical violence, sexual harassment or other harassment and verbal violence or any other form of intimidation shall be disclosed. We protect the right of employees to obtain offspring. Fundamental rights in the workplace as such, apply to all workers within the company without exception.

The results of review of the document of establishment of gender committee and interviews with gender committee, known that gender committee has been establish in the company. However, from interviews with female workers at spraying and fertilizing activity in Mulia 3-4 Estate, Mulia 5-6 Estate and Abadi 3-4 Estate, known that female workers did not know gender committee. In addition, the company also has not showed the socialization of gender committees for female workers. **NC 2019.12.**

Major 6.9.2

In the CLA Period 2017-2019 described section 53 regarding maternity leave and Section 56 Rest Menstruation. In Article 1 section 53 of a pregnant or will give birth shall be given a full maternity leave for 3 months at a maximum which shall be taken one and a half months before one and a half months after giving birth. Article 1 section 56 in accordance with section 81 of Law No.13 of 2003 to women workers who feel pain during menstruation is not required to work on the first and second day of menstrual period accompanied with a reference from Doctor.

The company has a policy on the protection of reproductive rights that has been explained in the CLA. However, from interviews with female workers at spraying and fertilizing activity in Mulia 3-4 Estate, Mulia 5-6 Estate and Abadi 3-4 Estate, found that female workers were not aware of H1 leave. In addition, the company also has not showed the socialization of H1 leave to female workers. **NC 2019.13**

Minor 6.9.3

There is no change in procedure or policy. The company has a Complaint SOP (Document No. SISM / SMA-HRD-04.00, effective from December 1, 2013) for internal complaint. Whereas for external complaints refer to SOP No. SISM-CDP.04.00, effective from December 1, 2013. Regarding the protection of whistleblowers, the company has a Policy of Anominity, aiming to provide a sense of security to the anominities (whistleblower), signed by the President Director of PT Genting Plantations Nusantara on October 18, 2012.

Results of interview with labor unions and gender committees, known that company has special complaint mechanisms through gender committees. If there are complaints related to women's issues submitted through the board of the gender committee. Based on the interviews with the Gender Committee, labor Union and housing residents, during 2018/2019 there were no complaints related to the sexual harassment or violence to all employees.

6.9.1	Status: Nonconformity No. 2019.12 with Major Category	
6.9.2	Status: Nonconformity No. 2019.13 with Major Category	

6.10

Growers and mills deal fairly and transparently with smallholders and other local businesses.
6.10.1 and 6.10.2

The price of FFB is determined by the Provincial Plantation Office based on a meeting with the parties consisting of the District Plantation Agency, the Industry Agency, the Regional Government (Bureau of Economic Affairs), the Village Unit and Self-employed Village Cooperative Representatives. Examples of Minutes of Meeting of Price Fixing of Oil Palm Fertilizer, Production of West Kalimantan Planters, II period June 2019. According to interview with village unit cooperation boards, they always invited by the company to following FFB pricing meeting with other company and government every month.

6.10.3 and 6.10.4

The company conducts business partnerships with local contractors, for example:

- Work Agreement on behalf of CV Restu Ibu (No.: SPKU 18-A3-031) related to the transportation of fresh fruit bunches (FFB)
- Work agreement on behalf of Rajidin (No.: SPKU-18-ABADI3-075) related to the making of Employee Barracks in Block G42.
- Work agreement on behalf of CV Lantang Tuah (No.: 001 / SISM-M5 & 6 / TBS / SPK / I / 2019) related to transportation activities for FFB.
- Work agreement on behalf of CV Thanks to Prayer (No.: 003 / SISM-M5 & 6 / TBS / SPK / I / 2019) related to the transportation of oil palm FFB.
- Work agreement on behalf of CV Tri Putri Kayung Abadi (No.: 002 / SISM-M5 & 6 / TBS / SPK / I / 2019) related to the transportation of oil palm FFB.

Based on the results of interviews with representatives of local contractors it is known that all contracts are written in accordance with the collective agreement. This is evidenced by the signature together on the stamp where each party also keeps a copy of the contract. Also, there's no issues late payment.

Status: Comply

6.11
Growers and millers contribute to local sustainable development wherever appropriate.
6.11.1, 6.11.2

PT SISM and PT SAM shows CSR programs for the 2019, consisting of 8 types of activities, namely: customs and culture aspect, social aspect, road and bridge infrastructure, religious affairs and education. PT SISM and PT SAM can show recapitulation of CSR implementation for the period of 2018. There are many activities that have been implemented, for examples:

- Funds for tumor surgery for Tanjung Bunga community leaders.
- Funding assistance for working activities at the Dayak Customary Council in Nanga Tayap Sub district, Ketapang Regency.
- Assistance in making a Population Identity Card (KTP) and Birth Certificate by inviting the District Population and Civil Registry Service. Ketapang.
- Funding for sports activities for the Persikat Cup Tournament in Ketapang Regency.
- Assistance in rehabilitation of the Ketapang Regency women's dormitory building in Pontianak.
- Assistance in the construction of the Al Mujahidin Mosque.
- Assistance in procuring 1 set of computers at SMK Negeri 1, Nanga Tayap Subdistrict.

In addition, the company has a working agreement with the Cooperatives of smallholders, among others:

- Cooperation agreement with oil palm plantation development partnership one-roof management between Trimulya Lastari Oil Plantation Cooperative with 001 / SISM-KT Kemitraan / 2011 number, 29 July 2011.
- Cooperation Agreement with Panca Mitra Abadi Service Cooperation with number No: 01 / Koperasi JPMA-SMA / VIII / 2015, No: 2 / SMA-Koperasi JPMA / Legal / VIII / 2015).

Training for cooperative board and supervisory bodies of Panca Mitra Abadi Service Cooperatives so that the board can implement the operational work with the management system that has been given by the mentor team from the Department of Cooperatives and Trading Industry District of Ketapang

	Status: Comply	
6.12		
No forms of forced or trafficked labour are used.		
Major 6.12.1; Minor 6.12.2; Major 6.12.3		
Based on review on the labor list document of PT SISM and PT SMA, known that there was no illegal worker. The entire workers have their position based on the signed work contract or appointment letter. Interview with labor union revealed that there is no force or illegal labor who work in company. Moreover, company does not hire illegal or force labor or contract substitution.		
Based on field visit in factory and estate, there was no indication the use of illegal or forced labor. And based on the field visit, there is no indication the use of child labor and no harvesters accompanied by wife or children.		
	Status: Comply	
6.13		
Growers and millers respect human rights		
There is a Genting Plantations Social Policy signed by the President Director on October 20, 2015 that explains human rights. The socialization done with sign board at the office and emplacement which can be read by all employee. Assistant Division also socialization the policy to workers on morning briefing. Based on interview result with workers on PT SISM and PT SMA, there's no issue related to human rights.		
	Status: Comply	
PRINCIPLE #7 Responsible development of new plantings		
7.1		
A comprehensive and participatory independent social and environmental assessment is undertaken prior to establishing new plantings or operations, or expanding existing ones, and the results incorporated into planning, management and operations.		
7.1.1, 7.1.2, 7.1.3		
PT SISM already has an Environmental Permit in the form of AMDAL approved by the Governor of West Kalimantan in accordance with Decree No. 700 of 2006 dated 16 October 2006 concerning Area 19,800 Ha and Mill Capacity 80 Tons of FFB / Hour.		
PT SMA already has an environmental permit issued by the Regent of Ketapang no. 206 / DPMPTSP-D.B / 2018, scope of area of 8953 Ha on June 8, 2018. Environmental feasibility document published by Bupati Ketapang no. 205 / DPMPTSP-D.B / 2018 concerning the environmental feasibility of oil palm plantation activities by PT SMA covering an area of 8953 Ha, established on June 8, 2018.		
PT SMA has conducted NPP verification by Mutuagung Lestari on 10 - 11 June 2014, the results of the NPP verification were sent to the RSPO Secretariat on 13 June 2014 and a notification was made public on 24 June 2014 on the RSPO Secretariat website.		
The environmental management and monitoring plan stated in the RKL / RPL matrix attached in the PT SISM and PT SMA environmental documents, has explained all aspects and impacts, the method of implementation and the implementation schedule.		
The EIA study has included estimates of the impact of plasma development, namely Sawit Trimulya Lestari and Perkebunan Sawit Harapan Jaya Cooperative at PT SISM, and as well Jasa Panca Mitra Abadi Cooperative at PT SMA.		
	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.		

<p>The PT SIsM and PT SMA has carried out a HCV assessment by Sonokeling Akreditasi Nusantara (as explained in C5.2) on 2014.</p> <p>PT SMA has conducted NPP verification by Mutuagung Lestari on 10 - 11 June 2014, the results of the NPP verification were sent to the RSPO Secretariat on 13 June 2014 and a notification was made public on 24 June 2014 on the RSPO Secretariat website.</p>		
	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.		
<p>7.3.1, 7.3.2, 7.3.3, 7.3.4, 7.3.5</p> <p>Genting Plantation BHD has compiled the "Reporting Template for Zero Liability Management Unit" document as of 31 July 2014 including PT SISM and PT SMA and the document has been sent to the RSPO secretariat.</p> <p>There was an email from the RSPO on October 23, 2017 which explained that LUCA PT SISM & PT SMA had been received by the RSPO without having to go through compensation procedures, but there was an area of 77.83 Ha river riparian which cleared between November 2005 and November 2007. The Compensation Panel agreed remediation plan dated 23 Oct 2017.</p> <p>The company can show reports on the implementation of the RSPO remediation realization until the 2019, namely marking the boundaries of river riparian carried out throughout the river borders, especially the area where remediation requires, monitoring of plant species has been carried out, conservation socialization and increasing human resource capacity to the personnel involved in the management of HCV as well as PT SISM and PT SMA employees through socialization and training, placement of HCV area markers and prohibition boards, rehabilitation (nursery forest nurseries) and planting of forest plants (by May 2019 there were 1,900 of <i>Shorea Sp</i>, <i>Durio zibetinus</i> and <i>Peronema canescens</i> in the riparian of Tapal river.</p>		
	Status: Comply	
7.4 Extensive planting on steep terrain, and/or on marginal and fragile soils, is avoided.		
<p>Minor 7.4.1 and Major 7.4.2</p> <p>The certificate holder shows a soil map that explains the distribution of soil types divided into several subgroups of soil types namely Tropudults, Paleudults, Tropohumults, Dystropepts, Haplorthox, and Tropaquepts, which are listed in the PT SISM Soil Type Map with an area of 14,261 ha with a scale of 1: 110,000. The source of the map comes from the PT SISM Work Area Map, the Rupa Bumi Indonesia Map (Geospatial Information Agency) and <i>Peta Sistem Lahan</i> RePPProT 1987.</p> <p>The certificate holder has a management strategy for planting on slopes which includes the identification of steep areas not suitable for planting which are listed in the <i>Penerapan Konservasi Tanah dan Air PT SISM dan PT SMA</i> document, April 2016. In the identification results, it was found that in PT SISM and PT SMA there are five grades of slope classes, namely flat (0 - 8%), sloping (8-15%), rather steep (15-25%), steep (25-40 %) and very steep (> 40%).</p> <p>Based on land type documents, it is known that the types of soil contained in PT SISM & PT SMA include Tropudult, Paleudult, Tropohumult, Haplorthox, Dystropepts and Tropaquepts. Based on this, it is known that the company's area does not have peatlands. Based on field observations at PT SISM and PT SMA, there were no peat areas in the company's operational area.</p>		
	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.		
<p>Major 7.5.1</p> <p>The results of the document review of the areal statement and interviews with management revealed that there was no new planting in PT SISM and PT SMA since initial assessment. The youngest planting year is the 2016 planting year for PT SISM and the 2015 planting year for PT SMA. The area that has been managed by the certification unit is the area that has been compensated and in accordance with an agreement with the land owner.</p> <p>The results of stakeholder consultations with the Plantation Agency of Ketapang District, interviews with the head of Pangkalan Suka Village, Pangkalan Suka customary head, Engkadin hamlet head (Sepakat Jaya village) along with 4 previous landowners</p>		

(PT SISM) and Bayangan hamlet head of Mensubang village and religious leaders who are also Previous land owners, said that in the past land acquisition, there was no coercion by the company. Land compensation is given based on the mutual agreement of both parties without coercion from the company. The process of land acquisition begins with socialization to the community landowners. From the results of interviews with the Head of Pangkalan Suka Village, it was also stated that he was also a member of the land acquisition socialization team consisting of the community, agencies and companies.

Status: Comply

7.6

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

7.6.1 Major, 7.6.2 Major and 7.6.3 Major

There is no change in surveillance-1 assessment.

SEIA covers among others:

- Natural Capital: agricultural resources (land and production), water resources, forest resources, and something related to the environment and have important value to meet basic needs.
- Social Capital: social institutions and socialization, stratification and social differentiation, including dynamics in social relations (formal or informal).

The company has had FPIC Procedure (Document Number: SOP/GPN-S/01) that approved by President Director since May, 1st 2015. There were several step regarding to FPIC as follows:

- Identification of land owners and customary rights
- Identification and engagement with village representative bodies
- Provision of information
- Negotiation process and agreement
- Documentation of the agreement
- Monitoring of agreement
- Conflict resolution mechanism
- Approval verification

The document regarding to land acquisition process such as land owner identification, minutes of meeting, negotiation and photos has been shown.

7.6.4 Minor, 7.6.5 Minor and 7.6.6 Minor

The results of interviews with the surrounding community and management conveyed that cooperatives had been formed in each unit of PT SISM and PT SMA. The cooperative members are previous land owners / who have received compensation from the company.

The cooperative is carried out in full management by the company according to the agreed agreement. The results of interviews with the management of cooperatives, conveyed that there are several benefits felt by the community, such as:

- In addition to getting compensation, the community is also included in the plasma program built by the company and its management is in accordance with mutual agreement.
- Cooperative management and members receive some training / socialization related to the management of oil palm plantations.
- etc.

In addition, the results of interviews with surrounding communities, also conveyed some positive impacts felt by the community, such as:

- The economy of the people is increasing
- Availability of jobs
- There is some assistance given to the local community
- etc.

The results of stakeholder consultations with the Plantation Agency of Ketapang District, interviews with the head of Pangkalan Suka Village, Pangkalan Suka customary head, Engkadin hamlet head (Sepakat Jaya village) along with 4 previous landowners

<p>(PT SISM) and Bayangan hamlet head of Mensubang village and religious leaders who are also Previous land owners, said that in the past land acquisition, there was no coercion by the company. Land compensation is given based on the mutual agreement of both parties without coercion from the company. The process of land acquisition begins with socialization to the community landowners. The document regarding to land acquisition process such as land owner identification, minutes of meeting, negotiation and photos has been shown have been well documented and well stored by Legal Department.</p>		
	Status: Comply	
7.7 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.		
Indicator 7.7.1. & 7.7.2. <p>The company has zero burning policy dated 18 October 2012. According to field observation to several block in Abadi Estate 3-4; Mulia Estate 3-4; and Mulia Estate 5-6 there are no indication open burning during land preparations all of land preparation was conducted by mechanic.</p>		
	Status: Comply	
7.8 New plantation developments are designed to minimise net greenhouse gas emissions.		
7.8.1 <p>The Company has demonstrated documents (High Carbon Stock) assessments undertaken to identify and estimate carbon stocks within the proposed development area and potential major emission sources that may be produced directly from the development of the plantation and plant. Carbon Stock calculation is not a requirement when NPP is done in 2014.</p>		
7.8.2 <p>The Company already has an inventory of GHG emission sources and a mitigation action plan from mill and plantation operations. The inventories of GHG emissions include the use of fossil fuels in boilers and diesel engines, the use of fossil fuels for transport of CPO and EFB, wastewater, land clearing activities and planting, maintenance, harvesting and housing activities. As for mitigation activities conducted by companies such as periodic monitoring of boiler and diesel (genset) emissions, regular maintenance of used mill machinery, using biofuels (shells and fiber) to reduce fossil fuel use, socialize to all workers on GHG mitigation programs that can be generated from the use of fossil fuel to run transportation and machinery, used as organic fertilizer (compost), conducting zero burning, planting emission absorbent plants, identifying areas conservation and reserve areas of conservation, regularly monitoring emissions, socializing electricity use savings and managing domestic waste. In addition, according to the review of GHG emission document on 2018, the company has calculated the GHG emission on 2018 by using PalmGHG Calculator version 4.0.</p>		
	Status: Comply	
PRINCIPLE #8 Commitment to continuous improvement in key areas of activity		
8.1 Growers and millers regularly monitor and review their activities and develop and implement action plans that allow demonstrable continuous improvement in key operations.		
<p>The company has routinely carried out internal audits conducted by trained internal auditors, most recently carried out on 11-15 March 2019, as many as 11 NCs were identified, and the follow-up to the discrepancy will be verified by the internal auditor at the next audit.</p> <p>In managing HCV area, the company has made continuous improvements by conducting collaborative management with outside institutions such as BKSDA, the Tropenbos foundation and YIARI.</p> <p>The company routinely carries out management and monitoring of HCV and RTE areas every semester.</p>		
	Status: Comply	

3.2. Summary of Assessment Report of Supply Chain Requirement

3.2.1 General Chain of custody requirements for the supply chain

Clause	Requirement														
5.1	Applicability of the general chain of custody requirements for the supply chain														
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 product are legally owned by the Mulia POM and all physically handling are done by it, except for product transportation are outsources to third parties which has been bounded by the agreement. The transporting of product are upon mill request to specified destination (bulking).</p>														
	Status: Comply														
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 audit are done to a palm oil mill which produced and sale its own CPO and PK, hence this clause are not applicable.</p>														
	Status: Comply														
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>Mulia POM has been registered as RSPO member under Genting Plantation Berhad no. 1-0086-06-000-00. Mulia POM has been registered in the RSPO IT Platform:</p> <table border="1"> <thead> <tr> <th colspan="2">License Information</th></tr> </thead> <tbody> <tr> <td>License ID</td><td>CB73093</td></tr> <tr> <td>Issued By</td><td>PT Mutuagung Lestari</td></tr> <tr> <td>Issued On</td><td>8/9/2018</td></tr> <tr> <td>Start Date</td><td>10/8/2018</td></tr> <tr> <td>End Date</td><td>9/8/2019</td></tr> <tr> <td>License Status</td><td>Active</td></tr> </tbody> </table>	License Information		License ID	CB73093	Issued By	PT Mutuagung Lestari	Issued On	8/9/2018	Start Date	10/8/2018	End Date	9/8/2019	License Status	Active
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	Status: Comply														
5.1.4	<p>Processing aids do not need to be included within an organization's scope of certification.</p> <p>The audit are done to a palm oil mill which only produced CPO and PK, there is no processing aid use by the mill.</p>														
	Status: Comply														
5.2	Supply chain model														
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 -> Segregated -> Mass Balance.</p> <p>The mill only applying RSPO SCC Module E – MB, the SCC model has been applied correctly.</p>														
	Status: Comply														

5.2.2	
The site can use one (1) or a combination of supply chain models as audited and certified by the CB.	
The mill only applying RSPO SCC Module E – MB, the SCC model has been applied correctly.	
	Status: Comply
5.3	Documented procedures
5.3.1	
The site shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified.	
<p>The mill has a procedure for implementing RSPO SCCS, which are explained in the document SOP/GPN/32, revision 1 issued on December 1, 2018 which covers supply chain, traceability and mass-balance. The SOP has explained the elements of implementing SCCS, including:</p> <ul style="list-style-type: none"> • Key personnel and their duties and responsibilities: <ul style="list-style-type: none"> ✓ Weigh bridge operators: check and ensure FFB DO (from certified suppliers must be stamped with a valid RSPO, deliver sustainable products based on contract in the Microsoft Dynamic System (SMD) and put a valid RSPO stamp for product delivery documents in accordance with the contract. ✓ Head of administration: coordinate sustainable product shipments, mass balance updates based on data from SMD according to sustainable and unsustainable categories, examine available contracts for sustainable products, coordinate and monitor product shipments, ensure RSPO requirements are met, carry out relevant monitoring and reconciliation at the end of every month, ensure that product delivery documents contain the required information ✓ Assistant and mill manager: obtain weekly and monthly FFB estimates, provide input to MPP regarding estimated CPO and PK production ✓ Palm product marketing department: make sales and input into the CXC according to product categories, conduct sales procedures, provide information to the mill according to the sales contract ✓ Sustainability ✓ Sustainability Dept.: provides a valid RSPO stamp • MB requirements - Supply chain models: preparation of mass balance reports, product shipments from positive stock, information on production that exceeds to CB, reporting through RSPO IT Platform • Annual SCCS training (refreshment) <p>All key personnel have understood all the SOPS and RSPO SCCS requirements, while interviewing the warehouse, security and head administration of mill can explain the whole process of implementing SCCS.</p> <p>The auditor verifies that FFB receiving documents and sustainable product (CPO and PK) shipments have been applied in accordance with the SOPs owned, for example the stamps on DO FFB and CSPO have been carried out by security and WB officers:</p> <ul style="list-style-type: none"> - Ticket weigh of CSPO - MB on April 30, 2019, no. PMM1CPO19003827, transporter: Koperasi Sawit Harapan Jaya, DO-SPSIM / 0419 / 02CPO, buyer: PT Intibenua Perkasatama, volume: 7340 Kg. 	
	Status: Comply
5.3.2	
The site shall have a written procedure to conduct annual internal audit	
The SOP of SCCS audit activities is explained in document no.: SISM-PPD-03-00.00 on 1 Dec 2013, the audit is carried out by a designated and trained team.	
The SCCS audit has been carried out by the company every semester in conjunction with the RSPO P&C audit, an audit report can be shown for Sem 1 year 2019, April 22-26 2019, the audit has covered all elements of SCC implementation refer to Supply Chain Requirements November 2014, revised on June 2017, there were no findings of non-compliance in the audit.	
	Status: Comply
5.4	Purchasing and goods in

5.4.1	<p>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</p>
	<p>The mill does not purchase any of palm oil product from outsider, Mulia POM only sell its own product CPO and PK which produced from raw material (FFB) from its own estate and associate estates (other estates under Genting plantation).</p>
	<p>Auditor observed the FFB DO from all suppliers which informs name of estate, location (block and division), date, volume, name of driver and plate number, RSPO stamp (specific for RSPO sources).</p>
	<p>Status: Comply</p>
5.4.2	<p>The site shall have a mechanism in place for handling non-conforming oil palm products and/or documents</p>
	<p>The mill has SOP of non-conforming product handling namely the SOP of " <i>pedoman pemeriksaan dan pengendalian pabrik kelapa sawit</i> ", MOM-OMCC-01 issued on 9 Aug 2012, in the clause of 1.1.2.18 explained that for every product that was rejected from refinery / buyer, shall allowed for gross weighing after receiving instructions and notifying the lab of the rejected load, the office will re-examine the load and its accuracy and compare it with the initial weighing.</p>
	<p>Status: Comply</p>
5.5	<p>Outsourcing activities</p>
5.5.1	<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 outsourced it transportation activities to independent third parties such as transportation of CPO from mill to bulking in Ketapang and transportation of PK from mill to Pontianak. All the third parties have been bounded by the agreement which states that they should be complies with the standard RSPO supply chain and are ready to be visited by the auditor if needed. In every delivery of sustainable products, the company has ensured to avoid mixing with outside products through the seal system on the vehicle (the seal number is recorded on the delivery document).</p>
	<p>Status: Comply</p>
5.5.2	<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"> The site has legal ownership of all input material to be included in outsourced processes; 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. The site has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor. 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
	<p>The MOM has been ensure the following:</p> <ol style="list-style-type: none"> All CSPO produced are legally owned by the MOM since produced and delivered to bulking (owned by PT SISM), ownership of the product officially belongs to the buyer after leaving the storage in bulking, while CSPK is legally owned by the mill since produced up to delivered to buyer location, changes of legal owner are after arrived in buyer location. All the third parties have been bounded by the agreement which states that they should be complies with the standard RSPO supply chain and are ready to be visited by the auditor if needed. <ol style="list-style-type: none"> PK transportation agreement 006 / SISM-MOM / II / 2018 on 28 Sept 2018 valid until 31 Dec 2020 between Tri Mulia Lestari Palm Oil Cooperative and PT SIsM, address in Ketapang, West Kalimantan Agreement of CPO transportation 001 / SISM-MOM / II / 2018 on 28 Sept 2018 valid until 31 Dec 2020, between

	<p>Tri Mulia Lestari Oil Palm Cooperative and PT SISM, address in Ketapang, West Kalimantan</p> <p>3. Agreement of transporting CPO no. : 003 / SISM-MOM-I / 2018 dated 28 Sept 2018 between PT Ponti Sarana Utama and PT SISM, valid until 31 Dec 2020, address in Pontianak, West Kalimantan</p> <p>4. Agreement of CPO transporting no. : 005 / SISM-MOM / II / 2018 on 28 Sept 2018 between PT Talenta Lestari Abadi and PT SISM, valid until Dec 2020, address in KETAPANG, West Kalimantan.</p> <p>5. Agreement of CPO transporting no. : 004 / SISM-MOM / I / 2018 on 28 Sept 2018 between PT Ponti Sarana Utama and PT SISM, valid until Dec 2020, address in Pontianak, West Kalimantan</p> <p>6. Agreement of PK transportation no. : 007 / SISM-MOM / II / 2018 on 27 Sept 2018, between Koperasi Sawit Harapan Jaya and PT SISM, valid until Dec 2020, address in Ketapang, West Kalimantan</p> <p>c) The company has a SOP for the appointment of the contractor in document of PP-PLA 02 dated 1 September 2016 which explains that the contractor was appointed through a tender, by means of prequalification, determination of tender participants, document verification, tender invitation, implementation and making of an agreement.</p>
	Status: Comply
5.5.3	<p>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.</p>
	<p>The information of names and contact details for all contractor are contained in the agreement document.</p>
	Status: Comply
5.5.4	<p>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</p>
	<p>There is no additional contractor since ST 2.</p>
	Status: Comply
5.6	Sales and goods out
5.6.1	<p>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</p>
	<p>Information relating to buyer data, product type, volume and type of sales are listed in the sales contract document, for example:</p> <ol style="list-style-type: none"> Sales contract no. : SPSIM / 0219 / 04CPO, buyer: PT Multimas Nabati Asahan, address: Medan Barat, Medan, North Sumatra, volume: 2200 MT, type: CPO-RSPO MB, dated 3-20 March 2019. Already reported to palm trace on 26 March 2019 (TR-054c6322-a0bc). Sales contract no. : 0560 / KJB-IBP-SISM / IV / 2019, buyer name: PT Intibenua Perkasatama (Medan Deli, Medan - SUMUT), volume: 2800 MT, type: CPO-RSPO MB (announcement on May 14 2019; TR-a8572648-edb5) Sales contract no.: SPSIM / 0119 / 02CPO with the buyer of PT LDC Indonesia (Tanah Abang, Jakarta Pusa, DKI Jakarta), amount: 2500 MT, 25-30 Jan 2019, CPO-RSPO MB (Trs id: TR- 5dfabe58-cb59, 15 Feb 2019). Sales contract no.: 0155 / KJB / IBP-SISM / I / 2019 by PT Intibenua Perkasatama, Volume 2800 MT, dated February 2019, CPO-RSPOMB (TR-7b687707-c195, dated 15 Feb 2019). Sales contract no.: 0226 / KJB / IBP-SISM / II / 2019 by PT Intibenua Perkasatama (Medan Deli, Medan - SUMUT), volume: 2600 MT, February 2019. Trs ID: TR-55007860-9e02 dated 22 Feb 2019. RSPO MB
	Status: Comply
5.7	Registration of transactions
5.7.1	<p>Supply chain actors who:</p> <ul style="list-style-type: none"> are mills, traders, crushers and refineries; and take legal ownership and/or physically handle RSPO Certified Sustainable oil palm products that are available in the yield scheme of the RSPO IT Platform (Figure 2 and 3, refer Annex 1) shall register their transaction in the RSPO IT platform and confirm upon receipt where applicable

- The audit are done to an palm oil mill which produce CPO and PK from FFB from its own estate
- All physically handling are done by the Mulia POM and the product are legally owned by it which managed under PT SISM. All the transaction of CSPO has been registered in the RSPO IT Platform.

Status: Comply

5.7.2

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

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

Mulia POM has been registered with the RSPO IT Platform and product sales reporting requirements have been done correctly:

- Confirm and shipping announcements are done upon receipt. There was an amount of 12,900 MT of CSPO are delivered and sold under RSPO MB Since 10 Aug 2018 - 22 July 2019 (ASA 1).
 - Shipping on March 3-20 2019 volume: 2200MT. It has been reported to Palm trace on 26 March 2019 (TR-054c6322-a0bc).
 - Shipping of CSPO volume of 2800MT, type: CPO-RSPO MB (announcement on 14 May 2019; TR-a8572648-edb5)
 - Shipping of CSPO volume of 2500 MT, 25-30 Jan 2019, CPO-RSPO MB (Trs id: TR-5dfabe58-cb59, dated 15 Feb 2019).
 - Shipping of CSPO Volume of 2800 MT, dated February 2019, CPO-RSPOMB (TR-7b687707-c195, dated February 15, 2019).
 - Shipping of CSPO volume of 2600MT, dated February 2019. Trs ID: TR-55007860-9e02 dated February 22, 2019. RSPO MB.
- Trace of volume sold has been done annually by marketing Dept.
- There is no CSPK sold under RSPO-MB
- There is no CSPO sold under other schemes

Mulia PKS through the Jakarta Marketing Dept. has reported all RSPO-MB CSPO product sales transactions through the RSPO IT Platform, however it has not been able to show the evidence that it has met the conventional CPO and PK sales reporting requirements (remove stock) which taken from sustainable stocks, namely CSPO 37,503.05 MT and CSPK 8,423.84 MT. **Non-conformity no.: 2019.14**

Status: NCR No 2019.14

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 has planned to conduct RSPO SCC training annually including refreshment training, it was mentioned in the SCC SOP.

The latest training to head of WB in PT SIsM and PT SMA held on 24 April 2018, next training planned to be done on Aug 2019. Sighted the minute of training followed by 16 WB Operator and Head WB.

Based on interview with WB clerk in MOM know that they are aware and fully understand regarding to SCC SOP and requirements.	
	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 planned to conduct RSPO SCC training annually including refreshment training, it was mentioned in the SCC SOP. The latest training to head of WB in PT SIsM and PT SMA held on 24 April 2018, next training planned to be done on Aug 2019. Sighted the minute of training followed by 16 WB Operator and Head WB. Based on interview with WB clerk in MOM know that they are aware and fully understand regarding to SCC SOP and requirements.	
	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 maintain all the record of RSPO SCC in accurate, complete and up-to-date, all the records can be accessed by the auditor, the records are kept in mill office. For example: <ul style="list-style-type: none"> - Document of mass balance report since 10 Aug 2018-21 July 2019 - Document of FFB DO from all suppliers - Document of CSPO/CSPK deliveries: weigh-bridge ticket of CSPO – MB on 30 April 2019, No. PMM1CPO19003827, transporter: Koperasi Sawit Harapan Jaya, DO-SPSIM/0419/02CPO, buyer: PT Intibenua Perkasatama, volume: 7340 Kg. 	
	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 SOP of document control on document no. SISM-PPD-01-00.00 issued on 1 Dec 2013, in clause 6 it is explained that documents retains is 5 years and a maximum of 5 revisions of documents.	
	Status: Comply
5.9.3 The organization shall be able to provide the estimate volume of palm oil / palm kernel oil content (separate categories) in the RSPO certified oil palm product and keep an up to date record of the volume purchased (input) and claimed (output) over a period of twelve (12) months.	
The mill has update the record of volume purchased (FFB) and claimed (CSPO/PK) over 12 months period, it can be shown in the mass balance report. Estimate of volume of CPO and PK in as MB product has been set by the mill and informed in the basic information of this report, and in the certificate annexes as well.	
	Status: Comply

5.10	Conversion factors
5.10.1	Where applicable a conversion rate shall be applied to provide a reliable estimate for the amount of certified output available from the associated inputs. Organizations may determine and set their own conversion rates which shall be based upon past experience, documented and applied consistently. Guidance on conversion rates is published on the RSPO website (www.rspo.org); 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 audit are done to a palm oil mill which only convert FFB to CPO and PK. The conversion rate to provide a reliable estimate for the amount of certified output from the associated inputs are set based on daily production such KER and OER. For e.g. average of OER in Jul 2018-June 2019 is 22.25%, while average of KER is 3.79%.
	Status: Comply
5.10.2	Conversion rates shall be periodically updated to ensure accuracy against actual performance or industry average if appropriate.
	The conversion rate updated in daily based on daily production.
	Status: Comply
5.11	Claims
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.
	The mill does not use RSPO logo and trademarks neither on their sales document nor on promotion document.
	Status: Comply
5.12	Complaints
5.12.1	The organization shall have in place and maintain documented procedures for collecting and resolving stakeholder complaints.
	The mill has a procedure for collecting and resolving complains and grievances document no. SMP-GBP-19 revision 2, issued on 5 September 2014, mentioned in the SOP that complaint can be delivered by post, email or verbally. The timeframe for action to be taken depends on the seriousness of complaint, however the acknowledgement and respond to the complainants is within 14 days.
	Status: Comply
5.13	Management review
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
	The company has a SOP on the implementation of management review in the document of SISM-PPD-04-00.00 which explains that the management review is carried out 1-2 times in one year prior to the external audit and as a follow-up to the internal audit.
	The factory has not been able to show a management review of the implementation of the RSPO SCC which is conducted at least once a year which addresses (but is not limited to): the results of the RSPO SCC internal audit, customer feedback, improvement status of the internal audit, follow-up actions from previous management reviews, changes that have an impact to the management system, recommendations for further improvement. It became a non-conformity no.: 2019.15
	Status: Non-conformity no.: 2019.15

5.13.2

The input to management review shall include information on:

- Results of internal audits covering RSPO Supply Chain Certification Standard.
- Customer feedback.
- Status of preventive and corrective actions.
- Follow-up actions from management reviews.
- Changes that could affect the management system.
- Recommendations for improvement.

The mill not yet carry out the management review of RSPO SCC implementation, it become a non-conformity no.: 2019.15 in the clause of 5.13.1

Status: Non-conformity no.: 2019.15

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.

The mill not yet carry out the management review of RSPO SCC implementation, it become a non-conformity no.: 2019.15 in the clause of 5.13.1

Status: Non-conformity no.: 2019.15

3.2.2 (Module E) CPO Mills - Mass Balance Requirements

Clause	Requirement																				
E.1	Definition																				
E.1.1																					
Certification for CPO mills is necessary to verify the volumes of certified and uncertified FFB entering the mill and sales volume of RSPO certified products. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.																					
Mulia POM are receiving and processing the FFB from certified and non-certified sources, so in this case, module E (MB) are applied.																					
	Status: Comply																				
E.2	Explanation																				
E.2.1																					
The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill must be recorded by the 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.																					
The mill has been set the estimated CPO and PK that could potentially be produced for one year, recorded in the certificate annex, the CB has been verified the actual production of CSPO and CSPK at the time of ASA 1 since 10 Aug 2018 up to 21 July 2019 (since license issued), it including verification of product estimation for next one year (10 Aug 2019 – 9 Aug 2020).																					
<table><tr><th>Product</th><th>Last year projection (10 Aug 2018-9 Aug 2019)</th><th>Actual production (10 Aug 2018-21 July 2019)</th><th>Next year projection (10 Aug 2019 – 9 Aug 2020)</th></tr><tr><td>FFB Estate</td><td>235,439</td><td>195,300.57</td><td>231,567</td></tr><tr><td>FFB Scheme</td><td>49,018</td><td>33,970.21</td><td>40,279</td></tr><tr><td>CPO</td><td>58,252</td><td>51,079.47</td><td>59,806</td></tr><tr><td>PK</td><td>10,178</td><td>8,811.53</td><td>10,873</td></tr></table>		Product	Last year projection (10 Aug 2018-9 Aug 2019)	Actual production (10 Aug 2018-21 July 2019)	Next year projection (10 Aug 2019 – 9 Aug 2020)	FFB Estate	235,439	195,300.57	231,567	FFB Scheme	49,018	33,970.21	40,279	CPO	58,252	51,079.47	59,806	PK	10,178	8,811.53	10,873
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PK	10,178	8,811.53	10,873																		
	Status: Comply																				
E.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).																					
Mulia POM has been registered in the RSPO IT Platform and product sales reporting requirements has been done correctly:																					
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	<p>edb5)</p> <ul style="list-style-type: none"> Shipping of CSPO volume of 2500 MT, 25-30 Jan 2019, CPO-RSPO MB (Trs id: TR-5dfabe58-cb59, dated 15 Feb 2019). Shipping of CSPO Volume of 2800 MT, dated February 2019, CPO-RSPOMB (TR-7b687707-c195, dated February 15, 2019). Shipping of CSPO volume of 2600MT, dated February 2019. Trs ID: TR-55007860-9e02 dated February 22, 2019. RSPO MB. <ul style="list-style-type: none"> Trace of volume sold has been done annually by marketing Dept. There is no CSPK sold under RSPO-MB There is no CSPO sold under other schemes <p>Mulia PKS through the Jakarta Marketing Dept. has reported all RSPO-MB CSPO product sales transactions through the RSPO IT Platform, however it has not been able to show the evidence that it has met the conventional CPO and PK sales reporting requirements (remove stock) which taken from sustainable stocks, namely CSPO 37,503.05 MT and CSPK 8,423.84 MT. Non-conformity no.: 2019.14</p>
	<p>Status: Non-conformity no.: 2019.14</p>
E.3	Documented procedures
E.3.1	<p>The site shall have written procedures and/or work instructions to ensure the implementation of all the elements specified in these requirements. This shall include at minimum the following:</p> <ul style="list-style-type: none"> a. Complete and up to date procedures covering the implementation of all the elements in these requirements; b. The name 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 procedures for the implementation of this standard.
	<p>The mill has a procedure for implementing RSPO SCCS, which are explained in the document SOP/GPN/32, revision 1 issued on December 1, 2018 which covers supply chain, traceability and mass-balance. The SOP has explained the elements of implementing SCCS, including:</p> <ul style="list-style-type: none"> Key personnel and their duties and responsibilities: <ul style="list-style-type: none"> ✓ Weigh bridge operators: check and ensure FFB DO (from certified suppliers must be stamped with a valid RSPO, deliver sustainable products based on contract in the Microsoft Dynamic System (SMD) and put a valid RSPO stamp for product delivery documents in accordance with the contract. ✓ Head of administration: coordinate sustainable product shipments, mass balance updates based on data from SMD according to sustainable and unsustainable categories, examine available contracts for sustainable products, coordinate and monitor product shipments, ensure RSPO requirements are met, carry out relevant monitoring and reconciliation at the end of every month, ensure that product delivery documents contain the required information ✓ Assistant and mill manager: obtain weekly and monthly FFB estimates, provide input to MPP regarding estimated CPO and PK production ✓ Palm product marketing department: make sales and input into the CXC according to product categories, conduct sales procedures, provide information to the mill according to the sales contract ✓ Sustainability ✓ Sustainability Dept.: provides a valid RSPO stamp MB requirements - Supply chain models: preparation of mass balance reports, product shipments from positive stock, information on production that exceeds to CB, reporting through RSPO IT Platform Annual SCCS training (refreshment) <p>All key personnel have understood all the SOPS and RSPO SCCS requirements, while interviewing the warehouse, security and head administration of mill can explain the whole process of implementing SCCS.</p> <p>The auditor verifies that FFB receiving documents and sustainable product (CPO and PK) shipments have been applied in accordance with the SOPs owned, for example the stamps on DO FFB and CSPO have been carried out by security and WB officers:</p> <ul style="list-style-type: none"> - Ticket weigh of CSPO - MB on April 30, 2019, no. PMM1CPO19003827, transporter: Koperasi Sawit Harapan Jaya, DO-

SPSIM / 0419 / 02CPO, buyer: PT Intibenua Perkasatama, volume: 7340 Kg.

Status: Comply

E.3.2

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

The Mulia Oil Mill has procedure for receiving a certified and non-certified FFB, explained in the procedure the document SOP / GPN / 32. Verification of certified and non-certified FFB is carried out by WB officers through DO documents attached from each estate, each estate will provide a valid RSPO stamp for each DO from certified sources. If there is a DO that is not stamped it will be considered non-certified. Based on SMD data, head adm mill will recapitulate all FFB from all sources based on type (certified and non-certified) in every month.

The auditor observes that the WB operator has conduct the FFB receiving according to the SOP, for example the stamps on DO FFB and CSPO have been carried out by security and WB officers:

- Ticket weigh of CSPO - MB on April 30, 2019, no. PMM1CPO19003827, transporter: Koperasi Sawit Harapan Jaya, DO-SPSIM / 0419 / 02CPO, buyer: PT Intibenua Perkasatama, volume: 7340 Kg.

Status: Comply

E.4

Purchasing and goods in

E.4.1

The site shall verify and document the volumes of certified and non-certified FFBs received.

The mill has been verify all certified FFB and non-certified FFB that received and processed since first licensed issued (10 Aug 2018 up to 21 July 2019), all the record can be shown to auditor:

Date	FFB Received (MT)		Total FFB (MT)
	Certified	Non cert	
10-31 Aug 2018	8,203.55	3,490.00	11,693.55
Sept 2018	26,602.69	11,792.76	38,395.45
Oct 2018	26,851.41	12,002.56	38,853.97
Nov 2018	23,091.57	12,039.19	35,130.76
Dec 2018	19,038.89	10,477.02	29,515.91
Jan-19	21,358.68	12,755.62	34,114.30
Feb-19	17,916.28	10,564.15	28,480.43
March -19	18,936.06	11,520.85	30,456.91
Apr-19	17,170.13	8,802.63	25,972.76
May-19	19,315.99	8,495.00	27,810.99
Jun-19	16,172.25	8,814.53	24,986.78
1-21 Jul 2019	14,613.28	5,730.24	20,343.52
Total	229,270.78	116,484.55	345,755.33

Status: Comply

E.4.2

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

Based on mass balance report, there is no overproduction of CSPO and CSPK compared between last year projection and actual production, which detailed below:

Product	Last year projection (10 Aug 2018-9 Aug 2019)	Actual production (10 Aug 2018-21 July 2019)
FFB Estate	235,439	195,300.57
FFB Scheme	49,018	33,970.21
CPO	58,252	51,079.47

	PK	10,178	8,811.53					
Note: the audit is for ASA-1, the mill obtained the license since 10 Aug 2018.								
	Status: Comply							
E.5	Record keeping							
E.5.1								
a. 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 and / or three-monthly basis.								
b. All volumes of palm oil and palm kernel oil that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO.								
c. The site can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a site is allowed to sell short. (I.e. product can be sold before it is in stock.)								
The mill has shown the balancing record of all receipts RSPO certified FFB and CSPO/CSPK deliveries on a monthly basis through mass-balance system, the person in charge is Mill Head ADM. The auditor verified the record since 10 Aug 2018 – 21 July 2019 (since the license issued):								
Date	CPO Cert Prod (MT)	CPO Non cert Prod (MT)	CPO MB Dispatch (MT)	CPO Convent dispatch (MT)	PK Cert prod (MT)	PK Non cert prod (MT)	PK MB dispatch (MT)	PK Non RSPO Dispatch (MT)
Total	51,079.47	25,995.22	12,913.38	37,503.05	8,423.84	4,761.68	-	8,423.84
	Status: Comply							

3.3. Conformity Checklist of Certificate and Logo Use

1.	Evidence of permission or approval certificate and trademark from Certification Body which submitted by Client	X or√
ASA-1	The CH did not use trademark and/or RSPO logo	√
	Status: Comply	
2.	Implementation of certificate and trademark used by Client comply with size and type (shape) against Guideline of Logo Use	X or√
ASA-1	The CH did not use trademark and/or RSPO logo	√
	Status: Comply	
3.	Implementation of Certificate and Trademark is not used on product	X or√
ASA-1	The CH did not use trademark and/or RSPO logo	√
	Status: Comply	
4.	Controlling of Certificate and Trademark, including withdrawing inappropriate logo.	X or√
ASA-1	The CH did not use trademark and/or RSPO logo	√
	Status: Comply	

3.4. Summary of RSPO Partial Certification.

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

Genting Plantation Bhd Time Bound Plan (TBP) is explained in table 1.10. Genting Plantation Bhd has 32 management units with 15 mills. Genting Plantation Bhd has informed the TBP progress, MUTU has considered that Genting Plantation Bhd is complied with the RSPO requirement for TBP. The Time Bound Plan was revised and declared by Genting Plantation Bhd on 12 Feb 2019.

MUTU has verified partial certification for un-certified unit's subsidiary of Genting Plantation Bhd based on their Time Bound Plan. There are 8 uncertified mills and 30 uncertified estates of Genting Plantation Bhd. 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 labour disputes that are not being resolved through an agreed process
- All plantations established since 2005 have been done so in accordance with the applicable laws of the country and that there is no evidence of non-compliance with law in any of the non-certified holdings which has not been declared above

Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
2.1.1	Did the company conduct an internal audit? If so, has a positive assurance statement been produced?	<p>Yes and positive assurance is developed under Genting Plantation Bhd</p> <p><i>Auditor verification</i> Based on the document review, there is a company pre audit that was conducted by SGS and the positive assurance is at this table that is also been verified.</p>
2.1.2	<p>No replacement after dates defined in Nis Criterion 7.3 of:</p> <ul style="list-style-type: none"> • Primary forest. • Any area identified as containing High Conservation Values (HCVs). • Any area required to maintain or enhance HCVs in accordance with RSPO criterion 7.3. 	<p>Total of 4 LUCA was submitted to RSPO Secretariat. PT SISM, PT GAL, GKCE & GJBE</p> <p>PT SISM: Social remediation (Concept Note submitted to RSPO in November 2016. Pending review & approval by Panel.</p> <p>PT GAL: Noncommercial clearing. LUCA pending approval by Panel.</p> <p>GKCE: ~498 Ha for compensation. LUCA pending approval by Panel.</p> <p>GJBE: Social remediation (487 Ha). LUCA pending approval by Panel.</p>

		<p><i>Auditor verification</i></p> <p>Based on evidence, the Genting Plantation Group has followed the requirement of RSPO.</p>
2.1.3	Any new plantings since January 1 st 2010 must comply with the RSPO New Plantings Procedure.	<p>NPPs have been submitted for new plantings since Jan 2010. The latest NPP was published on RSPO website on 13 July 2016 for Genting Jambongan Estate in Sabah for an expansion of the estate areas.</p>
2.1.4	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>No outstanding land conflicts</p> <p><i>Auditor verification</i></p> <p>Based on evidence provided, the company merely conducted planting on the area that has been compensated from the land owner by FPIC. The documentation of each land compensation/leasing is documented.</p>
2.1.5	Any Labour disputes are being resolved through a mutually agreed process, in accordance with RSPO criterion 6.3.	<p>There is no labor disputes. There is no information from public source and RSPO website on any labour conflict for uncertified unit of the group subsidiaries.</p> <p><i>Auditor verification</i></p> <p>There is no indication of labor disputes. There is no information from public source and RSPO website on any labour conflict for uncertified unit of the group subsidiaries and also from stakeholder consultation during 1st surveillance audit of the PT SIsM and PT SMA.</p>
2.1.6	Any Legal non-compliance is being resolved in accordance with the legal requirements, with reference to RSPO criteria 2.1 and 2.2.	<p>Yes, there is process for land legality.</p> <p><i>Auditor verification</i></p> <p>Land legal process is still going on and there is a detail update progress documented by the company for each year.</p>

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

3.5.1 Identification of Findings, Corrective Actions and Observations at Initial Assessment

NCR No.	:	2017.01	Issued by	:	All Auditor
Date Issued	:	20 October 2017	Time Limit	:	Before the certificate is issued
NC Grade	:	Major	Date of Closing	:	7 July 2018
Standard Ref. & Requirement	:	2.1.1. There should be evidence of compliance with relevant laws and regulations.			
Non-Conformance Description & Evidence observed (filled by auditor): There is no evidence that compliance with laws and regulations has been implemented. 1. The Company has not been able to show the structure and scale of wages in accordance with Regulation of Labor Ministry No.1 of 2017. 2. There has been no revision of P2K3 Structure in PT SISM and PT SMA, as well as its approval by the relevant agencies in accordance with Regulation of Labor Ministry No. 04 of 1987.					
PT SMA Based on employee data of PT SMA on September 2017, it is known that there are 34 Free Daily Worker who do not have contract with the workers. This is not in accordance with Ministerial Decree No. 100 of 2004 Article 12.					
Root Cause Analysis (filled by organization audited): 1. The wage scale structure is still in the preparation stage. 2. SHE officer is new, and has not received OHS expert training 3. HR of PT. SMA considers for temporary labor does not require a written agreement					
Correction (filled by organization audited): 1. Completed the wage scale structure document. 2. If there is a change of management immediately change the structure and requested approval to the Manpower Agency. HR will perform the change of management of P2K3, as well as train SHE Office that does not have OHS Expert Certificate. 3. Every new employee is created a Work Agreement Letter					
Corrective Action (filled by organization audited): 1. Completed the wage scale structure document. 2. Revise the structure of P2K3 SISM and SMA 3. Creating a letter of employment agreement for 34 Daily Dedicated Employees					
Assessor Evaluation and Conclusion (filled by auditor): Verify May 9, 2018 The Company shows some evidence of improvements as follows: 1. Head of Regional Decree No. 004 / SISM / HR / SK-U / X / 2017 dated October 1, 2017 concerning Structure and Wages Scale of PT Sepanjang Intisurya Mulia. In the appendix the decree details the wage structure and scale of the level of the daily employee of the Head of Regional. In addition, the letter has been reported to the Ketapang Manpower and Transmigration Office dated January 9, 2018 and was socialized to employees on February 3, 2018. 2. Decree of the Head of Manpower and Transmigration Office of Ketapang Regency. 121 / NAKER / TAHUN 2017 dated December 6, 2017 on P2K3 Ratification of PT SISM. With an organizational structure: Chairman M. Riduan,					

Secretary: Harmadi, Member consists of 12 people from the mill and estate. The new secretary attended the General AK3 training by PJK3 Gajah Mada Yogyakarta on 12 - 24 February 2018. (Certificate of Public Safety Expert from Menaker RI will be verified on the next appraisal).

3. Head of Regional Decree No. 002 / SMA / HR / SK-U / X / 2017 dated October 1, 2017 concerning Structure and Wages Scale of PT Sepanjang Intisurya Mulia. In the appendix the decree details the wage structure and scale of the level of the daily employee of the Head of Regional. In addition, the letter has been reported to the Ketapang Manpower and Transmigration Office dated January 9, 2018; and was socialized to employees on January 17, 2018.
4. Structure P2K3 PT SMA with Chair: Chok Yek Chuen, Secretary Farok Santoso. The new secretary attended the General AK3 training by PJK3 Gajah Mada Yogyakarta on 12th - 24th of February 2018. But it has not been shown the Approval Letter from the relevant agencies.

Verify June 29, 2018

The Company shows some evidence of improvements as follows:

1. Acceptance list of Working Agreement of Unspecified Time (Staff) PT SMA dated December 28, 2017 to January 3, 2018.
2. PKWTT No. 25 / PK / KT / XII / 2017 dated December 20, 2017 between PT SMA with Aulia as maintenance worker.
3. PKWTT No. 34 / PK / KT / XII / 2017 dated December 20, 2017 between PT SMA with Hendy Hariantono as upkeep labor and LCT.
4. PKWTT No. 17 / PK / KT / XII / 2017 dated December 20, 2017 between PT SMA with Zalin as harvest labor.
5. PKWTT No. 07 / PK / KT / XII / 2017 dated December 20, 2017 between PT SMA with Keki Saputra as a maintenance workforce.
6. Decree of the Head of Manpower and Transmigration Office of Ketapang Regency No.120 on P2K3 PT SMA dated December 6, 2017.

Verify 7 July 2018

The Company shows Head of UPT Decree of Supervision of Manpower of West Kalimantan Province No. 35 / WASNAKER / 2018 dated July 6, 2018 on Ratification of Membership Composition of P2K3 PT SMA with Chairman: Chock Yek Cheun, Secretary: Farok Santoso and oversees 12 members.

Auditor's Conclusion:

Based on evidence of improvements that have been shown then this non conformity has been met.

Verified by	: Trismadi N
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NCR No	: 2017.02	Issued by	: Andi Pratama Pasaribu
Date Issued	: 20 October 2017	Time Limit	: Before the certificate is issued
NC Grade	: Major	Date of Closing	: 11 June 2018
Standard Ref. & Requirement	: 2.2.1 Legal documents showing legal ownership or leasing, history of ownership, duration and actual land use should be available.		
Non-Conformance Description & Evidence observed (filled by auditor):			
Based on the data hectare statement is known that the current area of PT. Sepanjang Intisurya Mulia is 14,560.57 Ha which consists of certified areas of HGU No.1 of 2017 (14,255.69 Ha), HGU No. 9 of 2011 (100 Ha), HGU No. 148 of 2016 (199,31 Ha) and No. HGB. 1 of 2013 (5.57 Ha). On the basis of these facts, it is concluded that the			

operational activities of the company is not in accordance with the Plantation Business Permit / IUP owned.

Root Cause Analysis (filled by organization audited):

Areas that have received Land Use Title and Building Use Title are 75, 57 ha that are not cultivated so that they are not included in IUP.

Correction (filled by organization audited):

Reported to the Plantation Office regarding the difference between Right to Use and IUP of PT. SISM

Corrective Action (filled by organization audited):

Immediately report to the licensor if there are things that are not appropriate

Assessor Evaluation and Conclusion (filled by auditor):

Verify May 11, 2018

The Company has presented an improvement document in the form of a letter from the management of PT. SISM to the Head of Ketapang Regency Plantation Office (Letter No. 02 / AVP-SISM / I / 2018 dated January 8, 2018) related to the explanation of the wide difference between Land Use Title and its Plantation Business Permit. However, there has been no evidence of receipt of the letter by the Ketapang District Plantation Office and the response to the difference.

Conclusion of Auditors May 11, 2018

Based on the evidence of improvement that has been shown, this non conformity is not fulfilled.

Verify June 11, 2018

The company has sent a letter from the director of PT. Sepanjang Intisurya Mulia No.53 / SISM / Legal / V / 2018 Regarding Application for Change of Area and Plant Capacity on behalf of PT. Sepanjang Intisurya Mulia dated May 23, 2018 to the Head of One Stop Service and One Stop Service (DPMPTSP) Ketapang Regency about adjustment of Plantation Business Permit and additional plant capacity. The letter has been received by the One Stop Door (DPMPTSP) Investment and Service Department on May 24, 2018.

Auditor's Conclusion June 11, 2018

Based on the evidence of improvement that has been shown, this non conformity is stated can be fulfilled. The realization of Plantation Business Permit changes as well as additional plant capacity will be further verified in the next assessment activity.

Verified by : **Andi Pratama Pasaribu**

NCR No.	:	2017.03	Issued by	:	Andi Pratama Pasaribu
Date Issued	:	20 October 2017	Time Limit	:	Before the certificate is issued
NC Grade	:	Major	Date of Closing	:	19 January 2018
Standard Ref. & Requirement	:	4.5.1. A monitoring result of the implementation of the Integrated Pest Management (IPM) plan should be available			

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

Based on the results of interviews and verification documents of PT SISM and PT SMA it is known that census and pest-related detection activities are conducted simultaneously with fertilizer application. However, the company does not have a periodic pest monitoring procedure.

Root Cause Analysis (filled by organization audited):

- SOP has been in existence since December 2013 but is kept by the GPRC Manager who is on leave (his wife gave birth).
- Documents required for the audit are kept in an easily accessible document cabinet.

Correction (filled by organization audited):

Demonstrate SOP for periodic pest monitoring

Corrective Action (filled by organization audited):

Documents required for the audit are kept in an easily accessible document cabinet

Assessor Evaluation and Conclusion (filled by auditor):
Verify 5 January 2018

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

1. SOP for Identification and Control of Oil Palm Plant Pests and Diseases (No. SISM Document - AGR - 06 - 00.00).
2. IK Control of Oil Palm Plant Pest (No. SISM Document - AGR - 01 - 06).

Auditor's Conclusion January 5, 2018

The company has documented pest and disease monitoring procedures. However, further analysis and corrective action is needed in relation to the root of the problem set out in accordance with the auditor's question above. Based on these matters, this non conformity is not fulfill.

Verify January 19, 2018

The company has explained the mechanism of access to best practices procedures.

Conclusion January 19, 2018.

Based on the explanation, this non conformity is stated met.

Verified by	: Andi Pratama Pasaribu
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NCR No.	: 2017.04	Issued by	: Andi Pratama Pasaribu
Date Issued	: 20 October 2017	Time Limit	: Before the certificate is issued
NC Grade	: Major	Date of Closing	: 11 June 2018
Standard Ref. & Requirement	: 4.6.2. Records of pesticide use (including active ingredients used and LD50 of the active ingredient, treatment area, amount of use of active ingredient per ha and number of applications) should be available.		

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

The Company has demonstrated records related to the use of pesticides covering the area of treatment, LD50, number of applications and active ingredients used in PT SISM and PT SMA. However, the company has not accurately calculated the determination of the active ingredient per ha used.

Root Cause Analysis (filled by organization audited):

Pesticide data recoverees do not understand the calculation of active ingredients used

Correction (filled by organization audited):

GPRC make a standard form related to the calculation of active ingredients used pesticides

Corrective Action (filled by organization audited):

- GPRC make a standard form related to the calculation of active ingredients used pesticides
- Chemical storeroom filler form calculations of active ingredients of pesticides that have been made by GPRC

Assessor Evaluation and Conclusion (filled by auditor):

Verify May 9, 2018

The Company shows some evidence of improvements as follows:

1. Table of Calculation of Active Pesticide Material of 2017 Mulia 1-2; for example: during 2017 there is the use of Isopropyl amine glyphosate 480 g / l (Jurassic 480 SL) is 6,319 Liter with active ingredient 3,033,120 gram and Area of application 3,656 Ha; with active ingredient / Ha: 830 gr / Ha.
2. Table of Calculation of Active Pesticide Material of 2017 Mulia 3-4; for example: during 2017 there is use of Parakuat dichloride 276 g / l (Supretox 276 SL) is 2,660 Liter with active ingredient 734,160 gram and Application area 1,906.60 Ha; with active ingredient / Ha: 385.06 gr / Ha.
3. Table of Calculation of Pesticide Active Ingredients 2017 Mulia 5-6; for example: during 2017 there is use of Isopropyl amine glyphosate 480 g / l (Amiphosate 480 SL) is 6,286.00 Liter with active ingredient 3,017,280 gram and Application Area 5,620 Ha; with active ingredient / Ha: 537 gr / Ha.
4. Table of Calculation of Active Ingredients of Pesticides 2017 Abadi 1-2; for example: during 2017 there is the use of Isopropyl amine glyphosate 480 g / l (Amiphosate 480 SL) is 1,520 Liters with active ingredients 144.000 gram and Area application 176 Ha; with active ingredient / Ha: 894 gr / Ha.
5. Table of Active Pesticide Material Calculation 2017 Eternal 5-6; for example: during 2017 there is the use of Isopropyl amine glyphosate 480 g / l (Jurassic 480 SL) is 65 Liters with active ingredients 31,200 grams and Area application 40 Ha; with active ingredient / Ha: 780 gr / Ha.

Verify June 11, 2018

The Company has demonstrated the document of the use of active ingredients based on LD50 of each chemical for Mulia 1-6 Estate and Abadi 1-4 Estate. The example of determining LD50 include:

1. Pesticides under the Ratgone trademark have a LD50 value (contact and systemic properties) of 0.3 mg/kg.
2. Starane trademark pesticides have LD50 value (systemic properties) of 4230 mg/kg.
3. Pesticides under the trademark Metaprima have a LD50 value (systemic properties) of > 8000 mg/kg.
4. Pesticides under the Kenlon trademark have a value of LD50 (systemic properties) of 710 mg/kg.
5. Starane trademark pesticides have LD50 value (systemic properties) of 4230 mg/kg.

Based on this, the non conformity No. 2017.04 has been fulfilled.

Verified by	: Andi Pratama Pasaribu
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NCR No.	: 2017.05	Issued by	: Andi Pratama Pasaribu
Date Issued	: 20 October 2017	Time Limit	: Before the certificate is issued
NC Grade	: Major	Date of Closing	: 9 May 2018

Standard Ref. & Requirement	: 4.6.3. The use of pesticides should be minimized as part of the plan, and in accordance with the IPM plan. There should be no preventive use of pesticides for prophylactic use, except in the specific situations identified in the Best Practices guidelines in Indonesia.
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Non-Conformance Description & Evidence observed (filled by auditor):

The pesticides usage are not in accordance with the IPM Plan.
Based on document review, PT SMA has applied 2 kg of Ratgone BB (Brodifakum 0.005%) in 2017 in the nursery area. However the company has yet to show the related record of pest attack (Detection / Census).

Root Cause Analysis (filled by organization audited):

Census recording exists but saved by GPRC Manager who is on leave (his wife gave birth).

Correction (filled by organization audited):

Shows the related recording of pest attack (Detection / Census).

Corrective Action (filled by organization audited):

Documents required for the audit are kept in an easily accessible document cabinet

Assessor Evaluation and Conclusion (filled by auditor):
Verify May 9, 2018

The Company shows some evidence of improvements as follows:

1. Internal Office Memo from Estate Manager Abadi 1-2 to Manager of GPRCI dated May 25, 2017. Subject: application of directive that there is an attack of rat pest in breeding Abadi-1.
2. Internal Office Memo from GPRCI Manager dated May 27, 2018. Subject: Manual of rat pest handling in nursery. Explained that: the application of rat poison in polybags with the intensity of every ten items per ten rows is given 1 rat poison, the application is repeated every 4 days by replacing the missing and edible rat poison, the application is stopped if the replacement of rat poison is lost or eaten <20%; rat toxic replacement is done every 4 days; rat poison applications should use gloves.
3. The results of census / rat pest detection on May 29, 2017 note that in rotation 1 there is a sign of rat attack: 338 principal.
4. Based on the recapitulation there are 3 times the change of toxin (12 days) where the rotation 1: 338 pcs, 2: 247 pcs rotation, and 3: 48 pcs rotation.

Auditor's Conclusion:

Based on the evidence of improvement shown, this non conformity has been met.

Verified by	: Trismadi Nurbayuto
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NCR No.	: 2017.06	Issued by	: Andi Pratama Pasaribu
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Date Issued	: 20 October 2017	Time Limit	: ASA-1																																																									
NC Grade	: Minor	Date of Closing	: 9 May 2018																																																									
Standard Ref. & Requirement	4.6.4. There shall be documentary evidence indicating that chemical substances categorized as type 1A or 1B World Health Organization (WHO) or materials included in the Stockholm and Rotterdam convention lists and paraquats are not used except in specific situations which have identified in national best practice guidelines. The use of such pesticides is minimized or eliminated as part of a pesticide use plan except under specific conditions identified in national best practice guidelines.																																																											
Non-Conformance Description & Evidence observed (filled by auditor): The Company already has a decreasing policy on the use of paraquat (Internal memo No 73 / GPN / 55TA / X2016 dated October 17, 2016). However, the company does not yet have a program that demonstrates the company's commitment to minimize and eliminate the use of paraquats.																																																												
Root Cause Analysis (filled by organization audited): The program exists, but it is not created in writing																																																												
Correction (filled by organization audited): GPRC makes the program minimize and eliminate the use of paraquat																																																												
Corrective Action (filled by organization audited): GPRC makes the program minimize and eliminate paraquat usage and monitor it																																																												
Assessor Evaluation and Conclusion (filled by auditor): Verify May 9, 2018 The company shows Internal Office Memo No. 003/GPRC (I)/02/2018 dated February 1, 2018 from Agronomy Manager to Senior Estate Manager PT SISM and PT SMA. The following is the paraquat reduction program in each unit:																																																												
<table border="1"> <thead> <tr> <th rowspan="2">Operation Unit</th><th rowspan="2">Realization 2017 (liter)</th><th colspan="5">Use Program (Liter)</th></tr> <tr> <th>2018</th><th>2019</th><th>2020</th><th>2021</th><th>2022</th></tr> </thead> <tbody> <tr> <td>Mulia 1-2</td><td>2740</td><td>2,055</td><td>1,370</td><td>8,222</td><td>548</td><td>-</td></tr> <tr> <td>Mulia 3-4</td><td>3290</td><td>2,468</td><td>1,645</td><td>987</td><td>658</td><td>-</td></tr> <tr> <td>Mulia 5-6</td><td>2618</td><td>1,964</td><td>1,309</td><td>785</td><td>525</td><td>-</td></tr> <tr> <td>Abadi 1-2</td><td>4037</td><td>3,028</td><td>2,019</td><td>1,211</td><td>807</td><td>-</td></tr> <tr> <td>Abadi 3-4</td><td>3262</td><td>2,447</td><td>1,631</td><td>979</td><td>652</td><td>-</td></tr> <tr> <td></td><td></td><td>75%</td><td>50%</td><td>30%</td><td>20%</td><td>0%</td></tr> </tbody> </table>							Operation Unit	Realization 2017 (liter)	Use Program (Liter)					2018	2019	2020	2021	2022	Mulia 1-2	2740	2,055	1,370	8,222	548	-	Mulia 3-4	3290	2,468	1,645	987	658	-	Mulia 5-6	2618	1,964	1,309	785	525	-	Abadi 1-2	4037	3,028	2,019	1,211	807	-	Abadi 3-4	3262	2,447	1,631	979	652	-			75%	50%	30%	20%	0%
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Auditor's Conclusion: Based on evidence of the above improvement, this non conformity has been met.																																																												
Verified by	: Trismadi Nurbayuto																																																											

NCR No.	:	2017.07	Issued by	:	Andi Pratama Pasaribu
Date Issued	:	20 October 2017	Time Limit	:	Before the certificate is issued
NC Grade	:	Major	Date of Closing	:	11 June 2018
Standard Ref. & Requirement	:	4.6.5. Proof of pesticide application should be available by trained personnel and in accordance with the instructions on use on product labels and storage instructions. Sufficient safety equipment should be provided and used. Product warnings should be observed, understood and properly applied by the worker (see Criterion 4.7).			
Non-Conformance Description & Evidence observed (filled by auditor): Based on interviews with pesticide applicator in Blok H13 Division 1 Abadi 1 Estate, it is known that the company is still using the application of pesticides with paraquat dichloride active ingredient. But not all the labor to follow limited pesticide training.					
Root Cause Analysis (filled by organization audited): Sprayers who have not attended limited pesticide training when the training is unable to attend, or the employees join the company after the training.					
Correction (filled by organization audited): Conducting training on the use of limited pesticides in collaboration with suppliers and pesticide supervisors.					
Corrective Action (filled by organization audited): <ul style="list-style-type: none">• Conducting training on the use of limited pesticides in collaboration with suppliers and pesticide supervisors.• Employees who have not attended the limited pesticide use training are prohibited from applying pesticides entering limited classes (paraquat).					
Assessor Evaluation and Conclusion (filled by auditor): Verify 9 November 2018 The Company shows the Attendance List and photos of the socialization activities on limited pesticide handling dated 11-12 April 2018, as follows: 1. Mulia 1-2 Estate: 28 people 2. Mulia 3-4 Estate: 14 people 3. Mulia 5-6 Estate: 40 people 4. Abadi 1-2 and 3-4 Estate: 85 people Verify June 11, 2018 The company has shown evidence of improvement in the form of limited pesticide training to PT SISM and PT SMA spray workers. The training program is conducted in collaboration between the company and the Fertilizer and Pesticide Monitoring Commission of West Kalimantan Province. As for the number of spray workers who follow the training program at PT SISM amounted to 95 people and PT SMA as many as 86 people. Examples of training personnel include: PT SISM - Employee by the name of Heriyanus (525 / 924.1 / IV / 2018) with validity period until 16 April 2023 - Employee by the name of Murad (525 / 924.2 / IV / 2018) with validity period until 16 April 2023					

- Employee by the name of Yansyah (525 / 924.3 / IV / 2018) with validity period until 16 April 2023
- Employee by the name of Uti Hairi (525 / 924.4 / IV / 2018) with validity period until 16 April 2023
- Employee by the name of Ahdiar (525 / 924.5 / IV / 2018) with validity period until 16 April 2023

PT SMA

- Employee by the name of Riduan (525 / 924.102 / IV / 2018) with validity period until 16 April 2023
- Employees by the name of Nadi (525 / 924.96 / IV / 2018) with validity period until 16 April 2023
- Employees by the name of Dikin (525 / 924.97 / IV / 2018) with validity period until 16 April 2023
- Employee by the name of Narudin (525 / 924.98 / IV / 2018) with validity period until 16 April 2023
- Employee by the name of Yanto (525 / 924.99 / IV / 2018) with validity period until 16 April 2023

Based on proof of improvement that has been given, non conformity No. 2017.07 has been declared fulfilled.

Verified by : **Andi Pratama Pasaribu**

NCR No.	: 2017.08	Issued by	: Trismadi N
Date Issued	: 20 October 2017	Time Limit	: Before the certificate is issued
NC Grade	: Major	Date of Closing	: 11 June 2018
Standard Ref. & Requirement	: 4.6.11 A record of annual health examination results for pesticide operators and evidence of follow-up of the results of the examination should be available.		
Non-Conformance Description & Evidence observed (filled by auditor):			
Records of the results of pesticide health examinations and evidence of follow-up on the results of the examination of are not available. Based on interviews with doctors, as well as with several spraying teams in Mulia 1.2 Estate, Mulia 3.4 Estate, and Abadi 1.2 Estate it is known that cholinesterase health check has been done on October 13, 2017. Nevertheless, examination and follow-up, if any applicable pesticide applicator is affected by Occupational Disease.			
Root Cause Analysis (filled by organization audited):			
MCU results are still in the process of completion at the provider			
Correction (filled by organization audited):			
Follow up the MCU results to the Provider and follow up the cholinesterase health examination			
Corrective Action (filled by organization audited):			
<ul style="list-style-type: none">Delivering the results of health checks to employees, follow up the results of medical examinations.Special MCU will be conducted in semester 1 in each year			
Assessor Evaluation and Conclusion (filled by auditor):			
Verify May 9, 2018			
The Company shows some evidence of improvements as follows:			
1. The results of spirometry and cholinesterase examination of 30 pesticide applicators in Mulia 1-2, the results of cholinesterase showed entirely under normal conditions. As for the results spirometry known there are 5 people			

indicated mild restriction.

2. The results of spirometry and cholinesterase examination of 26 pesticide applicators at Mulia 3-4, cholinesterase results showed entirely under normal conditions. As for the results spirometry known there are 4 people indicated mild restriction.
3. The results of spirometry and cholinesterase examination of 26 pesticide applicators at Mulia 5-6, cholinesterase results show all under normal conditions. As for the results spirometry known there are 13 people indicated mild restriction.
4. Results of cholinesterase health examination at PT SMA conducted on 26 - 28 July 2016.
5. Socialization to employees whose MCU results indicate mild restriction on January 15, 2018 with recommendations: regular exercise, no smoking and avoidance of cigarette smoke, the use of PPE (masks) and health socialization by doctor.

Verify June 11, 2018

The Company shows some evidence of improvements as follows:

1. The results of health inspection of PT Sawit Mitra Abadi team spraying team as many as 81 people dated May 14, 2018 by Sakura Clinic Laboratory. Based on the results of the examination is known that 12 people identified mild restriction, while the rest under normal conditions.
2. Health Checkup Program PT SMA consists of before work, periodical physical (once a year), special (Cholinesterase 2 times a year, spirometry & audiometry once a year).

Auditor's Conclusion:

Based on evidence of the above improvement, this non conformity has been met.

Verified by : **Trismadi N**

NCR No.	:	2017.9	Issued by	:	Trismadi N
Date Issued	:	20 October 2017	Time Limit	:	Before the certificate is issued
NC Grade	:	Major	Date of Closing	:	11 June 2018
Standard Ref. & Requirement	:	4.7.1. A work safety policy should be available. The safety and health plan is implemented.			
Non-Conformance Description & Evidence observed (filled by auditor): Not all health and safety plans are implemented yet.					
1. Based on interviews with several operators in several process stations, it was explained that the medical check up has been done on October 13, 2017. Nevertheless, the health examination results have not been shown yet.					
2. The First Aid kit is not properly monitored.					
a) The observation result of the first aid box in the block T13 (harvesting foreman), Mulia 3.4 Estate is known that Aquades is expired in January 2017.					
b) The observation result of the first aid box in Block S01 (spraying foreman), Mulia3,4 Estate is known that sterile gauze does not exist, but not in the usage record.					
c) The observation result of the first aid box in block J11 (fertilizer foreman), Mulia 3.4 is known that there are only 16 items and no record of usage. In addition Povidone has expired since March 2017.					

d) The result of observation of the first aid box in block H20 Abadi 1.2 Estate, is known that an alcohol and aquades are gone, but there is no record of usage.
Root Cause Analysis (filled by organization audited): 1. MCU results are still in the process of completion at the provider 2. Lack of monitoring the use of boxes and bags of First Aid
Correction (filled by organization audited): 1. Follow up the MCU results to the Provider and follow up the cholinesterase health examination. 2. Completing the First Aid kit in accordance with the provisions
Corrective Action (filled by organization audited): 1. Delivering the results of health checks to employees, follow up the results of medical examinations 2. Special MCU will be done in semester 1 in each year 3. Medical officers / OHS staff check the first aid box once a month.
Assessor Evaluation and Conclusion (filled by auditor): Verify January 19, 2018 The Company shows some evidence of improvements as follows: 1. The results of spirometry, audiometry and cholinesterase for 5 employees of the process. There is one light restriction (spirometry). 2. Socialization to employees whose MCU results indicate mild restriction on January 15, 2018 with recommendations: regular exercise, no smoking and avoidance of cigarette smoke, use of PPE (mask) and health socialization by doctor. 3. The results of monitoring of 10 lists of first aid boxes and first aid bags in Mulia 3-4 November and December 2017, it is known that all items in first aid box are in conformity with Ministerial Decree no. 15 of 2008 (consisting of 21 items). 4. Photo of first aid box in four place 5. Photo list of contents of first aid box in 4 foreman of SMA. Verify June 11, 2018 The Company shows some evidence of improvements as follows: 1. The results of monitoring the completeness of the contents of first aid bags for the 8 men foreman from January to March 2018, each consisting of 23 items. 2. Documentation of handover of First Aid bag by paramedic to 8 foreman in PT SMA. Auditor's Conclusion: Based on evidence of the above improvement, this non conformity has been met.
Verified by : Trismadi N

NCR No.	:	2017.10	Issued by	:	Trismadi N
Date Issued	:	20 October 2017	Time Limit	:	Before the certificate is issued
NC Grade	:	Major	Date of Closing	:	5 January 2018
Standard Ref. & Requirement	:	4.7.2. Risk assessment, documentation and implementation records should be available.			

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

Results of HIRARC Evaluation have not been implemented.
SISM and SMA Estate management units have evaluated HIRARC on 18 August 2017, risk control for the potential hazards of electrical cables through harvest blocks. Among others: the provision of PPE and the installation of safety sign "The danger of lightning strikes in the rain". However, the risk control not yet implemented by the management unit.

Root Cause Analysis (filled by organization audited):

HIRARC for potential electrical wiring hazard has not been socialized

Correction (filled by organization audited):

Operating units realize risk control for potential electrical hazards

Corrective Action (filled by organization audited):

Immediately socialize if there is a change HIRAC and immediately realized its recommendations

Assessor Evaluation and Conclusion (filled by auditor):

Verify 5 January 2018

The Company shows some evidence of improvements as follows:

1. HIRAC Revision harvesting section where one of the risk control is done by the provision of PPE (boots), this is revised before using safety shoes.
2. Records of electric hazard signboard mounting in accordance with HIRAC owned in Mulia 1-2, Mulia 3-4, Mulia 5-6, Abadi 1-2, and Abadi 3-4.

Auditor's Conclusion:

Based on evidence of improvements that have been demonstrated, this non conformity has been met

Verified by : **Trismadi N**

NCR No.	:	2017.11	Issued by	:	Trismadi N
Date Issued	:	20 October 2017	Time Limit	:	Before the certificate is issued
NC Grade	:	Major	Date of Closing	:	5 January 2018
Standard Ref. & Requirement	:	4.7.3. Records of occupational safety and health (OSH) training programs and personal protective equipment in accordance with the results of hazard identification and risk analysis shall be made available to all workers.			
Non-Conformance Description & Evidence observed (filled by auditor):					
<p>Personal protective equipment suitable for hazard identification and risk analysis has not been implemented for all workers.</p> <p>Based on the results of field observations it is known that some employees do not use PPE in accordance with the results of hazard identification and risk analysis, for example:</p> <ul style="list-style-type: none">• Some harvester in L3, Mulia 1,2; T13 Mulia 3.4 blocks; and H17 Abadi 1.2 blocks do not use safety boots.• Pesticide applicator in block J7, Mulia 1,2; S12 Mulia Block 3.4; and Block H11 Abadi 1,2 did not use long-sleeved work clothes.					

Root Cause Analysis (filled by organization audited):

- a. Harvest employees choose to use boots rather than safety boots, because they are heavy and difficult when walking.
- b. have not provided long-sleeved work clothes for spraying teams by the company

Correction (filled by organization audited):

- a. Revise HIRAC for harvesting activities, changing from safety boot to boot
- b. Provide PPE in accordance with the needs and conditions

Corrective Action (filled by organization audited):

- a. Revise HIRAC for harvesting activities, changing from safety boot to boot
- b. Provide PPE in accordance with the needs and conditions

Assessor Evaluation and Conclusion (filled by auditor):

Verify 5 January 2018

The Company shows some evidence of improvements as follows:

1. HIRAC Revision harvesting section where one of the risk control is done by the provision of PPE (boots), this is revised before using safety shoes.
2. Records of attendance of boots to 48 harvests at Mulia 1-2 dated 5-6 December 2017.
3. Records of attendance of the spraying team's long-arm suit to 50 spraying workers in Mulia 1-2 on 12-13 December 2017.
4. Recorded attendance list of boots to 25 harvesters in Mulia 4.
5. Records of the present attendance of providing long-sleeved shirts to 21 spraying workers on December 14, 2017.
6. Records of HIRAC socialization & use of PPE on November 15, 2017 to employees of Mulia 1 & 2 Estate; as well as November 13, 2017 to employees of Mulia 3 & 4; as well as November 16, 2017 to employees of Mulia 3.4.
7. Documentation of the handover of boots at Mulia1-2 Estate, Mulia 3-4 and Mulia 5-6 Estate.
8. Documentation of handover of long sleeves at Mulia1-2 Estate, Mulia 3-4 and Mulia 5-6 Estate.
9. Records of harvesting APD in Abadi 1-2 Estate and Abadi 3-4 Estate consists of boots, helmet, cloth gloves and sarong dodos to 30 harvesters. As well as delivery of spray PPE to 20 employees consists of boots, head cover, apron, mask, glasses, cloth gloves and rubber gloves.
10. Socialization of HIRAC and use of PPE to employees Abadi 1-2 dated 15 November 2017,

Auditor's Conclusion:

Based on evidence of improvements that have been demonstrated, this non conformity has been met.

Verified by : Trismadi N

NCR No.	:	2017.12	Issued by	:	Nanang Mualib
Date Issued	:	20 October 2017	Time Limit	:	ASA-1
NC Grade	:	Minor	Date of Closing	:	11 June 2018
Standard Ref. & Requirement	:	5.1.2. A document of the environmental management plan must be available to prevent negative impacts and implementation reports and revisions if indicated of any impact that should change the activities of the company in progress. The			

	management of the company must appoint the person responsible for the implementation of the environmental management plan.
Non-Conformance Description & Evidence observed (filled by auditor): Based on document verification indicates that PT SMA has not been able to show evidence of preparing RKL-RPL Implementation Report for the first semester (January - June) period in 2017 and reporting it to relevant agencies in accordance with the RKL-RPL matrix in the AMDAL document.	
Root Cause Analysis (filled by organization audited): Employees of PT.SMA in charge of making the RKL-RPL implementation report withdraw from the company so that nobody does.	
Correction (filled by organization audited): Prepare RKL-RPL implementation report for the first semester of 2017	
Corrective Action (filled by organization audited): The RKL / RPL implementation report is reported in accordance with the provisions (6 months) If there are employees who resign, immediately replaced.	
Assessor Evaluation and Conclusion (filled by auditor): The Company shows receipt of RKL-RPL Implementation Report of Semester I & II Year 2017 PT SMA to Public Houseing, Settlement Area and Environment Ketapang Regency according to letter no. 04 / SMA-HR / I / 2018 (First Semester) and No. 05 / SMA-HR / I / 2018 (Semester II) on January 25, 2018. Verify June 11, 2018 The Company shows some evidence of improvements as follows: Report on RKL-RPL implementation Semester I of 2017, several parameters monitored and managed include: social unrest, soil fertility and erosion change, decreasing water quality, decreasing air and noise quality, forest and land fire, disruption of flora habitat and fauna, increased employment opportunities, business and community income, health problems and accidents. The report has been supplemented with comprehensive data such as water quality, ambient and noise test results. Report on the implementation of RKL-RPL Semester II of 2017, several parameters monitored and managed include: social unrest, soil fertility and erosion change, water quality reduction, air and noise deterioration, forest and land fire, disruption of flora habitat and fauna, increased employment opportunities, business and community income, health problems and accidents. The report has been supplemented with comprehensive data such as water quality, ambient and noise test results. Auditor's Conclusion: Based on evidence of improvements that have been demonstrated, this non conformity has been met.	
Verified by	: Trismadi N

NCR No.	: 2017.13	Issued by	: Nanang Mualib
Date Issued	: 20 October 2017	Time Limit	: ASA-1

NC Grade	: Minor	Date of Closing	: 11 June 2018
Standard Ref. & Requirement	5.1.3. There is a document of the environmental monitoring plan and its implementation report and an improvement plan for the monitoring result if a nonconformity is found. This plan is reviewed at least 2 years.		
Non-Conformance Description & Evidence observed (filled by auditor): Based on document verification indicates that PT SMA has not been able to show evidence of having prepared RKL-RPL Implementation Report for the first semester (January - June) period in 2017 and report it to related institutions in accordance with RKL-RPL matrix in AMDAL document.			
Root Cause Analysis (filled by organization audited): Employees of PT.SMA in charge of making the RKL-RPL implementation report resign from the company so that nobody does.			
Correction (filled by organization audited): To prepare RKL-RPL implementation report for the first semester of 2017.			
Corrective Action (filled by organization audited): The RKL / RPL implementation report is reported in accordance with the provisions (6 months) If there are employees who resign, immediately replaced.			
Assessor Evaluation and Conclusion (filled by auditor): Verify May 9, 2018 The Company shows receipt of RKL-RPL Implementation Report of Semester I & II Year 2017 PT SMA to Public Housing Agency, Settlement Area and Environment Ketapang Regency according to letter no. 04 / SMA-HR / I / 2018 (First Semester) and No. 05 / SMA-HR / I / 2018 (Semester II) on January 25, 2018. Verify June 11, 2018 The Company shows some evidence of improvements as follows: <ul style="list-style-type: none"> • Report on RKL-RPL implementation Semester I of 2017, several parameters monitored and managed include: social unrest, soil fertility and erosion change, decreasing water quality, decreasing air and noise quality, forest and land fire, disruption of flora habitat and fauna, increased employment opportunities, business and community income, health problems and accidents. The report has been supplemented with comprehensive data such as water quality, ambient and noise test results. • Report on the implementation of RKL-RPL Semester II of 2017, several parameters monitored and managed include: social unrest, soil fertility and erosion change, water quality reduction, air and noise deterioration, forest and land fire, disruption of flora habitat and fauna, increased employment opportunities, business and community income, health problems and accidents. The report has been supplemented with comprehensive data such as water quality, ambient and noise test results. 			
Auditor's Conclusion: Based on evidence of improvements that have been demonstrated, this non conformity has been met.			
Verified by	: Trismadi N		

NCR No.	: 2017.14	Issued by	: Nanang Mualib
Date Issued	: 20 October 2017	Time Limit	: Before the certificate is issued
NC Grade	: Major	Date of Closing	: 19 January 2018
Standard Ref. & Requirement	: 5.3.2 There shall be evidence that all chemical wastes and containers are disposed of responsibly.		

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

PT SISM

Based on field observation to the Mulia 3-4 day care it is known that hazardous waste has not been managed in accordance with the hazardous waste Handling Procedure (document number ENV 551).






PT SMA

Based on the field visit at Fertilizer Warehouse PT SMA, it was found out that the hazardous waste container had not been managed in accordance with LB3 Handling Procedure (document number ENV 551).



Root Cause Analysis (filled by organization audited): 3 character trash cases (organic, inorganic and LB3) are not available. There are still many employees who do not yet understand the management of LB3
Correction (filled by organization audited): Socialization of LB3 Handling Procedure (document number ENV 551) Manage LB3 in Mulia 3-4 in accordance with LB3 Handling Procedure (Document number ENV 551).
Corrective Action (filled by organization audited): Trash Build 3 character Refresh LB3 handler socialization once every year LB3 in the workshop area sent to TPS LB3 by workshop officer at least once a month LB3 in B3 warehouse area sent to TPS LB3 by chemical warehouse officer at least once a month
Assessor Evaluation and Conclusion (filled by auditor): Verification January 5, 2018 The Company shows some evidence of improvements as follows: 1. Photo LB3 transferred to TPS LB3. 2. Photo of trash can with organic characteristics, an organic and LB3 in several office and warehouse locations. 3. LB3 balance sheet November 2017 in Mulia 4: 2 liters oil and 2 pcs oil filter. 4. Trash / garbage disposal schedule in Mulia 3-4 of 2018 once a week, besides there are also respective officers. Auditor's Conclusion: Please be able to answer the root of the problem and corrective action according to the auditor team's question. Verification, January 19, 2018. The company demonstrated the socialization of B3 waste management conducted in January 2018 located in Mulia 3 & 4 estate which was attended by workshop staff and Chemical Warehouse officer (17 people). In addition, the company demonstrated the 2018 annual program related to the socialization of SOP Env 551 B3 waste management. In addition, the Company showed the B3 waste shipment records from the 3-4 Chemical Warehouse and Workshop in January 2018. For example: used 42 liters (liquid) oil, 20 pairs of oil filters (solid), 2 pairs of used batteries). Based on the above explanation, then this has been fulfilled. Auditor's Conclusion: Based on evidence of improvements that have been demonstrated, this non conformity has been met.
Verified by : Trismadi N

NCR No.	: 2017.15	Issued by	: Nanang Mualib
Date Issued	: 20 October 2017	Time Limit	: ASA-1

NC Grade	:	Minor	Date of Closing	:	9 May 2018
Standard Ref. & Requirement	:	5.3.3. A waste management plan should be available that is documented and implemented to avoid and reduce pollution			
Non-Conformance Description & Evidence observed (filled by auditor): Waste management plans to avoid and reduce pollution have not been implemented. 1. Based on field observations of leach pond near EFB station it is known that: leachate trench is clogged by EFB, besides EFB is outside the cement floor that has been provided and potentially lead to leachate water to environmental body. 2. Based on interviews with employees & field visits in the area of housing Mulia 2 Estate known domestic waste disposed around the residential area and then if the waste is full then the domestic waste will be burned. This is not accordance with burning ban policy and Non B3 waste management procedures (Document ID ENV55).					
<div></div> <div></div>					
PT SMA Based on field visit at Sawit Mitra Abadi daycare 1-2, it is known that domestic waste management is done by burning. This is not in accordance with burning ban policy and Non B3 waste management procedures (Document ID ENV55).					
<div></div>					
Root Cause Analysis (filled by organization audited): 1. There are no barriers and barriers in the location 2. Character trash cases (organic, anorganic and hazardous waste) are not available and many employees still do not understand the management of non-hazardous waste.					

Correction (filled by organization audited):

1. Improved leachate channels that are blocked by EFB
2. Socialization management limbah no hazardous waste
3. Manage non hazardous waste according to SOP ENV55.

Corrective Action (filled by organization audited):

1. Creating a barrier and a divider ditch at the location, the operator of the process of monitoring daily in the EFB station
2. Making of 3 characteristic trash
3. Refresh LB3 handler socialization once every year
LB3 in the workshop area sent to TPS LB3 by workshop officer at least once a month
LB3 in B3 warehouse area sent to TPS LB3 by chemical warehouse officer at least once a month

Assessor Evaluation and Conclusion (filled by auditor):
Evaluation of the Assessors and Conclusions (completed by the auditor):
Verification January 5, 2018

The company shows a photo of a retaining embankment around the EFB station, with a barrier trench added to prevent overflow to the environmental agency. In addition, there is a daily monitoring of the condition of the condition of the floor, the quantity of empty blanks, the state of the ditch & drainage, leachate in empty empty storage, sump leachate & water level, leachate pump & water feature.

Verification May 9, 2018

The Company shows evidence of improvements as follows:

1. Photos of 3 characteristic waste containers (organic, inorganic and hazardous waste) around housing, offices and warehouses Mulia 1-2. The schedule of domestic waste transport is done once every week, as well as Final Dump Area documentation that has separated between organic and an organic waste. Then shown the photo socialization of domestic waste management to employees on March 21, 2018.
2. Photo procurement of 3 characteristic waste containers (organic, inorganic and hazardous waste) around housing, offices and warehouse Mulia 3-4. The schedule of domestic waste transport is done once every week, as well as Final Dump Area documentation that has separated between organic and an organic waste. It then shows the photo socialization of domestic waste management to employees on January 23, 2018.
3. Photo procurement of 3 characteristic waste containers (organic, inorganic and hazardous waste) around housing, offices and warehouse Mulia 5-6. The schedule of domestic waste transport is done once every week, as well as Final Dump Area documentation that has separated between organic and an organic waste. It then shows the photo socialization of domestic waste management to employees on January 22, 2018.
4. Photo procurement of 3 characteristic waste containers (organic, inorganic and hazardous waste) around residential, office and warehouse of Eternal 1-2. The schedule of domestic garbage transport is done once every week, as well as Final Dump Area documentation that has separated between organic and an organic waste. It then shows the photo socialization of domestic waste management to employees on February 8, 2018.
5. Photo procurement of trashes 3 characteristics (organic, inorganic and hazardous waste) around residential, office and warehouse Abadi 3-4. The schedule of domestic garbage transport is done once every week, as well as Final Dump Area documentation that has separated between organic and an organic waste. Then shown the photo socialization of domestic waste management to employees on April 9, 2018.
6. Photos of cleaning activities in the neighborhood Mulia 2 housing is equipped with photos before and after cleaning.

Auditor's Conclusion:

Based on evidence of improvements that have been demonstrated, this non conformity has been met.

Verified by : **Trismadi N**

NCR No.	: 2017.16	Issued by	: Nanang Mualib
Date Issued	: 20 October 2017	Time Limit	: Before the certificate is issued
NC Grade	: Major	Date of Closing	: 9 May 2018
Standard Ref. & Requirement	: 5.6.2. Significant emission of Green House Gas (GHG) and pollutants should be identified, and plans to reduce or minimize emissions and pollutants should be implemented.		
Non-Conformance Description & Evidence observed (filled by auditor): <ul style="list-style-type: none">PT SISM already has a GHG emission mitigation plan from its operational activities but has not yet been able to demonstrate that the plan has been comprehensive including its objectives, targets and implementation schedule.PT SISM (Mulia Oil Mill) can not yet have a plan to reduce or minimize contamination and comprehensive emission covering the purpose, target and schedule of its implementation.PT SMA does not yet have a plan to reduce or minimize contamination and comprehensive emissions covering the objectives, targets and implementation schedule.			
Root Cause Analysis (filled by organization audited): GHG mitigation has been done but not scheduled and documented.			
Correction (filled by organization audited): Develop a GHG mitigation plan.			
Corrective Action (filled by organization audited): Prepare a GHG mitigation plan every year and implement it.			
Assessor Evaluation and Conclusion (filled by auditor): Verify May 9, 2018 The Company shows greenhouse gas mitigation matrix of Estate and Mill in 2018 with PIC equipped and implementation timelines, including: Estate <ul style="list-style-type: none">Doing land clearing without burning (zero burning).Planting emission absorbent plants.Backing up conservation areas.Implementation of plantation cultivation practices in accordance with the guidelines of oil palm cultivation.Planting the river border and critical areas.Maintenance / maintenance of vehicles and machinery on a regular basisRegular vehicle emissions testing.Conduct fertilization effectively in accordance with the dosage and recommendations.Not doing fertilization and spraying when it rainsNot applying fertilization and poisoning in river border			

- Perform effective toxic spraying according to dose
- Socialize electricity savings
- Conducting landfill after full landfill.

Mill

- Periodic monitoring of boiler emissions and diesel engines.
- Perform maintenance / service periodically for the machines used
- Using biofuels (shells, fiber) to reduce the use of fossil fuels
- Provide socialization to workers on greenhouse gas emission mitigation program that can be generated from processing of FFB into CPO by using fossil fuel as energy source in boiler and diesel engine
- Regular vehicle emissions testing
- Conducting reforestation in strategic places
- Utilization of liquid waste for fertilizer (land application)
- Monitoring the physical condition of waste water treatment plan pool and freeboard level
- Perform routine monitoring for POME
- Utilization of empty strip for compost and mulch.

It also shows evidence of other improvements, such as:

- a. Documentation of GHG emitting trees planted in Mulia 1-2 s.d Mulia 5-6.
- b. Records of the realization of fertilization in accordance with the recommendations of the GPRC team at PT SMA and PT SISM.
- c. Records of the realization of red paint marking along the river border as the limits of chemical applications. As well as the installation of signboard bans on the application of kimi materials at PT SISM river border and PT SMA (Sungai Belian Bedarah Reparian and Sungai Plakenan
- d. Records of electricity-efficient socialization dated January 15, 2018 to employees of PT SISM and PT SMA.
- e. Records of vehicle emission test results and PT SISM and PT SMA 2017; as well as recording of routine services of vehicles and machines at PT SISM and PT SMA.
- f. Result of emission test of genset at PKS Mulia on January 11, 2018 with result of CO 359 mg / Nm³. The results are still below the standard quality threshold (600 mg / Nm³).

Auditor's Conclusion:

Based on evidence of improvements that have been demonstrated, this non conformity has been met.

Verified by : **Trismadi N**

NCR No.	:	2017.17	Issued by	:	Nanang Mualib
Date Issued	:	20 October 2017	Time Limit	:	ASA-1
NC Grade	:	Minor	Date of Closing	:	29 July 2018
Standard Ref. & Requirement	:	5.6.3. There should be regular monitoring plans and results for emissions and pollutants from plantation and palm oil activities using appropriate methods.			
Non-Conformance Description & Evidence observed (filled by auditor):					

PT SISM and PT SMA have not been able to show the Greenhouse Gas calculation results consistently every 1 year period using the calculation method approved by RSPO Secretariat (RSPO Palm GHG Calculator 3.0.1).

Root Cause Analysis (filled by organization audited):

Lack of information on how to fill GHG calculations

Correction (filled by organization audited):

Calculating GHG RSPO Palm GHG Calculator version 3.0.1

Corrective Action (filled by organization audited):

Perform GHG calculations every year according to the latest version

Assessor Evaluation and Conclusion (filled by auditor):

Verify May 9, 2018

The Company shows the results of Green House Gas Greenhouse Gas Emission with the supply of Mulia 1-2 Estate bases; Mulia 3-4; and Mulia 5-6.

Verify June 29, 2018

The company shows the calculation results of Greenhouse Gas Emissions at Mulia Oil Mill to supply base.

\ Summary of Net GHG Emissions

Emissions per product	tCO ₂ e/tProduct	Extraction	%	Production	ton/year
CPO	202.77	OER	23.02	FFB Processed	115,659.18
PK	202.77	KER	3.68	CPO Produced	26,621.39

Land Use	Ha
OP planted area	19,333.27
OP Planted on peat	0
Conservation Area	2,090.63

Summary of Field Emissions and Sinks

	Own Crop		Group		3 rd Party	
	tCO ₂ e	tCO ₂ e/ha	tCO ₂ e	tCO ₂ e/ha	tCO ₂ e	tCO ₂ e/ha
Emissions						
Land conversion	116,953.25	7.12	20,655.81	7.12	0	0
*CO ₂ emissions from fertilizer	7,412.33	0.45	2,133.45	0.74	0	0
**N ₂ O emissions	580,886.67	35.35	1,117.28	0.39	0	0
Fuel consumption	5289.36	0.32	0	0	0	0
Peat Oxidation	0	0	0	0	0	0
Sinks						
Crop sequestration	-53824.98	-9.36	-27,167.94	-9.36	0	0

Conservation Sequestration	0	0	0	0	0	0
Total	556,487.55	33.87	4.26	-2,423.83	-1.12	-0.1

Summary of Mill Emissions and Credits

	tCO ₂ e	tCO ₂ e/tFFB
Emissions		
POME	5,705,941.86	49.33
Fuel consumption	645.58	0.01
Grid Electricity Utilisation	5.34	0
Credits		
Export of Grid Electricity	0	0
Sales of PKS	0	0
Sales of EFB	0	0
Total	5,706,592.78	49.34

Palm oil Mill Effluent (POME) Treatment

Divert to compost	-
Divert to anaerobic digestion	100

POME Diverted to Anaerobic Digestion:

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

Based on evidence of improvements that have been demonstrated, this conformity has been met.

Verified by : Trismadi N

NCR No.	:	2017.18	Issued by	:	Andi Pratama Pasaribu
Date Issued	:	20 October 2017	Time Limit	:	Before the certificate is issued
NC Grade	:	Major	Date of Closing	:	11 May 2018
Standard Ref. & Requirement	:	6.1.3 Plans to avoid or mitigate negative impacts and enhance positive impacts, and monitoring of identified impacts, should be developed in consultation with affected parties, documented and drafted into implementation schedules, including responsibilities for their implementation.			
Non-Conformance Description & Evidence observed (filled by auditor):					
Based on the evaluation results of the implementation and revision of SIA documents conducted in December 2016, an impact-based impact management model has been developed. However, there is insufficient evidence that the model has been developed and implemented with clear timelines and responsibilities.					

Root Cause Analysis (filled by organization audited): Implementation plan has been made through the CSR program but the PIC is not listed, assumes that without the PIC it is clear that the person in charge is Community Department	
Correction (filled by organization audited): Adding timelines and personnel to the SIA implementation plan	
Corrective Action (filled by organization audited): The SIA implementation program plan is complete with the time scale and the person in charge	
Assessor Evaluation and Conclusion (filled by auditor): Verify May 11, 2018 The Company has shown evidence of improvement in the form of a document of social management program of PT. Sepanjang Intisurya Mulia, Ketapang District, West Kalimantan Province Period 2017 and 2018 and the timeline and responsible for each program that has been established. Conclusion of Auditors May 11, 2018 Based on the evidence of improvement that has been demonstrated, this non conformity is stated to have been fulfilled.	
Verified by	: Andi Pratama Pasaribu

NCR No.	: 2017.19	Issued by	: Brigitta Prita
Date Issued	: 20 October 2017	Time Limit	: Before the certificate is issued
NC Grade	: Major	Date of Closing	: 19 January 2018
Standard Ref. & Requirement	: 6.5.1. Wage documentation and work conditions should be available in accordance with applicable labor requirements.		
Non-Conformance Description & Evidence observed (filled by auditor): There is no evidence that wage documentation and job requirements are in accordance with applicable employment regulations. Based on the result of document review, it is known that Sectoral Minimum Wage Regent of Ketapang is in accordance with Governor's Decree No. 789 / DISNAKERTRANS / 2016 on December 2016 is Rp. 2.480.000 / month or Rp. 99.200 / Day. Based on observations and interviews with several employees found the following facts: <ul style="list-style-type: none"> • All fertilizer labors in Block D6, Mulia 1.2 Estate; and Block H20 Abadi 1,2 have KHT status. Wages use the daily wage system every Monday-Thursday every week, while wages on Friday and Saturday use a wholesale system ranging from Rp. 5,000 - Rp. 7,000 per bag. As an example set forth in the foreman activity book on September 15, 2017 in Division 2D, Mulia 2 Estate value for the fertilization activity is Rp. 6000 / bag. However, the contract amount is still under the wage and premium agreement signed by the President Director of April 17, 2017 (should be Rp 10,000 - Rp 12,500 / bag). • Results of interviews with harvest checkers in Block T13, Mulia 3.4 Estate, explained that if working on a Sunday get paid twice the premium: Rp. 70,000 / Sunday. However, this is not in accordance with Kepmenaker. 102 of 2004 concerning Overtime and Overtime Wages. 			

Root Cause Analysis (filled by organization audited):

- a. It is needs to verify the type of fertilization activation between the specified premium and actual realization of work and the worker.
- b. There is no company regulation in detail regarding harvest checker work on holiday. HR assumes the foreman and Head of Administration staff have understood related to the calculation of wage work on holiday.

Correction (filled by organization audited):

- a. Socialization premium wages determination to the foreman and Head of Administration Staff.
- b. Make wages provisions of harvest checker workers on Sunday or public Holidays.

Corrective Action (filled by organization audited):

- a. Socialization premium wages determination to the foreman and Head of Administration staff and re-socialize if there is any change.
- b. Make wages provisions of harvest checker workers on Sunday or public Holidays.

Assessor Evaluation and Conclusion (filled by auditor):
Verification, 5 January 2018.

The Company shows evidence of improvements including:

1. Based on the information provided by the company, the structure and scale of wages are still in the process of drafting so this is still a nonconformity.
2. The Company shows the latest wage and premium determination in 2017 which explains the point 2.4 fertilization depends on dosis plan. eg: Application of fertilizer (gm / pk) > 2500 mg - 3000 mg amount 65,000 per ha. There is documents Mandor Mulia Activity Book 1 Division IV November 2017 which describes Employee Number, Employee Name, job description, daily work result, wholesale work, material use (quantity, dose), total premium and description. Fertilizer workers as many as 23 workers consist of 3 Supervisors and 20 Fertilizers. For example:
 - a. Fertilizer worker with ID number 10006922 is known contract work is 30.07 ha with a dose of 2.5 kg / ha so that the premium payment IDR 30.07 ha X IDR 65.000 (Dose > 2500 mg - 3000 mg) = IDR 1,954,550, -. There is pay slips indicate fertilizer premium of IDR 1,954,000, -. However, there is a difference between the paid of IDR 550, - (IDR 1,954,000 - IDR 1,954,550) please explain the difference and explanation premium difference for other fertilizer workers. In addition, please indicate Book of Mandor in October 2017 and November 2017 pay slip for workers of Pupuk Mulia 1 and 2 estate for other Divisions (Other than Division IV).
 - b. The Company showed the memo of the labor day harvest checker regulation on Sunday with IOM Number 001 / IOM / AVP-PAL / I / 2017 dated November 30th, 2017. On the memo described wage on Sunday for IDR 198,400, - (2 X Salary / days), the premium of GPN premium rate per days is IDR 35,000, so the total is IDR 233,400. This memo is approved by AVP Kalbar. This memo has been socialized to Head of Administration dated December 13th, 2017. Please be showed in relation to the payment of wages for the harvest checker, especially if there is a worker harvest checker working on Sunday (Mulia 3 & 4 Estate).

Verification, January 16th, 2018.

The Company has showed additional evidence in the form of:

1. Management Decree No. 004 / SISM / HR / SK-U / X / 2017 dated October 1st, 2017 on Wage Structure and Scale. Its describes the wage scale for each level of workers ranging from staff to level of workers.
2. evidence of reporting of the wage structure to the Manpower Office of Ketapang Regency (receipt and official seal dated January 9th, 2018).
3. Evidence of the wage scale socialization to workers on January 12th, 2018 (followed by 34 workers) and January

13 th , 2018 (followed by 37 staff and supervisors).	
4. Example of labor payroll slip.	
5. Internal office memo No. 001 / IOM / AVP-PAL / XI / 2017 dated November 30 th , 2017 on wages determination of the harvest checker on Sunday or holiday.	
6. Socialization memo harvest checker wage from HR Assistant Manager to Manager and Head of Administration via email dated December 13 th , 2017.	
Auditor's Conclusion January 16th, 2018.	
Based on the documents indicated above, please add another evidence as per the above auditor's notes.	
Verification, January 19th 2018.	
The Company shows the wage checker in accordance with memorandum No.001 / IOM / AVP-PAL / I / 2017 dated November 30 th , 2017. For example:	
<ul style="list-style-type: none"> Available implementation of calculation of harvest checker premium on Sundays and National Holidays in December 2017, for example: Employee with Number of worker 1000682, Number of attendance afternoon 24 days, Premium rate IDR 35.000, Premium rate IDR 840.000, -; holiday premium of 4 Days, premium / holiday IDR 233,400 so total holiday premium of IDR 933,600, -, total fuel allowance 26 days attendance, Total allowance IDR 247,000, -; total incentives & premiums amount to IDR 2,020,600, -, total premium of IDR 198,400, other premium IDR 167,600, rounding IDR 400 to total gross payment of IDR 4,966,200, -. However there are deductions is IDR 1,289,200, - (pension plan Daily Employee, 1% Insurance deduction and loan). So the total net salary earned is IDR 3,677,00, -. Available slip of overtime wage in December 2017 Employee Checker of Harvest Mulia 1 & Mulia 2 Estate for example: Employee with Number of worker 10006825 with payment of Basic Salary (26 days) amount to IDR 2,579,200, -; Non-harvest IDR 2.188.400, premium of IDR 198.400, -, rounding Rp 200, - Total payment of IDR 4,966,200, - However there is a deduction with a total of IDR 1,289,200, - (Pension plan Employee Daily, insurance deductions 1% and loans). So the total net salary earned is IDR 3,677,00, -. 	
Based on the above explanation, this indicator is stated has been Comply.	
Verified by	: Brigitta Prita

NCR No.	:	2017.20	Issued by	:	Nanang Mualib
Date Issued	:	20 October 2017	Time Limit	:	Before the certificate is issued
NC Grade	:	Major	Date of Closing	:	11 June 2019
Standard Ref. & Requirement	:	7.3.1. There should be evidence of no new plantation development that cleared primary forest or HCV since November 2005. The opening of new plantations should be planned and managed to ensure that HCVs are maintained or increase in value (See criterion 5.2).			
Non-Conformance Description & Evidence observed (filled by auditor): PT SMA has been verified NPP by Mutuagung Lestari on 10 - 11 June 2014, the verification result of NPP is sent to RSPO secretariat on June 13, 2014 and has been in public notification exist on June 24, 2014 in RSPO secretariat					

web and based on document verification indicate that notification it has been through a period of 30 days and there is no objection to the present.

Genting Plantation BHD has compiled the document "Reporting Template for Zero Liability Management Unit" on July 31, 2014 including for PT SISM and PT SMA and the document has been sent to the RSPO secretariat.

PT SMA has not been able to show proof that it has performed the LUCA calculation used for the Remediation and Compensation assessment and has been approved by RSPO as set forth in the RSPO Remediation and Compensation Procedure (RACP) related to Land Clearance without prior HCV Assessment ".

Root Cause Analysis (filled by organization audited):

Land clearing in PT. SMA conducted after the NPP (April 2009)

Correction (filled by organization audited):

Shows the land clearing map of PT. SMA

Corrective Action (filled by organization audited):

Shows the land clearing map of PT. SMA

Assessor Evaluation and Conclusion (filled by auditor):

Verify May 9, 2018

The company shows a land clearing map per year of PT SMA in 2009 s.d. 2015 from the map it is known that land clearing is done after April 2009 (after HCV assessment). The map is a version of the company.

Verify June 11, 2018

There was an email from RSPO on 23 October 2017 which explained that LUCA PT SISM & PT SMA had been accepted by the RSPO without having to go through procedure compilation, but there was an area of 77.83 Ha in the open river border in the period November 2005 to November 2007. Compensation Panel has approved remediation plan dated 77.83 Ha.

Auditor's Conclusion:

Based on the above explanation, this indicator is stated has been fulfilled.

Verified by : Trismadi N

NCR No.	:	2017.21	Issued by	:	Andi Pratama Pasaribu
Date Issued	:	20 October 2017	Time Limit	:	Before certificate issued
NC Grade	:	Major	Date of Closing	:	11 May 2018
Standard Ref. & Requirement	:	E.3.1 The facility must have written procedures and / or instructions to ensure application all elements mentioned in this requirement this minimum includes the following a. Complete and up-to-date procedures that include the application of all elements in this requirement			

	b. The name of the person who has overall responsibility and authority over the application of such requirements and compliance with all applicable requirements. This person should demonstrate awareness of facility procedures for the adoption of this standard.
Non-Conformance Description & Evidence observed (filled by auditor): Mulia Mill has not been able to show complete and up-to-date procedures covering all elements of supply chain implementation and the officer responsible for its implementation.	
Root Cause Analysis (filled by organization audited): SOP exists but still Genting Berhad version	
Correction (filled by organization audited): Make SOP of supply chain implementation along with officer responsible for implementation	
Corrective Action (filled by organization audited): Make SOP of supply chain implementation along with officer responsible for implementation	
Assessor Evaluation and Conclusion (filled by auditor): Verification May 11, 2018 The Company has shown evidence of improvements in the form of SOP Supply Chain, Traceability and Mass Balance (SOP / GPN / 32 effective on December 4, 2017) which discusses the job description of each person in charge of supply chain implementation, the separated and non certified product separation mechanism , mass balance balance calculation as well as flow procedure of supply chain implementation. In the procedure stated that the officer responsible for managing the supply chain system in the mill is the person appointed by the mill manager. Generally it is Head of Administration (KTU). Conclusion of Auditors May 11, 2018 Based on the evidence of improvement that has been demonstrated, this non conformity is stated to have been fulfilled and its implementation will be part of the observation on the next assessment activity (Closed with Observation).	
Verified by	: Andi Pratama Pasaribu

NCR No.	: 2017.22	Issued by	: Andi Pratama Pasaribu
Date Issued	: 20 October 2017	Time Limit	: Before certificate issued
NC Grade	: Major	Date of Closing Tanggal Terpenuhi	: 11 May 2018
Standard Ref. & Requirement	: E.3.2 The facility shall have documented and non-certified procedures for receiving and processing.		
Non-Conformance Description & Evidence observed (filled by auditor):			

Mulia Mill has not been able to demonstrate documented procedures regarding the acceptance and processing of certified and non-certified of FFB.	
Root Cause Analysis (filled by organization audited): SOP exists but still Genting Berhad version	
Correction (filled by organization audited): Make SOP of supply chain implementation along with officer responsible for implementation	
Corrective Action (filled by organization audited): Make SOP of supply chain implementation along with officer responsible for implementation	
Assessor Evaluation and Conclusion (filled by auditor): Verify May 11, 2018 The Company has shown evidence of improvements in the form of SOP Supply Chain, Traceability and Mass Balance (SOP / GPN / 32 effective on December 4, 2017) which discusses the job description of each person in charge of supply chain implementation, the separated and non certified product separation mechanism, mass balance calculation as well as flow procedure of supply chain implementation. In addition, we have also shown samples of TBS delivery notes from estate originating from the RSPO certification scope, weighted notes, CPO dispatch notes, mass balance recording and sample recording of certified product sales. Conclusion of Auditors May 11, 2018 Based on the evidence of improvement that has been demonstrated, the activity (Closed with Observation) will be observed.	
Verified by	: Andi Pratama Pasaribu

NCR No.	: 2017.23	Issued by	: Andi Pratama Pasaribu
Date Issued	: 20 October 2017	Time Limit	: Before certificate issued
NC Grade	: Major	Date of Closing	: 11 May 2018
Standard Ref. & Requirement	: E.5.1 a. The Facility shall record and balance all RSPO certified FFB and CPO, KPO and RSPO certified palm oil shipments on a quarterly basis b. All volumes of palm oil and palm kernel oil delivered are subtracted from material accounting systems according to the conversion rates mentioned by the RSPO. c. Facility can only send Mass Balance sales from positive stock. Positive stock can include order products for delivery within a quarterly period. However, facilities are allowed to sell lower (as the product can be sold before it becomes stock).		
Non-Conformance Description & Evidence observed (filled by auditor):			
It has been shown to the auditor, the system for recording and balancing of certified FFB receipts and delivery of			

CPO and PK certified on a quarterly basis through a manual calculation and separation approach. Includes for mass balance implementation. However, it can not be ascertained that the system will be able to be applied properly.	
Root Cause Analysis (filled by organization audited): No employees are responsible for recording Mass Balance system yet	
Correction (filled by organization audited): Recording and balancing certified FFB and CPO and PK certified shipments on 3 month basis	
Corrective Action (filled by organization audited): Appoints Head of Administration staff to perform recording and balancing of certified FFB receipts and delivery of CPO and PK certified on a 3 month basis.	
Assessor Evaluation and Conclusion (filled by auditor): Verify May 11, 2018 The Company has shown evidence of improvements in the form of samples of FFB delivery notes from estate originating from the scope of RSPO certification, weighing note and dispatch of CPO, for example management of certified product administration data on weighing system of weighbridge and certified delivery / sales records of products to buyers. Conclusion of Auditors May 11, 2018 Based on the evidence of improvement that has been demonstrated, this non conformity is stated to have been fulfilled and its implementation will be part of the observation on the next assessment activity (Closed with Observation).	
Verified by	: Andi Pratama Pasaribu

3.5.2 Identification of Findings, Corrective Actions and Observations at ASA-1 Assessment

<i>NCR No.</i>	: 2019.01	<i>Issued by</i>	: Rizliani Aprianita Hsb
<i>Date Issued</i>	: 26 July 2019	<i>Time Limit</i>	: 25 October 2019
<i>NC Grade</i>	: Major	<i>Date of Closing</i>	: 23 October 2019
<i>Standard Ref. & Requirement</i>	2.1.1 Evidence of compliance with relevant legal requirements shall be available.		

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

There are several nonconformities in the surveillance-1 assessment (NC 2019.01) :

Legality

➤ Based on the results of interviews with management, document review of areal statement and the HGU certificate, it was found that the company managed an area of 14,560.57 ha and an installed capacity of 90 tons of FFB / hour. PT SISM already has an IUP in accordance with the Decree of the Regent of Ketapang, Number: 518 / DISBUN - D / 2015, July 29, 2015. The document describes that PT Sepanjang Intisurya Mulia, is a company that commits Palm Oil Commodity, area of 14,485 Ha and the capacity of the processing unit 60 tons of FFB / hour. Related to this, the company has sent an Application for a change in plant area and capacity in PT SISM's IUP No. 53 / SISM / Legal / V / 2018 dated May 23, 2018 and was received by *Dinas Penanaman Modal dan Pelayanan Terpadu Satu Pintu* of Ketapang Regency on May 24, 2018. However, the revised IUP has not yet been issued (already 1 year). Based on the explanation above, it was concluded that the area of management area (HGU) was not in accordance with the Plantation Business Permit owned.

Wage Scale

The company showed the structure and scale of wages according to Decree No. 004 / SISM / HR / SK-U / X / 2017 dated October 1, 2017. However, the structure and scale of wages have not been shown for 2019 in accordance with Minister of Manpower regulations No. 1 of 2017.

Overtime Implementation

➤ The results of verification of labor documents and field interviews, it was known that the harvest supervisors at PT SISM and PT SMA on June also work on Sundays/holidays. The simulation results of overtime calculations at PT SMA (for example NIK 10011337) and PT SISM (for example NIK 10007741) are known that the calculation of premium / overtime payment is not in accordance with Minister of Manpower regulations No. 102 of 2004. Example of calculation for employees of NIK 10007741 on June (work starts at 06:00 - 17:00 with a break of 1 hour)

Premium / overtime paid:

- There were 8 working days on holidays (wages of Rp. 211,040 / holiday) + daily premium of Rp. 44,000 so that the total premium / overtime on June (holiday) is Rp. 1,968,320.

Minister of Manpower regulations No. 102 of 2004

7 hours 1 x 2 = 14 hours

8th hour x 3 = 3 hours

9th & 10th hour x 4 = 8

Total working hours: 25 hours

Total payment: 2,638,000 / 173 x 25 hours x 8 = 3,049,710.

➤ The results of verification of labor documents and field interviews, it was known that the head of security worked 3 shifts (8 working hours) on June (without holidays) and there were 10 holidays (weeks and national in the month). The simulation results of PT SISM's security head overtime calculation show that the calculation of the

awarding of premiums / overtime has not been in accordance with Minister of Manpower regulations No. 102 of 2004

Premium / overtime is paid in the form of a fixed premium of Rp. 2,800,000

Minister of Manpower regulations no.102 of 2004:

Overtime on holidays:

7 hours $1 \times 2 = 14$ hours

8th hour $\times 3 = 3$ hours

Total working hours: 17 hours

Total payment: $2,638,000 / 173 \times 17 \text{ hours} \times 10 = \text{Rp. } 2,592,254$

Overtime on a normal day: $1.5 \times \text{Rp. } 15,280 \times 26 \text{ HK} = \text{Rp. } 595,920$

Total overtime Rp. 3,188,174

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

1. IUP revision is still in process at the Plantation Agency of Ketapang District
2. HR does not know that the wage scale must be revised annually
3. - The estate considers that giving premiums to the harvest cheker does not violate the provisions
- Estate and MOM consider that giving premiums to Danru security is not against the provisions

Correction *(filled by organization audited):*

1. Follow up to the Plantation Agency regarding progress of changes in IUP
2. Develop a structure for the wage scale in 2019
3. Memo number 01 / SVP / SISM / X / 2019 with the subject "Provisions on Harvest Oversight Premiums" approved by the Senior Vice President on September 13, 2019, starting from September 2019 payroll and will be changed when there is a change in the minimum wages of Ketapang Regency
4. - Provide premium / overtime pay to the harvest cheker in accordance with Minister of Manpower's decision No. 102 of 2004.
- Provide premium / overtime wages to Danru Sekurity in accordance with Minister of Manpower's decisionNo. 102 of 2004

Corrective Action *(filled by organization audited):*

1. Ensuring Follow-up to the Plantation Office related to the development of changes in IUP periodically by the officer / public relations officer.
2. The mechanism for the preparation of the Wage Scale that is carried out every year is ensured by the Evaluation of Regulatory Compliance by the HR Assistant Manager, examined by the HR Manager and Approved by the Group Manager.
3. Ensuring overtime wages / premiums for all employees do not conflict with Minister of Manpower's decision no. 102 of 2004 is ensured by the Evaluation of Regulatory Compliance by the Assistant HR Manager, examined by the HR Manager and Approved by the Group Manager.

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

Auditor verification on October 2, 2019

Legality

The company shows evidence of improvement in the form of a statement letter from Dinas Pertanian peternakan dan Perkebunan Pemerintah Kabupaten Ketapang No. 525/1266 / Distanakbun-F / 2019 dated August 20, 2019, which explained that the Application for Revision of PT Perkebunan's Plantation Business Permit Sepanjang Intisurya Mulya was in the process.

Wage Scale

The company shows evidence of improvements in the form of:

- Structure and scale of wages of PT Sepanjang Intisurya Mulya in accordance with Decree No. 081 / SISM / HR /

SK-U / VIII / 2019 concerning Wage Structure and Scale dated January 1, 2019 and effective January 1, 2019.

- The structure and scale of wages of PT Sawit Mitra Abadi in accordance with Decree No. 029 / SMA / HR / SK-U / VIII / 2019 concerning Wage Structure and Scale dated January 1, 2019 and effective January 1, 2019.
- Wage scale socialization on 18 September 2019 was attended by 16 participants from PT SISM and socialization on 26 September 2019 was attended by 15 participants from PT SMA.

However, companies have not been able to demonstrate the implementation of the wage scale for workers.

Implementation of Overtime

Harvest supervisor

The company shows evidence of improvements in the form of:

- Payslip of harvest foreman (NIK 10007071), harvesting clerk (NIK 10007175) Mulia 3-4 Estate on July 2019 along with the employee's attendance on July.
- Payslip of harvest supervisor (NIK 10007686), harvesting clerk (NIK 10007624) Mulia 5-6 Estate on July 2019 along with the employee's attendance on July.
- Payslip of harvest supervisor (NIK 10007686), harvesting clerk (NIK 10007624) Mulia 5-6 Estate on August 2019 along with the employee's attendance on August.
- Payslip of harvest supervisor (NIK 10011337), harvesting foreman (NIK 10010184) Abadi 3-4 Estate on July 2019 along with the employee's attendance on July.
- Payslip of harvest foreman (NIK 10011337), harvesting foreman (NIK 10010184) Abadi 3-4 Estate on August 2019 along with the employee's attendance on August.

The company also did overtime calculations which explained that the harvest supervisor had 1 hour extra work time which, if calculated with the overtime version = $\text{Rp. } 105,520 / 7 = \text{Rp. } 15,074$, if 1 hour overtime the salary is $1.5 \times 15,074 = \text{Rp. } 22,611$. Holiday premium is calculated $2 \times \text{HK} + \text{premium} (2 \times 105,520) + 35,000 = \text{Rp. } 246,040$, plus fuel money 9500 / day.

However, the calculations and improvements sent have not been in accordance with Minister of Manpower Decree No. 102 of 2004.

Security

The company shows evidence of improvements in the form of:

- Examples of security payroll (NIK 10008587) in the form of payslip on July and August 2019 for Mulia 3-4 Estate units that inform basic salary, fixed premiums, non-harvest premiums, deductions, etc and along with the attendance of the workers.
- Examples of security payroll (NIK 10008580) in the form of payslip on July and August 2019 for Mulia 5-6 Estate units which inform the basic salary, fixed premiums, non-harvest premiums, deductions, etc and along with the attendance of the worker.
- Examples of payroll security (NIK 10010567) in the form of payslips on July and August 2019 for the Abadi 3-4 Estate unit which informs basic salaries, fixed premiums, non-harvest premiums, deductions, etc and along with the attendance of the worker.

The company has not been able to show the provisions of afternoon premiums for security.

Based on the explanation above, it was concluded that the discrepancy was stated not yet met.

Auditor verification on October 20, 2019

Wage Scale

The company shows evidence of improvements in the form of:

- Implementation of wage scales for staff level. However, it has not been able to demonstrate the implementation of the wage scale for the employee / worker level.
- Evaluation of compliance with laws and regulations

Implementation of Overtime

The company shows evidence of improvements in the form of:

- Internal Office Memo No. 01 / SVP / SISM / X / 2019 dated September 13, 2019 concerning Terms of Harvest Supervisor Premiums. The premium provisions is accordance with Minister of Manpower Decree No. 102 of 2004.
- The socialization of harvest supervisor premiums on September 14, 2019 to 21 participants
- Examples of Attendance and Payslip harvest / foreman on September 2019.
- List of security premium on December 3, 2018
- Examples of payslip security on August 2019, for example security No. NIK 10008580 which informs fixed premiums, non-harvest premiums, and holiday premiums.

Based on the explanation above, it was concluded that the discrepancy was stated not yet met.

Auditor verification on October 23, 2019

The company shows evidence of improvement in the form of implementation of the wage scale for workers with non-staff level employees. Based on the evidence of the improvements shown, it was concluded that the non-conformity was stated to be fulfilled and would be re-observed in the next assessment.

Verified by	: Rizliani Aprianita Hsb
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<i>NCR No.</i>	: 2019.02	<i>Issued by</i>	: Rizliani Aprianita Hsb
<i>Date Issued</i>	: 26 July 2019	<i>Time Limit</i>	: ASA-2
<i>NC Grade</i>	: Minor	<i>Date of Closing</i>	: 20 October 2019
<i>Standard Ref. & Requirement</i>	: 2.2.2 Legal boundaries are demonstrated clearly and maintained.		
<i>Non-Conformance Description & Evidence observed (filled by auditor):</i>			
Observation results at boundary pole No. 94 at Mulia 3-4 Estate and boundary pole No. 147 at Abadi 3-4 Estate, it was known that these boundary poles were missing (not found). In addition, the company also has not been able to show the monitoring record of HGU boundary pole. Based on this explanation it was concluded that there was not enough evidence that the legal boundaries were indicated by clear boundaries and maintained.			
<i>Root Cause Analysis (filled by organization audited):</i>			
The monitoring and maintenance of the HGU Pole condition in semester 2 of 2019 has not been carried out because in the previous SOP was not clear, what part of GIS is doing the monitoring			
<i>Correction (filled by organization audited):</i>			
<ul style="list-style-type: none">- Conduct monitoring and maintenance of HGU Pole- Install the missing HGU Pole			

Corrective Action *(filled by organization audited):*

GIS staff conduct monitoring and maintenance of HGU Pole conditions at least every 6 months
Revise the procedure No. SOP / GPN / 23 regarding maintenance HGU Pole Procedure

Assessor Evaluation and Conclusion *(filled by auditor):*
Verification on October 2, 2019

The company shows evidence of improvements in the form of:

- Monitoring of HGU pole in Mulia HGU 3-4 Estate on August 2019 which is equipped with coordinate points and monitoring officers. From the monitoring document, it was known that there are a total of 42 pole with 5 missing poles, 2 poles with bushy conditions and 35 poles in good condition.
- Monitoring pole in Abadi HGU 3-4 Estate on August 2019 which is equipped with coordinate points and monitoring officers. From the monitoring peg document, it was known that there are a total of 63 poles with 1 missing pole, 6 poles with bushy conditions and 56 poles in good condition.
- Report on the reinstallation of lost HGU poles at Mulia 3-4 Estate and Abadi 3-4 Estate on August 2019 according to the coordinates owned.
- Documentation in the form of HGU pole photo

However, the company has not been able to demonstrate procedure No. SOP / GPN / 23 regarding maintenance of HGU Pole Procedure.

Based on the explanation above, the discrepancy is stated not yet fulfilled.

Verification on October 20, 2019

The company shows evidence of improvement in the form of HGU Pole Maintenance Procedure No. SOP / GPN / 23 revision 01 dated 1 September 2019. The SOP explained that Surveyors or GIS staff are responsible every six months together with security to patrol or monitor the condition of HGU pole in the field.

Based on the explanation above, the discrepancy is stated to be fulfilled.

Verified by	: Rizliani Aprianita Hsb
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<i>NCR No.</i>	: 2019.03	<i>Issued by</i>	: Afiffuddin
<i>Date Issued</i>	: 26 July 2019	<i>Time Limit</i>	: 25 October 2019
<i>NC Grade</i>	: Major	<i>Date of Closing</i>	: 13 October 2019
<i>Standard Ref. & Requirement</i>	: 4.7.2 A documented risk assessment shall be available and its implementation shall be recorded.		
<i>Evidence observed :</i> 1. Based on the results of the document review, it is known that the certificate holder has documented risk assessments Estate in the Hazard Identification, Risk Assessment and Risk Control (HIRARC) documents, 18 August 2018 and Mill HIRARC, effective 30 July 2018. Based on field observations at the Estate, found activities that have not yet been carried out risk assessment, namely as follows and not limited to:			

- Fire monitoring from the fire tower
 - Monitoring and maintenance of boundary pole and HCV
 - Census and pest control
2. Based on the results of field observations on the Estate, activities that are not in accordance with the risk assessment are found, which are as follows and not limited to:
- Gas cylinders are standing and not chained and there is no OHS symbol.
 - No spillkit available (spill traction / spill) in the oil warehouse
 - The droplet reservoir in the fuel tank is broken
 - The tower does not have a fence, no warning and free access
 - FFB loaders sit on the tractor spakboard

Non-Conformance Description :

Based on the explanation above, it was concluded that not all of the company's operational activities have been assessed for risk and danger. In addition, there are activities whose control measures have not been effectively implemented and monitored.

Root Cause Analysis :

1. Assume fire monitoring from fire towers, monitoring and maintenance of boundary markers and HCV, census and pest control do not require HIRAC
2. Activities that are not in accordance with the risk assessment
 - Workshop employees assume there is no potential danger of gas cylinders standing without being fastened
 - New spillkit is taken when cleaning oil spills
 - The droplet reservoir in the fuel tank has not been repaired
 - There are a number of firemen who have not installed fences, warnings and free access and there are some that have been damaged
 - Loaders lack understanding of the dangers of sitting on a tractor spakboard

Correction :

1. Prepare HIRAC Fire monitoring from fire towers, Monitoring and maintenance of boundary markers and HCV and Census and pest control
2. Activities that are not in accordance with the risk assessment
 - Binding of the gas canister and the attachment of the Symbol is Easy to Explode
 - Provides a spillkit in the oil warehouse
 - Improved droplet storage in the fuel tank
 - Install fences, warnings and free access to fire towers that have not been installed and repair damaged ones
 - It is forbidden to hitch a ride and socialize HIRAC

Corrective Action :

1. During the HIRAC Review every year, re-identify the possibility that there are activities without HIRAC
2. Activities that are not in accordance with the risk assessment
 - Make a welding tube always in a bound condition or put into an iron basket
 - Spillkits are always available in the oil warehouse
 - Immediately repair if there are droplets in the damaged fuel tank
 - Immediately Install fences, warnings and free access to fire towers that have not been installed and immediately repair damaged ones
 - Stickers are not permitted to hitchhike and socialize HIRAC regularly
3. In SISM - SHE SOP 251 *Prosedur Penilaian Dan Pengendalian Resiko* Points of Responsibility: :
 - Manager and Assistant Manager
Reviewing every year all the activities, is there any danger that has not been identified.
 - SHE Officer
Together with Senior Managers, Managers and Assistant Managers review hazard identification in each

work activity

Assessor Evaluation and Conclusion:

Verification on 2 October 2019

The certificate holder shows the following evidence of improvement:

1. PT SISM HIRARC, document number HIRARC01 / SISM (7) / 0919, Revision 007, effective September 1, 2019 and PT SMA HIRARC, document number HIRARC01 / SMA (7) / 0919, Revision 007, effective date September 1 2019. The HIRARC has been added the results of risk assessment and its control for fire monitoring activities from the fire tower, monitoring and maintenance of boundary markers and HCV and census and pest control.
2. Presentation of HIRARC GPRC and Sustainability Presentation Document on Presentation on 8 August 2019 which was attended by 13 participants.
3. Photos of Gas Cylinders for Welding Activity in Mulia 3-4 Estate, Mulia 5-6 Estate, Abadi 3-4 Estate and MOM which have been given protection so as not to fall and are equipped with symbols related to OHS.
4. Photo Spill Kit provided at Mulia 3-4 Estate oil warehouse, Mulia 5-6 Estate, Abadi 3-4 Estate and MOM.
5. Photo of the refined solar charging stick droplets at Mulia 3-4 Estate, Mulia 5-6 Estate and Abadi 3-4 Estate.
6. Photos of fire monitoring towers that have been equipped with fences and warnings at Mulia 3-4 Estate, Mulia 5-6 Estate and Abadi 3-4 Estate.
7. Photo of *Dilarang Menumpang* (No Ride) sticker installation and socialization of HIRARC to operators, loading staff and other workers regarding the prohibition of riding on tractors at Mulia 3-4 Estate, Mulia 5-6 Estate and Abadi 3-4 Estate. The socialization in Mulia 3-4 was held on September 20, 2019 and was attended by 25 participants, in Mulia 5-6 it was held on September 19, 2019 and was attended by 16 participants and in Abadi 3-4 it was held on August 22, 2019 and was attended by 57 participants.

The root cause analysis and evidence of the improvement shown are acceptable, but regarding preventive action, please answer the auditor's comments above.

Thus, this discrepancy was declared not yet comply.

Verification on 13 October 2019

The certificate holder shows evidence of improvement in the form of Risk Assessment and Control Procedure, document number SISM-SHE 251, Revision 0.1, effective date 1 August 2019, which among others explains the duties and responsibilities of the Manager and Assistant Manager ie reviewing every year all activities, is there any missing identified the dangers and the duties and responsibilities of the SHE Officer, together with the Senior Manager, Manager and Assistant Manager conduct a hazard identification review in each work activity.

Based on the analysis of the root cause presented, the correction actions shown and the preventive actions that will be taken, the discrepancy in this indicator is stated **comply with observation**.

Verified by : **Afiffuddin**

NCR No.	: 2019.04	Issued by	: Afiffuddin
Date Issued	: 26 July 2019	Time Limit	: 25 October 2019
NC Grade	: Major	Date of Closing	: 21 October 2019
Standard Ref. & Requirement	: 4.7.3 Records of Occupational Health and Safety (OHS) program (see 4.8) and Personal Protective Equipment (PPE) training in accordance with the result of hazard		

	identification and risk analysis shall be available to all workers
<p><i>Evidence observed</i></p> <ol style="list-style-type: none"> 1. Based on interviews with the herbicide applicator at Abadi 3-4 Estate, it is known that 4 out of 6 workers were interviewed using boots that they bought themselves. Likewise with manual weed control workers at Abadi 3-4 Estate, it is known that 6 out of 6 workers were interviewed using boots that they bought themselves. 2. Based on the results of interviews with the herbicide applicator and field observations in the Abadi 3-4 Estate PPE warehouse, it is known that there is not yet a place for washing and storing PPE as well as a place for herbicide applicators. <p><i>Non-Conformance Description</i></p> <p>Based on the above evidence, the certificate holder has not been able to show evidence that workers have been provided PPE by the company in accordance with the results of HIRAC and also have not been provided with a washing and storage of PPE as well as a bath for herbicide applicators.</p>	
<p>Root Cause Analysis :</p> <ol style="list-style-type: none"> 1. Distribution of PPE items are late in arrival so some employees have to buy PPE from their own money. Procurement to purchase PPE waits a large amount in advance, so it does not repeatedly (fro) to buy PPE. 2. PPE cleaning and storage has been provided by the company, except that employees choose to bring work equipment to the house because it is closer to home. 	
<p>Correction:</p> <ol style="list-style-type: none"> 1. Provision of PPE for herbicide applicators and manual workers in Abadi 3-4 2. Personal Protective Equipment and Protective Equipment Document (PPE) document number SISM-SHE402, which explains briefly that PPE can be exchanged by handing over damaged PPE. 3. The herbicide and PPE work equipment are stored in a special place that has been provided, before returning home the herbicide applicator cleans itself in the space provided 4. Example of monitoring / checklist after spraying 	
<p>Corrective Action:</p> <ol style="list-style-type: none"> 1. The Estate Manager is responsible for planning the distribution of PPE according to the form provided. 2. Regular socialization to employees regarding the application of pesticides (before, during the application and after the application of pesticides). Estate manager & SHE Officer conducts socialization at least once every 6 months, and Field Assisstant conveyed socialization at least once a month through morning brefig. 3. The foreman / spraying supervisor checks the return of the attached work equipment. 	
<p>Assessor Evaluation and Conclusion:</p> <p>Verification on 2 October 2019</p> <p>The certificate holder shows the following evidence of improvement:</p> <ol style="list-style-type: none"> 1. OHS Compliance Form document and photo of Abadi 3-4 Estate spraying employees, which explained 30 spraying workers on August 22, 2019 had been equipped with boots, headgear, apron, masks, goggles, cloth gloves and rubber gloves. 2. OHS Compliance Form document for the manual weeding employees, which explained 20 weeding manual workers on August 24, 2019 had been equipped with boots, helmets, cloth gloves and <i>dodos</i> gloves. Photographs of upkeep workers given PPE. 	

3. Photo of PPE washing place and work equipment, bath and PPE Abadi 3-4 Estate storage place.
4. Subsequent Planning and Distribution Documents for PPE sprayers and slashing maintenance workers. Where is explained the subsequent division of PPE as follows:
 Herbicide Applicator PPE
 - Boots, headgear, apron and glasses: the date of receipt of 22 August 2019, the next distribution plan on 22 August 2020
 - Masks, cloth gloves and rubber gloves: the date of receipt of 22 August 2019, the next distribution plan on 22 January 2020
 Manual Weeding PPE
 - Boots, helmets and machete / *dodos* gloves: the date of receipt on August 24, 2019, the next distribution plan on August 24, 2020
 - Cloth gloves: the date of receipt on August 24, 2019, the next distribution plan on August 24, 2020

Based on the evidence of the improvements shown, please answer the auditor's comments above.
 No conformity in this indicator have not yet been comply.

Verification on 21 October 2019

The certificate holder shows evidence of improvement as follows:

1. Personal Protective Equipment and Clothing Guidelines (PPE), document number SISM - SHE 402, which among others explains in the section of the distribution of PPE, that PPE is distributed freely to all employees according to their respective hazard levels. Assistant manager distributes PPE according to the PPE distribution plan. Employees take PPE by exchanging it with the old PPE. If the PPE is damaged before its life time, employees can exchange it for a new PPE by bringing the damaged PPE.
2. Examples of post-spray monitoring / checklist, for example on August 14, 2019 in Abadi 3-4 Division 2, note that:
 - Spray employees have cleaned the equipment and PPE in a special cleaning place
 - Work equipment and PPE have been stored in a special place for spray equipment storage
 - Spray employees have rinse in a special bathroom to rinse the spray works

Based on the analysis of the root causes presented, the correction actions shown and the corrective actions to be taken, the non conformity in this indicator is stated **comply with observation** in the next assessment.

Verified by	: Afiffuddin
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<i>NCR No.</i>	: 2019.05	<i>Issued by</i>	: Afiffuddin
<i>Date Issued</i>	: 26 Juliy 2019	<i>Time Limit</i>	: 25 October 2019
<i>NC Grade</i>	: Minor	<i>Date of Closing</i>	: 21 October 2019
<i>Standard Ref. & Requirement</i>	: 4.7.5 A procedure for emergency and work accident shall be available in Indonesian Language; and the workers, who have attended First Aids training, are available in the working areas.		

Evidence observed

1. Based on the results of the document review and interviews with the foreman in the field, it is known that the First Aid training has been conducted in the work area. However, based on field observations at Abadi 3-4 Estate on herbicide application activities and manual weed control, it was discovered that the foreman was not equipped with first aid facilities.
2. Based on the results of field observations at Abadi 3-4 Estate in buildings that have been given first aid facilities, there is a lack of contents without monitoring usage, for example in the first aid box hazardous waste temporary warehouse and in the workshop.
3. Based on field observations in Mulia 5-6 Estate and Abadi 3-4 Estate at fueling stations, fertilizer warehouses and chemical warehouses, there are no MSDS Solar and MSDS pesticide and fertilizers not yet available.

Non-Conformance Description

Based on the evidence it is concluded that the certification holder has not been able to show evidence that emergency response procedures have been effectively implemented and monitored for aspects of the availability of first aid equipment at work sites and MSDS for all hazardous and toxic materials.

Root Cause Analysis :

1. First aid bag in the Procurement stage
2. Lack of monitoring of use of first aid boxes and bags
3. The old MSDS is broken, the new one as a replacement has not been installed (still stored at the office)

Correction :

1. The weeding manual foreman is equipped with a first aid bag
2. Completing the First Aid Kit in accordance with the provisions and monitored once a month
3. Install MSDS in the storage location of Hazardous Material and Hazardous Waste Material
4. Handling Procedures (Receipt, Storage and Expenditures) - Chemicals, Fuels and Lubricants, document number SIS - SHE 310.

Corrective Action :

1. Procurement at the request of HR after conducting first aid officer training. The foreman in the field is equipped with a First Aid Bag
2. Monitoring the use of first aid kits in first aid boxes and bags once a month, which is responsible by the medical officer or SHE staff
3. Install MSDS in the storage location of Hazardous Material and Hazardous Waste Material that is responsible by the Head of Warehouse.

Assessor Evaluation and Conclusion :
Verification on 2 October 2019

The certificate holder shows the following evidence of improvement:

1. Photo of proof of handover of First Aid bags to the foreman of Abadi 3-4 Estate
2. Photo of first aid kit completed in the workshop, Hazardous Waste Temporary Warehouse, fertilizer warehouse and office.
3. Documentation of the First Aid box checklist at workshops, Hazardous Waste Temporary Warehouse and offices.
4. Photo of MSDS installation at the fuel refueling station, fertilizer warehouse, herbicide warehouse Mulia 5-6 and Abadi 3-4 Estate

Based on the evidence of the improvements shown, please respond to the auditor comment and show additional evidence of improvement if necessary.

This non conformity was declared not yet comply.

Verification on 21 October 2019

The certificate holder shows evidence of improvement in the form of Handling Procedures (Receipt, Storage, and Expenditure) - Chemicals, Fuels, and Lubricants, document number SISM - SHE 310, which includes the Responsibility of the Head of the Warehouse, explained that the Head of the Warehouse or appointed responsible for ensuring that inventories of chemical, fuel and oil inventories are carried out regularly. The Head of Warehouse is responsible for taking corrective actions for non-conformities found by the Sustainability Officer in checking the work area "Work Area Checklist". The Head of Warehouse is also responsible for ensuring that Store Keepers comply with this procedure. And also responsible for installing material safety data sheets (MSDS) available in warehouses and Clinic Units.

Based on the analysis of the root causes presented, the correction actions shown as well as the corrective actions to be taken, the non conformity in this indicator is stated **comply with observation** in the next assessment.

Verified by : **Afiffuddin**

<i>NCR No.</i>	: 2019.06	<i>Issued by</i>	: Afiffuddin
<i>Date Issued</i>	: 26 July 2019	<i>Time Limit</i>	: 25 October 2019
<i>NC Grade</i>	: Minor	<i>Date of Closing</i>	: 21 October 2019
<i>Standard Ref. & Requirement</i>	: 4.7.6 All workers shall be provided with medical care, and covered by accident insurance.		
Evidence observed PT SMA shows documents including: <ul style="list-style-type: none">Request for Payment of PT SMA, on May 6, 2019 for the BPJS Employment in April 2019.JAMSOSTEK Summary Palmindo Non-Staff & Checkroll Employees in April 2019. PT SISM shows documents including : <ul style="list-style-type: none">Proof of payment of the BPJS Employmeny for the period June 2019 paid on July 15, 2019 for 1,609 workers and July 4, 2019 for 124 workers, bringing the total number of workers paid by the BPJS for June 2019 to 1,733 workers. The results of verification of PT SISM's labor registration documents in June 2019, found that there were 1,874 workers.			
Non-Conformance Description Based on the explanation above, it is concluded that there is not enough evidence available that all employees have been included in BPJS Employment and BPJS Health and proof of payment of contributions.			
Root Cause Analysis : The person who processes the payment is HR Head Office (Jakarta).			

BPJS Employment Payment is paid in 5 stages, namely Daily Estate Employees, Staff and Non Staff Estate, MOM Daily Employees, MOM Non Staff Employees, Manager-level Employees (executive).

Correction :

Show all proof of payment BPJS Employee (Daily, Staff & Non Staff)

Corrective Action :

HR Estate every month requests a copy of proof of payment Employee BPJS complete

Assessor Evaluation and Conclusion :
Verification on 3 October 2019

The certificate holder shows evidence of improvements in the form of:

- Total employees of PT SISM in June totaled 1,846 workers and not 1,874 workers according to the sound of nonconformities.
- Proof of payment of PT SISM's BPJS workforce for a total of 1,846 workers in June 2019 conducted in 4 phases, namely estate daily employees, factory daily employees, plantation staff & non staff employees, and factory staff & non staff employees.
- Proof of payment of PT SISM's BPJS workforce for a total of 1,861 workers in July 2019 which were also carried out in 4 phases, namely estate daily employees, factory daily employees, plantation staff & non staff employees, and factory staff & non staff employees.
- June employee data submitted to the auditor totaled 1,874, while those presented in the previous evidence of improvement in the number of employees were 1846 with a difference of 28 people. 28 people are 9 Manager Level Employees and 19 daily employees who just entered between 15 – 30 June 2019 so that they have not been included in Jakarta Payroll for BPJS Employment payments. Because on the 15th of every month the Jakarta Head Office payroll for calculation of BPJS Employment payments is closed. 19 The person was only included in the BPJS payment on 1 July 2019.
- BPJS Employment payment for Manager UP level, Input of Employee Muster data that is entered above 15 June 2019, Evidence that 19 employees have been included in BPJS payment payroll in July 2019.

Based on the explanation above, it was concluded that the discrepancy was declared not fulfilled.

Verification on 20 October 2019

The certificate holder shows evidence of improvement in the form of recording BPJS payments for Manager level of 9 people in June, which was paid on July 10, 2019 and 19 new employees who entered on June 15, 2019 who had been included in the BPJS payment payroll in July 2019.

Based on the evidence of the improvements shown, the non-conformity is stated to be **comply with observation**.

Verified by : **Afiffuddin**

<i>NCR No.</i>	: 2019.07	<i>Issued by</i>	: Briyogi Shadiwa
<i>Date Issued</i>	: 26 Juli 2019	<i>Time Limit</i>	: 25 October 2019

<i>NC Grade</i>	: Major	<i>Date of Closing</i>	: 19 October 2019
<i>Standard Ref. & Requirement</i>	5.3.2 Evidence must be provided that all chemical waste and containers are disposed of responsibly.		
Bukti yang diamati dan deskripsi ketidaksesuaian: <p>The company has a SOP for Hazardous and Toxic Waste Management (Doc. No.: SISM-ENV 551) which explains that used chemical containers are hazardous waste and must be managed in accordance with applicable regulations regarding the management of hazardous waste.</p> <p>However, based on the results of field observations, it is known that the plans for the management of used chemical container waste have not been implemented in accordance with SOPs and regulations, for example:</p> <ul style="list-style-type: none"> • Used pesticide containers are used as droplet container in the solar tank (Mulia Estate 5-6). • Used pesticide packaging is stored in the nursery area. (Abadi Estate 3-4) • Used pesticide containers stored in the Mulia Estate 3-4 washing room. <p>In addition, based on the results of interviews with management, it is known that the company does not have procedures related to hazardous waste utilization and permission to use hazardous waste container.</p>			
Root Cause Analysis <i>(filled by organization audited):</i> <p>Operators do not know that using hazardous waste must have a permit, because the diesel filling operator is still guided by prior socialization (18 January 2018) which states that it is permissible to reuse hazardous waste on condition that there must be a recording of hazardous waste.</p>			
Correction <i>(filled by organization audited):</i> <ol style="list-style-type: none"> 1. Sending used pesticide packaging from the nursery area to Hazardous Waste Temporary Storage. 2. Record the origin of waste in the waste record. 3. Make a memo prohibiting the use of hazardous waste. 4. Changing water reservoirs using non-hazardous materials. 5. Refresh training related to hazardous waste management in accordance with PT. SISM & SMA training matrices will be held in September 2019. One of the agendas will discuss Minister of Environment Decree No. 1 of 2018 regarding hazardous waste management licensing integrated with environmental permits through licensing services trying to be integrated electronically 			
Corrective Action <i>(filled by organization audited):</i> <ol style="list-style-type: none"> 1. Hazardous waste records are made for a period of 3 months, but records are updated at any time if there are changes 2. Record the origin of waste in the hazardous waste record 3. Make a memo prohibiting the use of hazardous waste 4. Monitoring carried out by SHE officers through environmental inspections once a month for example "Fuel Station Monthly Inspection Checklist". 			
Assessor Evaluation and Conclusion <i>(filled by auditor):</i> Verification 19 October 2019			

The company has explained the analysis of the root problems that arise in non-conformities in ASA-1 activities. The auditor has verified the evidence of improvements provided such as:

- Documentation of the transfer of Hazardous waste to a licensed hazardous waste temporary storage.
- Hazardous Waste Records (balance sheet) documentation for each business unit.
- Records of monthly monitoring by the HSE team through environmental inspections.

Based on the explanation, the non-conformities has been fulfilled and the implementation will be seen consistently in the next assessment. (Fulfilled with observation)

Verified by Diverifikasi oleh	: Briyogi Shadiwa
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NCR No.	: 2019.08	Issued by Diterbitkan oleh	: Briyogi Shadiwa
Date Issued Tanggal diterbitkan	: 26 Juli 2019	Time Limit Batas Waktu	: ASA-2
NC Grade Grade ketidaksesuaian	: Minor	Date of Closing Tanggal Terpenuhi	: 19 Oktober 2019
Standard Ref. & Requirement Acuan Standar & Persyaratan	: 5.3.3 A waste management plan must be available that is documented and implemented to avoid and reduce pollution.		

Bukti yang diamati dan deskripsi ketidaksesuaian:

The hazardous waste management plan is explained in the SOP for Hazardous and Toxic Waste (Doc. No.: SISM-ENV 551), namely by managing in accordance with applicable regulations, including explaining domestic waste management by placing it in a special labeled trash can and disposing it scheduled.

However, based on document review and field observations, it is known that:

- In the Hazardous Waste Temporary Storage Abadi Estate 3-4, no used oil waste was found, but in the hazardous and toxic waste records (in June 2019) there was a used oil waste stock of 0.606 liters.
- On the record of hazardous and toxic waste Mulia Oil Mill does not explain the amount of Hazardous Waste from Hazardous Waste Temporary Storage Mulia Estate on 1-2, 3-4 and 5-6.
- There is no record of hazardous Waste for hazardous waste stored in the nursery warehouse (Abadi Estate 3-4).
- No records have been found regarding the amount of hazardous waste used and utilized for plantation operations both in Mulia Estate and Abadi Estate.
- In the document note on Hazardous and Toxic Waste in Abadi Estate 3-4, no hazardous waste transfer record to Hazardous Waste Temporary Storage Abadi Estate 1-2. Based on interviews with officers related to the transportation of hazardous waste entirely carried out at Hazardous Waste Temporary Storage LB3 Abadi Estate 1-2
- The results of field observations show scattered used oil in the Mulia Estate 3-4 generator house.
- The results of field observations showed that used oil drums were used at the Security Post.
- Observation to the clinic shows that medical waste is stored in the clinic (Not stored at Hazardous Waste Temporary Storage).
- Used oil drums used for water storage in Mulia Estate 3-4 emplacement.
- Used Oil is stored in workshop Estate Estate 5-6 (not in Hazardous Waste Temporary Storage).

Based on the above evidence, the company has not been able to show evidence that the management of all waste has been carried out in accordance with applicable SOPs and regulations to avoid and reduce pollution.

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

1. Operators do not know that using hazardous waste must have a permit, because the diesel filling operator is still guided by prior socialization (18 January 2018) which states that it is permissible to reuse hazardous waste on condition that there must be a recording of hazardous waste.
2. Pesticide packaging has not been sent to Hazardous Waste Temporary Storage.
3. Hazardous Waste Temporary Storage officers do not understand how to fill in the hazardous waste records form.
4. Officers Assume that the reuse of hazardous waste (recycle) does not need a permit
5. There are no non-hazardous water containers available for use at the time.
6. The number of clean water reservoirs (polytank) is lacking.

Correction *(filled by organization audited):*

1. Replacing the solar droplets from the solar charging handle using non-hazardous materials
2. Sending used pesticide packaging from the nursery area to Hazardous Waste Temporary Storage.
3. Record the origin of waste in the waste record.
4. Make a memo prohibiting the use of hazardous waste.
5. Clean the area of the generator house from used oil spills.
6. Changing water reservoirs using non-hazardous materials.
7. Medical Waste is sent to Hazardous Waste Temporary Storage.

Corrective Action *(filled by organization audited):*

1. Hazardous waste records are made for a period of 3 months, but records are updated at any time if there are changes
2. Record the origin of waste in the hazardous waste record
3. Make a memo prohibiting the use of hazardous waste
4. Monitoring carried out by SHE officers through environmental inspections once a month for example "Fuel Station Monthly Inspection Checklist".

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

Verification 19 October 2019

The company has explained the analysis of the root problems that arise in non-conformities in ASA-1 activities. The auditor has verified the evidence of improvements provided such as:

- Documentation of the transfer of Hazardous waste to a licensed hazardous waste temporary storage.
- Hazardous Waste Records (balance sheet) documentation for each business unit.
- Records of monthly monitoring by the HSE team through environmental inspections.

Based on the explanation, the non-conformities has been fulfilled and the implementation will be seen consistently in the next assessment. (Fulfilled with observation)

Verified by : **Briyogi Shadiwa**
Diverifikasi oleh

NCR No.	: 2019.09	Issued by	: Briyogi Shadiwa
Nomor ketidaksesuaian		Diterbitkan oleh	

<i>Date Issued</i> Tanggal diterbitkan	: 26 Juli 2019	<i>Time Limit</i> Batas Waktu	: 25 October 2019
<i>NC Grade</i> Grade ketidaksesuaian	: Major	<i>Date of Closing</i> Tanggal Terpenuhi	: 20 October 2019
<i>Standard Ref. & Requirement</i> Acuan Standar & Persyaratan	6.3.2 Records of the process and results of dispute handling must be available		
Bukti yang diamati dan deskripsi ketidaksesuaian: <p>From the results of interviews with employees it is known that there are several complaints that have been submitted by employees who have not been recorded in the employee's complaint book, for example:</p> <ul style="list-style-type: none"> • Complaints related to emplacement that are still combined with other employees in Mulia Oil Mill Emplacement. • Complaints related to complaints of broken toilets and leaky roofs in Estate Mulia 3-4 Emplacement. • Complaints related to damaged houses in the Estate Mulia 5-6 Emplacement. • Complaints regarding clean water facilities. <p>And a number of complaints that have been recorded in the employee's complaints book, such as complaints related to a damaged septic tank in Mulia Estate 5-6 (November 30, 2018) have been responded to by the company, but until now there has been no progress record.</p> <p>Based on the evidence, it is known that the company has not recorded records of the process and results of handling employee disputes and complaints.</p>			
Root Cause Analysis <i>(filled by organization audited):</i> <p>Supervision has recorded employee complaints in the complaint document but was late in presenting to the auditor when the audit activity took place.</p>			
Correction <i>(filled by organization audited):</i> <ul style="list-style-type: none"> - Addition of MOM emplacement. - Repair of toilets and roof leaks. - Repair of employees' barracks 5-6 - Addition of water reservoirs - Repair of septic tanks - Complaints dissemination delivered to managerial level employees and daily employees. (Document Attached). 			
Corrective Action <i>(filled by organization audited):</i> <ol style="list-style-type: none"> 1. Addition of MOM housing 2. If there are damaged parts in the housing immediately repaired 3. Immediately repaired / replaced when there are damaged clean water facilities 4. Complaints dissemination delivered to managerial level employees and daily employees. (Document Attached). 			
Assessor Evaluation and Conclusion <i>(filled by auditor):</i> Verification 20 October 2019			

The company has shown evidence of improvements (facilities and infrastructure that have been repaired) and a record of socialization related to understanding supervision in recording complaints. Based on the analysis of the root cause of the problem presented, the corrective actions shown and the preventive actions that will be taken have been accepted, the non-conformity is declared fulfilled.

Verified by : **Briyogi Shadiwa**

NCR No.	: 2019.10	Issued by	: Rizliani Aprianita Hsb
Date Issued	: 26 July 2019	Time Limit	: 25 October 2019
NC Grade	: Major	Date of Closing	: 23 October 2019
Standard Ref. & Requirement	: 6.5.2 Collective Labor Agreement/Company Regulation, in accordance with the manpower regulations, shall be available in understandable language; and explained by the management or Labor Union to the workers		

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

The verification results of the list of workers documents for June 2019 of PT SISM and PT SMA revealed that there were casual workers, for example:

- PT SISM: NIK 10026289
- PT SMA: NIK 10011338 and NIK 10011341

However, the Employee Work Agreement has not yet been shown.

Root Cause Analysis (filled by organization audited):

HR considers that daily workers do not require a written work agreement

Correction (filled by organization audited):

- Conducting socialization related to Work Agreements to Human Resources, Administration Head, Estate Managers and Senior Estate Managers.
- Show a letter of appointment/work agreement for employees

Corrective Action (filled by organization audited):

Make work agreements for new employees in accordance with SOP Number SISM-HRD-01-00.00 Revision 01 and appoint a daily worker to a permanent employee in accordance with the provisions

Assessor Evaluation and Conclusion (filled by auditor):

Auditor verification on October 2, 2019

The company shows evidence of improvements in the form of:

- Permanent Employee Work Agreement of PT SISM No. 007 / HR-SISM / SK-PKT / V / 2019 dated July 1, 2019
- Permanent Employee Work Agreement of PT SMA No. 002 / HRAD-SMA / SK-PKT / X / 2019 on October 1, 2019
- Permanent Employee Work Agreement of PT SMA No 001 / HRAD-SMA / SK-PKT / X / 2019 dated October 1, 2019

The company has not been able to show evidence of socialization related to agreement and SOP Number SISM-HRD-01-00.00 Revision 01.

Based on the explanation above, the discrepancy is stated not yet fulfilled.

Verification is October 20, 2019

The company shows evidence of improvements in the form of:

- Dissemination of the Employee Agreement Letter dated 14 September 2019 addressed to Human Resources, Administration Head, Estate Manager and Senior Estate Manager.
- Minutes for recruitment socialization that contain information For Daily employee positions, the HRD Manager submits Personal archives to the Administration Head to make an Employee Master and Work Agreement Letter.

The company has not been able to show SOP Number SISM-HRD-01-00.00 Revision 01.

Based on the explanation above, the discrepancy is stated not yet fulfilled.

Verification is October 23, 2019

The company shows evidence of improvement in the form of: SOP Number SISM-HRD-01-00.00 Revision 01 dated September 1, 2019.

Based on the explanation above, the non-conformity is stated to be fulfilled and will be re-observed in the next assessment.

Verified by	: Rizliani Aprianita Hsb
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<i>NCR No.</i>	: 2019.11	<i>Issued by</i>	: Rizliani Aprianita Hsb
<i>Date Issued</i>	: 26 July 2019	<i>Time Limit</i>	: ASA-2
<i>NC Grade</i>	: Minor	<i>Date of Closing</i>	: 23 October 2019
<i>Standard Ref. & Requirement</i>	: 6.5.3 Growers and millers shall provide adequate housing, water supplies, medical, educational and welfare amenities to national standards or above, where such public facilities are unavailable or inaccessible.		
<i>Non-Conformance Description & Evidence observed (filled by auditor):</i>			
<p>Results of observations and interviews in the Mulia 3-4 estate estate, Mill housing, Mulia 5 Estate, known that the condition of some housing is in a damaged condition, toilets are not functioning and water supply difficulties (including Abadi 3-4 Estate). Regarding this matter, the company showed progress in the form of a purchase request along with a recap of the offer for Mulia 6 Estate.</p> <p>The results of interviews with mill workers revealed that the worker lives with his family and other workers in one house. In addition, the results of a study of housing facilities and infrastructure documents, there are 2 households in 1 house in Mulia 4 Estate.</p> <p>Based on the explanation above, it is concluded that there is not enough evidence that the company has provided adequate housing facilities and infrastructure for workers.</p>			
<i>Root Cause Analysis (filled by organization audited):</i>			
<ul style="list-style-type: none">- Repair of employee housing is still in process- The lack of housing in factories, the addition of houses is still under construction, while in Mulia 4 there are several damaged houses- Lack of clean water due to the dry season			

Correction *(filled by organization audited):*

shows improvements and additions of workers houses
adding 4 wells in Mulia 3-4, Mulia 5-6 and Abadi 3-4

Corrective Action *(filled by organization audited):*

- Identify the number of damaged and decent housing and immediately make repairs if there is damaged housing
- Make the addition of 4 wells in Mulia 3-4, Mulia 5-6, Abadi 3-4

Assessor Evaluation and Conclusion *(filled by auditor):*
Auditor verification on October 2, 2019

The company shows evidence of improvements in the form of:

- Photo of housing and toilet repair at Mulia 3-4 Estate
- Photos of water tank at Mulia 3-4 Estate
- Photo of housing and toilet repair at Mulia 5-6 Estate
- Photo of housing and toilet repair at Abadi Estate
- Photos of housing repairs / additions and repair of Mulia Oil Mill
- Photo of a water tank for clean water supply at the factory housing (source from WTP)
- List of names of occupants of Mulia Oil Mill employee housing
- List of names of Mulia 3 employee housing residents
- List of names of occupants of Mulia 4 employee housing

The company has not yet identified the number of houses in good / decent condition or houses in damaged condition and evidence of adding 4 wells.

Based on the explanation above, the discrepancy is stated not yet fulfilled.

Verification on October 20, 2019

The company shows evidence of improvements in the form of:

- Document identification of damage to the housing estate of Mulia 3-4 Estate. However, there is no information on whether the house is damaged or livable
- Progress document for making / adding wells for clean water for employees in the form of Capital Expenditure Request Form on September 13, 2019 and Photo of Adding employee wells.
- Detail Capital Expenditure 2019 Forecast, 2020 budget & Projection 2021 to 2024 which explains the plan to renovate houses in Mulia 3 & 4.
- Minutes of the inspection of the work for the establishment of No SPK-19-M3-GN-006 employee residence carried out by CV Mitra Tiga Putra on August 27, 2019 at Mulia 3 Estate along with billing invoices.
- Identification of Factory Housing Damage that explains the date of the planned repair, the date the repair was realized and the status of the repair.
- Photo updates on the condition of the addition of Factory Housing.

Based on the explanation above, the discrepancy is stated not yet fulfilled.

Verification on October 23, 2019

The company shows evidence of improvement in the form of identification and progress records of employee housing improvements. The document explained the information on houses that had been repaired up to October 21, 2019, which would be repaired in January 2020, houses were in the process of being constructed, and houses were in good condition.

Based on the explanation above, the non-conformity is stated to be fulfilled and will be re-observed in the next assessment.

Verified by : Rizliani Aprianita hsb

<i>NCR No.</i>	: 2019.12	<i>Issued by</i>	: Rizliani Aprianita Hsb
<i>Date Issued</i>	: 26 July 2019	<i>Time Limit</i>	: 25 October 2019
<i>NC Grade</i>	: Major	<i>Date of Closing</i>	: 20 October 2019
<i>Standard Ref. & Requirement</i>	6.9.1 A policy to prevent sexual and all other forms of harassment and violence, shall be documented, implemented and communicated to all levels of the workforce		

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

The results of review of the document of gender committee and interviews with gender committee, known that gender committee has been establish in the company. However, from interviews with female workers at spraying and fertilizing activity in Mulia 3-4 Estate, Mulia 5-6 Estate and Abadi 3-4 Estate, known that female workers did not know gender committee. In addition, the company also has not showed the socialization of gender committees for female workers.

Root Cause Analysis (filled by organization audited):

The existence of the Gender Committee has not been socialized to the level of daily workers because there are already old members of the gender committee who have mutated and resigned

Correction (filled by organization audited):

Socialize the existence of the gender committee to daily workers

Corrective Action (filled by organization audited):

The Gender Committee is socialized to all relevant employees every six months
At least 2 years the Gender Committee Organizational Structure is reviewed

Assessor Evaluation and Conclusion (filled by auditor):

Verification on October 2, 2019

The company shows evidence of improvements in the form of:

- Records of Attendance on Socialization of H1 Leave and Gender Committee on 3 August 2019 at Mulia 3-4 Estate were attended by 30 participants.
- Records of Attendance on Socialization of H1 Leave and Gender Committee on 1 August 2019 at Mulia 5-6 Estate were attended by 32 participants.
- Records of Attendance on Socialization of H1 Leave and Gender Committee on 27 September 2019 at Abadi 3-4 Estate attended by 52 participants.
- However, the company has not been able to show the Gender Committee Socialization Minutes

Based on the explanation above, the discrepancy is stated not yet fulfilled.

Verification on October 20, 2019

The company shows evidence of improvements in the form of:

- Minutes of socialization on menstruation leave for women workers and a gender committee that informs the basis of menstrual leave, mechanism for menstruation leave, gender committee, gender committee management,

gender committee activities, and conclusions. Based on the explanation above, the non-conformity is stated to be fulfilled and will be re-observed in the next assessment.	
Verified by	: Rizliani Aprianita Hsb

NCR No.	: 2019.13	Issued by	: Rizliani Aprianita Hsb
Date Issued	: 26 July 2019	Time Limit	: 25 October 2019
NC Grade	: Major	Date of Closing	: 20 October 2019
Standard Ref. & Requirement	: 6.9.2 A policy to protect the reproductive rights, shall be documented, implemented and communicated to all levels of the workforce		
Non-Conformance Description & Evidence observed (filled by auditor): The company has a policy on the protection of reproductive rights that has been explained in the CLA. However, from interviews with female workers at spraying and fertilizing activity in Mulia 3-4 Estate, Mulia 5-6 Estate and Abadi 3-4 Estate, found that female workers were not aware of H1 leave. In addition, the company also has not yet shown the socialization of H1 leave to female workers.			
Root Cause Analysis (filled by organization audited): Menstruation leave has not been socialized to the level of employees because there is no SOP that regulates who is responsible for socializing menstrual leave			
Correction (filled by organization audited): Socialize the menstrual leave to the workers			
Corrective Action (filled by organization audited): Menstruation leave is socialized to all relevant employees Revise O8 HR SOP on Leave Management Addition of Menstruation Leave in SOP on Leave Management			
Assessor Evaluation and Conclusion (filled by auditor): The company shows evidence of improvements in the form of: <ul style="list-style-type: none">- Records of Attendance on Socialization of H1 Leave and Gender Committee on 3 August 2019 at Mulia 3-4 Estate were attended by 30 participants.- Records of Attendance on Socialization of H1 Leave and Gender Committee on 1 August 2019 at Mulia 5-6 Estate were attended by 32 participants.- Records of Attendance on Socialization of H1 Leave and Gender Committee on 27 September 2019 at Abadi 3-4 Estate attended by 52 participants.- However, the company has not been able to show the Socialization Minutes Based on the explanation above, the discrepancy is stated not yet fulfilled.			
Verification on October 20, 2019			

The company shows evidence of improvements in the form of:

- Leave Management Procedure - Leave Management Procedure No. PI HRD 08 revision 02 dated 1 September 2019. In point 6.0, the procedure explains that the Assistant Manager and Plantation Manager are responsible for conducting socialization regarding all types of leave above to employees at least every three months through morning briefing or other meeting
- Minutes of socialization on menstruation leave for women workers and a gender committee that informs the basis of menstrual leave, mechanism for menstruation leave, gender committee, gender committee management, gender committee activities, and conclusions.

Based on the explanation above, the non-conformity is stated to be fulfilled and will be re-observed in the next assessment.

Verified by	:	Rizliani A Hsb
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NCR No.	:	2019.14	Issued by	:	Sandra Purba
Date Issued	:	26 Juli 2019	Time Limit	:	25 Oktober 2019
NC Grade	:	Major	Date of Closing	:	October 8, 2019
Standard Ref. & Requirement	:	SCCS CoC 5.7.2 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">Remove: RSPO certified volumes sold under other scheme or as conventional, or in case of underproduction, loss or damage shall be removed. Module E.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 or book and claim).			
Evidence observed and Non-Conformance Description (filled by auditor): Mulia POM through the HQ Marketing Dept. has reported all RSPO-MB CSPO product sales transactions through the RSPO IT Platform, but has not been able to show evidence that it has met the conventional CPO and PK sales reporting requirements (remove stock) taken from sustainable stocks, namely CSPO 37,503.05 MT and CSPK 8,423.84 MT.					
Root Cause Analysis (filled by organization audited): Marketing Section of PT. SISIM does not aware that CPO & PK Certified sold conventionally shall be removed in the RSPO IT Platform.					
Correction (filled by organization audited): Removing the CSPO stock of 37,503.05 MT and CSPK of 8,423.84 MT on the RSPO IT Platform					
Corrective Action (filled by organization audited): <ul style="list-style-type: none">Providing training related to Mass Balance reporting & RSPO IT Platform requirements to mill and marketing employees					

- Remove CSPO and CSPK unsold stock Certified on the IT Platform every three months as per stipulated in the SOP.

Assessor Evaluation and Conclusion (filled by auditor):
Verification on October 2, 2019,

The company has shown evidences, namely evidence of remove stock transactions on the palm trace for conventional sales of CPO and PK taken from sustainable stocks. The company has conducted training to PICs, namely Marketing Dept. and Sustainability Dept. related to reporting requirements for all transactions in RSPO Palm Trace, training was conducted on 13 Sept 2019 at Mula Oil Mill and 20 September 2019 at HQ Jakarta.

Verification is October 8, 2019,

The company indicated in the SOP SOP / GPN / 32 "SUPPLY CHAIN, TRACEABILITY AND MASS BALANCE" Point 5.6 that the Marketing Department as a responsible for registering all transaction (Shipping Announcement and stock remove) in the RSPO IT Platform. Declaration announcements are made no later than two weeks after each sale and delivery completed. As well as removing RSPO certified products that are sold under other schemes or conventionally, or in a condition of under-production, lost or damaged, must be removed on the RSPO IT Platform every 3 (three) months.

Non-conformity are stated fulfilled

Verified by : **Sandra**

NCR No.	: 2019.15	Issued by	: Sandra Purba
Date Issued	: 26 Juli 2019	Time Limit	: 27 Oktober 2019
NC Grade	: Major	Date of Closing	: October 8, 2019
Standard Ref. & Requirement	<p>SCCS CoC</p> <p>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.</p> <p>5.13.2 The input to management review shall include information on:</p> <ul style="list-style-type: none">• Results of internal audits covering RSPO Supply Chain Certification Standard.• Customer feedback.• Status of preventive and corrective actions.• Follow-up actions from management reviews.• Changes that could affect the management system.• Recommendations for improvement. <p>5.13.3 The output from the management review shall include any decisions and actions related to:</p> <ul style="list-style-type: none">• Improvement of the effectiveness of the management system and its processes.• Resource needs.		
Evidence observed and Non-Conformance Description (filled by auditor):			
Mulia POM has not been able to show management review of the implementation of RSPO SCC which is shall be conducted at least once a year which discusses (but is not limited to): the results of the RSPO SCC internal audit, customer feedback, improvement status of the internal audit, follow-up actions from previous management reviews, changes in impact management system, recommendations for further improvement.			

Root Cause Analysis (filled by organization audited): Management review are planned to be done on end 2019, because of the implementation of RSPO SCCS is started on Aug 2018.	
Correction (filled by organization audited): Conducted a management review	
Corrective Action (filled by organization audited): Conduct a management review at least once a year as stipulated in SOP SISM-PPD-04-00.00 regarding Management Review, at point 3 (Responsibilities) that the Management Representative is responsible for the Management Review Meeting program	
Assessor Evaluation and Conclusion (filled by auditor): Verification on 2 Oct 2019, The company has shown evidence of correction, namely minute of the management review conducted on 18 September 2019 attended by Sustainability Staff, Mill Manager, Estate Managers, Jakarta Marketing and personnel at POM. The number of participants was 19 people. The management review has discussed: the implementation of SCCS, feed backs from buyers, the status of nonconformities from external and internal audit results. However, the management review did not explain the related follow-up actions from the previous management review, changes that impacted the management system, recommendations for further improvement. And there has been no determination of the officer responsible for ensuring the management review is carried out once a year. Incompatibility has not been fulfilled. Verification on October 8, 2019, The company shows evidence in the form of revised management review results which have provided recommendations for improvements and changes to the management system, for example those related to the existence of new RSPO standards that need to be socialized to all key related personnel. The company shows SISM-PPD-04-00.00 SOP on Management Review at point 3 (Responsibilities) that the Management Representative is responsible for the Management Review Meeting program. The non-conformity is closed.	
Verified by	: Sandra

3.5.3 Opportunity for Improvement

No	Ref. Std.	Description
1.	Major 2.1.1	<ul style="list-style-type: none"> Ensuring operators licenses / certificates that are in the process of being issued Progress in STR's paramedic extension at PT SMA Monitoring and supervision of operators who operate heavy equipment
2.	Minor 2.3.2	Payments progress of area compensation in the HGU area of 317 ha in PT SMA
3.	Major 4.4.2	The effectiveness of water source monitoring management
4.	Minor 4.6.4	Monitoring of circular letter of the paraquat usage reduction
5.	Minor 4.6.6.	Monitoring of the implementation of Circular Letter to reduce the use of paraquat
6.	Major 4.7.1	Ensure the follow-up of workers exposed to noise to check with an ENT specialist according to the company's doctor's advice.
7.	Major 4.7.2	Evaluate the feasibility of a contractor FFB transport truck.
8.	Minor 4.7.5	<ul style="list-style-type: none"> Increase monitoring of emergency response equipment preparedness. To ensure the fulfillment of fire control infrastructure in accordance with the plan stipulated in reference to Minister of Agriculture Regulation number 5 of 2018.
9.	Major 6.3.2	Palm oil trees which not been maintained and covering by Mucuna bracteata, harvesting access blocked by wild wood and accelerate the fulfillment of harvesting bridge needs.
10	Major 6.5.1	Ensure harvesters working hours, periodic piece rate evaluations & price agreements with workers. Ensuring the socialization of the determination of Friday and Saturday working days to upkeep workers.
11	Major 6.6.1	Ensuring the structure and socialization of the existence of labor unions to employees.

1.1.2 Noteworthy Positive Components

No	Ref Std	Descriptions
1	-	Commitment to apply sustainable palm oil principle.
2	-	Already had agreement with NGO (YIARI & Tropenbos Foundation) and related agencies (BKSDA) for management of HCV and RTE in operational area.

3.6 Summary of Arising Issues from Public and Auditor Response

Public Issues (Institution/ NGO/Community)	Auditor Responses
Plantation Agency of Ketapang Regency <ul style="list-style-type: none"> The company has submitted several mandatory reports such as the Plantation Business Development report which also includes CSR reports, and also land fire reports. There are several land claims in the company, but the claims are made by the children or grandchild of which party who receiving compensation and cannot show the basis of the land claim. The company has been able to show its legality clearly. Land acquisition / land compensation is completed by involving <i>Muspika</i> and Regency agencies. PT SMA plans to add an area of 800 ha and will be adjusted to the previous HGU. However, the expansion of the area is still constrained by BPHK (Forest Area Consolidation Center). The facilities and infrastructure of land fires owned by the company are quite good and adequate. 	<ul style="list-style-type: none"> It has verified by auditor team and has been explained in criteria 2.2, 2.3 related to legality and land acquisition.
Manpower Agency of Ketapang Regency <ul style="list-style-type: none"> The company has submitted routine reports such as the Mandatory Report on Manpower and <i>P2K3</i> report. Wages are applied according to the Ketapang Regency Minimum Wage. There have never been fatal work accidents in the last 1 year. Equipment related permits are issued by labor inspectors and periodic inspections have been carried out. The company has a Labor Union and registration has been done. There are no complaints or reports related to labor violations. 	<p>It has verified by auditor team and has been explained in indicator 2.1.1 and criteria 6.5, 6.6. Some labor implementations have become nonconformity in indicator 2.1.1.</p>
Village Head, Customary Head and public figure of Pangkalan Suka Village (stakeholder including previous land owner) <ul style="list-style-type: none"> The company has provided CSR to the surrounding community such as ambulances, assistance in cultural and traditional activities, religious facilities, school bus assistance, village roads etc. Village head is one of the parties whose land has been compensated. Compensation is in accordance with the agreement and there is no coercion in the process of land acquisition / compensation. There are no land conflicts or land disputes. The company has provided information on conservation areas and protected flora and fauna. There is no overlapping land with mining areas. The Village Head is also a PT SISM land acquisition socialization team. There are no environmental pollution or land fire issues. 	<p>It has verified by auditor team and has been explained in indicator criteria 2.2, 2.3, and 6.11.</p>

Public Issues (Institution/ NGO/Community)	Auditor Responses
Head of Hamlet and 2 villagers of Engkadin Hamlet of Sepakat Jaya Village (stakeholder including previous land owner) <ul style="list-style-type: none"> The company has provided CSR assistance to the surrounding community such as heavy equipment, houses of worship, fire facilities, etc. Land claim ever occurred, but it was settled by agreement. The land claim was carried out unilaterally by the community and indeed it could not be clearly demonstrated by that party. Claims are made by the children or grandchild of which party who receiving compensation. There are no environmental pollution or land fire issues. land acquisition was carried out without coercion and in accordance with the agreement. The entire area of HGU which include in Engkadin Hamlet has been compensated by the company The company has provided information on concervation areas and protected animals. 	<p>It has verified by auditor team and has been explained in indicator criteria 2.2, 2.3 and 6.11.</p>
PT SISM and PT SMA's Workers Union <ul style="list-style-type: none"> The prevailing wages in the company are in accordance with the Ketapang Regency Minimum Wage. Wages in 2019 have risen on January 2019. The company has registered employees in the <i>BPJS</i> (Social Insurance) There are no serious or fatal work accidents in last 1 year. The company has provided PPE and work tools. Routine health checks are carried out every year. There are a number of complaints from workers regarding the provision of clean water. 	<p>It has verified by auditor team and has been explained in indicator 2.1.1 and criteria 4.7, 6.5, 6.3, 6.6. Some labor implementations have become nonconformity in indicator 2.1.1.</p>
Gender Committee <ul style="list-style-type: none"> There is no issue related to sexual harassment, reproductive rights, and discrimination. Routine activities <i>posyandu</i> and recitation. Women worker give menstruation leave by recommendation paramedic for maximum 2 days. Women workers also has rights of maternity leave for 45 day before and 45 days after. 	<p>There is no negative issue related to women workers. It has verified by auditor team and has been explained in indicator criteria 6.9 and become nonconformities in indicator 6.9.1 and 6.9.2</p>
Contractor <ul style="list-style-type: none"> The contractor has a copy of the agreement with the company Payments to contractor accordance with the agreement. Contractor workers have been provided with PPE and already have <i>BPJS</i> The company has provided socialization regarding the code of ethics and human rights. 	<p>Based on document verification, show that the rights and obligation of each party has been set in the contract.</p>
Harapan Jaya Cooperative & Trimulya Lestari Cooperative. <ul style="list-style-type: none"> Cooperative management is carried out with full management by the company. Employees who work in a cooperative area are company workers. 	<p>It has verified by auditor team and has been explained in indicator criteria 6.10 dan indivator 6.11.2.</p>

Public Issues (Institution/ NGO/Community)	Auditor Responses
<ul style="list-style-type: none"> • The company has provided training to farmers, cooperative members and field employees. • Provision of PPE is carried out by the company, including employee wages. • The company has provided / presented data transparently to cooperatives 	
<p>Head of Hamlet, Religious Figure and Community Figure in Bayangan Hamlet of Mensubang Village (stakeholder including previous land owner)</p> <ul style="list-style-type: none"> • Some positive impacts felt by the community with the presence of the company such as the help of the community's economy, improvement of infrastructure, the formation of cooperatives. • The land compensation process is carried out first with socialization, without coercion and with the involvement of all parties. • The majority of workers who work in companies come from Bayangan Hamlet (Mensubang Village) • The company has provided CSR assistance such as repairing houses of worship, assistance with educational facilities, teacher salary assistance, etc • There is an area that has not been compensated for an area of 317 ha that is entered into PT SMA's HGU. The process of land acquisition was carried out 2 years ago. Because it has not yet been compensated, the land is still being cultivated by the community. 	<p>It has verified by auditor team and has been explained in indicator criteria 2.2, 2.3 and 6.11.</p>

4.0	CERTIFIED ORGANISATION'S ACKNOWLEDGEMENT OF INTERNAL RESPONSIBILITY
4.1	Formal Sign-off of Assessment Findings
	<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 Sepanjang Intisurya Mulia Head of Sustainability Genting Plantation Indonesia</p>  <p><u>Dr. Faizal Amri Amran</u> Wednesday, 23 October 2019</p> </div> <div style="text-align: center;"> <p>Mutuagung Lestari Lead Auditor</p>  <p><u>Sandra Purba</u> Wednesday, 23 October 2019</p> </div> </div>

Appendix 1. List of Stakeholders Contacted in the RSPO Certification Process

No	Institution/NGO/Community	Address	Phone/Email	Form of Communication	Date of Contact	Response	
						Yes	No
1	Plantation Agency Ketapang Regency	Ketapang Regency, Kalimantan Barat Province	-	Direct interview	23 July 2019	✓	-
2	Man Power Agency Ketapang Regency	Ketapang Regency, Kalimantan Barat Province	-	Direct interview	23 July 2019	✓	-
3	Village Head & Traditional Head of Pangkalan Suka Village (stakeholder including previous land owner)	Ketapang Regency, Kalimantan Barat Province	-	Direct interview	23 July 2019	✓	-
4	Head of Hamlet and Engkadin Hamlet of Sepakat Jaya Village (stakeholder including previous land owner)	Ketapang Regency, Kalimantan Barat Province	-	Direct interview	23 July 2019	✓	-
5	Head of Hamlet, Religious Figure and Community Figure in Bayangan Hamlet of Mensubang Village (stakeholder including previous land owner)	Ketapang Regency, Kalimantan Barat Province	-	Direct interview	25 July 2019	✓	-
6	Labor Union	Ketapang Regency, Kalimantan Barat Province	-	Direct interview	23 July 2019	✓	-
7	Gender Committee	Ketapang Regency, Kalimantan Barat Province	-	Direct interview	23 July 2019	✓	-
8	FFB Transport Contractor	Ketapang Regency, Kalimantan Barat Province	-	Direct interview	23 July 2019	✓	-
9	Village Cooperative Unit Harapan Jaya & Village Cooperative Unit Trimulya Lestari.	Ketapang Regency, Kalimantan Barat Province	-	Direct interview	23 July 2019	✓	-
10	Mulia Oil Mill <ul style="list-style-type: none"> • 2 grading officers • 1 sterilizer operator • 1 press station operator • 1 engine room operator • 3 boiler station operators • 2 hydrant test officers 	PT. SISM	-	Direct interview	23 July 2019	✓	-
11	Mulia 3-4 Estate <ul style="list-style-type: none"> • 7 fertilizer employees • 8 spraying employees • 6 manual weeding employees • 9 harvest employees 	PT. SISM	-	Direct interview	23 July 2019	✓	-
12	Mulia 5-6 Estate <ul style="list-style-type: none"> • 6 spraying employees • 6 manual weeding 	PT. SISM	-	Direct interview	24 July 2019	✓	-

	<ul style="list-style-type: none"> employees • 2 FFB transport contractors • 8 fertilizer employees • 4 harvest employees • 1 pest census officer 						
13	WWF Indonesia	Graha Simatupang Tower 2 Unit C Lantai 7 Jl. Letjen TB. Simatupang Kav 38 Jakarta 12540	021-7829461/ wwf- indonesia@wwf. or.id	Questioner by email	10 July 2019	-	✓
14	Green Peace	Mega Plaza Building Lt. 5, Jl. HR. Rasuna Said Kav. C3 Kuningan, Jakarta Selatan, Indonesia 12920	Tel : +62 21 521 2552 Fax: +62 21 521 2553 Email : info.id@greenpe ace.org	Questioner by email	10 July 2019	-	✓
15	WALHI	Jl. Tegalparang Utara No 14, Mampang, Jakarta Selatan	021-79193363/ informasi@walhi. or.id	Questioner by email	10 July 2019	-	✓
16	Abadi 3-4 Estate <ul style="list-style-type: none"> • 5 fertilizer employees • 5 spraying employees • 2 nursery officer • 3 harvest employees 	PT. SMA	-	Direct interview	25 July 2019	✓	-

Appendix 2. Assessment Program

DATE	22 to 27 July 2019	
PROGRAM	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
Mon, 22 July 2019		
06.00 – 15.00	Flight from Jakarta - Pontianak - Ketapang	ALL TEAM MEMBER
15.00 – 19.00	Traveling from Ketapang to Site	ALL TEAM MEMBER
Tue, 23 July 2019		
08.00 – 08.30	Opening Meeting	ALL TEAM MEMBER
08.30 – 16.30	Konsultasi Publik ke Kabupaten Ketapang (Dinas Perkebunan, Dinas Lingkungan Hidup, Dinas Ketenagakerjaan dan Badan Pertanahan Nasional).	NTA
	Stakeholder consultation to Communities	
	Stakeholder consultation to local contractor (Transporter FFB, CPO and PK) and others	
08.30 – 12.00	Stakeholder consultation to labour union, gender committee, and FFB Supplier	NTA
	Field Observations at Mulia 3-4 Estate:	
	<ul style="list-style-type: none"> Legal boundary, HCV management area, housing complex, land fill 	BGS
12.00 – 14.00	<ul style="list-style-type: none"> Manuring, Spraying, Harvesting, IPM, Workers safety 	AFF
	<ul style="list-style-type: none"> Facility (storage, workshop, schedule waste, fuel tank) and land fire facilities. 	SDP
	Break	
14.00 – 16.30	Field Observations at Mulia POM:	
	<ul style="list-style-type: none"> SCCS (security and WB), Land Application 	SDP
	<ul style="list-style-type: none"> Storage, workshop, POM waste management (hazardous, emission, pollution, etc.) and Water management 	BGS
16.30 – 17.00	<ul style="list-style-type: none"> Mill Processing and OHS Implementation 	AFF
	Verification of field visit and completing checklist	ALL TEAM MEMBER
Wed, 24 July 2019		
08.00 – 12.00	Field Observations at Mulia 5-6 Estate:	
	<ul style="list-style-type: none"> Legal boundary, HCV management area, land fire facilities 	BGS

	<ul style="list-style-type: none"> • Manuring, Spraying, Harvesting, IPM, Workers safety, FFB transportation • Facility (storage, workshop, schedule waste, fuel tank) and Workers facilities (housing, worship, health care, school, union, etc.) and Waste management (landfill, sanitary) 	AFF SDP/NTA
12.00 – 14.00	Break	ALL TEAM MEMBER
14.00 – 16.30	Completing checklist	ALL TEAM MEMBER
16.30 – 17.00	Verification of field visit and completing checklist	ALL TEAM MEMBER
Thu, 25 July 2019		
08.00 – 12.00	Field Observations at Sawit Mitra Abadi 3-4 Estate:	
	<ul style="list-style-type: none"> • Legal boundary, HCV management area, land fire facilities, housing complex, landfill 	BGS/SDP
	<ul style="list-style-type: none"> • Manuring, Spraying, Harvesting, IPM, Workers safety, nursery 	AFF
	<ul style="list-style-type: none"> • Facility (storage, workshop, schedule waste, fuel tank) 	BGA
12.00 – 14.00	Break	ALL TEAM MEMBER
14.00 – 16.30	Completing checklist	ALL TEAM MEMBER
16.30 – 17.00	Verification of field visit and completing checklist	ALL TEAM MEMBER
Fri, 26 July 2019		
08.00 – 10.00	Completing checklist	ALL TEAM MEMBER
10.00 – 11.30	Preparing closing meeting	ALL TEAM MEMBER
12.00 – 14.00	Break	ALL TEAM MEMBER
14.00 – 17.00	Closing meeting	ALL TEAM MEMBER
Sat, 27 July 2019		
06.00 – 13.00	Traveling from Site to Pontianak	ALL TEAM MEMBER
17.45 – 19.15	Flight from Pontianak to Jakarta	ALL TEAM MEMBER