

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

**[ ✓ ] Surveillance**

Name of Management Organisation : Tengkalat Palm Oil Mill, PT Gunung Pelawan Lestari - subsidiary of MP Evans Group Plc.

Plantation Name : Tengkalat Estate; Gunung Pelawan Estate; Gelam Estate; Cemara Estate.  
Associated Smallholders: Mapur Mandiri Cooperative (Tengkalat KKPA); Ikhtiar Sejahtera Cooperative (Gunung Pelawan KKPA); Silip Lestari Cooperative (Gelam KKPA); Gunung Muda Sejahtera Cooperative (Cemara KKPA).

Location : Mapur Village, Riau Silip Sub-District, Bangka District, Kepulauan Bangka Belitung Province, Indonesia

Certificate Code : **MUTU-RSPO/102**

Date of Certificate Issue : 24 November 2017      Date of License Issue : 24 February 2020

Date of Certificate Expiry : 23 November 2022      Date of License Expiry : 23 November 2020

Assessment	Assessment Date	PT. Mutuagung Lestari Auditor	Reviewed by	Approved by
ASA-2	11 to 15 November 2019	Arif Fisal Simatupang (Lead Auditor), Satria Adi Putra, Yohanes Hardian, Radytio Puspanjana	Ardiansyah	Octo HPN Nainggolan

Assessment	Approved by MUTUAGUNG LESTARI on:
ASA-2	13 December 2019

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Figure 1. Location Map of PT Gunung Pelawan Lestari

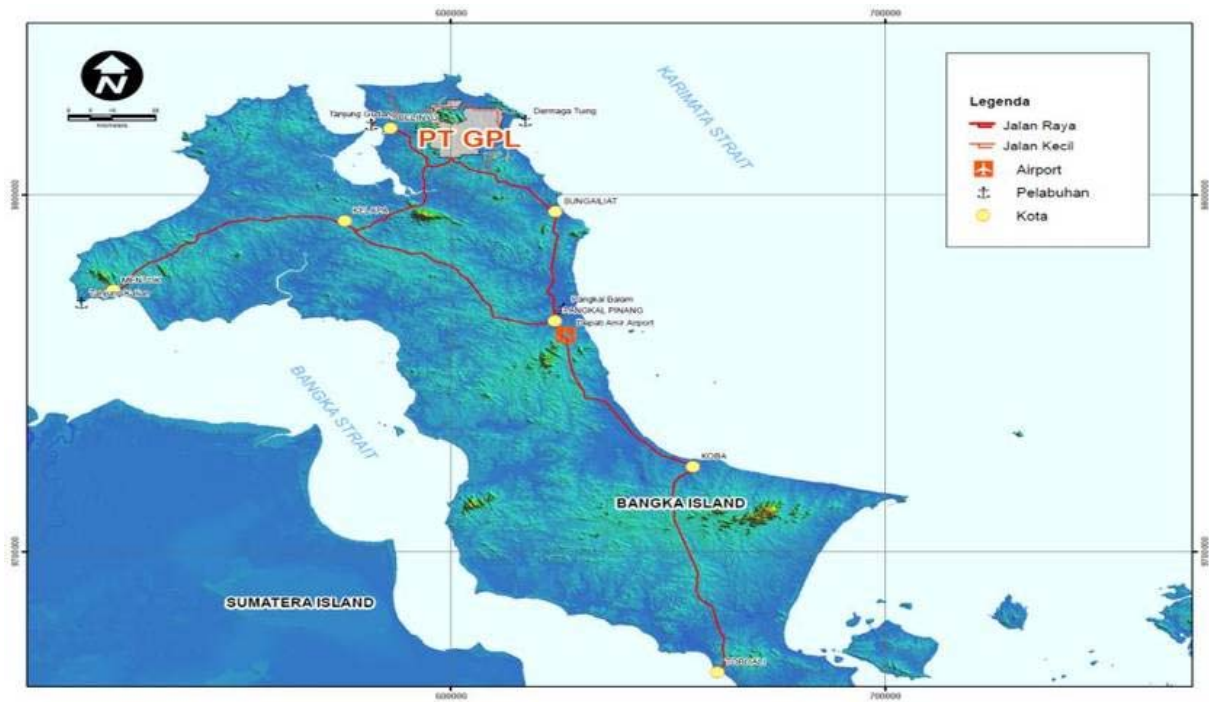
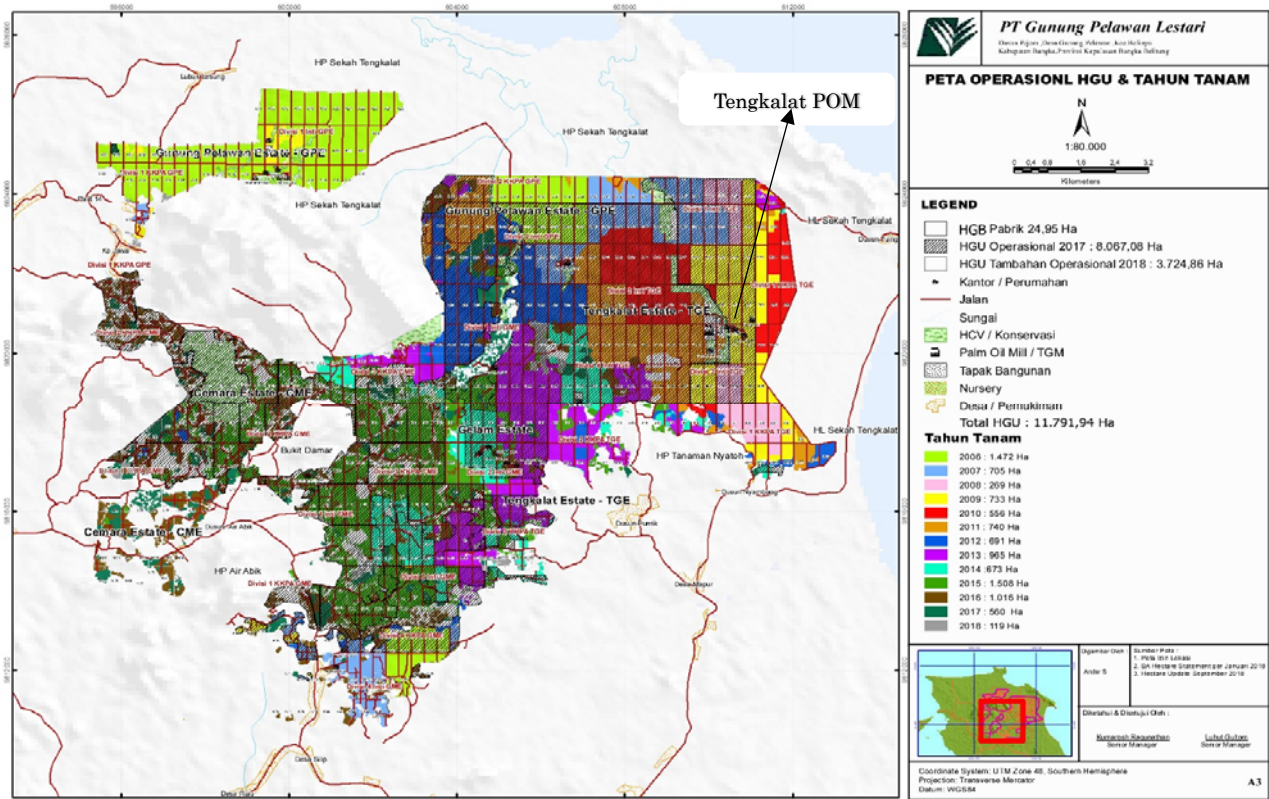


Figure 2. Operational Map of PT Gunung Pelawan Lestari



**Abbreviations Used**

BOB	: Barn Owl Box	MSDS	: Material Safety Data Sheet
BOD	: Biological of demand		
BMP	: Best Management Practices	NGO	: Non-Government Organization
BPJS	: <i>Badan Penyelenggara Jaminan Sosial</i>	OHS	: Occupational Health and Safety
CB	: Certification Body	PIC	: Person In Charge
COD	: Chemical of demand		
CME	: Cemara Estate	PK	: Palm Kernel
CPO	: Crude palm oil	PLC	: Public Limited Company
CSR	: Corporate Social Responsibility	PKWT	: <i>Perjanjian Kerja Waktu tertentu</i> / temporary worker
EFB	: Empty Fruit Bunches	POM	: Palm Oil Mill
EIA	: Environmental Impact Assessment	POME	: Palm Oil Mill Effluent
FFB	: Fresh Fruit Bunch	PPE	: Personal Protective Equipment
FPIC	: Free, Prior, Informed and Consent	PT	: Limited Company
GHG	: Green House Gas	QC	: Quality Control
		RSPO	: Roundtable on Sustainable Palm Oil
GME	: Gelam Estate	R&D	: Riset & Development
GPE	: Gunung Pelawan Estate	RTE	: Rare, Threatened, and Endangered
GPL	: Gunung Pelawan Lestari	SIA	: Social Impact Assessment
HCV	: High Conservation Value	SKU	: <i>Syarat Kerja Umum</i> / permanen worker
HGB	: <i>Hak Guna Bangunan</i> ( Building Use Title)	SOP	: Standard Operations Procedure
HGU	: <i>Hak Guna Usaha</i>	SPGPLM	: <i>Serikat Pekerja Gunung Pelawan Lestari Mandiri</i>
IDR	: Indonesian Rupiah	TGE	: Tengkalat Estate
ILO	: International Labour Organization	TGM	: Tengkalat Mill
Kaltim	: Kalimantan Timur	RKL-RPL	: Environment management and Monitoring Plan
KCP	: Kernel Crushing Plant	UNFCCC	: United Nations Framework Convention on Climate Change
KKPA	: Cooperative credit for members. Smallholders scheme which land owned by cooperative/smallholdings, but full developed and managed by the company.	WHO	: World Health Organization
kWh	: Kilowatt hour	WTP	: Water Treatment Plan
LA	: Land Application	WWTP	: Waste Water Treatment Plant
LB3	: <i>Limbah Berbahaya dan Beracun</i> (Hazardous Waste)		
LD	: Lethal Dosage		
LTA	: Lost Time Accident		

<b>1.0 SCOPE OF THE CERTIFICATION ASSESSMENT</b>				
<b>1.1 Assessment Standard Used</b>		<ul style="list-style-type: none"> <li>• Indonesian National Interpretation Principle and Criteria RSPO 2013 for Indonesia July 2016, approved RSPO Governors 30 September 2016.</li> <li>• RSPO Supply Chain Certification Standard For organizations seeking or holding certification Adopted by the RSPO Board of Governors on 21 November 2014 revised on 14 June 2017 (Module D / E for CPO Mill)</li> <li>• RSPO Certification System for Principles and Criteria, 14 June 2017</li> </ul>		
<b>1.2 Organization Information</b>				
1.2.1	Organization name listed in the certificate	PT GUNUNG PELAWAN LESTARI subsidiary of M.P. Evans Group PLC		
1.2.2	Contact person	Arvind Devadasan (Manager Sustainability & Certification)		
1.2.3	Organisation address and site address	RSPO registered company: Gedung Graha Aktiva Lt. 10, Jl. HR Rasuna Said Kav. 03 Blok X-1, Kuningan, Jakarta Selatan		
1.2.4	Telephone	021-52920338		
1.2.5	Fax	021-52920339		
1.2.6	E-mail	<a href="mailto:arvind@mpevans.co.uk">arvind@mpevans.co.uk</a>		
1.2.7	Web page address	<a href="http://www.mpevans.co.uk">www.mpevans.co.uk</a>		
1.2.8	Management Representative who completed the application for certification	Sivabalan Subbiah (Head of Operation Agronomy Kaltim)		
1.2.9	Registered as RSPO member	1-0027-06-000-00, October 08 <sup>th</sup> , 2006		
<b>1.3 Type of Assessment</b>				
1.3.1	Scope of Assessment and Number of Management Unit	1 Palm Oil Mill (Tengkalat POM) and 8 supply bases: Tengkalat Estate (own estate and Mapur Mandiri Cooperative) ; Gunung Pelawan Estate (own estate and Ikhtiar Sejahtera Cooperative); Gelam Estate (own estate and Silip Lestari Cooperative); Cemara Estate (own estate and Gunung Muda Sejahtera Cooperative).		
1.3.2	Type of certificate	Single		
<b>1.4 Locations of Mill and Plantation</b>				
1.4.1	Location of Mill			
	<b>Name of Mill</b>	<b>Location</b>	<b>Coordinate</b>	
			<b>Latitude</b>	<b>Longitude</b>
	Tengkalat POM	Mapur Village, Riau Silip Sub-District, Bangka District, Kepulauan Bangka Belitung Province, Indonesia	S 01° 37' 18"	E 105° 59' 18"
1.4.2	Location of Certification Scope of Supply Base			
	<b>Name of Supply Base</b>	<b>Location</b>	<b>Coordinate</b>	
			<b>Latitude</b>	<b>Longitude</b>
	<b>Gunung Pelawan Estate</b>			
	Own Estate	Gunung Pelawan Village, Belinyu	S 01° 35' 57"	E 105° 57' 23"

Smallholder (Ikhtiar Sejahtera) (178 SH)	Sub-District, Bangka District, Kepulauan Bangka Belitung Province, Indonesia			
Tengkalat Estate				
Own Estate	Mapur Village, Riau Silip Sub-District, Bangka District, Kepulauan Bangka Belitung Province, Indonesia	S 01° 37' 27"	E 105° 59' 47"	
Smallholder (Mapur Mandiri) (92 SH)				
Cemara Estate				
Own Estate	Gunung Muda Village, Belinyu Sub-District, Bangka District, Kepulauan Bangka Belitung Province, Indonesia	S 01° 38' 41"	E 105° 55' 30"	
Smallholder (Gunung Muda Sejahtera) (1,019 SH)				
Gelam Estate				
Own Estate	Gunung Muda Village, Belinyu Sub-District, Bangka District, Kepulauan Bangka Belitung Province, Indonesia	S 01° 38' 04"	E 105° 56' 52"	
Smallholder (Silip Lestari) (312 SH)				
Coordinates based on <a href="http://www.wikimapia.org">www.wikimapia.org</a> and within HGU only				
1.5 Description of Area Statement				
1.5.1	Tenure			
	• State	11,791.92 Ha (HGU)		
		24.95 Ha (HGB)		
	Total State Area		11,816.87 Ha	
	• Community	- Ha		
1.5.2	Area Statement			
	Descriptions	Own Estate (Ha)	Scheme Smallholder/ KKPA (Ha)	Total (Ha)
	Total area	6,803.06	5,013.81	11,816.87
	Planted area	5,808.51	4,202.66	10,010.17
	• Mature area	5,787.57	3,543.01	9,330.58
	• Immature area	341.42	338.17	679.59
	Roads	185.85	138.41	324.26
	Drains	19.95	6.63	26.58
	Buildings	43.69	0.80	44.49
	Oil Mill Site	24.95	-	24.95
	Unplantable swamps	56.00	35.00	91.00
	HCV	334.55	120.14	454.69
	Others	329.56	510.17	839.73
1.6 Planting Year and Cycles				
1.6.1	Age profile of planting year			
Planting Year	Hectarage (Ha)			
	Gunung Pelawan Estate	Tengkalat Estate	Cemara Estate	Gelam Estate

	Own Estate	Smallholder (Ikhtiar Sejahtera)	Own Estate	Smallhold er (Mapur Mandiri)	Own Estate	Smallholder (Gunung Muda Sejahtera)	Own Estate	Smallh older (Silip Lestari)	
2006	879.11	437.54	-	-	-	-	74.09	81.17	1,471.91
2007	208.99	91.62	187.42	-	-	-	152.04	65.41	705.48
2008	-	-	148.14	121.24	-	-	-	-	269.38
2009	47.32	16.91	418.16	214.82	-	-	-	36.32	733.53
2010	39.27	-	344.22	172.37	-	-	-	-	555.86
2011	139.82	76.44	470.00	53.88	-	-	-	-	740.14
2012	129.61	72.09	29.94	87.09	-	44.45	312.69	16.12	691.99
2013	-	14.26	93.06	296.44	-	78.64	482.71	-	965.11
2014	-	-	138.87	109.91	-	64.72	359.55	-	673.05
2015	16.85	0	0	104.45	320.48	593.19	473.43	0	1508.40
2016	26.64	95.09	43.21	-	90.48	567.24	161.47	31.6	1,015.73
Sub Total Mature	1,487.61	803.95	1,873.02	1,160.20	410.96	1,348.24	2,015.98	230.62	9,330.58
2017	53.23	11.62	24.81	19.50	41.84	245.06	139.31	24.73	560.10
2018	1.40	11.30	7.81	18.76	15.04	7.20	57.98	-	119.49
Sub Total Immature	54.63	22.92	32.62	38.26	56.88	252.26	197.29	24.73	679.59
TOTAL	1,542.24	826.87	1,905.64	1,198.46	467.84	1,600.50	2,213.27	255.35	10,010.17
1.6.2	New Planting area after January 2010				6,829.87 Ha				
1.6.3	Planting Cycle				1 <sup>st</sup> Cycle				
1.7	Description of Mill and Supply Base								
1.7.1	Description of Mill								
	Name of Mill		Capacity (tonnes/ hour)	FFB Processed (tonnes/year)	CPO		Palm Kernel		
					Out put (ton)	Extraction (%)	Out put (ton)	Extraction (%)	
		Tengkalat Mill		45	265,748.63	63,045.68	23.20	15,027.70	5.53
* Source of production data November 2018 to October 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)	%	
	Gunung Pelawan Estate	Own Estate	1,648.47	1,542.24	36,787.05	24.50	36,787.05	100	
		Ikhtiar Sejahtera Cooperative (178 SH)	875.86	826.87	17,767.83	22.67	17,767.83	100	
	Tengkalat Estate	Own Estate	2,201.56	1,905.64	45,914.49	25.14	45,914.49	100	
		Mapur Mandiri Cooperative (92 SH)	1,315.97	1,198.46	19,834.49	17.38	19,834.49	100	
	Cemara Estate	Own Estate	492.03	467.84	6,045.29	41.02	6,045.29	100	

		Gunung Muda Sejahtera Cooperative (1,019 SH)	2,236.74	1,600.50	10,604.44	6.63	10,604.44	100
	Gelam Estate	Own Estate	2,461.00	2,213.27	31,493.16	14.68	31,493.16	100
		Silip Lestari Cooperative (312 SH)	585.24	255.35	4,819.92	8.37	4,819.92	100
	TOTAL		11,816.87	10,010.17	173,266.67	17.91	179,266.67	100
	* Source of production data November 2018 to October 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)		
	CV Agung Bangka Lestari (RSPO non-certified)		Independent supplier	-	-	47,018.27		
	CV Dua Serangkai (RSPO non-certified)		Independent supplier	-	-	9,383.77		
	CV Prima Sawit (RSPO non-certified)		Independent supplier	-	-	4,816.86		
	CV Bangun Era Sejahtera (RSPO non-certified)		Independent supplier	-	-	7,106.13		
	CV Putra Mandiri (RSPO non-certified)		Independent supplier	-	-	899.83		
	CV Tandan Pratama (RSPO non-certified)		Independent supplier	-	-	499.81		
	Suhendra Gunawan (RSPO non-certified)		Independent supplier	-	-	239.26		
	Naiza Mulia (RSPO non-certified)		Independent supplier	-	-	8,841.94		
	CV Berkah Abadi Utama Jaya (RSPO non-certified)		Independent supplier	-	-	6,180.90		
	Bangka Jaya Lestari (RSPO non-certified)		Independent supplier	-	-	160.7		
	Cahaya Maras Abadi (RSPO non-certified)		Independent supplier	-	-	7,334.49		
	TOTAL					92,481.96		
	* Source of production November 2018 to October 2019							
1.7.4	Product categories			FFB, CPO, PK				
1.8 Tonnage of Product								
1.8.1	Past Annual Claim Certified Product		Last Year Projected Certified Volume (MT)		Last Year Actual Certified Volume (MT)			
	FFB Processed own estate		130,932		120,239.99			
	FFB Processed scheme smallholders		42,589		53,026.68			
	CPO Production		40,951		40,574.74			
	Palm Kernel (PK) Production		9,919		9,848.82			
1.8.2	Product Selling							
	Tonnage of selling product		Actual selling product for last year (MT)					

CSPO sold as RSPO certified product		38,602.84						
CSPK sold as RSPO certified product		9,284.39						
CSPO sold under other scheme		0						
CSPK sold under other scheme		0						
CSPO sold as conventional		0						
CSPK sold as conventional		0						
1.8.3	Estimate of Certified FFB Claim							
	Name of Estates		Total Area (Ha)	Planted Area (Ha)	FFB (tonnes/year)	Yield (tonnes/ha/year)		
	Gunung Pelawan Estate	Own Estate	1,648.47	1,542.24	40,251	26.10		
		Ikhtiar Sejahtera Cooperative (178 SH)	875.86	826.87	19,988	24.14		
	Tengkalat Estate	Own Estate	2,201.56	1,905.64	51,329	26.94		
		Mapur Mandiri Cooperative (92 SH)	1,315.97	1,198.46	22,489	18.76		
	Cemara Estate	Own Estate	492.03	467.84	6,439	43.70		
		Gunung Muda Sejahtera Cooperative (1,019 SH)	2,236.74	1,600.50	11,304	7.06		
	Gelam Estate	Own Estate	2,461.00	2,213.27	34,845	15.74		
Silip Lestari Cooperative (312 SH)		585.24	255.35	5,170	8.98			
TOTAL			11,816.87	10,011.17	191,815	19.16		
*Projected FFB production for 24 November 2019 to 23 November 2020								
1.8.4	Estimate of Certified Palm Product Claim							
	Name of Mill	Capacity (tonnes/hour)	FFB Processed (tonnes/year)	CPO		Palm Kernel		Supply Chain Module
				Out put (ton)	Extraction (%)	Out put (ton)	Extraction (%)	
	Tengkalat	45	191,815	45,268	23.60	11,029	5.75	MB
*Projected FFB production for 24 November 2019 to 23 November 2020								
1.9	Other Certifications							
	ISPO			Certificate MUTU-ISPO/180 issued by PT Mutuagung Lestari valid until 21 August 2024				
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						
	Pangkatan		2012	Pangkatan Estate (PT. Pangkatan Indonesia)	2012	Labuhanbatu, North Sumatera		Certified

		Sennah Estate (PT. Sembada Sennah Maju)	2012	Labuhanbatu, North Sumatera	Certified
		Bilah Estate (PT. Bilah Plantindo)	2012	Labuhanbatu, North Sumatera	Certified
		Pangkatan Palm Oil Mill	2012	Labuhanbatu, North Sumatera	Certified
Bumi Permai	2013	Bumi Permai Palm Oil Mill	2013	East Kutai, East Kalimantan	Certified
		PT. Prima Mitrajaya Mandiri	2013	East Kutai, East Kalimantan	Certified
		Koperasi Subur Makmur	2013	East Kutai, East Kalimantan	Certified
		Koperasi Sawit Etam Bersama	2013	East Kutai, East Kalimantan	Certified
		Koperasi Tanah Sama	2013	East Kutai, East Kalimantan	Certified
		Koperasi Mitra Sawit Mandiri	2013	East Kutai, East Kalimantan	Certified
		Koperasi Grenseng Indah	2013	East Kutai, East Kalimantan	Certified
		Koperasi Maju Membangun	2013	East Kutai, East Kalimantan	Certified
		Koperasi Sawit Etam Bersama – Tahap II	2019	East Kutai, East Kalimantan	Non-Certified
		Koperasi Maju Membangun – Tahap II	2019	East Kutai, East Kalimantan	Non-Certified
		Koperasi Tanah Sama – Tahap II	2019	East Kutai, East Kalimantan	Non-Certified
	2023	PT Bumi Mas Agro	2023	Kalimantan	Non-Certified
		Koperasi Dugai Jaya Mandiri	2023	Kalimantan	Non-Certified
		Koperasi Maruangan Sejahtera Mandiri	2023	Kalimantan	Non-Certified
		Koperasi Jaya Harapan Bersama	2023	Kalimantan	Non-Certified
Rantau Humpang	2019	PT. Teguh Jayaprima Abadi	2013	East Kutai, East Kalimantan	Certified
		Koperasi Karya Bersama	2013	East Kutai, East Kalimantan	Certified
		Koperasi Mitra Sejahtera Abadi	2013	East Kutai, East Kalimantan	Certified
		Rantau Humpang Palm Oil Mill	2019	East Kutai, East Kalimantan	Non-certified
Tengkalat	2017	PT. Gunung Pelawan Lestari	2017	Bangka	Certified
		Tengkalat Palm Oil Mill	2017	Bangka	Certified
		Koperasi Ikhtiar Sejahtera	2017	Bangka	Certified
		Koperasi Silip Lestari	2017	Bangka	Certified

		Koperasi Mapur Mandiri	2017	Bangka	Certified
		Koperasi Gunung Muda Sejahtera	2017	Bangka	Certified
	-	PT Evans Lestari	2023	Musirawas, South Sumatera	Currently FFB delivered to outside mill
	-	PT Simpang Kiri Plantation Indonesia	2023	Aceh	Currently FFB delivered to outside mill
1.10.2	<b>Progress of Associated Smallholders and Outgrowers for Certifiable Standard</b>				
	All smallholders of PT GPL were include on certification scope on ASA-2.				

<b>2.0</b>	<b>ASSESSMENT PROCESS</b>
<b>2.1</b>	<b>Assessment Team</b>
<b>ASA-2</b>	<p>1. <b>Arif Faisal Simatupang (Lead Auditor).</b> Bachelor of Agriculture, from Department of Agriculture Agronomy, Faculty of Agriculture, University of Gadjah Mada. He has successfully completed an RSPO endorsed P&amp;C Lead Auditor Training, RSPO SCCS endorsed Lead Auditor Training, Indonesian Sustainable Palm Oil (ISPO) Lead Auditor Training, Management System Certification ISO 9001-2008 Lead Auditor Training, Environmental Management System ISO 14001 Lead Auditor Training, ISO 17021 and ISO 17065 Awareness Training, Management of High Conservation Value (HCV) Training, Social Accountability SA 8000 Training. He has four years of working experience as a Field Assistant on oil palm plantation company in Indonesia. Since 2014, he works as an auditor of RSPO and ISPO in the aspects of legal, social, best management practices of mill and estate, OHS, employment, and environmental. In this audit he is responsible for assessing the aspects of legality and SCCS.</p> <p>2. <b>Satria Adi Putra (Auditor).</b> Indonesian citizen, Diploma III majoring in Palm Oil Plantation. Have experience of work more than six years since 2009 as the operational staff of private oil palm plantations in Indonesia. Training have been followed including Occupational Health and Safety Expert, Orang Utan and Wildlife Management, ISPO Auditor Training, RSPO Awareness, IHT Potential Mapping and Conflict Resolution in Production Forests, OHSAS 18001, SA 8000, RSPO Lead Training, Lead Auditor Training for ISO 9001, ISO 14001, ISO 17021, ISO 17065, ISO 19011 and ISO 22000. During this audit, he verify related worker welfare and OHS.</p> <p>3. <b>Yohanes Hardian (Auditor).</b> Bachelor of Forest Conservation, Faculty of Forestry, Bogor Agriculture University. A specialist in environment and wildlife aspects. He was participating HCV training in several Palm Oil Plantation Companies. He was working as environment staff on Palm Oil Plantation Company. He was participating on the training of Auditor of ISO 9001 and ISO 19011. Another training he followed was the training of ISPO legal document which was taught by ISPO commission (internal training). During this audit, he verify related social, tranparancies, long term plan, and best management practices.</p> <p>4. <b>Radytio Puspanjana (Auditor).</b> Indonesian Citizen. Bachelor of agriculture, majoring in Soil Science. Agriculture Faculty. He was working as honorarium Officer at the Riau Province Plantation Agency in the division of huge estate for 1 year. The participated trainings are Survey and Mapping (GIS) Training which was held by National GMT, ISPO auditor training, ISO 9001/2008 auditor training, ISO 14001/2004 auditor training, IHT Geospatial Information System, IHT High Conservation Value, IHT Environmental Impact Assessment, IHT Green House Gas and RSPO Lead Auditor Course by Checkmark Training. Since 2015 has been following many audit as auditor base on Best Management Practice and Environment. In this audit he is responsible for assessing the aspects of Environmental and HCV.</p>
<b>2.2</b>	<b>Assessment Methodology, Assessment Process and Locations of Assessment</b>
<b>2.2.1</b>	<b>Figure of person days to implement assessment</b>
<b>ASA-2</b>	<p>Number of auditors : 4 auditor</p> <p>Number of days for <b>ASA-2</b> at site : 5 days</p> <p>Number of working days for <b>ASA-2</b> at site : 20 Working days</p>
<b>2.2.2</b>	<b>Assessment Process</b>
<b>ASA-2</b>	<p>The assessment was conducted by measuring the sufficiency of implementation with the consistency done by the PT Gunung Pelawan Lestari to the requirements of Indonesian National Interpretation of RSPO Principles and Criteria 2013 by INA-NITF (Indonesian National Interpretation Task Force) July 2016, endorsed by the RSPO Board of Governors 30th September 2016 and Supply Chain Certification Standard For organizations seeking or holding certification Adopted by the RSPO Board of Governors on June 2017 (Module E for CPO Mill).</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</p>

information; and (3) field observation, aiming to observe directly the sufficiency of implementation on site.

During the audit, the CH was cooperative in supporting the audit activities starting from provide the transportation from airport to the site, the presentation of documents, facilitation of field observations and stakeholder interviews, and there was no any tendency of pressing and intervening the auditors. The opening meeting and closing meeting were involved by top management to the Staff of the company.

Some opportunities for improvement of the results **ASA-2** delivered by the MUTU auditor to the management unit and the results are the subject will be verified at the next assessment phase (**ASA-3**).

Improvement of findings from **ASA-1** findings were observed by auditors at this **ASA-2** assessment. All information obtained was recorded in Check List of PT Mutuagung Lestari (MUTU) and part of **ASA-2**.

The assessment program please find Appendix 2

<b>2.2.3</b>	<b>Locations of Assessment</b>
<b>ASA-2</b>	<p>Number of units in this certification activity is four (4) estates, which supply the raw material (FFB) to one (1) palm oil mill. In conducting the assessment, the team of auditors used the <math>0.8\sqrt{y \times z}</math> formula to determine the management units sampling to be focused on and also considered the issues raised by stakeholder. Based on certification system, the team of auditors determined that the sampling locations are <b>one (1) palm oil mill (Tengkalat POM) and Four Estates (Gunung Pelawan Estate, Tengkalat Estate, Gelam Estate and Cemara Estate).</b></p> <p><b>Tengkalat POM</b></p> <ul style="list-style-type: none"> <li>- <b>Boiler Station.</b> Direct observations and interviews about the tool's working system and the recording of equipment's working hours and maintenance.</li> <li>- <b>Sterilizer Station.</b> Direct observation and interview of the operator at the sterilizer station related to technical work, use of PPE, and employment (periodic health checks).</li> <li>- <b>Kernel Station.</b> Direct observation and operator interviews at the kernel station related to technical work, use of PPE, and employment (periodic health checks).</li> <li>- <b>Clarifier Station.</b> Direct observations and operator interviews at the clarifier station related to technical work, use of PPE, and employment (periodic health checks).</li> <li>- <b>Engine Room.</b> Observation and interview with the generator engine and factory manager. Officers use PPE and have permanent permission and periodic health checks.</li> <li>- <b>Security Post.</b> Observation and interview about the mechanism of receiving FFB, Officers 'Working Hours, Completeness of PPE and Compliance of workers' rights</li> <li>- <b>Area Sorting (grading).</b> Field observations and interviews related to the technical work of sorting (determination of samples, grading criteria, and recording), and the use of PPE.</li> <li>- <b>Loading Ramp.</b> Field observation on PPE usage, symbols and warning related OHS.</li> <li>- <b>Mill Drainage.</b> Observations mill effluent lines, sanitation mill and flow of leaching mill.</li> <li>- <b>WWTP.</b> Observation on WWTP, indication of waste overflow, OHS implementation, and interview with worker about worker welfare, OHS, and company's policies.</li> <li>- <b>Solid Waste.</b> Observation of the management of Solid waste consist of EFB to composting, fiber and shell from the production process of mill.</li> <li>- <b>Methane capture/ Biogas Plan.</b> Observations and interviews related to POME management, employment, health checks, OHS, PPE and biogas utilization management. The installation can processes 1000 of megawatt power / month.</li> <li>- <b>Workshop</b> Observation and interview related activities in workshop.</li> <li>- <b>Hazardous Waste Storage</b> Observation and interview related activities in Hazardous waste storage</li> <li>- <b>Chemical Storage</b> Observation and interview related management of chemical.</li> <li>- <b>Material Storage.</b> Observation and Interview related management material and waste</li> <li>- <b>Security Post.</b> Observation related to the acceptance of FFB and employment aspect of securities.</li> <li>- <b>Weighbridge Station.</b> Observation and interview related of supply chain implementation, and weighbridge calibration.</li> </ul>

#### Tengkalat Estate – own Estate

- **Fertilizer storage.** Observation related to management of agrochemical material and waste, MSDS, emergency response facilities and the types of fertilizer used.
- **Fuel Diesel tank.** Observation of OHS, environment aspect, emergency response and fire facilities.
- **Pesticide storage.** Observation related to management of oil and agrochemical material and waste, MSDS, emergency response facilities and the types of pesticides used.
- **Workshop.** Observations and interviews related to wages and overtime, waste management activities, OHS implementations and health inspections.
- **Daycare.** Observations and interviews related to the facilities provided to workers such as employee housing, clean water, daycares, school, employment and interview related complaint mechanism.
- **Housing Complex.** Observation and interview with residents about housing facilities, domestic waste management, and complaint mechanism.
- **Body shower of spraying team and mixing area.** Observation the conditions body shower room and PPE handling.
- **Fire Fighting Equipment Storage.** Simulation the function of fire extinguishers and team readiness.
- **Hazardous waste temporary warehouse.** Field observations related to the fulfillment of the attributes health and safety, recording, and the implementation of compliance requirements hazardous waste temporary warehouse.
- **Monitoring well, Block G41 (land control), Block G40 (Upland & lowland).** Observation on waste water management and nutrient cycle strategy, as well as soil water quality monitoring.
- **POME Land Application, Block G40.** Observation of waste water management as nutrient cycle strategy.
- **Clinic PT GPL.** Observation First aid rooms reasonably clean condition, medical waste recording, labor medical check up and work accident
- **Stop Bunch and water stakes Block F 51: Observation water management in peat land.**
- **Subsidence Stakes and Piziometer Block F 54: Observation for Piezometer and Subside pool**
- **HCV Block G49: observation management riparian and HCV area.**

#### Tengkalat Estate – Mapur Mandiri Cooperative

- **Selective Weeding Block G45 : Observation and interview with Foreman and worker towards technical, manpower, OHS, environment and conservation aspects.**
- **Harvesting Block H52: Observation and interview with Foreman and Harvesters team towards technical, manpower, OHS, environment and conservation aspects.**

#### Gunung Pelawan Estate – own Estate

- **Hazardous Storage.** Observation of OHS implementation such as the use of PPE, MSDS, Work Instructions, Hazardous Symbols & hazardous management emergency response.
- **Material Warehouse.** Observation of OHS implementation such as the use of PPE, MSDS, Work Instructions, Hazardous Symbols & hazardous management emergency response.
- **Chemical warehouse.** Observation of OHS implementation such as the use of PPE, MSDS, Work Instructions, Hazardous Symbols & hazardous management emergency response.
- **Fertilizer warehouse.** Observations and interviews with warehouse officials regarding the type of fertilizer stored, OHS facilities (symbols, APAR and first aid kit), technical work, warehouse conditions and employment aspects.
- **Pesticide Storage.** Observations and interviews with warehouse officials regarding the type of fertilizer stored, OHS facilities (symbols, APAR and first aid kit), technical work, warehouse conditions and employment aspects.
- **Employee Housing, Division 2.** Observation and interviews with employees' families related to housing facilities provided by the company, procedures for delivering complaints and handling damage to buildings, clean water facilities, electricity and supporting infrastructure such as mosques and shop.
- **Harvesting di Block E 35:** Obeservation dan Interviews work procedures, employement and K3 aspects
- **Transporting di Block E 35:** Obeservation dan Interviews work procedures, employement and K3 aspects
- **Chemical Sparying di Block D 35:** Obeservation dan Interviews work procedures, employement and K3 aspects
- **Fertilizer di Block: C28** Obeservation dan Interviews work procedures, employement and K3 aspects
- **Harpen land di Block D 37:** Harpen land management

**Gunung Pelawan Estate – Ikhtiar Sejahtera Cooperative**

- **Conservation Area (Grave), Block C30.** Observation of management of conservation areas and installing warnings.
- **River Border Conservation Area, Block D / E 33.** Observation of conservation area management and installation of prohibitions on hunting and cutting trees.
- **HGU Stone No. 184 and land demarcation.** Observation of aspect of land demarcation and maintenance of HGU stone, and land dispute potency.

**Gelam Estate – own Estate**

- **Chemical material warehouse.** Field observations related to the fulfillment of health safety as well as interviews with a warehouse clerk of safety health.
- **Body shower of spraying team and mixing area.** Observation the conditions body shower room and PPE handling.
- **Fertilizer Warehouse.** Observations relating to the implementation of storage hazardous material, Health safety and labor management.
- **Daycare.** Observations and interviews related to the facilities provided to workers such as employee housing, clean water, daycares, school, employment and interview related complaint mechanism.
- **Workshop.** Observations and interviews with workers related to the management and implementation of health safety, and social worker.
- **Fire Fighting Equipment Storage.** Simulation the function of fire extinguishers and team readiness.
- **Hazardous waste temporary warehouse division 4.** Field observations related to the fulfillment of the attributes health and safety, recording, and the implementation of compliance requirements hazardous waste temporary warehouse.
- **Housing Complex Silip.** Observation the availability of infrastructure such as housing, water and electricity facilities, fire extinguisher, education facilities, religious facilities, health facilities, daycare domestic waste management, childcare and sports facilities.
- **Fuel Diesel tank.** Observation of OHS, environment aspect, emergency response and fire facilities.
- **Domestic Waste Lanfill, Block Q23.** Observation on domestic waste management by landfill application, distance from housing.
- **Barn owl boxes** Number 17 Block Q22. Observation on management Control of biological rat pests using owl predators (*Tyto alba*).
- **Barn Owl Nest Observation Number 17 Block Q22.** To check nest box condition.
- **EFB/Compos application Block G29:** Observation the EFB/Compost application location with dosage 120 Kg per plants.
- **HCV area Block F33- 34:** observation management riparian and HCV area.
- **Spraying L 29 :** Observation and interview with Foreman and pesticide Applicators towards technical, manpower, OHS, environment and conservation aspects
- **HGU Stone No. 257, 258, 291, 293, 814 Block Q18 and land demarcation.** Observation of aspect of land demarcation and maintenance of HGU stone, and land dispute potency.

**Gelam Estate – Silip Lestari Cooperative**

- **Harvesting Block L25/26:** Observation and interview with Foreman and Harvesters team towards technical, manpower, OHS, environment and conservation aspects.

**Cemara Estate – own Estate**

- **Fertilizer storage.** Observation related to management of agrochemical material and waste, MSDS, emergency response facilities and the types of fertilizer used.
- **Fuel Diesel tank.** Observation of OHS, environment aspect, emergency response and fire facilities.
- **Pesticide storage.** Observation related to management of oil and agrochemical material and waste, MSDS, emergency response facilities and the types of pesticides used.
- **Workshop.** Observations and interviews related to wages and overtime, waste management activities, OHS implementations and health inspections.
- **Daycare.** Observations and interviews related to the facilities provided to workers such as employee housing,

- clean water, daycares, school, employment and interview related complaint mechanism.
- **Housing Complex.** Observation and interview with residents about housing facilities, domestic waste management, and complaint mechanism.
- **Body shower of spraying team and mixing area.** Observation the conditions body shower room and PPE handling.
- **Fire Fighting Equipment Storage.** Simulation the function of fire extinguishers and team readiness.
- **Urea Fertilization Block M20:** Observation the application fertilization and interview with Foreman and worker towards technical, manpower, OHS, environment and conservation aspects.
- **EFB/Compos Application Block M24:** Observation the EFB/Compost application location with dosage 120 Kg per plants **Selective Weeding Block H28:** Observation and interview with Foreman and 5 workers towards technical, manpower, OHS, environment and conservation aspects.
- **Harvesting Block H22:** Observation and interview with Foreman and Harvesters team towards technical, manpower, OHS, environment and conservation aspects.

**Cemara Estate – Gunung Muda Sejahtera Cooperative**

- **HGU Stone No. 378, 379, 340 Block L16 and land demarcation.** Observation of aspect of land demarcation and maintenance of HGU stone, and land dispute potency.
- **HCV of Hilly Area, Block H13.** Observation the implementation of management in HCV of hilly area.

**Stakeholder consultation with relevant agencies:**

- Mapur Mandiri Cooperative
- Silip Lestari Cooperative
- Silip Village
- Mapur Village
- Plantation Agency of Bangka District
- Environment Agency of Bangka District
- Labor Agency of Bangka District
- Sawit Lestari Cooperative (employment cooperative)
- Local Contractor of FFB transport - CV Hastungkoro
- Gender Committee
- Labor Union
- Employee Cooperative
- *Wahana lingkungan hidup indonesia (WALHI)* via email - no respon
- World Wildlife Fund (WWF) via email - no respon
- SAWIT WATCH (via email - no respon)
- *Aliansi Masyarakat Adat Nusantara (AMAN)* via email - no respon

2.3	<b>Stakeholder Consultation and Stakeholders Contacted</b>
2.3.1	<b>Summary of stakeholder consultation process.</b>
ASA-2	<ul style="list-style-type: none"> <li>- Public Notification at web <a href="http://www.mutucertification.com">www.mutucertification.com</a> on 7 October 2019.</li> <li>- Consultation meeting and interview with locals of the nearby village and two previous land owner (Silip Village and Mapur Village) on November 12<sup>th</sup> 2019.</li> <li>- Consultation meeting and interview with Internal Stakeholder (gender committee and local contractor) on November 12<sup>th</sup> 2019.</li> <li>- Public consultation meeting with government of Bangka District conducted by visits and interview on November 11<sup>th</sup> 2019.</li> <li>- Consultation with NGO (Walhi, Sawit Watch, WWF, and AMAN) on November 4<sup>th</sup> 2018.</li> </ul>
2.3.2	<b>Stakeholder contacted</b>
	Please find appendix 1

<b>2.4</b>	<b>Determining Next Assessment</b>
	The next visit <i>ASA-3</i> will be determined 8-12 month after date of certificate.

### 3.0. ASSESSMENT FINDINGS

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

Mutuagung Lestari has conducted an assessment of Tengkalat POM – PT Gunung Pelawan Lestari subsidiary of MP EVANS Group PLC operation consisting of one (1) mill with four (4) own estates and four (4) scheme smallholders.

During the assessment, there were one (1) nonconformity were assigned against Minor Compliance Indicators for CPO mill and three (3) 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.

Mutuagung Lestari found that Tengkalat POM – PT Gunung Pelawan Lestari, MP EVANS Group PLC complied with the requirements of Indonesian National Interpretation of RSPO Principles and Criteria 2013 by INA with the requirements of Indonesian National Interpretation of RSPO Principles and Criteria 2013 by INA-NITF (Indonesian National Interpretation Task Force) July 2016, endorsed by the RSPO Board of Governors 30th September 2016, and RSPO Supply Chain Certification Standard For organizations seeking or holding certification Adopted by the RSPO Board of Governors June 2017 (Module E for CPO Mill).

Therefore Mutuagung Lestari Recommends RSPO Certification of compliance is continued.

Ref Std.	VERIFICATION RESULT of MUTU-Certification	
<b>PRINCIPLE #1 COMMITMENT TO TRANSPARENCY</b>		
<b>1.1</b>	<b>Growers and millers provide adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.</b>	
<b>1.1.1; 1.1.2</b>	The company has list of stakeholders such as government agency, local communities, suppliers, contractors etc. Information (periodic reports) submitted to the government agencies such as hazardous waste reports, employment reports, health, safety and accident report etc. There is a procedure related to information request, contained in SOP Information Transparency (no. GPL/SOP/Umum-02 revision 01 dated 04 September 2013). Any requests for information from stakeholders are recorded on the logbook of information request. The information request has been responded in accordance mechanisms established by the company. It's declared either when interviews with government agencies, local communities and local suppliers. Based on the results of field visits to Cemara Estate and Gelam Estate, it is known that the list of information is available and can be accessed by relevant stakeholders. The list of information can access by public such as UKL/UPL document, CSR document and concervation document, etc The company has completed a list of stakeholders with the previous landowner category, in the stakeholder list.	
	<b>Status: Comply</b>	
<b>1.2</b>	<b>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.</b>	
<b>1.2.1</b>	The company has list related to shareable information contained in SOP Information Transparency (PI/SOP/Umum-02) which explains types of document that can or cannot be transparent, for example documents that can be transparent are UKL/UPL document, CSR document and concervation document, etc. The results of interviews with management, any incoming information requests will be discussed first with management. All information is accessible / transparent by first obtaining management approval and not having a negative impact for the company. Besides, the company always share the information to the cooperative through monthly report. The report contains of yield production, applicable FFB price, deduction, remaining bank loans, etc.	

	<b>Status: Comply</b>	
<b>1.3</b> <b>Growers and millers commit to ethical conduct in all business operations and transactions.</b>		
<b>1.3.1</b> <p>The company has a code of conduct policy of commitment to ethical conduct in all business operation and transaction in Anti-Bribery and Corruption. The policy was ratified on July 29, 2013 by Managing Director and has disseminated to all employees in Bahasa Indonesia. According to interviews harvester, warehouse officer, FFB supplier they already know code of conduct among others the prohibition of corruption, bribery and drugs. In addition, there is a record of Socialization related to policy, The company has shown of policy socialization on sustainability and Business ethics on October 30, 2019 followed by all Cemara Estate employees (attendance and photos)</p>		
	<b>Status: Comply</b>	
<b>PRINCIPLE #2 COMPLIANCE WITH APPLICABLE LAWS AND REGULATIONS</b>		
<b>2.1</b> <b>There is compliance with all applicable local, national and ratified international laws and regulations.</b>		
<b>2.1.1</b> <p>The Company proves its compliance toward the applicable regulations, for example: plantation permit (compliance to the Plantation Act 39/2014 on plantation), land use right license (Compliance to Law No. 5 of 1960 on Main Agrarian Regulations), EIA document, license for Temporary Hazardous Waste Storage, etc. Also, list of international laws are available, such as: ratified of UN Convention on Biodiversity (Act No. 5 of 1994), ratified of ILO No. 105 (Act No. 19 of 1999), ratified of UNFCCC (Act No. 6 of 1994), etc. Copies of laws and regulations are stored in the office of each unit. Based on interviews with relevant statutory bodies in District of Bangka (Plantation Agency, Labour Agency, Environment Bodies and the Land Office), it is noted that the management unit has been complied with the regulations related to their business.</p> <p>The company had list of regulation and act dated on July 10, 2019. The list is consisting of several aspect i.e land act, agriculture and plantation, industrial act, hazardous waste, safety and health, worker act, and environment. List of the regulation and act are kept in the all estates office and mill. The copied of the document are also available in place.</p> <p>Evidence of compliance with applicable laws and regulations can be demonstrated by companies, such as:</p> <p><b>Legal Aspect</b></p> <ul style="list-style-type: none"> <li>• Deed of company (<i>Akta Pendirian Perseroan</i>) No. 1 of 2003, dated 1 August 2003.</li> <li>• Plantation Business Permit: No. 188.45/554/Dishutbun/2015 dated 2 March 2015, covers an area of 11,157 Ha integrated with Mill capacity of 60 Ton FFB/Hour.</li> <li>• Land Use Title (HGU): 20 certificates of land use right (HGU) with total managed area 5,702.23 Ha. While, land use title for smallholder's scheme full managed totally is 2,364.90 Ha.</li> <li>• Also, list of international laws is available, such as: ratified of UN Convention on Biodiversity (UU No. 5 of 1994), ratified of ILO No. 105 (UU No. 19 of 1999), ratified of UNFCCC (UU No. 6 of 1994), etc. Copies of laws and regulations are stored in the office of each unit.</li> </ul> <p><b>OHS and worker welfare</b></p> <ul style="list-style-type: none"> <li>• The Company has undertaken prevention and control measures as listed in Safety Act no. 1 of 1970 Article 3, among others by monitoring the implementation of occupational safety and health, conducting accident investigations, hazard risk analysis, medical check-up, machine operation by persons authorized and socialized safe work practices.</li> <li>• The company has paid the worker in accordance with Decree of the Governor of the Bangka Belitung Islands Number: 188.44 / 831 / Disnaker / 2018 concerning the Minimum Wage of the Province of Bangka Belitung Islands in 2019 dated 31 October 2018. Based on the results of document review and interviews with factory 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. The Company also has there fire mitigation officers in accordance with the decision of the Head of the Manpower and Transmigration Agency.</li> </ul>		

### Environmental Aspect

The company Unit has shown compliance with laws and regulations, for example

- Has been implements the requirement of environment aspect such as EIA management and monitoring in routinely (refer to criteria 5.1).
- Has been manage the hazardous waste and domestic waste in accordance with applicable regulation (refer to criteria 5.3).
- Land preparation without burning and has the infrastructure in fire anticipation, according to *Permentan* Number. 26 of 2007 section 15. (refer to criteria 5.5).
- Has been implements the requirement of POME to land application accordance with applicable regulation (refer to criteria 4.4).

### BMP of Agronomy

In the aspect of agronomic, the company has a permit to use Diesel Genset Open Type No. 1, permit number 03 / SP-L / MD / 2016, last inspection date 06 May 2019 issued by the Labor Agency of province Bangka Belitung

#### 2.1.2; 2.1.3 & 2.1.4

The Company has a mechanism to identify, implement and evaluate the compliance with the law described in “*SOP Implementasi Undang-Undang dan Peraturan yang Berlaku*” No. GPL/SOP/Umum-01, dated 7 August 2012. This procedure has explained the PIC who is responsible for identifying the regulation and the PIC which is responsible for evaluating the rules. Responsible person for updating the changes of regulations is Legal Manager and Sustainability & Certification Manager.

The company has conducted an internal audit activity related to regulatory updates on July 10 2019 conducted by the legal department / HR Manager. Examples of regulatory updates include

- Regulation of the Minister of Environment and Forestry no P93 2019 concerning Monitoring of Wastewater Quality continuously and in a network for businesses and or activities
- Decree of the Governor of the Bangka Belitung Islands Number: 188.44 / 831 / Disnaker / 2018 concerning the Minimum Wage of the Province of Bangka Belitung Islands in 2019 dated 31 October 2018.

Based on this mechanism, the company identifies the type of legislation that must be met and classify them in a group of HCV, Labour, Environment and OHS. All regulations are noted in the list of rules are always evaluated and implemented directly if there any changes of regulatory / latest requirements referenced. The latest evaluation for example was concerning Applicable of Minimum Wage in Bangka Belitung Island Province 2019 No. 188.44/831/DISNAKER/2018 dated 31 October 2018.

Status: Comply

## 2.2

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

### 2.2.1

The scope of certification area covers **11,816.87 ha**, describe as follows:

- HGB (land use title for building) of Palm Oil Mill with area 24.95 Ha.
- HGU (land use title) of Ikhtiar Sejahtera Cooperative: 874.86 Ha
- HGU (land use title) of Mapur Mandiri Cooperative: 1,315.97 Ha.
- HGU (land use title) of Silip Lestari Cooperative: 264.76 Ha.
- HGU (land use title) of Gunung Muda Sejahtera Cooperative: 2,230.74 Ha
- HGU (land use title) of PT Gunung Pelawan Lestari (Own Estate): 7,105.59 Ha

Based on review of HGU Decree, as well as consultation with stakeholders, known that the land originally from state land and compensation from community land.

### 2.2.2

The Company has a boundary map completed with scale, number of boundary poles and coordinates issued by National Land Agency. Monitoring of boundary poles is conducting every six months based on the procedure SOP of Installation

and Management of Boundary Stones (SOP/Umm-14 dated 7 August 2012). Based on result of field observation using GPS in Gunung Pelawan Estate (HGU Stone No. 184), Gelam Estate (HGU Stones No. 257, 258, 291, 293, 814 Blocks Q18), and Cemara Estate (HGU Stones No. 378, 379, 340 Block L16), it is known that the company has maintain the land demarcation, such as by maintain the HGU Stones, building boundary roads and boundary drain. There is no indication of a land dispute with the community land.

### **2.2.3, 2.2.4, 2.2.5 & 2.2.6**

Based on the results of interviews with the stakeholder (Plantation Agency, Officials of Silip Village), currently no land disputes or land conflicts. Land disputes have occurred on 2017, however the complainants cannot show sufficient evidence of ownership so that the dispute is settled legally and mediated with the government. Until now the complainants did not submit the further legal action. The company also committed not to use mercenaries and paramilitaries in the process of problem solving or securing corporate activities.

**Status: Comply**

## **2.3**

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

### **2.3.1, 2.3.2, 2.3.3 & 2.3.4**

Based on document review, stakeholder consultation (Silip Village Official and previous land owner), as well as field observation, known that currently the company did not conduct new land acquisition. The land acquisition has been conducted in period of 2005 until 2017. The previous land acquisition document has been verified, as well as consultation with previous land owner, known that the land acquisition has been conducted in FPIC manner, in accordance with SOP of Land Acquisition Procedure (No. GPL/SOP/General-27 Document dated 2 March 2016). The procedure has been disseminated to the community parties with appropriate forms and languages (*Bahasa Indonesia*). The process starts from identification and mapping followed by measurement and physical check of the field then The Operation Room Assistant (ORA) will negotiate the price witnessed by Village Officials.

**Status: Comply**

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

## **3.1**

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

### **3.1.1; 3.1.2**

The company has a long-term business plan for the period 2018/2019, 2019/2020, 2020/2021, the long-term plan includes, among others (production projections, OER projections and KER projections related to the harvest budget, maintenance, fertilization, general costs, costs manufacturing processes, FFB sales, oil revenues (Rp) and core income (Rp).

The company shows the results of the balance sheet audit by public accountants Tanudiredja, Wibisana, Rintis and Partners. Based on the auditor's opinion, the report presents fairly, in all material respects, the financial position of PT Gunung Pelawan Lestari 31 December 2018 and its financial performance and consolidated cash flow for the year ended on that date, in accordance with Indonesian Financial Accounting Standards. Signed by Lok Budianto, S.E., Ak., CPA (Public Accountant Registration No. AP. 0239), 08 May 2019

Based on the document year planting of PT Gunung Pelawan Lestari and interview with management, it is known that the oldest age of oil palm plants is 13 years. Regarding this, the company does not have a replanting program.

**Status: Comply**

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

## **4.1**

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

### **4.1.1**

The SOP for plantations has been shown by the Agronomy Team in the Agronomy Policy Document which was approved by the President Director. The document contains, among others Breeding, Land Preparation, Oil Palm Planting, Bean Planting, Water Conservation and Management, Immature Plants, Weed Control, Pests and Diseases, Fertilizing,

Producing Plants, Harvesting and Transportation. Example: SOP for nurseries (GPL / SOP / AGRO-01), Revision 00, effective date 7 August 2012 describes activities in Pre Nursery and Main Nursery.

In addition, the company has demonstrated that the Factory SOP was validated by the President Director. Factory SOP include, among others, acceptance of plant activities, FFB assessments, processing techniques at each station and shipping.

Based on observations and interviews with workers at Mill and Estate, it is known that these procedures are well implemented in the field, workers can explain and demonstrate their work in accordance with the procedure.

#### 4.1.2, 4.1.3

The certificate holder uses several methods to monitor the implementation of procedures. Among other things, conduct an RSPO internal audit to monitor the implementation of procedures. RSPO internal audits evaluate the implementation of sustainability procedures on plantations and mills. Furthermore, management representatives (Assistant, Managers, and related Superiors) regularly visit inspectorates to control the implementation of procedures. Monitoring records have been documented, for example the RSPO internal audit was conducted in the 27 September 2019 period, and the SCCS internal audit (RSPO dated 02 October 2019). All nonconformities have been followed up and fulfilled by each management unit.

#### 4.1.4

Tengkalat POM has implementing of Mass Balance supply chain model where receiving FFB's from certified and non-certified sources. The recording has been conducted in accordance with SOP of FFB Receiving (No. Dok: SOP/TGM/22, Rev. 1, dated 1 January 2017). The source of FFB can be seen in part '1.7 Description of Mill and Supply Base' of this report.

Status: Comply

### 4.2

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

#### 4.2.1; 4.2.2

The company has a No. Fertilization SOP GPL / SOP / AGRO-09 dated 01 January 2011 explained that fertilizer recommendations must be made based on the analysis of leaf and soil tissue samples. the company shows the results of leaf analysis released by Carmiel Agrotech (Malaysian Standards) in Selangor Malaysia on July 24, 2019 Based on the document review there is an application of Urea fertilization on January 18, 2019 totaling 4,173 kg at a dose of 1.2 kg / principal Block M20 Division 1 Cemara Estate. Fertilization application is in accordance with recommendations and fertilization realization set by the company.

Overall, certificate holder has made efforts to maintain and improve soil fertility. Visually, there are no symptoms of nutrient deficiency at the blocks that have been visited. Based on production data from 12 months before the assessment (November 2018 - October 2019) for the planting year 2006 to 2016, showed reasonable productivity, that is average of 19.21 tons / ha / year for PT Gunung Pelawan Lestari.

#### 4.2.3

The company has had SOP for Soil and Leaf Sampling Procedure No. GPL / SOP / AGRO-09 dated January 1, 2011. The procedure states that leaf analysis is carried out periodically every year and soil analysis is carried out every five years. The results of the analysis are then used as a basis for calculating annual fertilizer recommendations.

The company has records relating to soil and leaf sampling listed in the Soil and Leaf Analysis Test Report:

- The company shows a leaf sample recording, for example as follows:  
There are leaf analysis results released by Carmiel Agrotech (Malaysian Standards) in Selangor Malaysia. Leaf sampling was taken in each block. Example : *Certificate Of Analysis* Block H24 tanggal diterima 24 July 2019 no. *Sample marking* : CME FIELD CM17K2 Block H24. Tested parameters Nitrogen, Phosphorus (as P), Pottasium (as K), Magnesium (as Mg), Calcium (as Ca), Boron (as B), Copper (as CU), Zinc (as Zn).
- The company shows records of soil samples, for example as follows:

Test Report Document, number 264 / LHP / Lab DITSL / VII / 2017, Laboratory of the Department of Soil and Land Resources of the Faculty of Agriculture IPB for PT GPL dated July 19, 2017, which shows the results of laboratory analysis of 4 soil samples. For example, for sample No. Field B8 with H<sub>2</sub>O results 4.89; C-org 1.98%; N-total of 0.11%; C / N 18.70%; P Bray 4.40 ppm; P HCl 25% 122.51 ppm; etc.

#### 4.2.4

The company has implemented a nutrient recycling strategy including solid waste in the form of EFB that have been processed in the composting area and then applied back to the farm to improve soil fertility. The company also utilizes all fiber and shells as boiler fuel. The company shows a record of 42,415.40 tons of solid waste generated from January to October 2019, which is applied in TGE, GPE, CME and GME. Whereas the utilization of liquid waste for October 2019 was 19,568.91 M3. Recordings from the EFB and POME applications have been well documented.

Status: Comply

#### 4.3

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

#### 4.3.1

The certification unit have a semi-detailed soil survey documents report for PT Gunung Pelawan Lestari dated August 12 to 23, 2009 informing about the kind and type of soil in all the 4 estates. The map has been equipped with a location about the company and the legend of the river, the surrounding city, the estate boundaries, soil types, and georeferen.

#### 4.3.2

The certification unit has a planting policy on the slope of which is contained in the Guideline of Oil Palm Cultivation B Palm Pointing Cultivation Point B which explains how to make the planting path on the hilly / slope area by making the pitch. In addition, the certification unit also has SOP No. GPL / SOP / AGRO-05) dated 7 August 2012 on soil and water conservation which states that soil conservation activities include constructing silplit / foot hill drain, trenches, planting of vertiver conservation crops and cover crops and also contained in SOP no. GPL / SOP / AGRO-04, concerning the planting of cover crops explaining that the type of cover crop used is *Mucuna bractetata*. Management of the slope area for example is done by making the terrace and planting *Mucuna bracteata*. Based on the results of observations in the field both at Cemara Estate and Gelam Estate, no area with steep slopes was found. Based on field visits in the H22 and H28 blocks at Cemara Estate it was found that the company made terraces and planted nuts to reduce erosion and based on the results of visits to the G29 block at Gelam Estate it was found that the company had made a *rorak* to reduce surface runoff speed, reduce erosion.

#### 4.3.3

The company shows the program and realization of the road maintenance of PT Gunung Pelawan Lestari in 2019. Based on this document, it is known that until the period January - November 2019 it is known:

- Gelam Estate with a planned road maintenance of 3,963, 27 km and realized road maintenance of 2,022.95 km
- Gunung Pelawan Estate with road maintenance plans. 2,370 km and realized road maintenance 853 km

Based on the results of field observation in CME, GME, and TGE, it is known that the road conditions of Access Road, Key road, Collection Road and Main Road are in good condition and well maintained.

#### 4.3.4 ; 4.3.5

The certification unit shows technical guidance on the management of peat areas listed in the Water Conservation and Water Management Sector Guideline Manual such as keeping the water level above the pyrite layer and at level of 0.45 - 0.60 m above the ground level throughout the year, measuring groundwater level using a piezometer, creating a permanent dam or using a sack. The certification unit shows a map of peat area and piezometer distribution (34 units), stop bund (2 units) and subsidence pole (3 units).

The decrease in ground level is monitored by using subsidence pole installed in the peat area. Based on field observation to subsidence pole number 2 in block E54 Division 1 KKPA TGE, it is known that the installation of new subsidence patent is done in September 2017 and until audit in 2019 there have been no significant changes.

Based on field observation in peat area in Division 1 KKPA TGE, Stop Bund and water level in block E53, Piezometer number 3 in block E54 and subsidence pole number 2 in block E54, it is known that the certification unit has done water

management and recording the condition high water level and ground level. Based on the field visit, piezometer number 3 shows the number 145 cm, water level indicates the number -200 cm below ground level and ditches in dry conditions due to the long dry season.

Based on the results of document review and interviews with management representatives, it is known that the oldest planting age is now 12 years (2006 planting year), so replanting program has not been projected.

#### 4.3.6

The certification unit has a management strategy on critical land and other land issues contained in the semi-detailed soil survey of PT GPL conducted by PT Earth Line in 2009. The report outlines the suitability of the land along with the necessary actions to increase the suitability of the land. Based on the report, it is known that the limiting factor in the land in the operational area of the company is low nutrient content, sandy soil, root conditions, water management and peat soil. Some recommended strategies include increasing soil organic content through nutrient recycling through the application of EFB compost and laying of frond among the palm. The company has a management strategy for fragile and other problematic soils (eg sandy soils, soils with low organic content, and sulfuric acid soils), for example by giving extra long compost at a dose of 300 kg / staple or 40.80 tons / ha. Based on field observations in CME and GME, it is known that management strategy such as giving extra compost with dose of 300 kg / palm.

Status: Comply

### 4.4

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

##### 4.4.1

The company has a water management plan that take account of the efficiency of use and renewability of sources. The management plan has described in EIA implementation report 1<sup>st</sup> of 2019. The plan described the objectives such as water sources including catchment pond, rainfall records, water requirement, current, water quality and contingency plan.

According to environment monitoring analysis, it was informed that the company activity has not give negative affect. Moreover, domestic housing well and consumption water from reverse osmosis testing shows that all parameters are accordance with Minister of Health Regulation (*Permenkes*) No. 32/2017.

##### 4.4.2

The company can be demonstrated a rivers map with scale of 1: 80,000, on April 22, 2016. From the map it is known that there are Tengkalat rivers and Duku rivers sourced from Mapur rivers.

All identified buffer zone has been designated as HCV and protected areas. Evidence of surface water flow protection measures and including riparian such as:

- Determination of river buffer zone with a distance of 50 meters left-right of small river demarcation of the border is done with the installation of boundary markers.
- Periodic water quality testing every six months (semester) with the parameters of environmental quality standards as stipulated in Government Regulation No. 82 in 2001.
- No chemicals application (fertilizers and herbicides) in the buffer zone area.
- Signboard of river buffer zone protection. Prohibiting the use of chemicals in the river buffer zone.
- Planting riparian with *gelam* and *vertifer grass* to prevent runoff and erosion.

##### 4.4.3

POME is processed first in the WWTP pond use of energy source (methane capture), forward POME quality tested periodically and applied to plantation area licensed. The company has managed its effluent of FFB processing as regulated. Document review shows there is monthly effluent quality against national regulation for waste that is discharge to land application.

Permit of effluent utilities was accordance Permit of effluent utilities was accordance letter Licensing Service integrated Agency, Bangka Regency Number 188.4/01/IPAL/DINPMP2KUKM/IV.2019 on 1 April 2019 valid 5 years.

The POME quality test result by accredited laboratory shows that the effluent quality especially BOD, pH and COD for

period July to September 2019 has fulfil the standard required Minister of Environment Decree (KepmenLH) No. 28 year 2003. Base on field visit in Tengkalat POM, no indication over flow effluent in WWTP, flow meter was well functioned and there is no issues from stakeholders related to land application.

#### 4.4.4

Observations on Tengkalat POM water treatment plant found monitoring for raw and process water usage was done by officer periodically, and flowmeters at inlet/outlet serves normally. The company recorded its actual water use. The average water use per tons FFB for period of January – October 2019 is 1.04 m<sup>3</sup>/ton FFB, while budget for water consumption for period 2019 is 1.14 m<sup>3</sup>/ton FFB.

Based on a field visit at the WTP station, it is known that the use of mill water use has been monitored through flow meter observations carried out by the operator.

**Status: Comply**

#### 4.5

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

##### 4.5.1, 4.5.2

The plan of integrated pest management was arranged in Procedure of Integrated Pest Management No. GPL / SOP / AGRO-07 dated 01 January 2013. Integrated pest control procedures explain how to control pests and diseases biologically, chemically and manually. The pests monitored were leaf-eating beetles, grasshoppers, fruit borers, termites, Oryctes rhinoceros, mice, pigs, elephants and palm-leaf-eating caterpillars. In addition, the company also has a Cultivation Handbook which also explains the related pest and disease control. In this book, an early warning system is explained, for example leaf-eating caterpillar pests are detected periodically with 2 months, a mouse census is conducted 3 months and a ganoderma census is carried out every 3 years if there is no attack, if there is a census attack carried out 6 months.

The CH has shown documentation of monthly potential pest and disease census, such as rat pests and leaf-eating caterpillars. The census is conducted by trained workers. The last training was held on 04 November 2019. Based on the results of the census on 27 March 2019, it was found that there were no pests and diseases above the economic threshold, so there was no use of pesticides to control pests and diseases, except routine weed control. The company also showed a map of the owl box. Field observations at each estate also verified that visually there were no symptoms of leaf-eating caterpillar pests in the canopy, or rat pests on FFB collected at TPH. Beneficial plants such as Turnera subulata and Cassia sp have been planted on the main road and collection road. The owl box is in good condition and monitored well

**Status: Comply**

#### 4.6

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

##### 4.6.1

The company shows justification that the pesticides used are registered with the Pesticide Commission, for example Roll Up No register. 01030120042133 valid until 3 September 2023. the company has a pesticide identification document in October 2019 which contains trademarks, including active ingredients, type (systemic / contact), LD50, target species, and WHO class. The pesticide has been verified and registered at [pestisida.id](http://pestisida.id) website. The pesticides used by the company have considered the target species and the minimum negative impact on non-target species.

##### 4.6.2

The routine application of pesticides is to control weeds in circles and pathways using Glyphosate, Metyl metsulfuron, and Trikluphr every four months. The company presented the Toxicity Units Monitored Pesticides document in October 2019 which recorded product names, active ingredients, LD50, percentage of active ingredients, total applications, total active ingredients, hectare applications and active ingredients per tonne of FFB production for each month and date. For example, for the Gelam Estate in the October 2019 period, three pesticide trademarks have been used. Use of Roll Up (Glyphosate) from October 2019 to the amount of 0.00001 kg / a.i / ton of FFB.

##### 4.6.3

the company has shown census documentation of potential monthly pests and diseases, such as rat pests and leaf-eating caterpillars. Based on the results of the census on 27 March 2019, it was discovered that there were rat pests above the

economic threshold, the Company explained that for now rat control was no longer using chemicals. Control of rat pests is carried out by biological means, this can be demonstrated by the realization of the installation of barn owl boxes until 2019, for example Division 2 GPE total installation of barn owl boxes 141, active barn owl boxes 40, inactive barn owl boxes 64 for control of rat pest.

#### 4.6.4

The CH shown evidences that the pesticides categorized in WHO 1A and 1B class, listed in Stockholm and Rotterdam Conventions, and paraquat are not used or minimized. Based on list of pesticides used, it is known that the pesticides used by the CH are included in WHO II class (medium hazard) there is no usage of Paraquat. It also has been verified by field observation in chemical warehouse and spraying activity.

#### 4.6.5, 4.6.9

Based on interview with spraying worker, they have received internal training related handling pesticide and spraying technic annually. Also there was records of training for plasma worker. The workers can demonstrate safe working practices in accordance with the existing procedures, such as spraying in the direction of the wind, or prohibition of spraying on riparian, and understanding emergency response in the event of an accident. Knapsack sprayers are in good condition, personal protective equipment has been used according to MSDS and HIRAC such as boots, apron, rubber gloves, mask, safety goggles. Pesticide solutions are mixed in pesticide warehouses and transported by special vehicles. After work, knapsack sprayer and PPE are stored in a special storehouse at the Estate.

#### 4.6.6

The CH has a chemical storage and mixing SOP (No. GPL / SOP / General-17). The results of observations at the chemical warehouse in each unit are known that the chemical pesticides have been stored in accordance with applicable regulations. The storage warehouse is equipped with MSDS chemicals, fire extinguisher and first aid kit. In addition, employees are also equipped with personal protective equipment such as shoes, helmets, gloves, masks and aprons (for mixing). In the warehouse is also equipped with an emergency response mechanism, warning of the use of PPE, work procedures for employees. Chemical packaging waste will be collected at a temporary waste werehouse and recorded in the toxic hazardous materials waste monitoring logbook. However, the company has opportunity for improvement to monitor the expired date of the pesticides, as sighted in the storage that some pesticide has been expired. **OFI**

#### 4.6.7

Based on document review and field observation, as well as interview with the workers, th CH shown evidences that the pesticides application has been conducted by methodes that has minimum risk and negative impacts to workers or environmental. Work equipment and PPE were stored in special warehouses, including for mixing pesticides, and washing after work. The rinse solution is stored in a special place and used again as a mixing agent in the next day's activities. Pesticide solution is brought to the field by special vehicles. The spraying activity conducted in selective manner by knapsack sprayer that the nozzle regularly calibrated.

#### 4.6.8

Based on document review, field observations, and consultations with stakeholders, it was found that the company did not apply air spraying

#### 4.6.10

The company has a Hazardous Waste Management Procedures Number document GPL/SOP/K3-11 revision 01 published August 27 2015, explained that the ex pesticide containers that have been washed save to wazardous waste storage. ex pesticide containers that are transported by transporter licensed recorded in the manifest of delivery.

The hazardous waste such as ex-pesticide container stored in Cooperative office and transport to temporary hazardous waste storage licensed on each estate namely Gunung Pelawan Estate, Tengkalat Estate and Gelam Estate/Silipi.

The record management Hazardous Waste, included in reporting management hazardous waste quarterly period July to Augustus 2019 to environment agency. The Training And socialization to spraying workers, about ex pesticide container disposal.

**Evidence observed**

- SOP for Hazardous waste management with No. GPL / SOP / K3-11 revision 01 April 27, 2015, which explains the hazardous waste management procedures that the hazardous waste placed on hazardous waste storage.
- Based on field observations, there are used pesticide container in form of racumin, starane and rollup placed on block L18, Cemara Estate.
- Based on field observations, there are used PPE pesticide applicator former (aprons) placed on block L18, Cemara estate.

**Non-Conformance Description**

The company has not been able to demonstrate the implementation of Hazardous waste management in accordance with procedures owned (GPL / SOP / K3-11 revision 01 dated 27 April 2015) and government regulation number 101 year 2014 concerning hazardous waste management. **Non-conformity Number 2019.01.**

**4.6.11**

The company has presented the Monitoring Document on the Results of Workers' Health Checks on September 4, 2019. Based on the document, it is known that there were 135 workers who performed health checks covering spray work, fertilizing laborers, welding operators, caving warehouse and head of the warehouse. Examinations include Cholinesterase, Spirometry, Physical and Radiology. The results of all workers who were examined were in a healthy condition for work.

**4.6.12**

The company shows a policy that states preventing pregnant and breastfeeding women from handling pesticides contained in the Sustainability and Business Ethics Policy which was passed in July 2019.

Based on the results of a document review and interviews with paramedics at the Tengkalat Estate Clinic, it is known that chemical handlers (spray / fertilizer) are subjected to physical health checks every 3 months (including checking for pregnancy and breastfeeding). Also based on interviews and observations on spray work at Tengkalat Estate and Gelam Estate, it is known that there are no spray workers who are currently pregnant or breastfeeding. The worker also explained that the company had been socializing about the prohibition of pregnant and breastfeeding workers from working on chemicals.

<b>4.6.10</b>	<b>Status: Non-conformity Number 2019.01.</b>
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**4.7**

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

**4.7.1**

The company has demonstrated health and safety policies in the workplace that are listed in the Policy on Sustainability and Business Ethics.

The company has shown plans related to OHS listed in the 2019 OHS program documents. The contents of the program include OHS Training, OHS monthly meetings, Giving PPE, Giving First Aid Box, Fire Monitoring every month every month, Checking house keeping every month, *P2K3* Report to the government every 3 months, Inspection / Safety Patrol every month every month, Employee safety inspection (August 2019) and accident investigation and analysis.

Based on the results of the document review, it is known that the company has conducted *P2K3* meetings on a regular basis, if there is OHS plan that is not achieved then the plan will be discussed and rescheduled if the plan is still relevant.

**4.7.2**

The company has presented an updated OHS Actual Risk Assessment Analysis document on January 2, 2019, for example the type of manuring activities; Activity Description: Giving Fertilizer to the plant after one month of planting; potential hazards: inhalation and tripping; Accident risk: poisoning, serious injury; risk level: low; control measures: use PPE, concentration, no smoking, etc; person in charge: division assistant. However, HIRAC has not specifically reviewed the work related to the monitoring of Tyto alba, this has become OFI.

Based on the results of field observations and interviews with workers at Cemara Estate, Tengkalat POM and Gunung Pelawan Estate it is known that workers have been provided with PPE in accordance with established risk analyzes. In

addition, for jobs that use chemicals (spray and fertilizer), the company has provided MSDS and implemented in accordance with written provisions such as using carbon masks for spray workers and the use of gloves for workers in fertilizing activities.

#### **4.7.3**

Based on the results of field observations and interviews with workers at Cemara Estate, Tengkalat POM and Gunung Pelawan Estate it is known that workers have been provided with PPE in accordance with established risk analyzes and if the PPE is damaged, it can be replaced by showing evidence of damage to the leadership. In addition, for jobs that use chemicals (spray and fertilizer), the company has provided MSDS and implemented in accordance with written provisions such as using carbon masks for spray workers and the use of gloves for workers in fertilizing activities. However, the company has opportunity for improvement to improve the monitoring of PPE replacement, as sight in the site that several broken PPE worn by worker and waiting for available stock. **OFI.**

Monitoring of the usage and replacement of broken PPE.

Moreover, company has a commitment to comply the applicable occupational health and safety procedure, such as:

- Ministry of Manpower, Transmigration and Cooperative Decree No. 01 in 1976 regarding the responsibility to take Hyperkes training for company's Doctors
- Ministry of Manpower and Transmigration Decree No. 01 in 1979 regarding the responsibility to take Hyperkes training for company's paramedics.
- Ministry of Manpower Decree No. 01 in 1988 regarding the qualification and requirement for steam engine operators.
- Ministry of Manpower and Transmigration Decree No. 09 in 2010 regarding to lift and transport vehicle's operators.
- Ministry of Manpower and Transmigration Decree No. 04 in 1985 regarding to energy and production vehicle.
- Ministry of Manpower and Transmigration Decree no. 02 in 1982 regarding to welder's qualification in work place.

#### **4.7.4**

The Company has officers responsible for safety and health. The organizational structure of the OHS has been endorsed by the Manpower Agency of Bangka district and the Secretary of OHS has been trained as a general safety expert. OHS meetings are held regularly once a month to discuss monitoring and supervision of OHS implementation in the field and work accident assessment so that work accident does not repeated. From the field observation also found personnel who are responsible in the case of OHS such as officers who bring the first aid kit and have received first aid training.

#### **4.7.5 & 4.7.7**

The company has OHS document with No. manual. document MNL / 5.1 / 1 (Estate) and No. MNL / 6.1 / 1 is valid on May 9, 2017. Then the Company has a Safety Operation Guide for General Plant and Plant Operations. The document explains safe operations for workers in the field.

Based on the OHS Manual document review, it is known that in the event of an accident an investigation of work accidents must be made available by the OHS expert/clinic officer along with the unit manager. For serious and fatal work accidents, the location of the accident must be marked until the investigation is complete. Preventive actions taken based on P2K3 recommendations (monthly meetings).

The company has shown the Safety Performance Indicator document for Cemara Estate and Gelam Estate. Based on these documents it is known that in the last 12 months (the period November 2018-2019) there were 3 days lost at Cemara Estate and 0 days lost at Gelam Estate.

Based on field observations, it is known that the harvest foreman, spray foreman, fertilizer foreman carry the first aid kit with the contents in accordance with the list set by the company.

The company showed several training record documents related to first aid kit including training for first aid kit box holders, followed by all foremen.

#### **4.7.6**

The company shows proof of payment of Employment & Health Insurance (*BPJS Ketenagakerjaan and BPJS Kesehatan*). The evidence related to proof of payment, namely proof pay of Employment Insurance Cemara Estate in September 2019, was paid on October 14, 2019 with proof of payment number KPB/BV/1019/00795 and Proof of payment of health insurance (*BPJS Kesehatan*) Tengkalat Estate in September 2019 paid on September 11, 2019 with proof of payment No. KPB / BV / 1019/00720. Related to this it is known that the company has paid employment and health insurance in accordance with the number of workers.

Related to this it is known that the company has paid Employment & Health Insurance in accordance with the number of workers.

The company has also shown commitment and proof of payment of insurance to contractors including Circular Letter Number: 001 / SM-GPL / I / 2019 which was approved by the Senior Manager on January 7, 2019 regarding the Use of Health Facilities to all estate, mill and contractor employees.

The realization of the fulfillment include:

- Evaluation form dated 31 December 2018 for Silip Lestari Palm Cooperative, CV Naiza Mulia, CV by Putra Bangka, PT Mitra Karya Jaya Perdana, PT Wana Ekabina Manunggal and PT Harapan Nusa Mandiri with coverage of evaluations regarding the quality and performance of contractors, the timeliness of completion employment, Employment Insurance, OHS Implementation Compliance, Housekeeping and health insurance.
- Employment Insurance (*BPJS ketenagakerjaan*) payment receipts from CV Pilar Tanggada Persada with receipts 919110807732679, 919110807732594, 919110807732435 and 919110807732272 with BPJS payments dated November 7, 2019.
- Certificate of Participation Number 190000000855079 for CV Neiza Mulia.
- Proof of payment for BPJSTK e payment with contribution code 191102913759.

	<b>Status: Comply</b>	
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<b>4.8</b>	<b>All staff, workers, smallholders and contractors are appropriately trained.</b>
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<b>4.8.1 &amp; 4.8.2</b>	
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The company has shown the document of PT Gunung Pelawan Lestari Training Implementation Schedule - 2019. The training program for the Mill has cover security, purchases, cashiers, weighbridge station, all processing stations, electricity, workshops, WTP, and laboratories, OHS, environmental, and SCCS. While for contractors include OHS, HIRA, safe working attitude, driving discipline, and use of PPE, as well as Policy of Sustainability. The training for Estate cover fertilization, spraying, harvesting, driver operator/warehouse operator, security, maintenance worker and contractors, OHS, HCV, domestic waste management.

The sample of realization of the program and the realization of the training were, OHS and Safety training on 15 July 2019, Vision / Mission / Complaint / Sustainability Policy Training on 15 July 2019, HCV training on 15-21 August 2019, domestic waste management training on 8 October 2019.

Field observations and/or interviews with workers in Estate was known that the workers have received regular training and guidance from supervision, they have understood the safe working practices. Based on interviews with workers at the Kernel Station it is known that workers have participated in OHS training activities and implemented them such as the necessity to use PPE including helmets, earmuffs / earplugs and conducting first aid in the event of a work accident.

	<b>Status: Comply</b>	
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	<b>PRINCIPLE #5 Environmental responsibility and conservation of natural resources and biodiversity</b>
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<b>5.1</b>	<b>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.</b>
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<b>5.1.1</b>	
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The company has Environment Impact Assessment (EIA) document approved by relevant agency (*Bapedalda*) of Belitung Province on March 28, 2008 (Decree 188.44/195.A/BAPEDALDA/2008). Total study area 17,000 Ha and mill capacity 60 tFFB/Hours. Then, the company conducted addendum EIA document, related to the change of location permit which

previously was 17,000 ha then changed to 13,565 ha with mill capacity 60 tFFB/Hour, and there is a change of activity plan for waste water management system. Addendum EIA document approved by relevant agency of Belitung Province on January 27, 2014 (Decree no.188.45/154.2/LH/2014). The EIA document has been cover all area and activities in Matrix RKL/RPL.

### 5.1.2 & 5.1.3

The company has conducted environmental management based on addendum documents of Environmental Management Plan / Environmental Monitoring Plan or namely RKL-RPL, among others:

- Negative impact of emission & noise quality → management by machine maintenance, distribution PPE to operators who work in high noise places.
- Negative impact of surface and groundwater quality → management by managing POME on WWTP and then applied to land area.
- Negative impact of public attitudes and perceptions → management by workers recruitment from local community, providing CSR assistance, etc.

Based on the verification of RKL-RPL Implementation of environmental monitoring was described in RKL-RPL implementation report. Based on the RKL-RPL implementation report of 1<sup>st</sup> semester 2019 known there isn't negative impact caused by the company, until, the corrective plan of environmental monitoring, still the same as the previous plan. Records of implementation of environmental management describe in RKL-RPL implementation report such as report of 1<sup>st</sup> semester 2019 and has been reported to environment agency.

Implementation of environmental monitoring was described in RKL-RPL implementation report. Based on the RKL-RPL implementation report of 1<sup>st</sup> semester 2019 known there isn't negative impact caused by the company. The result of mill effluent quality testing that conducted periodically has been accordance with the standard qualities set by the government. Interview with Environmental Agency of Bangka Agency show that company has been submit the RKL-RPL implementation report every six month and there isn't negative impact caused by company.

<b>Status: Comply</b>
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## 5.2

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

### 5.2.1

High Conservation Value (HCV assessment) carried out by AKSENTA CONSULTANT in Mei 2013, with study area of 13,565 Ha. HCV assessment use ProForest 2003 and 2008 Guide, and involved relevant stakeholders. Stakeholder consultation was held in January 2013.

- Total HCV area 454.69 Ha
- Elements HCV identified: HCV 1.2; HCV 1.3; HCV 1.4; HCV 3; HCV 4.1, HCV 4.2.
- Vegetation identified: Pelawan (*Tristanopsis wightiana*), Gelam (*Melaleuca cajuputi*), Simpur (*Dillenia* sp).
- Fauna (wildlife) identified: Tarsius (*Tarsius bancanus*), Trenggiling (*Manis javanica*), Kubung (*Cynocephalus variegatus*), Kukang (*Nycticebus coucang*), Lutung (*Trachypithecus cristatus*), Monyet ekor panjang (*Macaca fascicularis*), Beruk (*Macaca nemestrina*), Tupai (*Callosciurus prevosti*), Jelarang (*Ratufa affinis*), Berang-berang (*Lutra sumatrana*), Tengalung (*Viverra zibetha*), Musang luwak (*Paradoxurus hermaphrodites*), Kucing hutan (*Prionailurus bengalensis*), Babi hutan (*Sus scrofa*), Kancil (*Tragulus kanchil*), Napu (*Tragulus napu*), Kijang (*Muntiacus muntjak*, dan Rusa sambar (*Cervus unicolor*), Puyuh sengayan (*Rollulus rouloul*, Walik jambu (*Ptilinopus jambu*, Sempur-hujan darat (*Eurylaimus ochromalus*), Planduk merah (*Trichastoma bicolor*), Ciungair pongpong (*Macronous ptilosus*), Kepudang hutan (*Oriolus xanthonotus*), Labi-labi (*Amyda cartilaginea*), kura-kura (*Coura amboinensis*), Biawak (*Varanus salvator*), Ular sawah (*Python reticulatus*).

### 5.2.2, 5.2.3 and 5.2.4

- Total HCV area **454.69** Ha with elements: HCV 1.2; HCV 1.3; HCV 1.4; HCV 3; HCV 4.1, HCV 4.2; 6.
- RTE **species identified such as:** Tarsius (*Tarsius bancanus*), Trenggiling (*Manis javanica*), Kukang (*Nycticebus coucang*), Lutung (*Trachypithecus cristatus*), Beruk (*Macaca nemestrina*), Jelarang (*Ratufa affinis*), Berang-berang (*Lutra sumatrana*), Rusa sambar (*Cervus unicolor*), Puyuh sengayan (*Rollulus rouloul*, Walik jambu (*Ptilinopus*

jambu, Sempur-hujan darat (*Eurylaimus ochromalus*), Planduk merah (*Trichastoma bicolor*), Ciungair pongpong (*Macronous ptilosus*), Kepudang hutan (*Oriolus xanthonotus*), Labi-labi (*Amyda cartilaginea*), and kura-kura (*Coura amboinensis*).

The management and monitoring plan for RTE species and HCV areas has been implemented (period of July 2018 to June 2019), such as:

- Socialization of RTE species & HCV to workers and nearest on 18 December 2018.
- Maintenance of signboard RTE species and HCV December 12 2018 and April 12 2019.
- RTE species monitoring and HCV inspection November 12 2019.
- Review of management and monitoring RTE species and HCV May 19 2019.

Based on field observation on riparian area of block G49 Tengkalat Estate and HCV area block F33- 34 Gelam Estate known that the HCV area has been managed well and in accordance with the management plan. The company was able to shows monthly monitoring of fauna and monitoring/maintenance of marking HCV pole which conducted weekly. It was reported that there were no conflict between human and wildlife.

Based on interview with nearest community namely Silip Village and Mapur Village known that the socialization related to protected species and HCV has been done.

The company was able to shows evidence of receipt note document of flora and fauna identified in to relevant Agency. Monitoring of RTE species has been conducted routinely (every semester), the monitoring result will be the input in the next monitoring plan. According to document review seen that record of protected species is regularly monitored. The Last Evaluation feedback from monitoring for included Review of management and monitoring RTE species and HCV May 19 2019.

#### 5.2.5

Based on document verification and field observation, interview with workers, surrounded community and related institution known HCV area was not overlapped with local communities' rights, and that there is no community land and traditional rights defined as HCV area.

**Status: Comply**

### 5.3

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

#### 5.3.1

The company has identified its waste and pollution source and developed waste and pollution management plan in 2019. The identification is grouped based on estate and mill activity. Among the identified waste and pollution source in estate are manuring activity, clinic, workshop, spraying activity, office, warehouse and housing complex, generator use and transportation. Meanwhile, the source of pollution and waste identified in mill among others are processing activities, workshop, office, laboratory and WWTP.

#### 5.3.2

The result of inventory in Tengkalat POM, warehouse from each Estate such as spray activities produce waste, such as former pesticide container placed in hazardous waste warehouse, preparation and maintenance block mark, such as former paint cans, placed in hazardous waste warehouse, plastic waste fertilizer, placed in hazardous waste warehouse. And then in Tengkalat POM such as activities in the loading ramp, used sacks lose fruit placed in landfill, in WTP, Waste resulting is ex chemical container placed in hazardous waste warehouse.

Based on field visits in chemical warehouse Tengkalat Estate, Gunung Pelawan Estate and Cemara Estate is known that ex chemicals container be placed to hazardous waste warehouse. Record of hazardous waste management included in report of hazardous waste management which quarterly sent to environment agency, such as report of on July to Augustus 2019. The training and socialization to spraying workers, about ex pesticide container disposal is available. The last hazardous waste transported licensed by PT Valten Cahaya Anugrah on 11 July 2019,

Based on observation and interviews with some workers and management representatives, the employee understood of

hazardous and toxic waste management procedures and evaluation of control management on hazardous and toxic waste management.

**5.3.3**

The company has identified the source of waste and pollution source and treat the identified source to reduce emission and pollution. The effort taken by the company are:

- Domestic waste: based on field observation, the company has collected domestic waste periodically and dump it to the landfill and its known that location of landfill is far away from waterways and the housing area.
- Empty fruit bunch is applied to estate plantation area to substitute chemical fertilizer. Based on field visit EFB application is well managed.
- Shell and fiber are reused for engine fuel of boiler. It reduce the carbon emission from the combustion of fossil fuel.
- POME use for biogas plant and fertilizer, based on field visit the condition of flatbed has been maintenance well and no environmental pollution potential.
- The managing for clinical waste, the company also has cooperation with licensed parties such as PT Valten Cahaya Anugrah.

Based on observation and interviews with some workers and management representatives, the employee understood of hazardous and toxic waste management procedures and evaluation of control management on hazardous and toxic waste management.

**Status: Comply**

**5.4**
**Efficiency of fossil fuel use and the use of renewable energy is optimised.**

The Company already maximizing the use of renewable energy (fiber & shell) as boiler fuel. For example use of For example use of shells and fiber in January to September 2019 was 53.24 (shells) and fiber 1,567.20 ton which produce 3,141,496 kWh of electricity from turbine. Renewable energy use per ton of palm product in the mill is 13,20 kwh / ton CPO. Result Direct fossil fuel used is 0,14 kWh/ ton CPO.

**Status: Comply**

**5.5**
**Use of fire for waste disposal and for preparing land for replanting is avoided except in specific situations, as identified in the ASEAN guidelines or other regional best practice.**
**5.5.1; 5.5.2**

The Company has issued Guideline Oil Palm Cultivation MP Evans Indonesia, where technically open land without burning is in Chapter II clearings, Section 2 zero burning and SOP Management and Monitoring HCV no. GPL/SOP/Umum-07 dated 20 January 2017 revision 01 point 4.1.10 which states that land clearing for new planting is done without burning.

Base on field observation on during audit surveillance 4 on Gelam Estate, Tengkalat Estate and Cemara Estate no evidence of burning of land in the operational area visited by the auditor.

**Status: Comply**

**5.6**
**Plans to reduce pollution and emissions, including greenhouse gases, are developed, implemented and monitored.**
**5.6.1**

GHG emission sources are explained in:

- GHG inventory and mitigation document on February 2016
- Inventory and mitigation procedure (GPL/SOP/UMUM-28, March 2016).
- PT GPL PalmGHG versi 4 document period January to December 2018.

Source of emissions in factory such as → FFB transport, Mill process, Palm Oil Mill Effluence.

Source of emissions in estate such as → Land conversion, fossil fuels use, chemicals use (fertilizer), and agrochemical use (pesticides).

**5.6.2**

Sources of GHG emissions are explained in **indicator 5.6.1**

The GHG emission mitigation plan is explained in:

- GHG inventory and mitigation document, February 2016
- Inventory and mitigation procedure (GPL/SOP/UMUM-28, March 2016).
- PT GPL PalmGHG versi 4 document period January to December 2018.

GHG emission mitigation plan has been implemented, such as:

- Manage POME in WWTP and applied it as organic fertilizer in land area. total POME applied to the land area 19.568,91 M<sup>3</sup>. (October 2019).
- Use fibers and shells as boiler fuel.
- Use of FFB composting as organic fertilizer. In January – October 2019 applied to the land area 42.415,40 ton
- Application of fertilizers and pesticides according to recommendations by agronomi departement
- Engine maintenance regulary
- Protect vegetation in HCV areas
- Conduct emissions quality analysis in generator and boiler machine. From the test results in semester 1 2019 there are no test results that are above the quality standard.

### 5.6.3

Tengkalat POM and its suppliers conduct GHG calculation using PalmGHG V4 RSPO (period of January to December 2018). Summary of GHG emmison are listed as follows :

Emissions per product	tCO <sub>2</sub> e/tProduct
CPO	2.24
PK	2.24

Production	t/yr
FFB processed	54.49

Extraction	%
OER	20.80
KER	5.91

Description	Ha
Oil palm planted on mineral Soil	9205.88
Oil Palm planted area on peat	810.67
Total Oil Palm planted area	10016.55
Conservation (forested)	445.72
Conservation (non-forested)	9.30

Summary of field emission and Sinks

Description	Own plantation		Group plantation		3 <sup>rd</sup> party	
	tCO <sub>2</sub> e	tCO <sub>2</sub> e/tFFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e/tFFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e/tFFB
Land conversion	71295.13	7.12	0.00	0.00	0.00	0.00
CO <sub>2</sub> emission from fertilizer	7115.00	0.71	0.00	0.00	0.00	0.00
NO <sub>2</sub> emissions from Peat	6068.56	0.61	0.00	0.00	0.00	0.00
NO <sub>2</sub> emissions from fertilizer	5266.58	0.53	0.00	0.00	0.00	0.00
Fuel consumption	699.38	0.07	0.00	0.00	0.00	0.00
Peat oxidation	44263.13	4.42	0.00	0.00	0.00	0.00
Sinks					0.00	0.00

Crop sequestration	-93772.26	-9.36	0.00	0.00	0.00	0.00
Sequestration in Conservation area	-3293.96	-0.33	0.00	0.00	0.00	0.00
Total	37641.56	3.76	0.00	0.00	137591.68	0.00

**Summary of Mill Emissions and Credits**

Emissions	tCO <sub>2</sub> e	tCO <sub>2</sub> e/tFFB
POME	396.05	0.00
Fuel Consumption	162.51	0.00
Grid Electricity Utilization	2288.57	0.00
Credits		0.00
Export of Grid Electricity to Housing & Grid	-998.35	0.00
Sales of PKS	0	0.00
Sales of EFB	0	0.00
Total	1848.77	0.00

**POME Treatment**

Emissions	%
Divert to compost	0
Divert to anaerobic digestion	100

**POME Diverted to Anaerobic Digestion**

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

CH has conducted GHG emission calculations period 2019 make use of Calculator Palm GHG version 4.0 Accurate data has been put into the RSPO PalmGHG Calculator and has been verified by auditor. Summary of net GHG emissions from PalmGHG calculator of the audit report which calculation option is applied full Version for the reporting.

**Status: Comply**

**PRINCIPLE #6 Responsible consideration of employees and of individuals and communities affected by growers and mills**
**6.1**

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

**6.1.1; 6.1.2**

The company has a PT GPL Social Impact Assessment Report (SIA) conducted in April 2013 by Aksenta. The area that became the assessment of SIA PT GPL was the PT GPL location permit area of 13,565 ha (including KKPA). SIA covers all aspects of livelihood, health, education, culture and religion etc. Consultation involving affected parties. The recordings that show evidence involve the affected parties, including attendance on 16 January 2013 which was attended by 18 participants and a list of 69 participants. In the SIA document, it was explained that the implementation method was carried out by interviewing, group discussion/FGD and observation. Based on interview with representative of Gunung Muda Village, Silip Estate and Mapur Estate, It is know that the SIA has been prepared in a participatory manner and all existing social impact has been identified by the company.

**6.1.3**

The company has a social management plan for PT GPL in 2019 - 2020 which contains management plans related to external and internal impacts caused. The plan also contains the implementation schedule, responsibilities, targets and PICs that implement it.

CH has plans to reduce negative impacts and increase positive impacts, among others, conducting CSR activities, absorbing local labor, making housing/repair programs, providing training/apprenticeships to local students, conducting annual meetings of plasma cooperative groups, cooperating with clinics and health centers outside the plantation for employee health, etc. The company has a documented schedule such as activities to absorb local labor twice a year and the implementation of CSR programs that are carried out monthly.

#### 6.1.4

The company has a Plan and Review Plan for SIA for the period of July 2018 to June 2019 PT GPL. Based on the report, it was concluded that the SIA Management Plan had been carried out in its entirety, the relationship between PT GPL management and the community around PT GPL's HGU was well established and the employment of the company could help improve the development of the surrounding community.

In the report also includes the realization of the realized SIA management and monitoring program throughout 2018-2019 and attachments to the recording of consultations with surrounding villages. In addition, the company has recorded an action plan report consulting the village and the community in July 2019 The report also contains a questionnaire for the community along with attendance.

In the questionnaire, it contains advice / input from the surrounding village community regarding the action plan consultation with the village and surrounding communities. As for community advice / input, it has been discussed in the SIA management plan such as CSR and employment opportunities.

#### 6.1.5

The company has described related impacts including:

##### Positive impact

- Additional income or monthly savings for cooperative members
- Increased public knowledge of organizational issues, especially cooperative organizations
- Can support the economy of the community especially cooperative members
- Open employment for the community

##### Negative impact

- The emergence of pros and cons in several villages around PT GPL on the plasma pattern
- Lack of information dissemination and information on core-plasma partnerships

**Status: Comply**

#### 6.2

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

##### 6.2.1; 6.2.2

The company has shown the document of PT Gunung Pelawan Lestari Stakeholder List 2019. The list of stakeholders for Tengkalat Mill included sub-district level (2 stakeholders), village level (4 stakeholders), hamlet level (12 stakeholders), security (2 stakeholders), community health center and hospital (6 stakeholders), government agencies ( 4 stakeholders), NGOs (1 stakeholder), education (6 stakeholders), suppliers (39 stakeholders), contractors (20 stakeholders), management of the Ikhtiar Sejahtera Cooperative (5 stakeholders), Ikhtiar Sejahtera Cooperative supervisor (3 stakeholders), Silip Lestari cooperative management (4 stakeholders), Gunung Muda Sejahtera cooperative (5 stakeholders), Gunung Muda Sejahtera Cooperative (2 stakeholders), Koperasi Gunung Mapur Mandiri (5 stakeholder) and Mapur Mandiri cooperative (3 stakeholders).

The company has socialized the SOP of Communication and Consultation to all parties carried out on October 27, 2017. The socialization was attended by 5 people from the company, 1 head of the Riau Silip sub-district, 1 village head of

Mapur, 17 people of Mapur Village and to the management / supervisor of Mapur Mandiri Cooperative. The company has conducted SOP Communication and Consultation to all parties conducted on 30 October 2019, followed by all Cemara Estate employees

The company has identified responsibilities for implementing communication and consultation procedures. Based on interviews with stakeholders (internal and external), information was obtained that these stakeholders knew about the PIC designated by the company for communication and consultation.

### 6.2.3

The company keeps all records and records them in the complaint book. Based on the verification of the document, there is a request for information. For example, Requests for training assistance for forest and land fire prevention from the Environmental Agency of Bangka Regency on September 25, 2019 were responded to with the provision of financial assistance on October 8, 2019.

**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; 6.3.2

The company has had SOP of Internal and External Complaint that (No. GPL/SOP/General-05 revision 00 dated 7 August 2012). The purpose of the SOP is to complete every internal and external complaint both quickly and well and to create a safe and prosperous atmosphere within the company and surrounding communities. In the SOP it explains objectives, responsibilities, procedures, documentation and exceptions. The period of complaint settlement is 2 weeks for each part. Based on interview with the workers and Official of Silip Village, known that the procedure has been disseminated and understood by stakeholders, and they had no objection to the mechanism.

**Status: Comply**

### 6.4

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

#### 6.4.1 & 6.4.2

The procedur for identifying legal, customary or user rights, and also for identifying people entitled to compensation and determining calculation method to provide fair compensation has been set in SOP of Land Acquisition (No. GPL/SOP/Uum-27, dated 2 March 2016). The procedure also contains the FPIC mechanism describes that identification of participatory map related to legal ownership of communities are considering gender, community leader, local or transmigrant communities, ethnic groups or communal land ownership, etc. It was communicated to related parties such as community leaders, and religious figures and youth leaders. The Evidence of Procedure Awareness was documented.

#### 6.4.3

Implementation of land compensations were done directly to the land owners. This was shown in the land acquisition document and from the results of interview with the surrounding community as well as previous land owner. Based on consultation, known that there was no customary rights or indigenous people, but private land. There was no new land acquisition during last assessment.

**Status: Comply**

### 6.5

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

#### 6.5.1;

The company has shown sample of temporary worker (PKWT) agreement No. GPL / CME / PKWT / 10/19/009 In October 2019, that explained working condition such as minimum payment in accordance with regulation, working hours, overtime, annual leave, and dismission. The contractual agreement is valid from 01 October 2019 - 31 March 2020. Based on these data it is known that the company has paid salaries in accordance with the Provincial Minimum Wage, based on Governor Decree No. 188.44/831/Disnaker/2018, that is Rp 2,976,706 / month (Rp 119,068 / day).

There are two kind of workers in company, permanent workers (SKU) and temporary workers (PKWT). All workers has been paid in accordance to minimum wage, for instance

- SKU No. 2005090005 receive a wage of Rp 2,979,706 with a total receipt of basic salary of Rp 2,976,706 plus a wage scale of Rp 3,000.
- PKWT No. 2012010062 receive a wage of Rp 2,976,706.

Based on interviews with spray workers in Block G35 Division 1 Gelam Estate, it was found that the payment of employee salaries was in accordance with UMP Bangka, amounting to Rp 2,976,706. In addition, based on the results of public consultations with the Serikat Pekerja Mandiri Gunung Pelawan Lestari (SPGPLM) it was explained that PKWT employees and SKUs employees had made payments in accordance with the UMP of Rp 2,976,706. The company has also shown document wage scale, where wages are given based on the length of service for each worker.

#### 6.5.2

The company has also shown the documents of the Collective Labor Agreement between PT Gunung Pelawan Lestari and the Gunung Pelawan Lestari Mandiri Workers Union (SPGPLM) for the period 2018-2020 in accordance with the Decree of the Head of the Bangka Regency Industry and Trade Manpower Office Number KEP.003 / PKB / DISNAKERPERINDAG / 2018 on November 30, 2018. The CLA has covered all aspect of employment such as such as minimum payment in accordance with regulation, working hours, overtime, annual leave, dismission, etc. The CLA has been disseminated to Labor Union and the workers, based on interview with the Labor Union and workers, they understood the provision in the CLA.

#### 6.5.3 & 6.5.4

The company has shown the public facility data document for PT GPL which states that the company has provided 2 places of Store (supply of food and daily need), in the Gelam Estate (2 places), Pelawan Estate (2 places), Tengkalat Estate (2 places) and Cemara Estate (1 place). Based on the results of field visits to factory employees, it is known that basic needs can be purchased at the store/kiosk area, besides that it is explained that the distance between the plantation and the market is close, so that access to the market can be easily reached by motorized vehicles.

Besides that, based on interviews with spray, harvest and maintenance workers and labor unions at PT GPL it is known that the company has provided work support facilities such as housing, electricity, water and medical facilities for all employees. In addition, based on a field visit to the Gunung Pelawan Estate Division 2 (housing complex), it is known that the company has facilitated the worker in accordance with the infrastructure documents that it has. The company also explained related to the provision of facilities for the transfer of children to school to surrounding villages and educational facilities from elementary to junior high school level.

	<b>Status: Comply</b>	
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#### 6.6

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

#### 6.6.1 & 6.6.2

The company has a union policy contained in the Policy on Sustainability and Business Ethics document passed in July 2019 which states that the group respects workers' rights to freedom of association and organizes with other individuals and groups to jointly express, encourage, pursue and defend common interests.

Implementation of trade union records is registration of the Serikat Pekerja Gunung Pelawan Lestari Mandiri (SPGPLM) No.002/SP/SB/Sosnaker/2013 dated July 3, 2013. In addition, a recording of a letter from the Labor Agency of Sungai Liat District on May 3, 2017, number 530/269/DINAKERPERINDAG/V/2017 is related to the change in management of the Serikat Pekerja Gunung Pelawan Lestari Mandiri (SPGLM).

The company has documented the meeting between the company and the union, including:

- Worker Union Meeting on November 5, 2019 which contained a discussion on Work Agreement, Procedure on fertilizer work, allocation of labor and filing of pruning premiums. The meeting was attended by 15 participants.
- The program celebrates of Independence Day on August 17, 2019. The meeting was attended by 15 participants.

Based on the above data it can be concluded that the company already has records related to meetings and meetings

between the company and the union.

**Status: Comply**

## 6.7

### Children are not employed or exploited.

#### 6.7.1

The company has also presented a Circular Letter with HRD number A23-001-00 dated January 1, 2012 regarding Procurement of Labor. Based on these documents it is known that prospective SKU employees are at least 18 years old. In addition, the company has presented Circular Letter No.HRD B23-007-00 dated August 1, 2014 regarding Procurement of PKWT Employees. The document stipulates that the PKWT work requirements are a minimum age of 15 years and a maximum of 35 years at the time of admission.

Based on the review of the Gunung Pelawan Estate Employee List document (358 SKU and 47 PKWT), Gelam Estate (389 SKU and 32 PKWT people), it is known that there are no underage workers. In addition, based on the results of interviews with daycare workers at the Gunung Pelawan Estate Division 2 (Housing complex), it is known that socialization has been carried out related to the prohibition of employing minors and the prohibition of carrying children.

Besides that, based on the results of interviews with the Bangka Regency Manpower Office, it was stated that there were no issues related to underage workers in the scope of the PT GPL work area.

**Status: Comply**

## 6.8

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

#### 6.8.1; 6.8.2

The company has a policy on non-discrimination contained in the Policy on Sustainability and Business Ethics which was passed in July 2019. The contents of the policy include the Group's intention to provide fair and equal opportunities to all its employees. The company seeks to prevent discrimination in the workplace. The company has shown the PT GPL Estate and Mill Employee Register documents. Based on these documents it is known that the distribution of labor comes from various religions, ethnicities, genders and races. The tribes include Malay, Batak, Flores, Java, Bugis and Chinese. The distribution of religion includes Islam, Christianity, Buddhism and Khonghuchu.

Based on the results of interviews with workers in the factory (grading operators, sterilizer operators, boilers and engine rooms) as well as the chairman of the gender committee, it was found that there were no issues related to discrimination, where all employees were treated the same. In addition, based on the results of consultations with the Bangka Regency Manpower Agency, it is known that there is no discrimination issue in the work area of PT GPL.

#### 6.8.3

The company has presented the Monthly SKU Employee Job Performance Evaluation Form for employees with initial K in Cemara Estate work units November 2018 - October 2019. The assessment aspects include the level of discipline, work quantity, work quality, cooperation, work attitude and responsibility. Based on the above data it can be concluded that the company already has records and records of employee track records along with an assessment of company performance.

**Status: Comply**

## 6.9

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

#### 6.9.1; 6.9.2

The company has demonstrated the Prevent Sexual Violence Policy contained in the Policy on Sustainability and Business Ethics in the Sexual Harassment section which was ratified in July 2019. In addition, the company has demonstrated Gender / Gender Equality Socialization on 21 October 2019 for plantation employees to 20 workers.

Based on interviews with spray workers in Block D35, Gunung Pelawan Estate is known that workers have been given the opportunity to breastfeed. In addition, based on the results of interviews with women workers, information was obtained

that the employees already knew were related to policies regarding sexual prevention and treatment.

### 6.9.3

The company has SOPs for internal and external complaints that are endorsed by the president director with no. GPL / SOP / General-05 document revision 00 dated 7 August 2012. The purpose of the SOP is to resolve every complaint both internal and external well and quickly and to create a safe and prosperous environment within the company and surrounding communities. The SOP explains the objectives, responsibilities, procedures, documentation and exceptions. The time to resolve the complaint is 2 weeks for each section.

The company has presented a complaint book, which is recorded about complaints, among others on October 12, 2019 there was a complaint regarding the overflow of garbage in the trench, related to this the company has made a response in the form of making a ditch channel on October 25, 2019. Based on the results of interviews with Boiler and sterilizers operators it is known that workers already know about the mechanism for grievance. Submission of complaints can be done in writing or verbally. Every complaint submission will be recorded in the complain book.

<b>Status: Comply</b>
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## 6.10

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

#### 6.10.1; 6.10.2;

The Company has shown document of the Results of the Team Meeting for the Determination of Purchase Prices of Palm Oil FFB Production Sales of Planters in the Bangka Belitung Islands Province in November 2019.. The company made a payment to the plasma party referring to the minutes.

The company shows proof of payment of FFB Plasma through a Payment Recognition Letter no. 007 / SPB / KPKS-SL / VIII / 2019 to the Silip Lestari Oil Palm Plantation Cooperative on August 15, 2019. In the Letter it is explained that the payment for FFB has followed the price from the Plantation Office in August 2019 which is valid and there is an explanation of operational costs and profit sharing for cooperatives. Related to this, it can be concluded that the payment of FFB is in accordance with the stipulations of the Provincial Plantation Agency of the Bangka Belitung Islands.

#### 6.10.3 6.10.4

The company has also shown the FFB Price Determination document from a third party, pricing based on a business to business agreement and notified daily to third parties. Besides that, the company has shown the Addendum Oil Palm FFB Sale and Purchase Agreement No.GPL/HO/10/VII/2016 Sale and Purchase dated July 26,2019 between PT GPL and CV Multi Nusa Pratama. In Article 6 of the agreement, it is stated that "the second party is not permitted to send to the First Party illegal FFB obtained. The company has also shown a TBS Pricing Determination document from third parties, pricing based on business to business agreements and disclosed on a daily basis to third parties. The proof of payment records includes payment to CV Multi Nusa Pratama on November 21, 2019.

Based on the logbook document handling complaints is known that there are no complaints related to FFB pricing. In addition, based on interviews with the *KUD*, it is known that the payment of FFB prices is in accordance with the prices set by the Office and payments have been made in a timely manner.

<b>Status: Comply</b>
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## 6.11

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

#### 6.11.1

The company has a program to improve the quality of life and the environment that is useful and has been realized throughout 2019 which is contained in the Corporate Social Responsibility document for the 2018-2022 period. The example of PT GPL's CSR program is

- Repair of Houses of Worship
- Assisting religious and customary activities
- Assistance with RI Anniversary Commemoration Activities
- Assistance for Village Anniversary Commemoration Activities
- Establish partnerships with local contractors to transport FFB
- Providing assistance for means of production infrastructure for village gardens
- Maintenance of Village Roads using heavy equipment

- Improvement of sports facilities and fields

Based on interviews with the surrounding village community, it is known that the company has provided CSR assistance which is very beneficial for the community. With CSR from the company, the community was helped and positive responses were obtained from the community and local government. An example of the implementation of PT GPL's CSR program is as follows:

- Assistance in Improving Access to Kampung Trench 14 and Pajem Roads in Gunung Pelawan village on January 28, 2019
- Mapur Village Bridge Repair Assistance on March 4, 2019.
- Development Assistance for Belinyu Village at Cabjari Mosque on March 12, 2019
- Assistance for Bangka Regency Triathlon Activity on May 9, 2019

#### **6.11.2**

Based on interviews with relevant stakeholders (agriculture and plantation service agencies, and village heads) and from interviews with management it was known that the company implemented the KKPA full manage scheme for plasma farmers, where for operational techniques ranging from planting, maintenance to harvesting following the applicable provisions in the core estate.

	<b>Status: Comply</b>	
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#### **6.12**

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

#### **6.12.1**

The company has demonstrated a Policy on Sustainability and Business Ethics which contains commitments in:

- The Group will clearly communicate its approach to overcoming modern slavery to its employees and suppliers
- All staff will receive training on how to identify and report modern slavery
- The group will support anyone who delivers serious training in good faith regarding modern slavery and will ensure that they will not experience mistreatment, regardless of whether they will be a problem
- Groups can cut ties with individuals or organizations working on their behalf if they violate modern slavery policies
- The group will provide equal opportunities for all workers to obtain decent work and income and to develop their careers without discriminating on race, caste, nationality, ethnicity, religion, disability, gender, sexual orientation, union membership, political affiliation and age.
- The group assigns all workers according to their expertise, compliance, abilities, skills and experience as well as group needs
- Groups will not tolerate any discrimination based on sex such as role restrictions, labeling, violence, intimidation and excessive workload
- The Group will at all times comply with the law on discrimination in the process of termination of employment, terms and conditions of employment, wages and benefits, promotion and transfer opportunities, training, recruitment and reduction of workers.
- Groups prohibit forced or compulsory labor and illegal overtime. All work hours including overtime, for each group employee is recorded.
- The group prohibits the use of physical punishment, mental or physical coercion, physical restrictions, excessive verbal abuse, intimidation, harassment by management or employees.

Based on a review of the list of workers, field visits and interviews with workers at Tengkalat POM, Gelam Estate, Cemara Estate and Gunung Pelawan Estate, it is known that there are no forced, illegal or trade workers in the scope of PT GPL.

#### **6.12.2 & 6.12.3**

Based on the review of work agreement document, there is no substitution of contract. In addition, there are no foreign workers in the company's operations, and there is a letter of employment agreement for each worker who has been formally signed by both parties.

	<b>Status: Comply</b>	
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#### **6.13**

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

#### **6.13.1**

The company has a policy to respect human rights in the Policy on Sustainability and Business Ethics. Besides that, the Company has documented Company Policy which includes human rights related matters. The policy was socialized to

workers on July 23, 2019 and was attended by 348 participants. Based on interviews with management and workers, there were no cases of human rights violations until the audit activities were carried out.

**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 and 7.1.3**

The land preparation of PT GPL started 2005, where year of planting are 2006 – 2017. For the development new plantings, the company has completed the requirements RSPO New Planting Procedure Assessment Report notification on 17 December 2013, included environmental documents (EIA and RKL/RPL documents) has been explained at **indicator 5.1.1**. The implementation of management and monitoring plan potentials negative impact has been explained on document RKL-RPL semester 1 year 2019 (has been explained in **indicator 5.1.2, 5.1.3**). The scope RSPO New Planting Procedure Assessment Report and EA document also includes smallholder.

<https://www.rspo.org/file/CB%20Assesment%20report%20PT%20Gunung%20Pelawan%20Lestari%202013.pdf>

**Status: Comply**

### **7.2**

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

#### **7.2.1; 7.2.2**

The land suitability map for oil palm palm is contained in the semi-detailed soil survey report from 12 to 23 August 2009 conducted by PT Earthline which covered PT GPL 9,721.6 ha. Documents explained and presented include land suitability map documents both physical conditions (topography and slope) and soil types. The company shows a map of soil types with a scale of 1: 80,000 and slope maps with a scale of 1: 80,000. based on the slope map of PT. GPL is dominated by flat areas.

Based on the planting year distribution document, it is known that the youngest palm age is 2018, after that there is no expansion area for the development of new planting.

**Status: Comply**

### **7.3**

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

#### **7.3.1; 7.3.2; 7.3.3; 7.3.4; 7.3.5**

The land preparation for PT. GPL started 2005, where year of planting are 2006 – 2017. PT. GPL has conducting New Planting Procedure (NPP) on 13-17 December 2013 and has been submitted to the RSPO website on 17 December 2013. There are no comments from stakeholders for its NPP notification.

<https://www.rspo.org/file/CB%20Assesment%20report%20PT%20Gunung%20Pelawan%20Lestari%202013.pdf>

Disclosure of Liability for MP Evans Group PLC (and its subsidiaries) has been submitted to the RSPO on 23 July 2014 and RSPO stated *have no non-compliant land clearance*. All subsidiaries of MP Evans Group PLC are:

1. PT Pangkatan Indonesia (North Sumatera)
2. PT Bilah Plantindo (North Sumatera)
3. PT Sembada Sennah Maju (North Sumatera)
4. PT Simpang Kiri Plantation Indonesia (Aceh)
5. **PT Gunung Pelawan Lestari (Bangka)**
6. PT Prima Mitrajaya Mandiri (East Kalimantan)
7. PT Teguh Jayaprima Abadi (East Kalimantan)
8. PT Evans Lestari (South Sumatera)

According to these, MP Evans Group PLC and its subsidiaries does not necessary to made Land Use Change Analysis.

**Status: Comply**

<b>7.4</b>	<b>Extensive planting on steep terrain, and/or on marginal and fragile soils, is avoided.</b>
<b>7.4.1; 7.4.2</b>	<p>The land suitability map for oil palm planting is contained in a semi-detailed 2009 soil survey report conducted by PT Earth Line. Maps are available on a scale of 1: 80,000 for soil types and slopes. Both maps inform that there is peat soil with a depth of 1-1.5 m which covers an area of 398.45 ha; 1.5-2.0 m covering 224.18 ha; 2.0-3.0 m covers an area of 148.24 ha. Then, the texture of the sandy soil is also informed, which is 121.74 ha. based on the PT GPL land slope map information dominated by flat areas.</p> <p>Based on the planting year distribution document, it is known that the youngest palm age is 2018, after that there is no expansion area for the development of new planting.</p>
	<b>Status: Comply</b>
<b>7.5</b>	<b>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.</b>
<b>7.5.1</b>	<p>In the previous corporate operational area there was no indigenous or communal land, but private land that has been compensated and has given their consent. Agreements are shown in the indemnification documents that are directly conducted with the parties without representation. Based on the results of interviews with the surrounding community it was known that the compensation process has been done directly with the landowner without any coercion from any party.</p>
	<b>Status: Comply</b>
<b>7.6</b>	<b>Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their free, prior and informed consent and negotiated agreements.</b>
<b>7.6.1, 7.6.2, 7.6.3, 7.6.4, 7.6.5 &amp; 7.6.6</b>	<p>The procedur for identifying legal, customary or user rights, and also for identifying people entitled to compensation and determining calculation method to provide fair compensation has been set in SOP of Land Acquisition (No. GPL/SOP/Uum-27, dated 2 March 2016). The procedure also contains the FPIC mechanism describes that identification of participatory map related to legal ownership of communities are considering gender, community leader, local or transmigrant communities, ethnic groups or communal land ownership, etc. It was communicated to related parties such as community leaders, and religious figures and youth leaders. The Evidence of Procedure Awareness was documented. The process of identification and assessment of legal rights has been documented and involves the parties affected.</p> <p>The negotiation process with the land owners has been made directly and the owner are agrees to grant the land to the company with compensation. The process and outcome of each grant of compensation is documented and signed by both parties. Communities also get benefit from the company's presence in partnership of plasma plantation cooperation that managed by the company.</p> <p>Based on the results of interviews with the surrounding community it was known that the land acquisition process was conducted by involving the affected parties in identifying the land owner. The landowners were free to decide whether or not to dispose of their land, then the pricing and payment process was determined based on the negotiation between the company and the landowner without going through an intermediary. The community also acknowledges the benefits of plasma plantation cooperation that managed by the company.</p>
	<b>Status: Comply</b>
<b>7.7</b>	<b>Use of fire in the preparation of new plantings is avoided other than in specific situations, as identified in the ASEAN guidelines or other regional best practice.</b>
<b>7.7.1 ; 7.7.2</b>	<p>The land preparation of PT GPL started 2005, where year of planting are 2006 – 2017. For the development new plantings, the company has completed the requirements RSPO New Planting Procedure Assessment Report notification on 17 December 2013. The policy of zero burning and implementation has been explained on indicator 5.5.1.</p>

Base on field observation and interview with nearest community and workers during audit surveillance 2 on Gelam Estate, Tengkalat Estate and Cemara Estate no evidence of burning of land in the operational area visited by the auditor.

Status: Comply

#### 7.8

#### New plantation developments are designed to minimise net greenhouse gas emissions.

The company has completed the requirements RSPO New Planting Procedure Assessment Report notification on 17 December 2013 by Control Union (Malaysia) Sdn. Bhd CB's. At that time, there is no requirement for GHG emission assessment for NPP.

<https://www.rspo.org/file/CB%20Assesment%20report%20PT%20Gunung%20Pelawan%20Lestari%202013.pdf>

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.

The company has implemented commitment to reduce environment impacts on the regular action plan. For example:

- Effluent management and monitoring. WWTP pond management, effluent quality test and report it to Bangka District Environment Agency.
- Air quality management and monitoring. Road maintenance, air quality test and report it to Bangka District Environment Agency.
- Surface water management and monitoring. Testing surface water quality and report it to Bangka District Environment Agency.
- Hazardous waste management. Storing hazardous waste at the permitted warehouse of hazardous waste, managing and monitoring hazardous waste.

#### BMP of Agronomy

The CH has policy not to use the pesticides categorized in WHO 1A and 1B class, listed in Stockholm and Rotterdam Conventions, and paraquat, as well as to reduce other pesticide as a part of integrated pest management. There were evidences related implementation of the policy, such as regular census, planting beneficial plant and installing barn owl boxes. The IPM has been carried out quite effectively, so that there is no chemical use for pest control, except for routine weed control.

#### RSPO Internal Audit

internal audit S&C Department dated 27 September 2019. All non-conformities have been followed up by each management unit.

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																		
<b>5.1</b>	<b>Applicability of the general chain of custody requirements for the supply chain</b>																		
<b>5.1.1</b>	<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>Based on document review and field observation known that the Mill has legal ownership and physically handles of RSPO Certified Sustainable palm oil products.</p>																		
	<b>Status: Comply</b>																		
<b>5.1.2</b>	<p>Traders and distributors require a license obtained from RSPO Secretariat to sell RSPO certified product but do not themselves require certification. When selling RSPO certified products, a licensed trader and/or distributor shall pass on the certification number of the product manufacturer and the applicable supply chain model.</p> <p>The Mill was FFB processing and produced CPO and PK. The sources of material input was FFB's from the certified and uncertified area from own estates, plasma, as well as third party. The Mill did not purchased any CPO/ PK from others suppliers, and the Mill did not has a role as trader/distributor.</p>																		
	<b>Status: Comply</b>																		
<b>5.1.3</b>	<p>Either the operator at site level or its parent company seeking certification shall be a member of the RSPO and shall register on the RSPO IT platform.</p> <p>The Mill was RSPO member and has been registered with member ID RSPO IT Platform as follows :</p>																		
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	<b>Status: Comply</b>																		
<b>5.1.4</b>	<p>Processing aids do not need to be included within an organization's scope of certification.</p> <p>The Mill did not have any processing aids at site.</p>																		
	<b>Status: Comply</b>																		
<b>5.2</b>	<b>Supply chain model</b>																		

5.2.1	<p>The site can only use the same supply chain model as its supplier or go to a less strict system. Declassification/downgrading can only be done in the following order: Identity Preserved -&gt; Segregated -&gt; Mass Balance.</p>
The Mill was certified palm oil mill which implement Mass Balance using Module E-CPO Mill for its supply chain models.	
	<b>Status: Comply</b>
5.2.2	<p>The site can use one (1) or a combination of supply chain models as audited and certified by the CB.</p>
The Mill was certified palm oil mill which implement one module only, that was Mass Balance using Module E-CPO Mill for its supply chain models.	
	<b>Status: Comply</b>
5.3	<b>Documented procedures</b>
5.3.1	<p>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>
<p>The Mill has had SOP of RSPO Sustainability for Mill Manual No MNL/6.1/3 Revision 03 dated 12 April 2018, that refers to RSPO SCCS System and Standart of 2014, revised June 2017. The procedure has covers all aspects in SCCS MB model, such as identification and traceability of RSPO certified and uncertified source and products. This procedures also mentioned that security, weight bridge clerk, grader, dispatch/kernel officer, production clerk, and etc as critical control point PIC.</p>	
<p>Based on field observation on Mill, acquired information that PIC for SSCS implementation (for examples weight bridge operators, security, and Head of Administration) that training and refreshment (awareness) of supply chain management system were carried out annually. FFB from certified and uncertified areas were received and verified by software program of weighbridge to classified and separate RSPO certified and uncertified source.</p>	
	<b>Status: Comply</b>
5.3.2	<p>The site shall have a written procedure to conduct annual internal audit</p>
<p>Internal audit procedure was available on RSPO Sustainability for Mill Manual No MNL/6.1/3 clause 4.0 which mentioned that the internal audit are conducted once a year before the external surveillance audit. It includes the compliance of traceability, mass balance report and sales reporting through the RSPO IT Platform. Supply Chain internal audit has been conducted on 27 September 2019.</p>	
	<b>Status: Comply</b>
5.4	<b>Purchasing and goods in</b>
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>Based on document review, field observation, and interview with management unit, the Mill did not purchase RSPO certified oil palm product such as FFB, CPO or PK. However for certified FFB received, were from certified unit of certification (own Estates and Plasma). The documentation of FFB received from certified source such as from delivery notes has been meet the minimum information.</p>	
	<b>Status: Comply</b>
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 had Manual RSPO Sustainability for Mill (No. MNL/6.1/3), which in clause 5.1.3 mention that if there is any error in delivery of product then customer can complain within 1 month after product / document received. Based on field observation on Mill, acquired information that PIC for SSCS implementation (for examples weight bridge operators, security, and Head of</p>	

Administration) that training and refreshment (awareness) of supply chain management system were carried out annually.

**Status: Comply**

## 5.5 Outsourcing activities

### 5.5.1

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.

There is physical handling of the products handed over to third parties such as:

No	Agreement	Name	Address	PIC
1	No. GPL/TGM/2016/01-PENGANGKUTAN CPO	PT Wana Ekabina Manunggal (CPO Transport)	Jl Ekor Kuning No 37 RT 001/RW 003, Kelurahan Gabek Dua, Kecamatan Gabek, Pangkalpinang, Kepulauan Bangka Belitung.	PIC: Supervisor - 081373588744
2	No. 002/BS/IDT/IX/2015	PT Indotrust (CPO Bulking)	Tanjung Gudang RT: 029, Kelurahan. Air Jukung, Kecamatan Belinyu, Bangka. Capacity: 3000 MT	PIC: Head of Bulking - 082178445958

**Status: Comply**

### 5.5.2

Sites which include outsourcing within the scope of their RSPO Supply Chain certificate shall ensure the following:

- 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

There is physical handling of the products handed over to third parties such as:

No	Agreement	Name	Address	PIC
1	No. GPL/TGM/2016/01-PENGANGKUTAN CPO	PT Wana Ekabina Manunggal (CPO Transport)	Jl Ekor Kuning No 37 RT 001/RW 003, Kelurahan Gabek Dua, Kecamatan Gabek, Pangkalpinang, Kepulauan Bangka Belitung.	PIC: Supervisor - 081373588744
2	No. 002/BS/IDT/IX/2015	PT Indotrust (CPO Bulking)	Tanjung Gudang RT: 029, Kelurahan. Air Jukung, Kecamatan Belinyu, Bangka. Capacity: 3000 MT	PIC: Head of Bulking - 082178445958

There were statement letter from both of contractor that the CB's can access to their operations system dated 22 October 2018. The Mill has disseminated SCCS procedure to all contractor on 30 June 2018.

<b>Status: Comply</b>														
<b>5.5.3</b> The site shall record the names and contact details of all contractors used for the processing or physical handling of RSPO certified oil palm products.														
Record of all name and contact details of outsources and contractors are well maintained, as follows:														
<b>No</b>	<b>Agreement</b>	<b>Name</b>	<b>Address</b>	<b>PIC</b>										
1	No. GPL/TGM/2016/01-PENGANGKUTAN CPO	PT Wana Ekabina Manunggal (CPO Transport)	Jl Ekor Kuning No 37 RT 001/RW 003, Kelurahan Gabek Dua, Kecamatan Gabek, Pangkalpinang, Kepulauan Bangka Belitung.	PIC: Supervisor - 081373588744										
2	No. 002/BS/IDT/IX/2015	PT Indotrust (CPO Bulking)	Tanjung Gudang RT: 029, Kelurahan. Air Jukung, Kecamatan Belinyu, Bangka. Capacity: 3000 MT	PIC: Head of Bulking - 082178445958										
<b>Status: Comply</b>														
<b>5.5.4</b> The site shall at its next audit inform its CB of the names and contact details of any new contractor used for the processing or physical handling of RSPO certified oil palm products														
The list of contractor at this ASA 2 is the same as ASA 1. There was no additional contractor from the previous audit period.														
<b>Status: Comply</b>														
<b>5.6</b>	<b>Sales and goods out</b>													
<b>5.6.1</b> The supplying site shall ensure that the following minimum information for RSPO certified products is made available in document form: The name and address of the buyer														
The CSPO and CSPK from the Mill were sold has meet the minimum nformation of certified products. Supporting document shown were contract agreement, delivery order, delivery ticket, which inform delivery date, description of product and supply chain model, quantity, identification number, certificate number, sender's name and address of the seller.														
<b>Status: Comply</b>														
<b>5.7</b>	<b>Registration of transactions</b>													
<b>5.7.1</b> Supply chain actors who: <ul style="list-style-type: none"> <li>• are mills, traders, crushers and refineries; and</li> <li>• take legal ownership and/or physically handle RSPO Certified Sustainable oil palm products that are available in the yield scheme of the RSPO IT Platform (Figure 2 and 3, refer Annex 1) shall register their transaction in the RSPO IT platform and confirm upon receipt where applicable</li> </ul>														
The Mill was RSPO member and has been registered with member ID RSPO IT Platform as follows :														
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Issued On	23/01/2019
Issued By	PT Mutuagung Lestari
Start Date	07-02-2019
End Date	23-02-2020
	<b>Status: Comply</b>
<b>5.7.2</b>	<p>The involved supply chain actors mentioned in 5.7.1 shall do the following actions in the RSPO IT Platform:</p> <ul style="list-style-type: none"> <li>Shipping Announcement / Announcement: When RSPO certified volume is sold as certified, the volumes of products that are in the yield scheme (Figure 2 and 3, refer Annex 1) shall be registered as a Shipping Announcement / Announcement in the RSPO IT Platform. The declaration time to do Shipping announcement / Announcement is based on members' own standard operating procedures.</li> <li>Trace: When RSPO certified volumes are sold as RSPO certified to actors in the supply chain beyond the refinery, the volume shall be traced at least annually. Tracing triggers the generation of a trace document with a unique traceability number. Tracing can be done in a consolidated way at least annually.</li> <li>Remove: RSPO certified volumes sold under other scheme or as conventional, or in case of underproduction, loss or damage shall be removed.</li> <li>Confirm: Acknowledge the purchase of RSPO certified volume by confirming Shipping Announcements / Announcements.</li> </ul>
	<p>All transaction has been announced to RSPO IT Platform and confirmed shipped. The Mill has conducted SCCS mechanism such as announcement in Palm Trace of RSPO CSPO and CSPK sold as certified and confirming the shipping announcement. The summary of CSPO and CSPK sold based on Mass Balance Record, announcement, and remove in period of November 2018 to October 2019 for CSPO sold as RSPO 38,602.84 MT and CSPK sold as RSPO 9,284.39 MT.</p>
	<b>Status: Comply</b>
<b>5.8</b>	<b>Training</b>
<b>5.8.1</b>	<p>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</p>
	<p>Training of SCCS will be conducted once a year, for 2019 planned in October 2019.</p>
	<b>Status: Comply</b>
<b>5.8.2</b>	<p>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</p>
	<p>The latest SCCS training conducted on 5 October 2019. Based on interviews with security, weighbridge officers and Managers, it is known that key persons in SCCS activities have understood the procedures and can demonstrate how documented FFB, CPO, PK are certified and not certified.</p>
	<b>Status: Comply</b>
<b>5.9</b>	<b>Record keeping</b>
<b>5.9.1</b>	<p>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</p>
	<p>The Mill has maintain accurate, complete and up-to-date records and reports, such as the FFB receives, process and CPO &amp; PK production from its supply bases.</p>

**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

According to the company's procedure (document control and maintaining confidentiality), all records are kept for 10 years. Based on document verification, the management unit can shown all recording data for previous two years. Such as contract document, FFB Consignment, CPO Ticket, etc.

**Status: Comply**
**5.9.3**

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

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

Product	Last Year Projected Certified Volume (MT)	Last Year Actual Certified Volume (MT)	Estimate Production of 12 month (MT) further
FFB own estate	130,932	120,239.99	132,864
FFB scheme smallholders	42,589	53,026.68	58,951
CSPO	40,951	40,574.74	45,268
CSPK	9,919	9,848.82	11,029

Note : \* estimate based on increasing approximately 7 % from previous 12 month Estate production.

Certified and non-certified FFB received period of 01 November 2018 – 31 October 2019 (12 month).

Month	FFB		
	RSPO Certified	Non Certified	Total
November 2018 to October 2019	173,266.67	92,481.96	265,748.63

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

**CPO production and Dispatch**

Period	CPO Production (MT)			CSPO Dispatch (MT)			
	CSPO	Non Cert CPO	Total	RSPO	Other Scheme (ISCC)	As Non Cert	Total CSPO Dispatch
November 2018 to October 2019	40,574.74	18,152.99	58,727.73	38,602.84	-	-	38,602.84

**PK production and dispatch**

Period	PK Production (MT)			CSPK Dispatch (MT)			
	CSPK	Non Cert PK	Total	RSPO	Other Scheme (ISCC)	As Non Cert	Total CSPK Dispatch
November 2018 to October 2019	9,848.82	4,789.15	14,637.97	9,284.39	-	-	9,284.39
	<b>Status: Comply</b>						
<b>5.10</b>	<b>Conversion factors</b>						
<b>5.10.1</b>	Where applicable a conversion rate shall be applied to provide a reliable estimate for the amount of certified output available from the associated inputs. Organizations may determine and set their own conversion rates which shall be based upon past experience, documented and applied consistently. Guidance on conversion rates is published on the RSPO website ( <a href="http://www.rspo.org">www.rspo.org</a> ); RSPO Rules for Physical Transition of Oleochemicals and its Derivatives. This is relevant for derivatives of Palm Oil and Palm Kernel Oil, as used in the oleochemical and personal care industries						
	The Mill only received and processed of FFB's as material input. This mill did not purchase CPO and/or PK from others. Therefore, this mill did not using conversion factors.						
	<b>Status: Comply</b>						
<b>5.10.2</b>	Conversion rates shall be periodically updated to ensure accuracy against actual performance or industry average if appropriate.						
	The Mill only received and processed of FFB's as material input. This mill did not purchase CPO and/or PK from others. Therefore, this mill did not using conversion factors.						
	<b>Status: Comply</b>						
<b>5.11</b>	<b>Claims</b>						
<b>5.11.1</b>	The site shall only make claims regarding the use of or support of RSPO certified oil palm products that are in compliance with the RSPO Rules on Market Communications and Claims.						
	All certified product claims never using RSPO symbol or logos. A unique identification number, certificate number and supply chain model are available on relevant documents. Also, the CH using RSPO Palm Trace for communication, transaction, confirmation status and shipping announcement. The claim has been referred to RSPO Rules on Market Communications and Claims.						
	<b>Status: Comply</b>						
<b>5.12</b>	<b>Complaints</b>						
<b>5.12.1</b>	The organization shall have in place and maintain documented procedures for collecting and resolving stakeholder complaints.						
	The procedure related complaint refer to SOP of Internal and External Complaint (No. GPL/SOP/General-05 Revision 00 dated 07 August 2012). The purpose of SOP is to solve any complaints both internally and externally with good and fast and to create a safe and prosperous atmosphere within the company and surrounding communities. The SOP describes objectives, responsibilities, procedures, documentation and exceptions. The settlement period of the complaint is 2 weeks for each section.						

	<b>Status: Comply</b>
<b>5.13</b>	<b>Management review</b>
<b>5.13.1</b>	<p>The organization is required to hold management reviews annually at planned intervals, appropriate to the scale and nature of the activities undertaken</p> <p>Management review was conducted on 7 October 2019. The content of Management Review including follow up of internal and external audit finding, customer feedback, process performance and product suitability, and recommendation for improvement.</p>
	<b>Status: Comply</b>
<b>5.13.2</b>	<p>The input to management review shall include information on:</p> <ul style="list-style-type: none"> <li>• Results of internal audits covering RSPO Supply Chain Certification Standard.</li> <li>• Customer feedback.</li> <li>• Status of preventive and corrective actions.</li> <li>• Follow-up actions from management reviews.</li> <li>• Changes that could affect the management system.</li> <li>• Recommendations for improvement.</li> </ul> <p>Result of Management Review report on 7 October 2019 were following information :</p> <ul style="list-style-type: none"> <li>♦ Customer Feedback and Stakeholder Complaints:</li> <li>♦ Performance of Processing Activity and Conformity of Products: Production of Certified Product, Sales and Goods Out has been appropriate with estimation and supply chain requirements.</li> <li>♦ Any changes of Management System</li> <li>♦ Internal Audit of Supply Chain and Follow-Up Actions</li> <li>♦ External audit RSPO of 2018.</li> <li>♦ Recommendations for Improvement</li> </ul>
	<b>Status: Comply</b>
<b>5.13.3</b>	<p>The output from the management review shall include any decisions and actions related to:</p> <ul style="list-style-type: none"> <li>• Improvement of the effectiveness of the management system and its processes.</li> <li>• Resource needs.</li> </ul> <p>The result of management review has been included regarding to improve of management system and resources need.</p>
	<b>Status: Comply</b>

### 3.2.3 (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.																					
The Mill was used RSPO supply chain of Mass Balance module due to still received FFB from the outgrowers which has not been certified with RSPO. The Mill has conducted verification the volumes of certified and uncertified FFB entering the mill and sales volume of RSPO certified products.																					
	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.																					
Estimated certified product recorded in the certificate annex of last surveillance, actual certified produced has been verified during this assessment, as well as the estimates of certified production for the next license period has been set by the Mill, describes in the following table:																					
<table><tr><th>Product</th><th>Last Year Projected Certified Volume (MT)</th><th>Last Year Actual Certified Volume (MT)</th><th>Estimate Production of 12 month (MT) further</th></tr><tr><td>FFB own estate</td><td>130,932</td><td>120,239.99</td><td>132,864</td></tr><tr><td>FFB scheme smallholders</td><td>42,589</td><td>53,026.68</td><td>58,951</td></tr><tr><td>CSPO</td><td>40,951</td><td>40,574.74</td><td>45,268</td></tr><tr><td>CSPK</td><td>9,919</td><td>9,848.82</td><td>11,029</td></tr></table>		Product	Last Year Projected Certified Volume (MT)	Last Year Actual Certified Volume (MT)	Estimate Production of 12 month (MT) further	FFB own estate	130,932	120,239.99	132,864	FFB scheme smallholders	42,589	53,026.68	58,951	CSPO	40,951	40,574.74	45,268	CSPK	9,919	9,848.82	11,029
Product	Last Year Projected Certified Volume (MT)	Last Year Actual Certified Volume (MT)	Estimate Production of 12 month (MT) further																		
FFB own estate	130,932	120,239.99	132,864																		
FFB scheme smallholders	42,589	53,026.68	58,951																		
CSPO	40,951	40,574.74	45,268																		
CSPK	9,919	9,848.82	11,029																		
Note : * estimate based on increasing aproximately 7 % from previous 12 month Estate production.																					
	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).																					
The Mill has been registered and met the requirements of reporting supply chain through the RSPO supply chain managing organization (palm-trace), which describing below:																					
License																					
Sub License ID	CB79539																				
Member Name	TENGKALAT PALM OIL MILL, PT. GUNUNG PELAWAN LESTARI																				
Member ID	RSPO_PO1000006652																				

RSPO Membership Number	1-0027-06-000-00 (M.P. Evans Group PLC)
Issued On	23/01/2019
Issued By	PT Mutuagung Lestari
Start Date	07-02-2019
End Date	23-02-2020
<p>The entire requirements for appropriate supply chain has been met by the mill such as the estimate certified product already recorded in the RSPO IT platform and including finalized transactions records and stocks transactions record during the 12 month before the assessment.</p> <p>All transaction has been announced to RSPO IT Platform and confirmed shipped. The Mill has conducted SCCS mechanism such as announcement in Palm Trace of RSPO CSPO and CSPK sold as certified and confirming the shipping announcement. The summary of CSPO and CSPK sold based on Mass Balance Record, announcement, and remove in period of November 2018 to October 2019 for CSPO sold as RSPO 38,602.84 MT and CSPK sold as RSPO 9,284.39 MT.</p>	
	<b>Status: Comply</b>
<b>E.3</b>	<b>Documented procedures</b>
<b>E.3.1</b>	<p><b>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:</b></p> <ul style="list-style-type: none"> <li><b>a. Complete and up to date procedures covering the implementation of all the elements in these requirements;</b></li> <li><b>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.</b></li> </ul> <p>The Mill has had SOP of RSPO Sustainability for Mill Manual No MNL/6.1/3 Revision 03 dated 12 April 2018, that refers to RSPO SCCS System and Standart of 2014, revised June 2017. The procedure has covers all aspects in SCCS MB model, such as identification and traceability of RSPO certified and uncertified source and products. This procedures also mentioned that security, weight bridge clerk, grader, dispatch/kernel officer, production clerk, and etc as critical control point PIC.</p> <p>Based on field observation on Mill, acquired information that PIC for SSCS implementation (for examples weight bridge operators, security, and Head of Administration) that training and refreshment (awareness) of supply chain management system were carried out annually. FFB from certified and uncertified areas were received and verified by software program of weighbridge to classified and separate RSPO certified and uncertified source.</p>
	<b>Status: Comply</b>
<b>E.3.2</b>	<p><b>The site shall have documented procedures for receiving and processing certified and non-certified FFBs</b></p> <p>The Mill has had SOP of RSPO Sustainability for Mill Manual No MNL/6.1/3 Revision 03 dated 12 April 2018, that refers to RSPO SCCS System and Standart of 2014, revised June 2017. The procedure describes to guarantee the products produced by the mill can be traced to its source and certainly comes from certified sources or uncertified sources. The procedure also explains the related officers and the responsibility in the implementation of the requirements.</p> <p>Based on field observation on Mill, acquired information that PIC for SSCS implementation (for examples weight bridge operators, security, and Head of Administration) that training and refreshment (awareness) of supply chain management system were carried out annually. FFB from certified and uncertified areas were received and verified by software program of weighbridge to classified and separate RSPO certified and uncertified source.</p>
	<b>Status: Comply</b>


**CPO production and Dispatch**

Period	CPO Production (MT)			CSPO Dispatch (MT)			
	CSPO	Non Cert CPO	Total	RSPO	Other Scheme (ISCC)	As Non Cert	Total CSPO Dispatch
November 2018 to October 2019	40,574.74	18,152.99	58,727.73	38,602.84	-	-	38,602.84

**PK production and dispatch**

Period	PK Production (MT)			CSPK Dispatch (MT)			
	CSPK	Non Cert PK	Total	RSPO	Other Scheme (ISCC)	As Non Cert	Total CSPK Dispatch
November 2018 to October 2019	9,848.82	4,789.15	14,637.97	9,284.39	-	-	9,284.39

**Status: Comply**

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

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

### 3.4. Summary of RSPO Partial Certification.

Compliance of the uncertified management units of MP Evans Group PLC 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.

MP Evans Group PLC Time Bound Plan (TBP) is explained in table 1.10. MP Evans Group PLC has sixteen (17) management units with three (3) mills. MP Evans Group PLC has informed the TBP progress, MUTU has considered that MP Evans Group PLC is complied with the RSPO requirement for TBP. The Time Bound Plan was revised and declared by MP Evans Group PLC on May 2019.

MUTU has verified partial certification for un-certified unit's subsidiary of MP Evans Group PLC based on their Time Bound Plan. There are one (1) uncertified mills and six (7) uncertified estates of MP Evans Group PLC. 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 MP Evans Group PLC</p> <p><i>Auditor verification</i> Based on the document review, there is a company internal audit that was conducted on February 2019 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"> <li>• Primary forest.</li> <li>• Any area identified as containing High Conservation Values (HCVs).</li> <li>• Any area required to maintain or enhance HCVs in accordance with RSPO criterion 7.3.</li> </ul>	<ul style="list-style-type: none"> <li>- <b>PT. Simpang Kiri Plantation Indonesia.</b> RACP is not applied for this unit because the last land clearing was conducted before November 2005. The unit does not have mill.</li> <li>- <b>PT. Evans Lestari (PT.EL)</b> has conducted HCV and SIA identification by Forestry Faculty of Institute Pertanian Bogor (IPB) on March 2013 led by Dr. Ir. Jarwadi Budi Hernowo Msc. Before land clearing, therefore the unit has no liability related to RACP. PT Evans Lestari also conducted NPP on 17 December 2013 conducted by Certification Body of Control Union.</li> </ul> <p><i>Auditor verification</i> Based on internal audit results and evidence provided (communication to RSPO on liability disclosure) the</p>

		<p>three uncertified units of:</p> <p><b>PT Simpang Kiri Plantation Indonesia:</b> Last land clearing happened before November 2005 and there is no new land clearing of new planting.</p> <p><b>PT Evans Lestari</b> Land clearing was conducted after November 2005 but has been first conducted HCV identification before land clearing. Liability of disclosure has been sent to RSPO Compensation Team on 23 July 2014.</p>
2.1.3	Any new plantings since January 1 <sup>st</sup> 2010 must comply with the RSPO New Plantings Procedure.	<p>New planting/land clearing after 1<sup>st</sup> January 2010.</p> <p><i>Auditor verification</i> Based on internal audit, documented time of land clearing and liability disclosure sent to RSPO, there is new planting/land clearing after 1<sup>st</sup> January 2010 for PT Gunung Pelawan Lestari and PT Evans Lestari but NPP has been conducted for these units. Evidence of submission to RSPO is provided and the NPP notification are at RSPO website.</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>There is no land conflicts.</p> <p><i>Auditor verification</i> 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> 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 1<sup>st</sup> surveillance audit of the PT PMM.</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> Land legal process is still going on and there is a detail update progress documented by the company for each year.</p> <p><b>Update legal for PT Evans Lestari:</b> the company has got plantation business permit (IUP) from Bupati Decree of Musi Rawas No. 891/KPTS/Disbun/2012 dated 12 November 2012 for 20,000 ha. It is in</p>

		accordance with the scale of the company location permit (Decree of Bupati Musi Rawas No. 578/KPTS/BPM=PTP/2012 dated 30 October 2012 for 20,000 ha). However the location permit has been expired – need further HGU process information or any other legal process.
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### 3.5 Identification of Findings, Corrective Action, Observations, Opportunity for Improvement and Noteworthy Positive Components.

#### 3.5.1 Identification of Findings, Corrective Actions and Observations at ASA 1

<i>NCR No.</i>	: 2018.01	<i>Issued by</i>	: Sofyan Hadi Lubis
<i>Date Issued</i>	: 26 October 2018	<i>Time Limit</i>	: ASA-2
<i>NC Grade</i>	: Minor	<i>Date of Closing</i>	: 14 November 2019
<i>Standard Ref. &amp; Requirement</i>	4.4.3 Records of plant wastewater monitoring must be available, especially BOD (Biochemical Oxygen Demand) and efforts to meet requirements according to applicable regulations (see criteria 2.1 and 5.6).		
<b>Evidence observed (filled by auditor):</b> a. The company has shown the results of analysis of the quality of factory wastewater used in land / land assessment land applications for the period January 2017 to September 2018. From the results of the analysis it is known that there is a BOD5 parameter that exceeds the Quality Standards set by the government, such as in February 2017 (6890 mg / l), May 2017 (8900 mg / l), June 2017 (7900 mg / l), July 2017 (8950 mg / l), November 2017 (20400 mg / l), February 2018 (9077 mg / l), March 2018 (44467 mg / l), and September 2018 (77760 mg / l). b. The company has shown a permit to assess the use of palm oil industrial wastewater on the land of oil palm plantations (permission to study land application), No. 660 / 335.3 / DINLH / VIII / 2017 which was set on July 31, 2017. The company has also shown the proposed plan and land application assessment map. The study area is ± 40 Ha which is in blocks F41 and G40. Based on field visits it is known that there are applications of liquid waste in blocks F42 and F43 Tengkalat Estate.			
<b>Non-Conformance Description (filled by auditor):</b> a. Based on the evidence that has been observed, the company has not been able to show evidence of the planned reduction in BOD5 that has been implemented in accordance with the Quality Standards set by the government. b. Based on the evidence that has been observed, it is known that the company has carried out the application of factory wastewater not on the blocks permitted by the related agency.			
<b>Root Cause Analysis (filled by organization audited):</b> a) No available evidence of monitoring results water testing for Land Application. b) On audit ASA-1, a study on Land Application has not been ratified, so the 2 blocks land application has been included in the LA study.			
<b>Correction Action (filled by organization audited):</b> a) Monitoring of Land Application water quality testing for BOD and pH parameter accordance threshold b) Arrangement of Permit for Utilization of POME to land application to Environmental Agency.			
<b>Corrective Action (filled by organization audited):</b>  Regularly water testing monitoring for land application.			
<b>Assessor Evaluation and Conclusion (filled by auditor) :</b>  <b>Verifkacation November 14 2019.</b> The company shown evidence consist of:			

- POME testing conducted by a laboratory accredited for the period July - September 2019 and the result still in accordance with KepMenLH No. 28 of 2003.
- The company has a Land application permit based on decision Integrated Licensing Service, Bangka Regency number: 188.4 / 01 / IPAL / DINPMP2KUKM / IV.2019 April 1, 2019 valid for 5 years.

Based on field visit on Block G40 block Tengkalat Estate, be found company has fulfilled the requirements stated on Land Application permit. The application is carried out in accordance with the location stated on permit and there are monitoring wells in G41 land control, G40 land study (lower & upper slopes).

Based on the evidence submitted on ASA-2 audit Non-Conformity No.2018.01 has been comply.

Verified by : **Radytio Puspanjana**

<i>NCR No.</i>	: <b>2018.02</b>	<i>Issued by</i>	: <b>Trismadi N</b>
<i>Date Issued</i>	: <b>26 October 2018</b>	<i>Time Limit</i>	: <b>Next Surveillance</b>
<i>NC Grade</i>	: <b>Minor</b>	<i>Date of Closing</i>	: <b>14 November 2019</b>
<i>Standard Ref. &amp; Requirement</i>	: <b>4.7.6 All workers must be provided with medical services and be covered by work accident insurance (See 6.5.3).</b>		

**Evidence observed (filled by auditor):**

The company has cooperation with several contractors, including:

1. CV Al Barokah Jaya (transporting employees at GME & CME)
2. CV Hastungkoro (transport employees at GME & CME)
3. Silip Lestari Oil Palm Cooperative (transporting FFB, transporting school children, renting a car)
4. CV Naiza Mulia (transporting GME employees, and transporting school children)
5. Expanding CV Umbrella (transporting FFB / loose fruit & compost transport)
6. PT Harapan Nusa Mandiri (Land Clearing)
7. CV Karya Putra Bangka (Repair of roads and ditches)
8. PT Wana Ekabina Manunggal (CPO Transport)
9. CV Pilar Tangguh Persada

The company shows proof of BPJS Employment payment for contractor employees as follows:

1. Proof of BPJS Employment of PT Mitra Karya Jaya Perdana (replanting) in October 2018 with a total of 12 people.
2. Proof of payment for CV Karya Putra Bangka Health BPJS in October 2018 on October 8, 2018.
3. Proof of payment of BPJS Employment CV Pilar Tangguh Persada in October 2018 on October 24, 2018.
4. Proof of payment of BPJS Health of PT Harapan Nusa Mandiri in October 2018 on October 8, 2018.
5. Proof of BPJS Employment of PT Wana Ekabina Manunggal in October 2018 on October 1, 2018.
6. Proof of payment of PT Wana Ekabina Manunggal Health BPJS in October 2018 on October 11, 2018.

Whereas other contractors have not been shown proof of BPJS payments, including:

1. Proof of payment for BPJS Employment and Health a.n. CV Al Barokah Jaya.
2. Proof of BPJS Employment and Health payments a.n. CV Hastungkoro.
3. Proof of payment for BPJS Employment and Health a.n. Silip Lestari Palm Oil Cooperative.
4. Proof of BPJS Employment and Health payments a.n. CV Naiza Mulia.
5. Proof of payment of BPJS Employment a.n. Karya Bangka Putra.
6. Proof of payment of BPJS Kesehatan a.n. CV Pilar Tangguh Persada.
7. Proof of payment of BPJS Employment PT Harapan Nusa Mandiri.

**Non-Conformance Description (filled by auditor):**

The company has not been able to show a system to ensure that all workers (contractors) have been provided with health

services and are protected by accident insurance.

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

There is no evaluation mechanism for the contractor related to fulfilling the agreement stated in the SPK (Work Agreement Letter) for labor protection

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

Selecting and evaluating vendors that are carried out by the operational manager in the contractor's evaluation and recommendation form to include the insurance/BPJS documents from the vendor before the contract is signed by both parties.

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

Monitor the completeness of contractor obligations for the completeness of employment and health insurance to contractor workers.

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

**Verification November 14, 2019**

The company has shown evidence of improvements including:

1. Circular Number: 001 / SM-GPL / I / 2019 which was endorsed by the Senior Manager on January 7, 2019 regarding the Use of Health Facilities to all Estate, Mill and Contractor employees. The policy contains, among others :
  - a) The company provides health facilities (polyclinics) at Tengkalat Estate and for permanent employees of estate and mill which are equipped with health insurance facilities.
  - b) Every farm employee, factory including contractor can use the health facility (polyclinic) in Tengkalat free of charge
  - c) Polyclinic officers are required to record and monitor the number of plantation employees, mill and contractors for each treatment carried out
  - d) In the event of further treatment related to the referral, the health officer must inform the Manager in the area of the Estate, mill and the Contractor working
2. Evaluation Form dated 31 December 2018 for Sawit Silip Lestari Cooperative, CV Naiza Mulia, CV Putra Bangka, PT Mitra Karya Jaya Perdana, PT Wana Ekabina Manunggal and PT Harapan Nusa Mandiri with evaluation coverage on the quality and performance of the contractor, punctuality work completion, Employment Insurance, OHS Implementation Compliance, Housekeeping and health insurance. Related to this assessment score is 14 with an evaluation recommendation that is not recommended to work again.
3. BPJS Employment Payment receipts from CV Pilar Tanggada Persada with receipts 919110807732679, 919110807732594, 919110807732435 and 919110807732272 with BPJS payments dated November 7, 2019.
4. Certificate of Participation Number 190000000855079 for CV Neiza Mulia.
5. Proof of payment for BPJSTK e payment with contribution code 191102913759

Based on the results of verification of documents, field visits and evidence of corrections, the non-conformity No. 2018.02 was declared fulfilled.

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

**3.5.2 Identification of Findings, Corrective Actions and Observations ASA-2**

NCR No.	: 2019.01.	Issued by	: Radytio Puspanjana
Date Issued	: 15 November 2019	Time Limit	: ASA-3
NC Grade	: Minor	Date of Closing	: 12 December 2019
Standard Ref. & Requirement	4.6.10 Proper disposal of waste material, according to procedures that are fully understood by workers and managers shall be demonstrated (see Criterion 5.3).		
Evidence observed (filled by auditor): <ul style="list-style-type: none"><li>- SOP for Hazardous waste management with No. GPL / SOP / K3-11 revision 01 April 27, 2015, which explains the hazardous waste management procedures that the hazardous waste placed on hazardous waste storage.</li><li>- Based on field observations, there are used pesticide container in form of racumin, starane and rollup placed on block L18, Cemara Estate.</li><li>- Based on field observations, there are used PPE pesticide applicator former (aprons) placed on block L18, Cemara estate.</li></ul>			
Non-Conformance Description (filled by auditor): <p>The company has not been able to demonstrate the implementation of Hazardous waste management in accordance with procedures owned (GPL / SOP / K3-11 revision 01 dated 27 April 2015) and government regulation number 101 year 2014 concerning hazardous waste management.</p>			
Root Cause Analysis (filled by organization audited): <p>In the SOP of Hazardous Waste Management (No. GPL / SOP / K3-11 revision 01 on 27th April 2015) has not yet explained the PIC Responsible for hazardous waste management in Cemara Estate.</p>			
Correction (filled by organization audited): <p>The company will issue a letter of appointment of person in charge of hazardous waste management in each estate.</p>			
Corrective Action (filled by organization audited): <ol style="list-style-type: none"><li>1. Will conduct refreshment training for all worker every three months.</li><li>2. Will conduct evaluation of refreshment training effectiveness that has been conducted.</li></ol>			
Assessor Evaluation and Conclusion (filled by auditor):			
Auditor verification 11 December 2019 <p>The company shown evidence to compliance consist of :</p> <ul style="list-style-type: none"><li>- Documentation (photo) of transporting hazardous waste namely used pesticide container i.e. racumin, starane and rollup on Block L18, Cemara Estate to hazardous waste storage.</li><li>- Documentation (photo) of transporting hazardous waste namely used / torn apron pesticide applicator on Block L18, Cemara Estate to hazardous waste storage.</li><li>- Documentation (photo) of transporting hazardous waste namely used pesticide container i.e. racumin, starane and rollup from Cemara Estate to hazardous waste storage licensed on division 4 Gelam Estate.</li><li>- Minutes of hazardous waste transporting November 12,2019 from Block L18 to hazardous waste storage consist of:<ul style="list-style-type: none"><li>• Used pesticide container namely garlon 1 pcs.</li><li>• Used pesticide container namely roll up 1 pcs.</li></ul></li></ul>			

- Used pesticide container namely racumin 5 pcs.
- Used pesticide container namely starane 2 pcs.
- Used apron pesticide applicator 1 pcs.
- Log book hazardous waste Gelam Estate update November 2019.
- Minutes of hazardous waste transported November 16 ,2019 by PT Vaten Cahaya Anugrah (licensed transporting) from hazardous waste storage Gelam Estate consist of:
  - Used lubricant 396 liter
  - Used oil filter 43.6 kg
  - Used pesticide container 225.8 kg
  - Used rag 1.4 kg
  - Used paint cans 8.8 kg
  - Used lamp 1.6 kg
- List attendance of hazardous waste transported November 16, 2019 by PT Vaten Cahaya Anugrah and estate representative officer.

**Verification dated 12 December 2019**

The company shows evidence of compliance consisting of :

- Decree of Cemara Estate Manager (No. 1/EM/CME/SK-SC/XI/2019 dated 18 November 2019) regarding the PIC appointment of environmental, that explains related:
  - Waste, pollution and emissions management
  - Supervision of the implementation of domestic water management activities for employee activities.
  - Oversee all hazardous waste management activities in the unit.
  - Ensure the availability of relevant environmental and licensing documents.
- Minutes of the dissemination of hazardous waste management on 10 August 2019 explaining the management of hazardous waste to fertilizer workers, applicator pesticides and workshops (attached documentary evidence in the form of photos and absences).
- Trainings of hazardous waste and MSDS waste management on 4th December 2019 which are located in day care centers, there is a attendance list of as many as 82 workers consisting of fertilizer workers, applicator pesticides and workshops. (attached documentary evidence in the form of photographs).
- Training evaluation recap of 4 December 2019 of 82 employees who have participated in the dissemination with the information that they have passed the training.
- Recapitulation of the Cemara Estate Training on 4 December 2019 to 82 employees who had participated in the socialization and training on B3 waste management.

**Based on the evidence of the improvements shown, it was concluded that Non-Conformity No.2019.01 was declared complied.**

<b>Verified by</b>	<b>:</b>	<b>Radytio Puspanjana</b>
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### 3.5.3 Opportunity for Improvement

No	Ref.	Description
1	4.6.6	Evaluation monitor the storage of pesticide stocks in warehouses
2	4.7.2	Opportunities in HIRAC evaluation related to the monitoring work of Tyto alba
3	4.7.3	Monitoring of the usage and replacement of broken PPE.

### 1.5.4 Noteworthy Positive Components

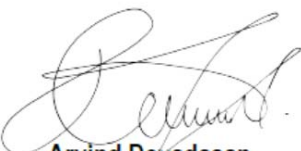

No	Description
1	Have competent human resources to implement the principles of sustainable palm oil development.
2	Has received an Award Charter from the Central Statistics Agency related to providing quality industrial statistics.
3	Award from the Ministry of Environment and Forestry (predicate - <b>Blue PROPER</b> , period 2017 - 2018).
4	Management POME for biogas plant & EFB composting.
5	Minimize consumption of plastic packaging water to reduce plastic waste

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

Public Issues	Auditor Verification
<b>Environment Agency of Bangka Regency</b>  <p>There are no negative issues related to environmental pollution. The company has fulfilled obligations related to environmental licensing (AMDAL, Hazardous Waste Storage permit, Land Application permit), as well as mandatory reporting.</p>	<p>There are no negative issues that need to be verified. The company has fulfilled environmental obligations such as licensing and mandatory reporting that have been described in related indicators.</p>
<b>Plantation Agency of Bangka Regency</b>  <p>The management of PT GPL is transparent to outsiders, so that communication and information distribution can be established properly. The relationship between the Company and the Department is well established, reporting related to the development of PT GPL's plantation business is always routinely submitted every 6 months. PT GPL has implemented a partnership in the form of KKPA. The plantation agency has received a report on plantation business activities. Already have an assessment of plantation with Class II.</p>	<ul style="list-style-type: none"> <li>• The company has had all plantation permit and has been complied all obligation reports. It refer to indicator 1.1.1.</li> <li>• According to field observation, there are no environment pollution from estate and mill operational.</li> <li>• Company has realized the assistance to local communities based on needs of society that explained in the criteria 6.11</li> </ul>
<b>Labor Agency of Bangka Agency</b>  <p>Wages refer to the Decree of the Governor of Bangka Belitung, Number 188.44 / 831 / DISNAKER / 2018 dated October 31, 2018 concerning the Determination of the Minimum Wage in 2019. The company has applied the employee basic wages in accordance with the Bangka Regency minimum wage. There are no employment issues in the company, for example related to the use of child labor, the issue of employee harassment, or the existence of discrimination.</p> <p>There is a labor union at the company. Labor unions have been registered at the labor agency. In addition, it was stated that all reports related to employment had been recorded in the compulsory employment report.</p>	<ul style="list-style-type: none"> <li>• All obligation report by company has been verified by auditor team as written on indicator 1.1.1.</li> <li>• Auditor has verified related to employment and has been described in the criteria 6.5</li> </ul>
<b>Silip Village (Village Head and Community Figure)</b>  <p>There are no negative issues, land dispute issues or environmental pollution. The land compensation process has been carried out by involving various parties such as the village head and related elements. The company has made efforts to develop the surrounding community through CSR programs, recruitment of local workers. local contractors, the creation of plasma plantations and so on.</p>	<p>Based on verification on related Indicators: Indicator 2.2.3 to 2.2.6 and 2.3.1 to 2.3.3 does not indicate a conflict between the company and the surrounding community.</p> <p>Indicator 6.3.1 &amp; 6.3.2, there are no significant complaints from the other parties</p>

Public Issues	Auditor Verification
<p>So far the relationship between the company and the community was well and harmoniously. Communication between the company and the village went well enough.</p>	<p>Indicator 6.11.1 &amp; 6.11.2, the company has implemented/provided assistance to the surrounding community.</p>
<p><b>Sawit Lestari Cooperative.</b> <b>(Head of the Cooperative)</b></p> <p>Cooperative Established in May 2015. Activities of Cooperative Members' Meetings are carried out routinely annually and carry out the Annual Meeting for Fiscal Year 2018 on January 7, 2019. Employee cooperative activities include 6 convenience stores scattered throughout PT GPL's.</p> <p>The number of members in October 2019 was 1959 members consisting of PT GPL employees. Compulsory contributions are IDR 10,000 / month while the basic savings are IDR 50,000. The company provides support for building that are used as cooperative shops.</p>	<p>Auditor has verified related to employment and has been described in the criteria 6.5</p>
<p><b>Plasma Mandiri and Plasma Silip Lestari Cooperative</b></p> <p>The company has collaborated with the community in the development of plasma plantations under the KKPA scheme. Distribution of land under the 60: 40 system has now entered production period and the farmers are still in the stage of paying off credit.</p> <p>The price of FFB uses the price determination from Plantation Agency. The farmers can find out the price easily. FFB payments from the company are paid via bank transfer once a month.</p> <p>The number of Mapur Mandiri plasma members is 466 people, while the number of Silip Lestari members is 227 people.</p> <p>Communication between the company and the cooperative's management went well. In addition, the cooperative management understands PIC related to corporate communication.</p>	<p>Indicator 6.10 the company has implemented/provided assistance to the surrounding community.</p>
<p><b>Employee Cooperative</b></p> <p>The company has supported cooperatives in the form of providing facilities such as buildings for cooperative activities. The cooperative actively holds member meetings every year. There has been no change to the Articles of Association of the cooperative. The number of</p>	<p>The company has facilitated the establishment of cooperative employees thus simplifying the daily activities especially for drinking water needs at more affordable prices.</p>

Public Issues	Auditor Verification
cooperative members was 1959 as of October 2019 and consisted of plantation and factory employees.	
<b>Labor Union</b>  Trade union members consist of PT GPL employees. There are rules regarding the minimum age of workers in the company (18 years). There are no underage PT GPL employees. The company does not discriminate in terms of recruitment. The company provides PPE for its workers. Regularly hold meetings both internal SPSI itself and with company representatives.	Has been described in 4.7.3; 6.5 and 6.6
<b>Gender Committee</b>  There are no issues related to sexual harassment. Gender committee activities include the provision of religious events, integrated service posts and sports. There are no issues related to gender discrimination. Outreach activities include notices regarding sanitation and hygiene. The Gender Committee holds member meetings every 4 months.	Every problem concerning sexual harassment have been recorded in the book of complaints and the informant identity kept secret by the company.
<b>Local contractor</b> <b>CV Hastungkoro – FFB Transporter.</b> <ul style="list-style-type: none"> <li>• Cooperation with companies began in 2009</li> <li>• There is a letter of agreement with the company and valid for 1 year and will be renewed if the company still uses the services of the contractor. The company evaluates contractors every year and if the assessment results are good the SPK will be updated.</li> <li>• If there is a price change in the contract between the contractor and the company addendum to the applicable contract.</li> <li>• There are information on costs, rights and obligations, type of work, time period, and others</li> <li>• Payments from companies are made every 25th of the month.</li> <li>• Payments are made on time and according to agreed wages / costs.</li> <li>• Contractor workers are equipped with PPE and must be used at work.</li> </ul>	<ul style="list-style-type: none"> <li>• Certificate holder has establishing several business relationship with villagers especially in surrounding village. (verified in criteria 1,3 ; 6.2 ; 6.3 ; 6.4 ; 6.10)</li> </ul>

4.0	CERTIFIED ORGANISATION'S ACKNOWLEDGEMENT OF INTERNAL RESPONSIBILITY
4.1	<p><b>Formal Sign-off of Assessment Findings</b></p> <p>Hereunder sign by management representative from inspected company to acknowledge a field assessment and agree for all content explained in this assessment report, included of non-compliance findings.</p> <p>Signed on behalf of:</p> <div style="display: flex; justify-content: space-around; align-items: flex-end;"> <div style="text-align: center;"> <p>PT Gunung Pelawan Lestari Management Representative</p>  <p><b>Arvind Devadasan</b> Thursday, 12 December 2019</p> </div> <div style="text-align: center;"> <p>Mutuagung Lestari Lead Auditor</p>  <p><b>Arif Faisal Simatupang</b> Thursday, 12 December 2019</p> </div> </div>

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

No	Institution/NGO/Community	Address	Phone/Email	Form of Communication	Date of Contact	Response	
						Yes	No
1	Plantation Agency of Bangka Regency	Bangka Regency	-	Direct Interview	11 November 2019	✓	
2	Environment Agency of Bangka Regency	Bangka Regency	-	Direct Interview	11 November 2019	✓	
3	Labor Agency of Bangka Regency	Bangka Regency	-	Direct Interview	11 November 2019	✓	
4	Land Agency of Bangka Regency	Bangka Regency	-	Direct Interview	11 November 2019		✓
5	Head of Silip Village	Bangka Regency	-	Direct Interview	12 November 2019	✓	
6	Head of Mapur Village	Bangka Regency	-	Direct Interview	12 November 2019		✓
7	Mapur Mandiri Cooperative	Bangka Regency	-	Direct Interview	12 November 2019	✓	
8	Silip Lestari Cooperative	Bangka Regency	-	Direct Interview	12 November 2019	✓	
9	Sawit Watch	Jakarta	<a href="mailto:info@sawitwatch.or.id">info@sawitwatch.or.id</a>	Questionnaire by Email	04 November 2019		✓
10	WALHI	Jakarta	<a href="mailto:info@walhi.or.id">info@walhi.or.id</a>	Questionnaire by Email	04 November 2019		✓
11	WWF	Jakarta	<a href="mailto:supporter-service@wwf.or.id">supporter-service@wwf.or.id</a>	Questionnaire by Email	04 November 2019		✓
12	AMAN	Pekanbaru	<a href="mailto:rumahaman@cbn.net.id">rumahaman@cbn.net.id</a>	Questionnaire by Email	04 November 2019		✓
13	<b>Tengkalat POM</b> <ul style="list-style-type: none"> <li>• Grading : 3 Operator</li> <li>• Sterilizer : 1 Operator</li> <li>• Kernel Station : 4 Operator</li> <li>• Engine Room Station : 1 Operator</li> <li>• Boiler Station : 1 Operator</li> <li>• 1 WWTP operator</li> <li>• 2 biogas operator</li> <li>• 2 security</li> <li>• 2 weighbridge operator</li> </ul>	PT Gunung Pelawan Lestari	-	Field Observation and Direct Interview	11 November 2019	✓	
14	<b>Cemara Estate</b> <ul style="list-style-type: none"> <li>• 1 residents of housing</li> <li>• 2 warehouse worker</li> <li>• 1 worker of hazardous temporary warehouse</li> <li>• 2 mechanic at workshop</li> <li>• 2 Daycare worker</li> <li>• 3 Equipment firefighters</li> <li>• 1 PIC of HGU monitoring</li> <li>• 1 PIC of HCV monitoring.</li> <li>• Harvesting 2, loss fruit collector 2.</li> <li>• Manual selectif weeding 5</li> <li>• Manuring</li> </ul>	PT Gunung Pelawan Lestari	-	Field observation and direct interview	12 November 2019	✓	
15	<b>Gelam Estate</b> <ul style="list-style-type: none"> <li>• 1 residents of housing</li> </ul>	PT Gunung Pelawan Lestari	-	Field observation and direct interview	13 November 2019	✓	

	<ul style="list-style-type: none"> <li>• 2 warehouse worker</li> <li>• 1 worker of hazardous temporary warehouse</li> <li>• 2 mechanic at workshop</li> <li>• 3 Equipment firefighters</li> <li>• Harvesting 4,</li> <li>• Loss fruit collector 4</li> <li>• Spraying 5 Manuring 6.</li> <li>• 1 PIC of HGU monitoring</li> </ul>						
16	<b>Tengkalat Estate</b> <ul style="list-style-type: none"> <li>• 2 residents of housing</li> <li>• 2 warehouse worker</li> <li>• 1 worker of hazardous temporary warehouse</li> <li>• 3 mechanic at workshop</li> <li>• 4 Equipment firefighters</li> <li>• Harvesting 4, Loss fruit collector 4 Spraying 5.</li> </ul>	PT Gunung Pelawan Lestari	-	Field observation and direct interview	14 November 2019	✓	
17	<b>Gunung Pelawan Estate</b> <ul style="list-style-type: none"> <li>• Harvesting 4 People</li> <li>• Transport 3 People</li> <li>• Chemical spraying 5 people.</li> <li>• Fertilizer 4 people</li> <li>• workshop : 1 workers</li> <li>• housing : 3 residence</li> </ul>	PT Gunung Pelawan Estate		Field Observation and Direct Interview	14 November 2019	✓	

**Appendix 2. Assessment Program**

DATE	11 November – 16 November 2019	
PROGRAM	PROCESSES / CLAUSES TO BE AUDITED	PIC
<b>Monday, 11 November 2019</b>		
06.00 – 08.00 08.00 – finish 08.00 – 12.00	<b>Flight Jakarta → Pangkal Pinang</b> <b>Public Consultation to Agencies in Bangka Regency</b> <b>Traveling Pangkal Pinang → PT Gunung Pelawan Lestari</b>	<b>All Auditor</b> <b>Satria, Rio</b> <b>Faisal, Yohanes, Tio</b>
12.00 – 14.00	<b>Break</b>	<b>All Auditor</b>
14.00 – 14.30	<b>Opening Meeting at Tengkalat POM</b> <ul style="list-style-type: none"> <li>Auditee Speech (Introduction of PIC, Profile of Certified Management Unit)</li> <li>Auditor Team Speech (Introduction, Audit Objective, Audit Scope, Audit Plan Discussion, Determine of Audit Sample, Transparency and Confidentiality Clarification)</li> </ul>	<b>Management Unit</b> <b>Faisal, Yohanes, Tio</b> <b>Management Unit</b>
14.30 – 17.00	<b>Field Observation of Tengkalat POM and consultation with internal stakeholder in the field (Gender Committee, Worker's Union, Worker's Cooperative)</b> <ul style="list-style-type: none"> <li>Observation of Supply Chain (FFB Receiving, Weighbridge)</li> <li>Observation of FFB grading, Processing Activity, Despatch CPO) Observation of Chemical Storage, Hazardous Waste Storage, Fire Control Simulation</li> <li>Observation of WWTP, WTP, LA, EBA</li> </ul>	<b>Faisal</b> <b>Yohanes</b>  <b>Tio</b>
<b>Tuesday, 12 November 2019</b>		
08.00 – 12.00	<b>Stakeholder consultation to affected communities surrounding the plantations and previous land owner</b>  <b>Field Observation of Cemara Estate and consultation with internal stakeholder in the field (Gender Committee, Worker's Union, Worker's Cooperative)</b> <ul style="list-style-type: none"> <li>Observation of HGU poles, and land demarcation.</li> <li>Observation of Agronomy Aspect (Harvesting &amp; Transportation, Manuring, Pesticides Application, Road Maintenance, IPM, EFB Application)</li> <li>Observation of Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management)</li> <li>Observation of Workers Facilities (Housing, School, Worship Place)</li> <li>Observation of HCV area.</li> </ul>	<b>Satria</b>   <b>Faisal</b> <b>Yohanes</b>  <b>Tio</b>  <b>Tio</b> <b>Yohanes</b>
12.00 – 14.00	<b>Break</b>	<b>All Auditor</b>
14.00 – 17.00	<b>Stakeholder consultation of Local Contractors / FFB suppliers</b>  <b>Continue internal stakeholder consultation if necessary (Gender Committee, Worker's Union, Worker's Cooperative)</b>  <b>Document review</b>	<b>All Auditor</b>  <b>All Auditor</b>  <b>All Auditor</b>
<b>Wednesday, 13 November 2019</b>		
08.00 – 12.00	<b>Field Observation of Gelam Estate and consultation with internal stakeholder in the field (Gender Committee, Worker's Union, Worker's Cooperative)</b>	

	<ul style="list-style-type: none"> <li>• Observation of HGU poles, and land demarcation</li> <li>• Observation of Agronomy Aspect (Harvesting &amp; Transportation, Manuring, Pesticides Application, Road Maintenance, IPM, EFB Application) //</li> <li>• Observation of Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management).</li> <li>• Observation of Workers Facilities (Housing, School, Worship Place). Observation of HCV area</li> </ul>	<b>Faisal</b> <b>Yohanes</b>  <b>Satria</b>  <b>Tio</b>
12.00 – 14.00	<b>Break</b>	<b>All Auditor</b>
14.00 – 17.00	<b>Continue internal stakeholder consultation if necessary (Gender Committee, Worker's Union, Worker's Cooperative)</b>  <b>Document review</b>	<b>All Auditor</b>   <b>All Auditor</b>
<b>Thursday, 14 November 2019</b>		
08.00 – 12.00	<b>Field Observation of Tengkalat Estate and consultation with internal stakeholder in the field (Gender Committee, Worker's Union, Worker's Cooperative)</b> <ul style="list-style-type: none"> <li>• Observation of HGU poles, and land demarcation.</li> <li>• Observation of Agronomy Aspect (Harvesting &amp; Transportation, Manuring, Pesticides Application, Road Maintenance, IPM, EFB Application)</li> <li>• Observation of Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management)</li> <li>• Observation of Workers Facilities (Housing, School, Worship Place).</li> <li>• Observation of HCV area.</li> </ul> <b>Field Observation of Gunung Pelawan Estate and consultation with internal stakeholder in the field (Gender Committee, Worker's Union, Worker's Cooperative)</b> <ul style="list-style-type: none"> <li>• Observation of HGU poles, and land demarcation.</li> <li>• Observation of Agronomy Aspect (Harvesting &amp; Transportation, Manuring, Pesticides Application, Road Maintenance, IPM, EFB Application)</li> <li>• Observation of Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management)</li> <li>• Observation of Workers Facilities (Housing, School, Worship Place)</li> <li>• Observation of HCV area.</li> </ul>	<b>All Auditor</b>  <b>Faisal</b> <b>Faisal</b>  <b>Yohanes</b>  <b>Yohanes</b>   <b>Tio</b>  <b>Satria</b>  <b>Tio</b> <b>Tio</b> <b>Satria</b>
12.00 – 14.00	<b>Break</b>	<b>All Auditor</b>
14.00 – 17.00	<b>Continue internal stakeholder consultation if necessary (Gender Committee, Worker's Union, Worker's Cooperative)</b>  <b>Document review</b>	<b>All Auditor</b>
<b>Friday, 15 November 2019</b>		
08.00 – 12.00	<b>Auditor's Internal discussion of closing meeting preparation</b>	<b>All Auditor</b>
08.30	<b>Deadline for submitting of audit documents</b>	<b>Management Unit</b>
12.00 – 14.00	<b>Break</b>	<b>All Auditor</b>
14.30 – 16.30	<b>Closing Meeting</b>	<b>All Auditor</b>

	<ul style="list-style-type: none"> <li>• Presentation of audit findings (Noteworthy Positive Component, Non Conformities, OFI, Timeline of CAR's, Conclusion)</li> <li>• Comments, Responses and Questions</li> </ul>	
<b>Saturday, 16 November 2019</b>		
07.00 – 09.00 10.00 – .....	Traveling PT Gunung Pelawan Lestari → Pangkal Pinang Flight Pangkal Pinang → Jakarta	All Auditor