

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

**[ ✓ ] Re-Certification**

Name of Management Organisation : **POM 4 Subsidiary of PT DHARMA SATYA NUSANTARA Tbk**

Plantation Name : PT Swakarsa Sinarsentosa (Jabdan 1 Estate, Long Jenew 1 Estate and Long Jenew 2 Estate)

Location : Benhes Village, Muara Wahau Sub-District, Kutai Timur District, Kalimantan Timur Province, Indonesia

Certificate Code : **MUTU-RSPO/060**

Date of Certificate Issue : 01 June 2020                      Date of License Issue : 01 June 2020

Date of Certificate Expiry : 31 May 2025                      Date of License Expiry : 31 May 2021

Assessment	Assessment Date	PT. Mutuagung Lestari Auditor	Reviewed By	Approved by
<b>RC</b>	<b>03 to 06 March 2020</b>	Moh Arif Yusni (Lead Auditor), Satria Adi Putra, Radytio Puspanjana	Ganapathy Ramasamy	Ardiansyah

Assessment	Approved by MUTUAGUNG LESTARI on:
<b>RC</b>	<b>28 April 2020</b>

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**TABLE OF CONTENT**

**FIGURE**

Figure 1. Location Map of POM 4 PT Dharma Satya Nusantara 2

Figure 2. Operational Map of POM 4 PT Dharma Satya Nusantara 3

Abbreviations Used 4

**1.0 SCOPE of the CERTIFICATION ASSESSMENT**

1.1 Assessment Standard Used 6

1.2 Organisation Information 6

1.3 Type of Assessment 6

1.4 Location of Mill and Plantations 6

1.5 Description of Area Statement 7

1.6 Planting Year and Cycles 7

1.7 Description of Mill and Supply Base 7

1.8 Estimate Tonnage of Certified Product 8

1.9 Other Certifications 9

1.10 Time-Bound Plan 9

**2.0 ASSESSMENT PROCESS**

2.1 Assessment Team 12

2.2 Assessment Methodology, Assessment Process and Locations of Assessment 12

2.3 Stakeholder Consultation and Stakeholders Contacted 16

2.4 Determining Next Assessment 16

**3.0 ASSESSMENT FINDINGS**

3.1 Summary of Assessment Report of the RSPO Certification 17

3.2 Conformity Checklist of Certificate and Logo Use 60

3.3 Summary of RSPO Partial Certification 61

3.4 Identification of Findings, Corrective Actions, Observations, Opportunity for Improvement and Noteworthy Positive Components 65

3.6 Summary of Arising Issues from Public, Management and Auditor Responses 68

**4.0 CERTIFIED ORGANISATION'S ACKNOWLEDGEMENT OF INTERNAL RESPONSIBILITY**

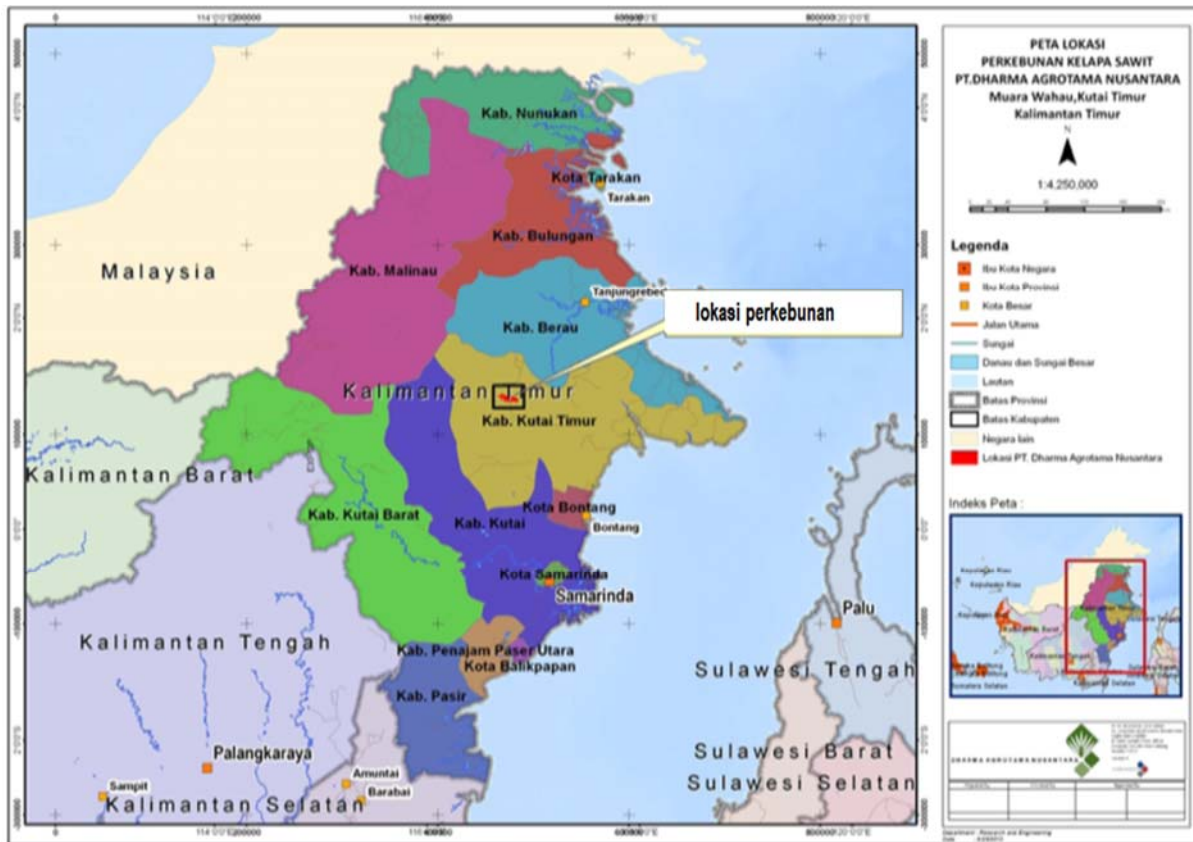
4.1 Formal Signing of Assessment Findings 70

**APPENDICES**

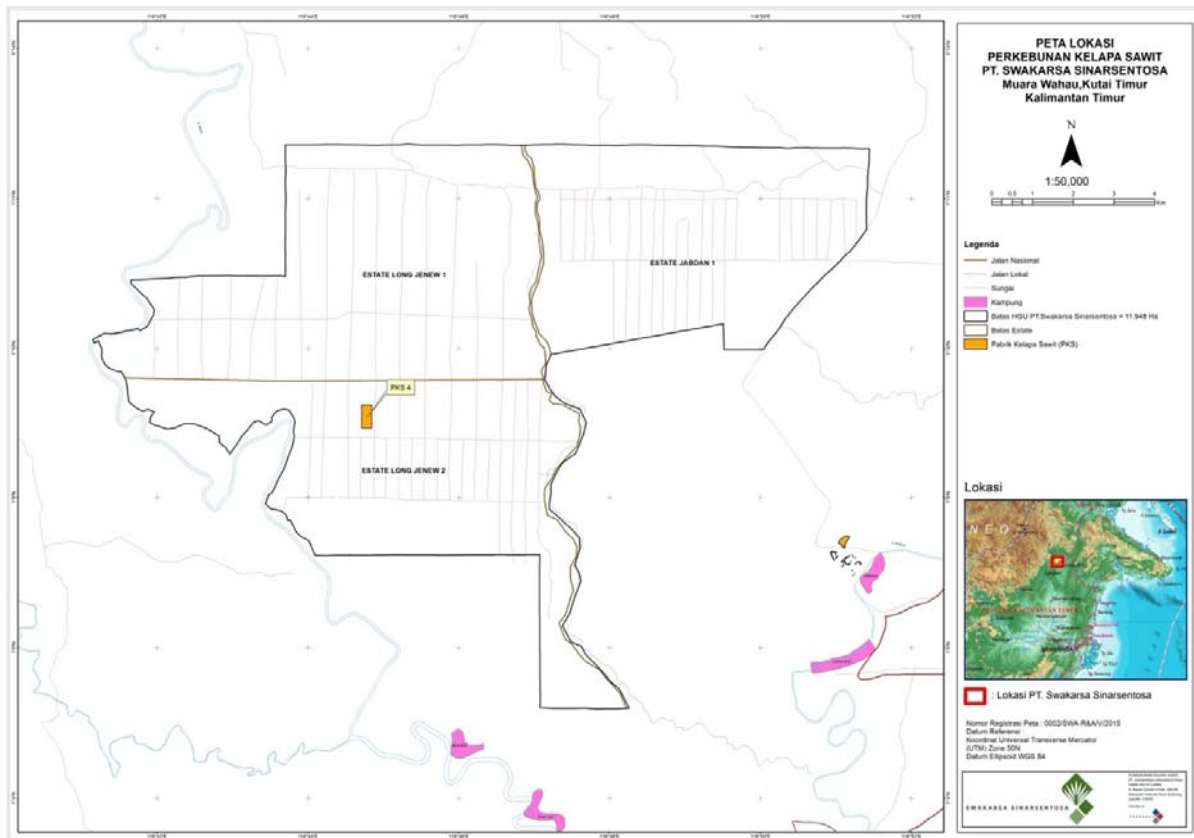
1. List of Stakeholders Contacted in the RSPO Certification Process 71

2. Assessment Program 74

**Figure 1. Location Map of POM 4 – PT Dharma Satya Nusantara, Tbk**



**Figure 2. Operational Map of PT Swakarsa Sinarsentosa**



**Abbreviations Used**

ACOP	:	Annual Communication of Progress
AKAD	:	<i>Angkatan Kerja Antar Daerah</i> (inter-city inter-regional labor)
AMDAL	:	<i>Analisis Mengenai Dampak Lingkungan</i> / Environmental Impact Assessment
APAR	:	<i>Alat pemadam api ringan</i> (Fire Extinguisher)
ASA	:	Annual Surveillance Assessment
BMP	:	Best Management Practices
BOD	:	Biological Oxygen Demand
BPJS	:	<i>Badan Penyelenggara Jaminan Sosial</i> (Workers Social Security Agency)
BPN	:	<i>Badan Pertanahan Nasional</i> / National Land Agency
CB	:	Certification Body
COD	:	Chemical Oxygen Demand
CH	:	Certificate Holder
CPO	:	Crude Palm Oil
CSPK	:	Certified Sustainable Palm Kernel
CSPO	:	Certified Sustainable Palm Oil
CSR	:	Corporate Social Responsibility
DIN	:	Dharma Intisawit Nugraha
DSN	:	Dharma Satya Nusantara
EFB	:	Empty Fruit Bunch
FFB	:	Fresh Fruit Bunch
EIA	:	Environmental Impact Assessment
ETP	:	Effluent treatment Plant
FR	:	Frequency Rate
GHG	:	Green House Gas
HCV	:	High Conservation Value
HGU	:	<i>Hak Guna Usaha</i> /Land Use Permit
HIRAC	:	Hazard Identification Risk Assessment
HRD	:	Human Resources Department
IPM	:	Integrated Pest Management
ISO	:	International Organization for Standarization
ISPO	:	Indonesian Sustainable Palm Oil
JB1	:	Jabdan 1
KCP	:	Kernel Crushing Plant
KSU	:	<i>Koperasi Serba Usaha</i> (Business Multipurpose Cooperative)
KUD	:	<i>Koperasi Unit Desa</i> (Village Cooperative Unit)
KER	:	Kernel Extraction Rate
KM	:	<i>Kemitraan</i> / Partnership / Scheme Smallholders
KWH	:	Kilowatt Hours
LCC	:	Legume Cover Crop
LD50	:	Lethal dosage 50
LHM	:	<i>Lapran Harian Mandor</i> / Supervisors Daily Reports
LJ1	:	Long Jenew 1
LJ2	:	Long Jenew 2
LTA	:	Lost Time Accident
MB	:	Mass Balance
MSDS	:	Material Safety Data Sheet
NGO	:	Non Government Organization
NPK	:	Nitrogen Phosphate Kalium (Nitrogen Phosphate Potash)
OAD	:	Operational Audit Department

OER	:	Oil Extraction Rate
OFI	:	Opportunity For Improvement
OHS	:	Occupational Health & Safety
OSH	:	Occupational Safety & Health
PK	:	Palm Kernel
P2K3	:	<i>Panitia Pelaksana Keselamatan dan Kesehatan Kerja</i> Guiding Committee of Occupational Safety & Health
PGS	:	Personnel General Services
PIC	:	Persons in Charges
PJK3	:	<i>Penyedia Jasa Keselamatan dan Kesehatan Kerja</i> /Occupational Safety & Health Service Provider
PK	:	Palm Kernel
PKO	:	Palm Kernel Oil
POM 4	:	Palm Oil Mill 4
POME	:	Palm Oil Mill Effluent
PPE	:	personal protective equipment
RKL-RPL	:	<i>Rencana Kelola Lingkungan Rencana Pemantauan Lingkungan</i>
RSPO	:	Roundtable Sustainable Palm Oil
SBU	:	Strategic Business Unit
SCCS	:	Supply Chain Certification System
SIA	:	Social Impact Assessment
SEIA	:	Social & Environmental Impact Assessment
SKU	:	<i>Syarat Kerja Umum</i> / Permanent Workers
SOP	:	Standar Operational Procedure
SR	:	Severity Rate
SWA	:	Swakarsa Sinarsentosa
TBP	:	Time Bound Plan
UKL-UPL	:	<i>Upaya Kelola Lingkungan Upaya Pemantauan Lingkungan</i>
WHO	:	World Health Organization
WTP	:	Water Treatment Plan
WWTP	:	Water Waste Treatment Plan

<b>1.0</b>	<b>SCOPE of the CERTIFICATION ASSESSMENT</b>		
<b>1.1</b>	<b>Assessment Standard Used</b>	<ul style="list-style-type: none"> <li>RSPO Certifications Systems for Principles &amp; Criteria (Endorsed by RSPO Board of Governors 14<sup>th</sup> June 2017)</li> <li>RSPO Principles and Criteria for the Production of Sustainable Palm Oil 2018 Endorsed by the RSPO Board of Governors and adopted at the 15<sup>th</sup> General Assembly by RSPO Members on 15<sup>th</sup> November 2018.</li> </ul>	
<b>1.2</b>	<b>Organisation Information</b>		
1.2.1	Organisation name listed in the certificate	PT Dharma Satya Nusantara, Tbk	
1.2.2	Contact person	Agustinus Triwibowo	
1.2.3	Organisation address and site address	<b>Central Office register at RSPO:</b> Jl. Rawa Gelam V Kav. OR/3B, Kawasan Industri Pulo Gadung, Jakarta, Indonesia	
1.2.4	Telephone	+62-21-4618135	
1.2.5	Fax	+62-21-46834865	
1.2.6	E-mail	<a href="mailto:agustinus.triwibowo@dsn.co.id">agustinus.triwibowo@dsn.co.id</a>	
1.2.7	Web page address	<a href="http://www.dsn.co.id">www.dsn.co.id</a>	
1.2.8	Management Representative who completed the application for certification	Agustinus Triwibowo	
1.2.9	Registered as RSPO member	1-0135-12-000-00 dated on 4 December 2012	
<b>1.3</b>	<b>Type of Assessment</b>		
1.3.1	Scope of Assessment and Number of Management Unit	1 POM (POM 4) with 3 supply bases: Jabdan 1 Estate; Long Jenew 1 Estate dan Long Jenew 2 Estate	
1.3.2	Type of certificate	Single	
<b>1.4</b>	<b>Locations of Mill and Plantation</b>		
1.4.1	Location of Mill		
	<b>Name of Mill</b>	<b>Location</b>	<b>Coordinate</b>
			<b>Latitude</b> <b>Longitude</b>
	POM 4	Benhes Village, Muara Wahau Sub-District, Kutai Timur District, Kalimantan Timur Province, Indonesia	N 01° 09' 06"      E 116° 44' 46"
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>
	Jabdan 1	Benhes Village, Muara Wahau Sub-District, Kutai Timur District, Kalimantan Timur Province, Indonesia	N 01° 10' 53"      E 116° 49' 44"
	Long Jenew 1	Benhes Village, Muara Wahau Sub-District, Kutai Timur District, Kalimantan Timur Province, Indonesia	N 01° 11' 14"      E 116° 46' 56"
	Long Jenew 2	Benhes Village, Muara Wahau Sub-District, Kutai Timur District, Kalimantan Timur Province, Indonesia	N 01° 07' 46"      E 116° 43' 45"

<b>1.5</b>	<b>Description of Area Statement</b>						
1.5.1	Tenure						
	• State		16,850.00*	Ha			
	• Community			Ha			
	* 5,121 ha under operational Jabdan 2 Estate and not included scope of certification/audit POM 4						
1.5.2	<b>Area Statement</b>						
	• Total Area		11,729.00	Ha			
	• Mature Area		10,765.00	Ha			
	• Mill		45.00	Ha			
	• Housing and Infrastructure		342.40	Ha			
	• HCV (Secondary Forest)		325.00	Ha			
	• Kenden Kecil River (Riparian)		28.60	Ha			
	• Others (swamp / unplanted / occupation)		223.00	Ha			
<b>1.6</b>	<b>Planting Year and Cycles</b>						
1.6.1	Age profile of planting year						
	<b>Planting Year</b>	<b>Hectarage (Ha)</b>					
		<b>Jabdan 1 Estate</b>	<b>Long Jenew 1 Estate</b>	<b>Long Jenew 2 Estate</b>	<b>Total</b>		
	1998	368	-	-	<b>368</b>		
	1999	654	-	564	<b>1,218</b>		
	2000	508	-	-	<b>508</b>		
	2001	747	-	1,434	<b>2,181</b>		
	2003	780	1,488	903	<b>3,171</b>		
	2004	-	2,839	439	<b>3,278</b>		
	2011	-	-	41	<b>41</b>		
	<b>TOTAL</b>	<b>3,057</b>	<b>4,327</b>	<b>3,381</b>	<b>10,765</b>		
1.6.2	New Planting area after January 2010		0		Ha		
1.6.3	Planting Cycle		1 <sup>st</sup> Cycle				
<b>1.7</b>	<b>Description of Mill and Supply Base</b>						
1.7.1	Description of Mill						
	<b>Name of Mill</b>	<b>Capacity (tonnes/ hour)</b>	<b>FFB Processed (tonnes/year)</b>	<b>CPO</b>		<b>Palm Kernel</b>	
				<b>Out put (tonnes)</b>	<b>Extraction (%)</b>	<b>Out put (tonnes)</b>	<b>Extraction (%)</b>
	POM 4	60	312,614.80	70,987.06	22.70	12,789.66	4
	*Production data source from March 2019 to February 2020						
1.7.2	Description of Certification Scope of Supply Base						
	<b>Name of Estate</b>	<b>Total Area (Ha)</b>	<b>Planted Area (Ha)</b>	<b>FFB (tonnes/year)</b>	<b>Yield (tonnes/ ha/year)</b>	<b>Supplied to Mill</b>	
						<b>FFB (tonnes/year)</b>	<b>%</b>
	Jabdan 1 Estate	3,508	3,057	82,833.00	27.10	16,538.12	19.97



	Long Jenew 1 Estate	4,446	4,327	128,332.26	29.66	97,520.05	75.99
	Long Jenew 2 Estate	3,775	3,381	104,224.40	30.83	103,793.82	99.59
	<b>TOTAL</b>	<b>11,729</b>	<b>10,765</b>	<b>315,389.66</b>	<b>29.30</b>	<b>217,851.99</b>	<b>69.07</b>
	*Production data source from March 2019 to February 2020						
	*not all FFB Production delivered to POM 4, the rest of FFB production sent to another mill under subsidiary of PT DSN						
1.7.3	FFB description from other source						
	<b>Name of sources/Organisation</b> (RSPO certified / non-certified)	<b>Type of Organization</b>	<b>number of smallholders</b>	<b>Production Area (Ha)</b>	<b>Supplied to Mill</b>		
					<b>FFB</b> (tonnes/year)		
	Jabdan 2 (RSPO Certified)	PT SWA	-	4,517	3,097.47		
	Kemitraan 1 (RSPO Non Certified)	PT SWA	180	430	38,868.40		
	Kemitraan 2 (RSPO Non Certified)	PT SWA	80	500	12,127.42		
	Kemitraan 4 (RSPO Non Certified)	PT SWA	467	175	12,911.20		
	Kemitraan 8 (RSPO Non Certified)	PT DAN	489	558	2,964.80		
	Kemitraan 10 (RSPO Non Certified)	PT SWA	253	550	24,794.80		
	<b>TOTAL</b>				<b>94,764.09</b>		
	*Production data source from March 2019 to February 2020						
1.7.4	Product categories			<b>FFB, CPO, PK</b>			
<b>1.8</b>	<b>Tonnage of Product</b>						
1.8.1	Past Annual Claim Certified Product		Last Year Projected Certified Volume (MT)		Last Year Actual Certified Volume (MT)		
	FFB Processed		349,887		220,948.46		
	CPO Production		80,474		50,153.24		
	Palm Kernel (PK) Production		15,745		9,054.79		
	*Only 63.15% FFB supply to POM 4, the rest FFB supply to another Mill under DSN Group						
1.8.2	Product selling						
	Type of selling product	Actual selling product for last year (MT)					
	CSPO sold as RSPO certified product	0					
	CSPK sold as RSPO certified product	7,558.68					
	CSPO sold under other scheme	0					
	CSPK sold under other scheme	0					
	CSPO sold as conventional	50,120.06					
	CSPK sold as conventional	0					
1.8.3	Estimate of Certified FFB Claim						
	<b>Name of Estates</b>	<b>Total Area (Ha)</b>	<b>Planted Area (Ha)</b>	<b>FFB (tonnes/year)</b>	<b>Yield (tonnes/ha/year)</b>		
	Jabdan 1 Estate	3,508	3,057	80,000	26.17		
	Long Jenew 1 Estate	4,446	4,327	127,000	29.35		

	Long Jenew 2 Estate	3,775	3,381	103,000	30.46			
	<b>TOTAL</b>	<b>11,729</b>	<b>10,765</b>	<b>310,000</b>	<b>28.80</b>			
*Production data source from 01 June 2020 to 31 May 2021								
1.8.4	Estimate of Certified Palm Product Claim							
	<b>Name of Mill</b>	<b>Capacity (tonnes/ hour)</b>	<b>FFB Processed (tonnes/year)</b>	<b>CPO</b>		<b>Palm Kernel</b>		<b>Supply Chain Module</b>
				<b>Out put (tonnes)</b>	<b>Extraction (%)</b>	<b>Out put (tonnes)</b>	<b>Extraction (%)</b>	
	POM 4	60	310,000	71,300	23.00	12,400	4	MB
*Production data source from 01 June 2020 to 31 May 2021								
<b>1.9</b>	<b>Other Certifications</b>							
	ISO 9001:2008			-				
	ISO 14001: 2004			-				
	OHSAS 18001:2007			-				
	ISCC			ISCC No. EU-ISCC-Cert-ID215-23191161 valid from 13 November 2019 until 12 November 2020				
	Others			Proper Hijau from Ministry of Environmental and Forestry Period of 2018-2019				
<b>1.10</b>	<b>Time Bound Plan</b>							
1.10.1	<b>Time Bound Plan for Other Management units</b>							
	<b>Management Unit</b>		<b>Estate (Supply Base)</b>	<b>Time Bound Plan</b>	<b>Location</b>	<b>Status</b>		
	<b>Mill</b>	<b>Time Bound Plan</b>						
	POM 1 (PT SWA)	June 2012	Jabdan 2 (PT SWA)	2012	Kutai Timur District, Kalimantan Timur Province	Certified		
			Smallholder (KM 5.9)	2015		Certified		
			Smallholder (KM 3,6,11,12)	2017		Certified		
	POM 2 (PT DSN)	June 2013	Puhus 1 (PT DIN)	2013	Kutai Timur District, Kalimantan Timur Province	Certified		
			Puhus 2 (PT DIN)	2013		Certified		
			Puhus 3 (PT DIN)	2013		Certified		
	POM 3 (PT DSN)	August 2013	Long Kejiak 1 (PT DSN)	2013	Kutai Timur District, Kalimantan Timur Province	Certified		
			Long Kejiak 2 (PT DSN)	2013		Certified		
			Long Kejiak 3 (PT DSN)	2013		Certified		
	POM 4 (PT DSN)	Nov 2014	Jabdan 1 ( PT DSN)	2015	Kutai Timur District, Kalimantan Timur Province	Certified		
			Long Jenew 1 (PT SWA)			Certified		
			Long Jenew 2 (PT SWA)			Certified		
			Smallholder			2022	Waiting RaCP	
	POM 5 (PT DSN)	2020	Bukit Pandunlangan 1 (PT Pilar Wanapersada)	2020	Lamandau District, Kalimantan Tengah Province	-		

		Bukit Pandulangan 2 (PT Pilar Wanapersada)	2020		-
		Bukit Pandulangan 3 (PT Pilar Wanapersada)	2020		-
		Smallholder	2023		-
POM 6 (PT DSN)	2019	Melenyu 1 (PT DWT)	2019	Kutai Timur District, Kalimantan Timur Province	Certified
		Melenyu 2 (PT DWT)	2019		Certified
		Melenyu 3 (PT DWT)	2019		Certified
		Smallholder	2022		-
POM 7 (PT DSN)	2019	Melenyu 4 (PT DWT)	2019	Kutai Timur District, Kalimantan Timur Province	Certified
		PT Karya Prima Agro Sejahtera	2020		NPP & RaCP Process RSPO
		Smallholder (KM 9)	2015		Certified
-	-	PT Dharma Intisawit Lestari	2020	Bulungan District, Kalimantan Timur Province	-
-	-	PT Karya Prima Agro Sejahtera	2020	Kutai Timur District, Kalimantan Timur Province	-
		Smallholder	2023		-
-	-	PT Putra Utama Lestari	2020	Kutai Barat District, Kalimantan Timur Province	-
		Smallholder	2023		-
-	-	PT Agro Andalan	2020	Sekadau District, Kalimantan Barat Province	-
		Smallholder	2023		-
-	-	PT Kencana Alam Permai	2020	Sintang District, Kalimantan Barat Province	-
		Smallholder	2023		-
-	-	PT Prima Sawit Andalan	2020	Sintang District, Kalimantan Barat Province	-
		Smallholder	2023		-
-	-	PT Dharma Persada Sejahtera	2020	Sintang District, Kalimantan Barat Province	-
		Smallholder	2023		-
PKS Tepian Langsat	2021	PT Bima Palma Nugraha	2021	Bengalon District, Kalimantan Timur Province	-
		Smallholder	2024		-
PKS Muara Bulan	2021	PT Bima Agri Sawit	2021	Karangan District, Kalimantan Timur Province	-
		Smallholder	2024		-

PT Dharma Satya Nusantara has committed to obtain RSPO Certificate to all management unit in accordance with TBP that has been set. MUTU has considered that PT Dharma Satya Nusantara is complied with the RSPO requirement for Time Bound Plan. The Time Bound Plan was revised and declared by PT Dharma Satya Nusantara on 02 January 2020 and signed by Head of Sustainability.

1.10.2	<b>Progress of Associated Smallholders and Outgrowers for Certifiable Standard</b>
	The scheme smallholder under PT SWA is Cooperative of Min Sun Lekut (KM1), Cooperative of Min Bea Glang Mandiri (KM2) and Cooperative of Jengea Bong Pet Kuq (KM 10). Those cooperatives have entered the initial assessment phase, but now is still not certified.

<b>2.0</b>	<b>ASSESSMENT PROCESS</b>
<b>2.1</b>	<b>Assessment Team</b>
<b>RC</b>	<p>1. <b>Moh Arif Yusni (Lead Auditor)</b>. Indonesian citizen. Bachelor of Agriculture, majoring in Plant Protection. Has experience as an operational staff at a private oil palm plantation company in Indonesia on 2010 to 2012. Has attended several trainings, i.e.: ISO 19011, ISO 9001; ISO 14001, SA 8000, RSPO lead auditor, ISPO lead auditor, OHS expert, OHS auditor based on National Government No. 50/2012, SCCS, etc. Has conducting ISPO, RSPO and MSPO audit as an auditor and lead auditor with expertise on best management practices for estate and mill, legality, worker welfare, safety, social, environment, conservation, transparency, long term economic management plan and supply chain for palm oil mill aspects. In this audit he is responsible for assessing the aspects of legal, social, TBP and SCCS.</p> <p>2. <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 GMIT, 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, HCV and GHG.</p> <p>3. <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, ISO 22000 and ISCC Training. During this assessment OHS, Worker Welfare, Best Management Practices for mill and estate and transparency</p> <p>4. <b>Andriobiko (Observer)</b>. Associate Expert in Oil Palm Plantations. Experienced in several national private oil palm plantation companies as Operational Staff in 2008-2019. Has attended ISPO Auditor training. In this RSPO recertification activity, he is become an observer.</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>RC</b>	<p>Number of auditors: 3 auditors          Number of days for <b>RC</b> at site: 4 days          Number of working days for <b>RC</b> at site: 12 Working days</p>
<b>2.2.2</b>	<b>Assessment Process</b>
<b>RC</b>	<p>The assessment was conducted by measuring the sufficiency of implementation with the consistency done by the POM 4 PT Dharma Satya Nusantara to the requirements of <b>Principles and Criteria for the Production of Sustainable Palm Oil 2018, endorsed by the RSPO Board of Governors and adopted at the 15<sup>th</sup> Annual General Assembly by RSPO Member on 15 November 2018 and RSPO Certification System for Principles and Criteria, 14 June 2017.</b></p> <p>PT Swakarsa Sinarsentosa consist of four (4) estate (Jabdan 1 Estate, Jabdan 2 Estate, Long Jenew 1 Estate and Long Jenew 2 Estate) with the total of land title is 16,850 Ha, however the scope of certification consist of three (3) Estate covering 11,729 Ha and the another one (5,121 Ha) is under scope of POM 1.</p> <p>The audit program is included as Appendix II. The approach to the audit was to treat the mill and its supply base as an RSPO Certification Unit. Mill was audited together with the sample estates. A range of environmental and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HCVs, declared</p>

	<p>conservation areas and local communities.</p> <p>The assessment was conducted in three methods: (1) document review, aiming to observe the sufficiency of types or substances from required documents; (2) <i>interview</i>, aiming to obtain more detailed information and cross check the information; and (3) field observation, aiming to observe directly the sufficiency of implementation on site.</p> <p>Public Stakeholder Notification was made on MUTU Website and RSPO Website. There is no written negative feedback receive. Stakeholder consultation involved internal and external stakeholders. Meetings were held with stakeholders to seek their views on the performance of the company with respect to the RSPO requirements and aspects where they considered that improvements could be made. At the start of each meeting, the interviewer explained the purpose of the audit followed by an evaluation of the relationship between the stakeholder and the company before discussions proceeded. The interviewer recorded comments made by stakeholders and these have been incorporated into the assessment findings. The comments made by external stakeholders were also taken into account in the assessment</p> <p>Structured worker interviews with male and female workers and staff were held in private at the workplace in the mill and the estates. Fieldworkers were interviewed informally in small groups in the field. In addition, the wife's of workers and staff were interviewed in informal meetings at their housing. Company officials were not present at any of the internal or external stakeholder interviews. A list of Stakeholders contacted is included as Appendix III. Stakeholders consultation with government conducted on 14 January 2020 together with POM 2 and POM 3 ASA 1.1</p> <p>Commonly, the audit activities went smoothly with good support from the unit management. The presentation of documents is presented quite well by involving related personnel.</p> <p>Some opportunities for improvement of the results Recertification delivered by the MUTU auditor to the management unit and the results are the subject will be verified at the next assessment phase ASA 1.1. All information obtained was recorded in Check List of PT Mutuagung Lestari (MUTU) and part of <i>Recertification reports</i></p> <p>The assessment program please find Appendix 2</p>
<p><b>2.2.3</b></p>	<p><b>Locations of Assessment</b></p>
<p><b>RC</b></p>	<p>The sampling location consider the issue arose from the review documents and stakeholder's consultation that are fundamental and crucial. On this assessment sample locations that visited and respondent that interviewed by team auditor are:</p> <p><b>POM 4</b></p> <ul style="list-style-type: none"> <li>- <b>Grading Station.</b> Observations and interviews related to criteria for EFB grading, wages, sampling techniques, and PPE.</li> <li>- <b>Engine room.</b> Observations and interviews related to medical check-up, PPE, and operator understanding of emergencies</li> <li>- <b>Boiler.</b> Observations and interviews related to OHS, understanding of emergency response, and operator licenses</li> <li>- <b>Sterilizer.</b> Observations and interviews related to the duties and responsibilities of daily work</li> <li>- <b>Press Station.</b> Observations and interviews related to medical check-up, PPE feasibility, and operator responsibility</li> <li>- <b>Hydrant simulation.</b> Observation related emergency preparedness</li> <li>- <b>Weigh bridge.</b> Observation and interview related SCCS implementation and employment.</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, fiber and shell from the production process of mill.</li> <li>- <b>WTP.</b> Observations and interviews related to water management, recording of water use, health checks, PPE</li> </ul>

- and waste management.
- **ETP.** Field observations and interview related POME management, recording, OHS and environmental.
- **Empty bunch area.** Field observations related to empty bunch management.
- **Hazardous Waste Temporary Warehouse.** Field observations and interview related hazardous waste management, OHS and environmental aspect.
- **Sparepart Warehouse.** Field observations and interview related sparepart management, OHS, and environmental aspect.
- **Chemical warehouse and Fuel warehouse.** Field observations and interview related chemical management, OHS, and environmental aspect.
- **Workshop.** Field observations and interview related workshop activity, OHS, environmental and worker welfare aspect.
- **Mill drainage.** Field observation and interview related mill drainage and potency of environmental contamination.
- **Reservoir.** Field observation of management water source of Telen river.
- **Biogas plan.** Field observation of progress biogas plan.

**Jabdan 1 Estate**

- **Fire Fighting Facilities.** Observation and simulation the emergencies response facilities.
- **Daycare.** Observation and interview with worker related labor aspect and OHS.
- **Sparepart and PPE warehouse.** Observation minimum stock of PPE's.
- **Diesel Tank.** Observation of OHS, environment aspect, emergency response and fire facilities.
- **Oil and Agrochemicals Warehouse.** Observation related to management of oil and agrochemical material and waste, MSDS, emergency response facilities and the types of pesticides used.
- **Hazardous Waste Warehouse (Temporary).** Field observations related to the fulfillment of the attributes health and safety, recording, and the implementation of compliance requirements hazardous waste temporary warehouse, wages and complaint mechanism.
- **Workshop.** Observations and interviews related to wages and overtime, waste management activities, OHS implementations and health inspections.
- **Fertilizer warehouse.** Observation related to management of agrochemical material and waste, MSDS, emergency response facilities and the types of fertilizer used.
- **Generator (Electricity).** Observation for waste management, and interviews related to workers facility, electricity, domestic waste, sources offresh water, socialization of company policy and complaint mechanism.
- **Housing Complex.** Observation and interview with residents about housing facilities, domestic waste management, and complaint mechanism.
- **Central Store.** Observation to Rice Store, Lubricant Store, Pesticide Store, Fertilizer Store, fuel storage and Fire Fighter
- **Pesticide mixing area and PPE storage:** observation related pesticide mixing area, PPE storage, safety aspect.
- **Boundaries Stones No 203; 67 and 60** Observation of aspect of land demarcation and maintenance of HGU pole, and land dispute potency.
- **HCV Forest Conservation, Block VI.** Observation the implementation of management in HCV of forest area.
- **HCV Kenden Besar River Riparian Area, Block VI, Block A28.** Observation the implementation of management in HCV of riparian area.
- **Harvesting activity, Block A20, Afdeling 1,** Observation and interviews with foremen and workers related to work procedures, health insurance and labor protection, safe working practices and use of PPE.
- **Circle and Path Spraying, Block B37, Afdeling 3.** Interviews and Observations with pesticide applicators related work safely for themselves and the environment.
- **Detection of Pest and disease Block A17 Division 1.** Interviews and observations regarding work procedures and OHS awareness
- **Nest Box Block F44 Division 12.** Observation regarding the application of biological control

**Long Jenew 1 Estate**

- **Harvesting activity, Block B41/42, Afdeling III,** Observation and interviews with foremen and workers related to work procedures, health insurance and labor protection, safe working practices and use of PPE.



- **Spraying, Block B35, Afdeling II.** Interviews and Observations with pesticide applicators related work safely for themselves and the environment.
  - **Boundaries Stones No 57,55, 50,48, 45 and 001** Observation of aspect of land demarcation and maintenance of HGU pole, and land dispute potency.
  - **HCV Kenden Kecil River Riparian Area, Block B47.** Observation the implementation of management in HCV of riparian area.
  - **Housing complex, afdeling 1.** Observation and interview regarding to feasibility of facilities, complain mechanism, waste management, daycare, clean water and access to basic needs.
  - **Generator engine room emplacement afdeling 1.** Observation for OHS and worker welfare
  - **Housing complex, afdeling 2.** Observation and interview regarding to feasibility of facilities, complain mechanism, waste management, daycare, clean water and access to basic needs.
  - **Water treatment plant afdeling 2.** Observation related to clean water.
  - **Landfill block D 37 afdeling 5.** Observation and interview related to waste management.
  - **Daycare facility.** Interview related to worker welfare, complain mechanism, and feasibility of facilities.
  - **Chemical storage & Pesticide mixing area.** Observations and interview related to condition of the storage and management of hazardous and toxic materials and OHS implementation.
  - **Fertilizer warehouse.** Observations and interview related to the condition of fertilizer warehouse
  - **Hazardous Waste Storage.** Field observations related to the management of hazardous and toxic materials.
  - **Diesel Tank.** Observation of OHS, environment aspect, emergency response and fire facilities.
  - **Oil and Lubricants Warehouse** Field observations and interview related fuel, Oil and lubricants, OHS and environmental aspect.
  - **Pesticides applicator Washing/rinse house afdeling 2.** Observation for pesticides applicator OHS hazardous waste management.
  - **Workshop.** Field observations and interview related workshop activity, OHS, environmental and worker welfare aspect.
  - **Firefighter facilities.** Observation related emergency response, readiness of fire fighting equipment
- Long Jenew 2 Estate**
- Boundaries Stones No 477; 479 and 481 Observation of aspect of land demarcation and maintenance of HGU pole, and land dispute potency.
  - **HCV Kenden Kecil River Riparian Area, Block G-50 afdeling 13.** Observation the implementation of management in HCV of riparian area.
  - **HCV Long Sengat River Riparian Area, Block G32 Afdeling 09.** Observation the implementation of management in HCV of riparian area.
  - **Telen River.** Observation related riparian management
  - **Water Intake Block G27 Afdeling 09.** Observation related water management and facilities
  - **Others Area Block G27 Afdeling 09.** Observation related unplanted area
  - **Harvesting activity, Block E47, Division 12,** Observation and interviews with foremen and workers related to work procedures, health insurance and labor protection, safe working practices and use of PPE.
  - **Circle and Path Spraying , Block E41, Afdeling 11.** Interviews and Observations with pesticide applicators related work safely for themselves and the environment.
  - **Manual wedding activity Block G35 Division 11,** Observation and interviews with foremen and workers related to work procedures, health insurance and labor protection, safe working practices and use of PPE.
  - **Detection Of Pest and disease Block G36 Division 10** Interviews and observations regarding work procedures and OHS awareness
  - **EFB application Block E 31 Afdeling 9.** Interviews and observations regarding work procedures and OHS awareness
  - **Nest Box Block F44 Division 12.** Observation regarding the application of biological control
  - **Land Application Block F40 Afdeling 11.** Observation and interview regarding the application system for POME (Palm Oil Mill Effluent).
  - **Housing complex, afdeling 8.** Observation and interview regarding to feasibility of facilities, complain mechanism, waste management, daycare, clean water and access to basic needs.
  - **Water treatment plant afdeling 8.** Observation related to clean water.



	<ul style="list-style-type: none"> <li>- <b>Generator engine room emplacement.</b> Observation for OHS and worker welfare</li> <li>- <b>Landfill block F30 afdeling 9.</b> Observation and interview related to waste management.</li> <li>- <b>Daycare facility.</b> Interview related to worker welfare, complain mechanism, and feasibility of facilities.</li> <li>- <b>Chemical storage &amp; Pesticide mixing area.</b> Observations and interview related to condition of the storage and management of hazardous and toxic materials and OHS implementation.</li> <li>- <b>Fertilizer warehouse.</b> Observations and interview related to the condition of fertilizer warehouse</li> <li>- <b>Hazardous Waste Storage.</b> Field observations related to the management of hazardous and toxic materials.</li> <li>- <b>Diesel Tank.</b> Observation of OHS, environment aspect, emergency response and fire facilities.</li> <li>- <b>Oil and Lubricants Warehouse</b> Field observations and interview related fuel, Oil and lubricants, OHS and environmental aspect.</li> <li>- <b>Pesticides applicator Washing/rinse house.</b> Observation for pesticides applicator OHS</li> <li>- <b>Workshop.</b> Field observations and interview related workshop activity, OHS, environmental and worker welfare aspect.</li> <li>- <b>Firefighter facilities.</b> Observation related emergency response, readiness of fire fighting equipment</li> </ul> <p><b>Consulted Stakeholder</b></p> <ul style="list-style-type: none"> <li>- Muara Wahau Sub-District</li> <li>- Village Official of Diak Lay</li> <li>- Min Sun Lekut Cooperative</li> <li>- Gender Committee of PT DSN (03 March 2020)</li> <li>- Worker Union of PT DSN (03 March 2020)</li> <li>- Gender Committee of PT Swakarsa Sinarsentosa (04 March 2020)</li> <li>- Worker Union of PT Swakarsa Sinarsentosa (04 March 2020)</li> <li>- Environmental Agency, Kutai Timur Regency</li> <li>- Manpower &amp; Transmigration Agency, Kutai Timur Regency</li> <li>- Plantation Agency, Kutai Timur Regency</li> <li>- National Land Agency, Kutai Timur Regency</li> <li>- Local Contractor of Transportation (on behalf of personal).</li> </ul>
<b>2.3</b>	<b>Stakeholder Consultation and Stakeholders Contacted</b>
<b>2.3.1</b>	<b>Summary of stakeholder consultation process.</b>
<b>RC</b>	<p>Summary of stakeholder consultation process</p> <p>Consultation of stakeholders for POM 4 PT Dharma Satya Nusantara was held by:</p> <ul style="list-style-type: none"> <li>• Public Notification on website on RSPO and MUTU Website on 02 February 2020</li> <li>• Public consultation with NGOs (by email) such as WALHI, AMAN, Sawit Watch and IARI on 26 February 2020</li> <li>• Public consultation meeting with government institution 14 February 2020</li> <li>• Public consultation meeting with communities on 04 March 2020</li> <li>• Public consultation meeting with internal stakeholders and contractor 04 March 2020</li> </ul> <p>Numbers of input from stakeholders were clarified by POM 4 PT Dharma Satya Nusantara</p>
<b>2.3.2</b>	<b>Stakeholder contacted</b>
	Please find appendix 1
<b>2.4</b>	<b>Determining Next Assessment</b>
	The next visit ASA -1.1 will be conducted eight (8) month to twelve (12) month after date of annual license.

3.0 ASSESSMENT FINDINGS

3.1 Summary of Assessment Report of the RSP0 Certification

MUTUAGUNG LESTARI has conducted an assessment of POM 4 – PT Dharma Satya Nusantara operation consisting of one (1) mill and three (3) oil palm estates.

During the assessment, no critical or non-critical nonconformity identified, only one (1) opportunities for improvement.

MUTUAGUNG LESTARI found that POM 4 – PT Dharma Satya Nusantara complied with the requirements of **Principles and Criteria for the Production of Sustainable Palm Oil 2018, endorsed by the RSP0 Board of Governors and adopted at the 15<sup>th</sup> Annual General Assembly by RSP0 Member on 15 November 2018 and RSP0 Certification System for Principles and Criteria, 14 June 2017.**

Therefore MUTUAGUNG LESTARI Recommends RSP0 Certification of compliance is continued.

Ref Std.	VERIFICATION RESULT of MUTU-Certification	
<b>PRINCIPLE #1 BEHAVE ETHICALLY AND TRANSPARENTLY</b>		
<b>1.1</b>	<b>The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSP0 Criteria, in appropriate languages and forms to allow for effective participation in decision making.</b>	
<b>1.1.1 &amp; 1.1.2</b>	The Unit of Certification has a list of information that can be accessed by stakeholders is explained in the Communication and Consultation Procedure (Document No.: SOP-AGR-044-R01). The information such as: HGU documents, SEIA, UKL / UPL, RKL / RPL Reports, Company Policy, HCV, SIA, etc. The Information provide on <i>Bahasa Indonesia</i> , how to submit an application can be oral, email, fax, telephone and a direct visit to the office.	
<b>1.1.3, 1.1.4 and 1.1.5</b>	From document review of the logbook documents of 2019, there was no request for information from the stakeholders, so there was no response. Based on interview with representatives of stakeholders, it was known that they had not requested information from the Unit Certification. It is known that letters from external parties only contain letters related to requests for funding assistance and transportation units during 2019, such as: request for Assistance for BOB JENGEA traditional party fund received by the Unit Certification on 13 April 2019 and the Unit Certification responded to the letter on 16 September 2019 and realized on 26 April 2019.	
	The Unit of Certification has procedure and has appointed person in charge in the requests for information from stakeholders is CSR Operation Department. The Company responded to information requests with maximum time of 3 days since mail received. Based on verification document and interview with external stakeholders, management always responds the information request no longer than 3 working days.	
	<b>Status: Comply</b>	
<b>1.2</b>	<b>The unit of certification commits to ethical conduct in all business operations and transactions.</b>	
<b>1.2.1 &amp; 1.2.2</b>	The Unit of Certification has commitment related to integrity and ethical conduct in all operational activities. The commitment is listed in " <i>Pedoman Mutu</i> " document (PDM-AGR-R06) dated 1 January 2020 by Executive Director SBU Agro I. In clause 7.5 about ethical conduct in all operational business activities, stated that: <ul style="list-style-type: none"> <li>• Each activity must reflect to fair business practices.</li> <li>• Prohibits any employee for corruption, bribery and fraud in the use of funds and resources.</li> <li>• Provide information in accordance with applicable laws and practices of the oil palm industry.</li> </ul>	

This policy has been socialized to the contractor and stakeholders on 17 December 2019 to all workers and stakeholders. This policy is available in *Indonesian*. Based on interview with worker in estate and mill including local contractors, it is known that they understand about the ethical conduct of the Unit of Certification. Interview with worker in estate and mill informed that there is no issue about integrity and ethical conduct.

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

The system to monitoring compliance and the implementation of the policy and ethical business practice explained on grievance document year 2019, based on that document during year 2019 no infraction to policy and ethical business practice.

**Status: Comply**

**PRINCIPLE #2 OPERATE LEGALLY AND RESPECT RIGHTS**

**2.1**

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

**2.1.1**

The list of laws or regulations is explained in the regulatory list document (law register) which already update in December 2019. Law registers are available in soft and hard copy. The unit of certification can demonstrate compliance with these laws and regulations, for example: have land title (HGU), have environmental documents, conduct factory wastewater testing, conduct river water quality testing, conduct groundwater quality testing, conduct air quality testing, perform noise and noise testing, pay employee wages, pay employee overtime, etc.

**OHS & Employment Aspect**

In the worker welfare aspect, it was known the unit of certification have been paid the employees wage in accordance with the applicable regulation. In OHS Aspect the unit of certification has established the structure for guiding committee for occupational health and safety in each management unit and this committee has received approval from the Ministry of Manpower and Transmigration in Kutai Timur Regency, which has provided emergency facilities and etc. Furthermore, in environmental aspect the company has had EIA document that approved by government, have hazardous and toxic waste storage issued by relevant agencies in each estate and etc.

There is a Minutes of Examination and Testing Completion by *PJK3* (licenced training provider for OHS) of PT Perdau Karya Utama for the inspection and testing of 33 POM 4 units and machine tools in the framework of certification and issuance of certificates and usage from the DISNAKER of East Kalimantan province on October 10, 2019.

Beside that the company has shown recap document for Operator License such as Fajar TM for Boiler Class I (valid until June 16, 2022), Suharyono for Wheel Loader (valid 20 April 2023), Arie CK for Welder Class II (valid July 1, 2021) and Akmal for Motor Diesel Class I (May 1, 2024).

**Best Management Practice**

In terms of best management practices, it is known that plantation and mill management has implemented a number of compliances with Indonesian laws and regulations, for example not using the burning method in the land clearing process, trees planted are from seed producers (*Dura x Psifera*), recognized by the Indonesian government. Every unit of the Unit of Certification has implemented integrated pest management, biological control and only uses pesticides that are listed on the [www.Pesticide.id](http://www.Pesticide.id)

**Legal Aspect**

In term of legal aspect, the CH has shown evidence towards legal aspect, The Certificate Holder has complied with regulations in the field of plantation and land legality, such as HGU (land use title) IUP P (plantation business permit for mill) as well as mandatory reports on annual land use to BPN.

**2.1.2**

The mechanism and system to ensure the legal compliance stipulated in Procedures and Other Legal Requirements (SOP-AGR-024-R01, dated 8<sup>th</sup> September 2014). The procedure contains a flowchart of application for consideration of the legality and licensing, as well as flow charts of identifying and updating of laws and regulations. Also in the document are the forms of legality and licensing application, a summary of laws and regulations, evaluation summary of compliance to regulation, the address list of agency/department issuing laws and regulations and summary documents of law and regulations. This procedure describes that every 6 months, SHE/HCD/HCO/Legal Dept Head conduct monitoring and evaluating of compliance with laws and regulations and requirements. Monitoring and evaluation evidence are including the minutes, reports, checklists, minutes of meetings, photographs or other documents.

Monitoring and evaluation results are listed in form of Evaluation Summary of Compliance with Rules and Regulations (No. DK-MS-01A-RO1) that was renewed in July 2019. The document is an inventory of national and local regulations related to aspects of legal, labour, health and safety, and environmental. To ensure compliance with law or regulations, the company conducts an internal RSPO audit. Internal audits have been conducted continuously and are documented and reviewed in the management review activities, latest July 2019.

To ensure the legal compliance for third party/contractors, the company has had SOP of Contractual Arrangement (No. SOP-AGR-023-R01 dated 1 November 2016) that sets legal due diligence for contractor candidates, includes requirements for personal and legalized contractors. The legal requirements covers of Directors identity, identity card of company's tax (NPWP), trade permit (*izin perdagangan*), company deed of establishment (*akta pendirian perusahaan*), license of management signing the contract (deed of management, appointment letter). The Legal Department was responsible to assess the due diligence of appropriateness of contractors before take contractual agreements with the company. However, the SOP was not detailed explained the mechanism to ensure the fulfilment related to aspects of OHS, employment, and environment to the contractor, although based on document review, field observations, and interviews those aspects have been fulfilled by the contractor (detailed explanation in Criteria 2.2). Based on that's explaining, the unit of certification has an opportunity for improvement by ensuring that legal compliance assessment procedures for third parties cover those aspects. Based on document review, field observations, and interviews with management and contractors, it was known related to compliance with laws and regulations (aspects of OHS, labor, and environment) had been fulfilled by the contractor (detailed explanation in Criterion 2.2), furthermore, in the work agreement with the contractor clause related to the compliance of law aspect has been regulated in article 4. In this regard, the company has an opportunity for improvement to create a system for assessing third parties (contractors) regarding compliance with applicable legal regulations. **OFI 01.**

**2.1.3**

The position of all legal boundaries as much as 327 pole describes in the HGU map issued by BPN scale of 1:25000. HGU Pole maintenance programmed once a year in accordance with the CH's SOP (IK-AGR-OLP-33-R00), the realization report for the period 2019 verified during Recertification. Field observations were conducted to ensure that the poles are available on place and maintained, the positions was checked using GPS, such as observation in Long Jenew 1 Estate (HGU Pole No. BPN 57,55, 50,48, 45 and 001) Long Jenew 2 Estate (HGU Pole No. BPN 477, 479 and 481) and Jabdan 1 Estate HGU Pole No. BPN 203; 67 and 60) . It is also known that there are no indications of land disputes. Land boundaries have been demarcated with boundary trenches or clear control roads.

	<b>Status: Comply</b>	
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**2.2**

**All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.**

**2.2.1**

List of all contractor parties been maintained by the unit of certification. Based on document verifications there are 60 contractors who have cooperation with the unit of certifications for activities in transportation (CPO, kernel, FFB, school bus, and operational car). Based on document verifications there are no contractors related workers recruitment agencies or operational activity in plantations.

**2.2.2; 2.2.3**

Based on the document's verifications, interview with management and local contractors the unit of certification can be

demonstrate if all contracts containing specific clauses on meeting applicable legal requirements and this can be demonstrated. Clauses related legal requirements are mentioned in all works agreements in article 4 who described the fulfillments to Minimum Wages, Participate in the Insurance and Social Security program (BPJS), no child labor, PPE provision, Anti-corruption, bribery and fraud and etc.

As the implementation, the unit of certification can present several efforts to ensure the fulfilment of the legal aspect for contractors among others

- Monitoring use of PPE
- Registered and pay off the Insurance and Social Security program (BPJS), for example for period of January 2020 has been paid in 20 February 2020 for 111 contractors workers
- Conduct evaluation and coaching for local contractors on 29 June 2019, with aspects discussed regarding OHS, minimum wages, BPJS and etc.

The results of field observation and interviews with contractor workers can be concluded that workers had been included in the Insurance and Social Security program (BPJS), the use of PPE, and minimum wages in accordance with the law and there is no child labor.

**Status: Comply**

**2.3**

**All FFB supplies from outside the unit of certification are from legal sources.**

**2.3.1; 2.3.2**

Records of the origins of all third-party FFB sourced are available on computerized system at POM 4. Implementation of traceability FFB sources started from an SOP for third party suppliers are available on procedure of contract (No. SOP-AGR-023-R01, 1 November 2016). This procedure is required for all purchasing material should be based on contract, including FFB purchasing from third parties.

Based on documents verifications FFB that supplies to POM 4 are from estate under scope of certifications, full manage smallholders under PT Swakarsa Sinar Sentosa (KUD Min Sun Lekut, KUD Min Bea Glang Mandiri, KSU Gerdabang Agri Centre and full manage smallholders under subsidiaries of PT Dharma Satya Tbk ((KUD Sawit Sawit Wehea Telan Sejahtera and KUD Jengea Bong Pet Kuq) There are no FFB from the collection centers, agents or other intermediaries.

The unit of certification can presented FFB from scheme smallholders are from legal source, for Instance FFB from KUD Min Sung Lekut with information on geo location of FFB origins 1°6'15.869" N and 116°46'44.663" E, agreement with company No 187/DIR-ARF/SWA/JKT/VIII/2008 and land ownership documents for example No 22/520.1-44.9/REDIS-PPAN/APBN/2008

**Status: Comply**

**PRINCIPLE #3 OPTIMISE PRODUCTIVITY, EFFICIENCY, POSITIVE IMPACTS AND RESILIENCE**

**3.1**

**There is an implemented management plan for the unit of certification that aims to achieve long-term economic and financial viability.**

**3.1.1; 3.1.2**

The unit of certification has presented the work plan and budget projection for 2020 -2024. Information in the document consists of general routine operational activities such as target projections for operational estate (land clearing, planting, upkeep, and harvesting) and mill (FFB Process, OER, KER, CPO & PK Produced, and FFA); CSR program, environmental program; expenses projections including budget plan for operational mill and estate, supporting department (Social and community, environmental & conservation and others, income projections (FFB selling, CPO & PK Celling), Example:

Parameter	2020	2021	2022	2023	2024
Areal Mature (Ha)	10,765	10,765	10,765	10,765	10,765
FFB (mt)	305,030	294,570	287,349	280,737	263,516
OER	23.65	23.65	23.65	23.65	23.65
FFB/ha	28.34	27.36	26.69	20.08	24.67

CPO/ha	6.52	6.29	6.14	5.99	5.63
cost/Ton FFB	728,609	753,493	794,662	843,352	884,312
Total income	896,139	904,688	918,194	933.407	936.345

The unit of certification has also developed a yearly plan as seen for the year 2020 containing information on the budget for each activity (including activities for environmental management programs and all CSR related expenses, legal compliance and RSPO P & C compliance) and revenue from company's products including all company's liabilities. Budget and target achievement evaluations are carried out quarterly, and the evaluation of achievement for management plan year 2019 was sighted.

Based on the document review, the Unit Certification does not have a replanting plan in the next 5 years because the age of the plant is not yet entering the time for replanting. The oldest plant age in the scope of certification this time is 22 years (Planting year 1998). For the potential for crop production in 1998, 26.93 tons/ha/year and 1999, 29.14 tons/ha/year, this indicates the potential for old crop production is still good.

**3.1.3**

The management review conducted in several review, consist of Weekly and Monthly Management Review in Estate level, and quarterly management review in company level. The latest Company Management Review carry out in 3<sup>rd</sup> December 2019. Based on summary the management revise discussed about performance review, Budget and cost review, FFB production and yield statement, Manuring progress, CPO and PK production, Supply chain issue related CPO and PK sales , Result of internal and external audit, Corrective action plan, Effectivity of procedure, and etc. Result of managements meeting includes decisions about improvement of the effectiveness of the management system and its processes and Resources required

**Status: Comply**

**3.2**

**The unit of certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable continuous improvement in key operations.**

**3.2.1**

The company regularly conducted monitoring of continuous improvements, covers aspects of economic/best practices, social, as well as environmental for every unit (Mill and Estates). The company had an internal audit that can ensure all the aspect was implemented related the procedure.

The implementation to monitor and review related economic, social and environmental performance, and develop and implement action plans such as :

**Labor and OHS**

The certification unit has identified needs and conducted training for workers who are required to have special competencies as regulated in regulations such as steam operators, lift transport operators, OHS officers, and motor diesel operators.

**Internal audit**

The company has conducted an internal audit conducted in each unit in 2019. Internal audit is carried out 2 times in 1 year, including:

- POM 4: Internal audit semester 1 is conducted on 25-27 March 2019 with the results of 3 NCs found and 5 observations. All NCs have been equipped with root causes and corrective actions along with the date for corrective actions.
- POM 4: Internal audit semester 2 is conducted on 12-14 September 2019 with the results of 3 NCs found and 4 observations. All NCs have been equipped with root causes and corrective actions along with the date for corrective actions.
- JB1: Internal Audit semester 2, 11 - 13 November 2019 with 1 NC results found and 2 Observations, all non-conformities were corrected and fulfilled on 14 December 2019.
- LJ1: Internal Audit semester 2, 18-20 November 2019 with the results of 2 NCs found and 8 observations, all non-conformities were corrected and fulfilled on 20 January 2020.



- LJ2: Internal Audit semester 2, 12-14 November 2019 with 1 NC results found and 6 observations, all non-conformities were corrected and fulfilled on 18 December 2020.

**Environment Aspects**

- Utilizing organic waste from households for composting.
- Contribution in local economic development through the development of plasma plantations and partnerships.
- The company on development a biogas plan.

**Sustainability Aspect**

In the sustainability aspect, the unit of certification develops audit certification from external parties using a virtual data room starting from audit preparation, document presentation, and audit process, with the goal the audit process will effective and efficient.

**BMP**

The Unit Certification regularly monitors continuous improvement, including economic / best, social and environmental aspects for each unit (Plant and Plantation). For best practices and economic aspects, one of the monitoring and strategies is carried out through the annual Quality Control Circle (QCC) program, a kind of internal mechanism to encourage each unit to convey the idea of continuous improvement in certain aspects. For example, the QCC proposal from the Unit of Certification, namely Hydro Tegar for fertilization mechanization. The aim of the innovation is to reduce the use of HK emdeck from 0.52 HK / ha to 0.28 HK / ha by providing fertilizer hanger on the emdeck so that it only requires 1 person to assist the operator of the Emdek tractor in fertilizer application

**3.2.2**

As long as the RSPO template has not available this indicator is not applicable, but the company has reported the RSPO Annual Communication of Progress 2019. The latest ACOP for period of 2018 has been submitted on 17 May 2019.

<b>Status: Comply</b>
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**3.3**

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

**3.3.1**

There was no change over the procedure for cultivation and processing since ASA- 4 until Recertification. The unit of certification has documents procedure of Palm Cultivation and mill processing. in the estate the procedure documents among others about the planning of new area planting, nurseries, land clearing, planting, replanting, pest and disease control, weed control, fertilization, maintenance of immature plant, preparation ahead of harvest, harvesting, loading, and transportation of FFB. The Oil Mill has procedures covering all mill operations such as FFB Grading, Sterilization Station, Press Station, Threshing Station, Oil Room, Kernel Plant, Laboratory, CPO & PK Dispatch, Engine Room, Boiler Room, Electrical, Workshop as well as Raw and Boiler Water Treatment Plan and also supply chain.

The procedure that is owned by the Unit of Certification has covered all the main process activities from land clearing up to transporting FFB and for POM starting from receiving fruit to dispatch CPO. In the procedure also includes aspects of OHS and the environment.

The procedure is available on audit site (Estate and mill office) and are written in a language (Bahasa) that is easily understandable for workers. Based on field observation in mill and estate during an audit, it was known if the procedure has been implemented and the workers can explain and demonstrate their work in accordance with the procedure, refers to the best practices of operational, safety, and environmental.

**3.3.2**

The Unit of Certification has a system that ensures consistency in the implementation of its SOP, such as the Checking or Inspection of Work Quality (Operational Audit of Plantation and Mills), ISPO and RSPO Internal Audit which checks whether the procedures in the unit Certification have been implemented by the company units and Financial Audits conducted by external parties to ensure the use or costs used are in accordance with the rules set by the Unit Certification. Daily internal supervision is carried out by the level of supervision from the Foreman, Division Assistant,

Assistant Head, to the Estate Manager. Operational audits are conducted once a month. an operational audit evaluates the operational and administrative operations of plantations and mills. Whereas an RSPO internal audit is carried out every 6 months to evaluate the implementation of sustainability procedures in plantations and factories. Financial audits of public accountants are conducted once a year. Furthermore, management representatives (Assistant, Managers, and related Superiors) routinely visit inspectorates to control the implementation of procedures. The monitoring to implementation to the procedure that conducted by unit of certification also included activity that carry out by third party or contractors. Furthermore, the unit of certification conduct evaluation for local contractors annually. Last evaluation conducted on 29 June 2019 with aspect that discussed about OHS, company procedure and policy, minimum wages, insurance and etc.

All of the Unit of Certification operational activities are recorded in the form of Monthly Reports for plantations and mills. The operational activities report is a recap of daily activities. This report is a routine report prepared by the plantation and mill management unit and submitted to top management.

**3.3.3**

Based on the Non Conformity Form and Internal Audit Observation, it was known that the unit given a maximum corrective action up to three months before the next internal audit period. Records of monitoring and corrective actions has been observed, covers operational and RSPO Internal Audit, Monthly Report, etc. For instance, RSPO Internal Audit of POM 4 was carried out on 11 – 13 November 2019 in Jabdan 1, Long Jenew 1 on 18 – 20 November 2019 and Long Jenew 2 on 22- 24 July 2019. Operational audit has been conducted monthly covers aspects of harvesting quality, manuring quality, circle and path quality, as well as harvesting losses. All nonconformity has been followed up and fulfilled by each management unit. The audits have covered several aspect of contractors such as minimum payment and payment of employment insurance.

The result of field visits and interviews with the harvesting supervisor indicated that they also record all operational activities in the Supervisor’s Daily Report (LHM) and submit such reports on a daily basis. The daily report describes types of work, numbers of workers, usage of materials, and employee’s individual achievement. Hereinafter all of the company’s operational activities are recorded in the form of Monthly Reports for both the estate and the palm oil mill (POM). Said operational activity report is a recap from the daily activities. The company also discusses each item of the activities. The evaluation mechanism for the entire operational activities, both the estate and the mill, is performed by the manager. The report is a regular report prepared by the unit manager of the estate and the mill and submitted to top management.

**Status: comply**

**3.4**

**A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.**

**3.4.1**

PT SWA and POM 4 areas. Organization has conduct Environmental impact assessment for mill and estate, listed on following details:

- PT. Dharma Satya Nusantara (POM 4): UKL-UPL document for the Development of Palm Oil Mill 4 with a production capacity of 60 ton FFB/hour and Palm Kernel Oil (PKO) production capacity of 300 tons of kernel / day. The document has been approved by local government through decree number 660/520/3-BLH/IV /2011 dated 14 April 2011 concerning Recommendations on UKL-UPL of CPO and PKO POM 4 of PT. Dharma Satya Nusantara in Benhes Village, Muara Wahau Sub-District, East Kutai District, East Kalimantan Province.
- The company (PT. SWA) has conducted Environmental Impact Assessment (EIA or AMDAL) study in 1998 and had been approved by the Ministry of Agriculture through the approval letter number 21/EA/RKL-RPL/BA/VI/1998 June 8, 1998. The scope of the study was the Plantation and Processing Plant in Muara Wahau, Kutai, East Kalimantan with plantation area 25,000 hectares and mill processing capacity of 60 ton FFB /hour (Mill 1) and capacity of 60 ton FFB/hour (Mill 2). Addendum of EIA in year 2013 has included changes in protocol and plans of environmental management and monitoring (RKL-RPL) into the following environmental impacts: 1) the quality of surface water, 2) ambient air quality, 3) attitudes and negative perceptions of the community, 4) employment opportunities , 5) business opportunities, 6) attitude and positive perception of society, 7) degradation of soil fertility, 8) degradation of



biodiversity, 9) public safety due to traffic, 10) load of sediment in the water body, 11) disruption of runoff, 12) reduction of environmental sanitation quality.

PT SWA has document of Social Impact Assessment (SIA) that made by the Certificate Holder. SIA has completely carried out on December 2011 engaged Daemeter Consulting as a consultant. These documents was explained of negative and positive impact of plantation (PT. Swakarsa Sinarsentosa) and mill operation to social aspect and the recommendation for negative impact reduction and increasing of positive impact. SIA assessment compiled based on the aspirations of the community through in-depth interviews and Focus Discussion Group, villages sampled namely Deabeq Village, Village of Nehas Liang Bing, Village of Beanheas, Village of Diak lay, Village of Miao Bau and Muara Wahau Village. Records of participatory in the form of attendance list, has been involve the community around, for example: Muara Wahau SP2 as many as 18 people.

### **3.4.2**

The Implementation of environmental monitoring and management plan are documented on periodical report of environmental monitoring and management implementation report (UKL-UPL) for POM 4 and environmental monitoring and management plan (RKL-RPL) report for PT SWA. The company are consistently done the environmental management and monitoring as outlined in the Report of the Environmental Management and Monitoring per semester regularly.

The company are consistently done the environmental management and monitoring as outlined in the Report of the Environmental Management and Monitoring per sixth month regularly. These reports described realization of monitoring and management of the environment in accordance with environmental parameters in the RKL/RPL. Public consultation with Environmental agency of Kutai Timur indicate that the company has made environmental management and there is no issue of pollution caused by the company's operational activities.

The participatory impact social assessment with nearest community i.e. discussion with the nearest community and questioner method to the village such as Nehas Liah Bing village, Jabdan village, Benheas village. During the audit, there is no conflict with the company and the evaluation of a plan for managing and monitoring the company's social impact routinely.

Based on interviews with the village officials of Muara Wahau, Diak Lay and Benheas, known that the community has been involved in the preparation of SIA, all impacts on the community have been accommodated.

### **3.4.3**

Based on verification, RKL-RPL report semester 2 year 2019 has already contained adequate environmental management and monitoring component as follows: 1) water quality, 2) ambient air quality, 3) attitudes and negative perceptions of the community, 4) employment opportunities, 5) business field, 6) attitude and a positive perception of society, 7) degradation of soil fertility, 8) degradation of biodiversity, 9) traffic accidents ashore, 10) load of sediment into the water body, 11) disruption of governance runoff, 12) reduction in environmental sanitation.

The Evaluation for environmental monitoring / management plans have been developed on January 2019 and as the feedback of review, company has included landfires monitoring, land applications, and toxic/hazardous waste monitoring parameters since 2<sup>nd</sup> semester 2019 monitoring report.

The impact identified in SIA has been managed and monitored through SIA Management and Monitoring Plan. The plan describes monitoring indicator, monitoring method, PIC and frequency. Compiled based on the results of reviews of management plan on January 2018, which conducted in a participatory manner. In the SIA Management and Monitoring Plan, there are 14 social impacts to be monitored during 2018/2019 including the impacts to smallholder's scheme.

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

No negative issues raised during interviews with communities surround the plantation such as interviews with community leaders, women's communities, local contractors, and Subditrict Official of Muara Wahau and Village Official of Diak Lay.

**Status: Comply**

**3.5**

**A system for managing human resources is in place.**

**3.5.1**

The process of selecting and recruiting company employees has been described in the SOP for recruitment Document No. SOP-AGR-012-R02 dated January 1, 2015. The document has been signed and approved by the Operations audit & management system head and executive Director of SBU Agro I. In the document It was explained that all workers, both Jakarta office representatives / representatives, local site admissions and AKAD admissions must be based on selection (administration and interview) and complete with a certificate of work worthiness from a doctor. Based on the selection results, the workforce is placed according to their expertise / ability and quality.

In addition, companies (PT DSN and PT Swakarsa Sinarsentosa) have also shown company regulations for the period 2020 - 2022 CHAPTER II also regulates the Basis for Reception, Placement, Transfer and promotion of workers. In general terms of acceptance, among others, state that workers must be in good health and at least 18 years old.

The company also has an Internal Memorandum (No.:0017/HCO/IM/III/2016) concerning the Declaration of the Recognition of Human Rights set by the Human Capital Group Head on March 14, 2016. The memorandum explains:

- The company treats employees according to the principle of equality and will not discriminate or carry out direct, indirect restrictions, harassment or exclusion based on human differentiation or the basis of religion, ethnicity, race, ethnicity, group, class, social status, economic status genital sex, language, political beliefs.
- The company does not discriminate in recruiting employees. And provide jobs to all employees in accordance with their areas of expertise and without a forced labor system.

Based on interview and document verification, it is know that the labor sector is stored and managed by the HC (Human Capital) team.

**3.5.2**

The company has shown that labor procedures are properly implemented, recorded and managed. The implemented related of labor procedure such as:

**Promotion and Appointment of Employees**

- Work Agreement No.082/SPK/LJ2/SK/WHU/II/2020 dated January 22, 2020 states Daily Worker with NPK (Employee Identification Number) 0057553 from those who were previously contract employees have been appointed as permanent employees as of January 23, 2020.
- Work Agreement No.071/SWA/JB1/SK/WHU/III/2020 dated February 14, 2020 states Daily Worker with NPK (Employee Identification Number) 0059175 from those who were previously contract employees have been appointed as permanent employees as of February 15, 2020.

**Employee Assessment**

- Trial employee evaluation form for NPK 0031370, date of entry to work January 19, 2015. Date of assessment on April 18, 2015 by appraisal supervisor with an average rating of Good so it is recommended to be appointed as permanent employees.
- Trial employee evaluation form for NPK 0060287, date of entry to work January 16, 2019. Date of assessment on June 15, 2019 by appraisal supervisor with an average rating of Good so it is recommended to be appointed as permanent employees (3 down).

**Status: Comply**

**3.6**

**An occupational health and safety (H&S) plan is documented, effectively communicated and implemented.**

**3.6.1; 3.6.2**

Policy on occupational health and safety (OSH) was issued in December 2010 by Chief Executive AGRO in Jakarta which

describes company commitment to create a safe and health working environment through:

- Company operational activity shall in accordance with the respective Laws and Regulations.
- Actively monitoring and improve system management implementation and OSH application.
- Continuous improvement as a part of corporate culture.

Procedure of OSH was presented in document No. SOP-AGR-037-R01 dated November 1<sup>st</sup> 2013, issued by the Executive Director SBU Agro 1. The procedure has describes plan of OSH and environment program for estates and mill, risk identification and management control, work permit application, handling and reporting of accident, evaluation and follow up, monitoring and environment measurement, emergency handling, OSH and environment communication, participation and consultation.

#### HIRAC

The company has carried out Hazard Identification Risk Assessment (HIRAC) for all activities in the estates and mill, which documented in HIRAC document No. FM-SHE-29-R02.

HIRAC for PT DSN issued by Secretary of *P2K3* and Mill Head in January 02<sup>nd</sup> 2020. HIRAC document has describes any product activity, danger/aspect, risk/impact, condition (normal, abnormal and emergency), risk evaluation (impact, opportunity, risk level), operational control, risk impact control (elimination, substitution, engineering, administration and PPE), remarks, remnant risk evaluation (result/consequences, opportunity, risk level), action (important, not important and environment) and person in charge. HIRAC has covers all mill activities. Furthermore, HIRAC for estate issued by *P2K3* Secretary and Plantation Head in January 20, 2020. HIRAC has covers all activities in estate.

HIRAC scope for mill has covers loading ramp, sterilizer, tippler, screw press, clarification, kernel plant, boiler, WTP, engine room, maintenance, laboratory, compound, material/goods flows, cleanliness of hazardous waste warehouse, road traffic to the mill, general, office, EFB storage, WWTP, staff and employees housing, organic and non-organic domestic waste management, operators and non-routine activity. Meanwhile HIRAC scope for estates has cover land clearing, immature palm upkeep, pest and diseases management, harvesting and transportation, manuring, chemist, manual upkeep, by product application (EFB and Land Application), emplacement afdeling, workshop, unit, warehouse, office, road and infrastructure, estate clinic, domestic activities in emplacement and building infrastructure.

The company has made work programs related to OHS made by the *P2K3* team, in addition to that has been shown the Environmental Health and Safety Work Program Documents in 2019 and 2020. The examples of OHS programs include identifying hazards and risks, determining Job Safety Analysis, conducting health checks periodic/special health checks, conduct training related to OHS certification/licensing, conduct *P2K3* meetings, conduct emergency response drills and anticipate, monitor and control fires.

#### Plan and Realization Related OHS

##### PPE Giving

The company has a document to identification PPE according to the job, for example the spraying activity needs helmet, faceshield, gloves, apron and shoes for PPE. The company also give PPE to worker such as :

- PPE for harvester (initial H) in Afdeling 4 on December 2, 2019. The worker give a booth shoes, uniform, helmet and *egrek* cover.
- PPE for harvester (initial R) in Afdeling 4 on November 2, 2019. The worker give a booth shoes, uniform, helmet and *egrek* cover.
- PPE for harvesting clerk (initial A) in Afdeling 4 on October 29, 2019. The worker gives a booth shoes.
- PPE for sprayer (initial SM) in Afdeling 10 Long Jenew Estate on February 27, 2020. The worker give a apron.
- PPE for sprayer (initial S) in Afdeling 10 Long Jenew Estate on February 27, 2020. The worker gives a apron and rubber gloves.
- PPE for sprayer (initial VF) in Afdeling 10 Long Jenew Estate on February 27, 2020. The worker gives a apron, mask, helmet and rubber gloves.

Based on field visit to warehouse in Jabdan 1 Estate, it is know that there are PPE stock such as helmet, shoes and rubber gloves. Besides that, based on interview with sterilizer worker (POM 4), it is known that the worker get a PPE for

free and the company will replace the broken PPE immediately.

Monitoring Work Accidents

The company has showed the Annual Monitoring Work Accident, based on that document it is known that through 2019, there are 8 days Lost time Accident in POM 4, 19 days in Jabdan 1 Estate, 1 day in Long Jenew 1 Estate and 16 days in Long Jenew 2 Estate.

Regular Medical Check Up

The company has conducted regular health checks for mill and estate workers. In the Health Test Identification Document states that regular health checks for employees include MCU (once a year), Audiometry (once a year), Cholinesterase (twice a year), Spirometry (once a year) and pregnant test (once a year).

POM 4

The company has a medical check up for employee such as Audiometry (on April 2019) for 75 workers, Spirometry (On September 2019) for 40 workers, Cholinestrace (on November 2019) for 33 workers and regular medical check up (On Mei 2019) for 144 workers. All workers are fit for working and no one crosses the threshold.

Long Jenew 1 Estate

The company has a medical check up for employee such as Audiometry (on March 11, 2019) for 29 workers, Spirometry (On September 28, 2019) for 38 workers, Cholinestrace (on July 2019) for 66 workers and regular medical check up (On December 2019) for 468 workers.

Based on document, it was identified 1 worker (initial AR) get the result of spirometry over the threshold. The company makes a referral to the hospital. As for the results of checking it is known that there are Tuberculosis and Bronchitis. Related to this matter, the company issued Letter No. 0018 / OS-KP / SKI / I / 2020 which explains that it is recommended that workers be moved to light work, non-dusty area work and non-chemical handling.

Long Jenew 2 Estate

The company has a medical checkup for employee such as Audiometry (on March 11, 2019) for 22 workers, Spirometry (On September 28, 2019) for 68 workers, Cholinesterase (on January 2020) for 81 workers and regular medical checkup (On February 2020) for 442 workers. All workers are fit for working and no one crosses the threshold.

Jabdan 1 Estate

The company has a medical checkup for employee such as Audiometry (on March 11, 2019) for 21 workers, Spirometry (on September 28, 2019) for 69 workers, Cholinesterase (on January 2020) for 104 workers and regular medical checkup (on Mei 2019) for 294 workers.

Based on interview with Boiler Operator (POM 4) it is know that the worker had a medical checkup regularly, the worker also get a PPE according to risk identification.

The company has showed the P2K3 report (quarterly). It also implementing of compliance regulation such as :

- P2K3 Report for July – September 2019 (PT Swakarsa Sinarsentososa) that already reporting to Governor of Kalimantan Timur Province and Head of Labor Agency Kalimantan Timur Province on September 30, 2019.
- P2K3 Report for October – December 2019 (PT Swakarsa Sinarsentososa) that already reporting to Governor of Kalimantan Timur Province and Head of Labor Agency Kalimantan Timur Province on January 20, 2020).
- P2K3 Report for July – September 2019 (PT Dharma Satya Nusantara) that already reporting to Head of Labor Agency of Kalimantan Timur Province on October 25, 2019.
- P2K3 Report for October – December 2019 (PT Dharma Satya Nusantara) that already reporting to Head of Labor Agency Kalimantan Timur Province on February 5, 2020).

Monitoring the effectiveness of the OHS plan in managing health & safety risks includes checking PPE before work, evaluating OHS in P2K3 routine meetings and a comprehensive annual evaluation related to work accidents.

**Status: Comply**

**3.7**

**All staff, workers, Scheme Smallholders, outgrowers, and contract workers are appropriately trained.**

**3.7.1**

The company has a training program for all worker, staff and contractor. The implementation program for 2020 such as :

Employee

- ISO, RSPO, ISPO, ISCC and SCCS training in February
- Training related to conservation in January
- Hazardous waste handling training in January
- Fire Fighting, First Aid, Emergency Response, Environment and OHS Training in the January-December period 2020

Staff

- Role estate Assistant Training with training programs in April and August.
- Basic training in recruitment, selection and interviews in March
- Negotiation skills training and CSR mediation in June
- SAP Training and Estate Management in February

Contractor

- SCCS Training in February and November
- Environment and OHS Training in April and June
- Training on Introduction to RSPO, ISO, ISCC, and ISPO in August and September

Based on interviews with factory and plantation employees such as sterilizer operators, boilers, kernels, engine rooms, harvesters in block B41 / 42 and spray teams in block B35 Long Jenew 1 Estate, it is known that socialization and training have been routinely carried out at least during morning briefings. Health and Safety Materials such as compliance with PPE, health checks, and emergency response are also routinely delivered to employees.

Beside that, based on interview with local contractor (FFB transport) it is known that the contractor was already follow the training such as OHS training, SCCS Training and Environment Training on 2019.

**3.7.2**

Training records are maintained by the Learning Center department. The frequency of training varies from weekly, monthly and yearly.

Examples of recorded training that has been carried out include :

- First aid training on 14 February 2019 for Emplacement Officer (Jabdan I Estate)
- First aid training on 11 March 2019 for Mechanic (Jabdan I Estate)
- Motor Diesel Training on 27 August 2019 (Long Jenew 1 Estate)
- Clerk Estate Training on 6 November 2019 (Jabdan 1 Estate)
- Traction and Civil Management Training on 25 February 2019 (Long Jenew 1 Estate)
- OHS Training for FFB contractor on 14 October 2019 (Long Jenew 1 Estate), was attended by 6 peoples.

Based on the results of the document review it is known that training records have been made for individuals, the training matrix has also been made with an individual approach.

**3.7.3**

The latest training conducted on 17 July 2019 attended by PIC of each SCCS aspects, as well as socialization for contractors. Based on Work Instruction of Traceability of CPO, PK and PKO in MB Model (No. IK-AGR-MS-04-R10 dated 25 February 2019. During the audit, the Staff and operators shows the understanding of SCCS requirement and critical point, for example security and weighbridge operator were able to demonstrate how to verify the FFB from certified and uncertified source and marking by certified stamp.

**Status: Comply**

**3.8**

**Supply Chain Requirements for Mills**

**3.8.1; 3.8.2**

POM 4 applied SCCS Model Mass Balance since its received and processing the FFB from certified and uncertified sources, verification are done through field observation and interview to security and weigh-bridge operator as well as management representative. The mill claim only the volume of oil palm products produced from certified FFB as MB.

Sighted the FFB supplier list of POM 4 between March 2019 to February 2020, in the following table

Supplier	Unit/Code	Certified	Uncert
PT SWA (scope of certification)	LJ1	✓	
	LJ2	✓	
	JB1	✓	
PT SWA (out of scope)	JB2	✓	
PT SWA - KM	KM1 (KUD Min Sun Lekut)		✓
	KM2 (KUD Min Bea Glang Mandiri)		✓
PT DAN - KM	KM4 (KSU Gerdabang Agri Centre)		✓
	KM8 (KUD Sawit Sawit Wehea telan Sejahtera)		✓
	KM10 (KUD JengeaBong Pet Kuq		✓

**3.8.3**

Estimated certified product recorded in the certificate annex of last surveillance, actual certified produced has been verified during this assessment (Recertification), as well as the estimates of certified production for the next license period has been set by the Mill, describes in the following table:

Product	Estimate Production 12 months (MT)	Actual Production 12 months (MT)	Estimate Production 12 months (MT)
	1 June 2019 – 31 May 2020	1 March 2019 – 29 February 2020	1 June 2020 – 31 May 2021
FFB	349,887	220,948.46	310,000
CSPO	80,474	50,153.22	71,300
CSPK	15,745	9,054.79	12,400

**3.8.4**

POM 4 has been registered and met the requirements of reporting supply chain through the RSPO supply chain managing organization (palm-trace), which describing below:

Sub License ID                      CB85839  
 Member Name                        PT DHARMA SATYA NUSANTARA (PKS4)  
 Member ID                            RSPO\_PO1000002088  
 RSPO Membership Number        1-0135-12-000-00 (PT DHARMA SATYA NUSANTARA)



Issued On 18 May 2019  
 Issued By PT Mutuagung Lestari  
 Start Date 06/01/2019  
 End Date 31-05-2020  
 Group Size 0  
 Total Certified Area (Ha) 11,729

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.

**3.8.5**

POM 4 has had Work Instruction of Traceability of CPO, PK and PKO in MB Model (No. IK-AGR-MS-04-R11 dated 27 May 2019) that refers to RSPO SCC Standard and System revised June 2017. The procedure already describes all the elements specified in the SCCS requirements as well as the PIC for aspects of FFB acceptance, production processing, product storage, product delivery, registration and transactions in RSPO IT platform, excess production reporting to CB, outsourcing activities, training, internal audit, communicating and claiming according to the RSPO standard, handling of nonconformity, and record keeping. Related management reviews were in SOP of Management Reviews Meeting (No. SOP-AGR-041-R01 dated 01 November 2016).

Based on observation and interview to the PIC in specific activities (i.e security/receiving FFB, weighbridge, and mass balance data PIC), they have been provided SCCS training and able to demonstrate awareness of the procedures related SCCS implementation.

**3.8.6**

Internal Audit of SCCS will be conducted annually, described in Work Instruction of Traceability of CPO, PK and PKO in MB Model (No. IK-AGR-MS-04-R11 dated 27 May 2019). The latest internal audit are conducted in 12 – 14 September 2019 together with the RSPO P & C audit. There is no NC related SCCS implementation.

**3.8.7**

- i. The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.**

The mill has a record amount of FFB tonnage as follows:

Months	FFB Received		Total
	Certified	Non-certified	
Mar-19	18,625.75	6,869.09	25,494.84
<b>Total</b>	<b>18,625.75</b>	<b>6,869.09</b>	<b>25,494.84</b>
Apr-19	18,877.86	6,124.98	25,002.84
May-19	19,282.25	8,311.64	27,593.89
Jun-19	17,120.85	6,889.82	24,010.67
<b>Total</b>	<b>55,280.96</b>	<b>21,326.44</b>	<b>76,607.40</b>
Jul-19	18,884.25	7,151.59	26,035.84
Aug-19	22,831.73	8,950.66	31,782.39
Sep-19	18,674.73	6,969.32	25,644.05
<b>Total</b>	<b>60,390.71</b>	<b>23,071.57</b>	<b>83,462.28</b>
Oct-19	20,627.89	9,579.93	30,207.82

Nov-19	18,886.10	8,358.30	27,244.40
Dec-19	18,470.21	9,190.51	27,660.72
<b>Total</b>	<b>57,984.20</b>	<b>27,128.74</b>	<b>85,112.94</b>
Jan-20	13,792.56	6,335.88	20,128.44
Feb-20	14,874.28	6,934.62	21,808.90
<b>Total</b>	<b>28,666.84</b>	<b>13,270.50</b>	<b>41,937.34</b>
<b>TOTAL</b>	<b>220,948.46</b>	<b>91,666.34</b>	<b>312,614.80</b>

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

Estimated certified product recorded in the certificate annex of last surveillance, actual certified produced has been verified during this assessment (Recertification), that describes in the following table:

<b>Product</b>	<b>Estimate Production 12 months (MT) 1 June 2019 – 31 May 2020</b>	<b>Actual Production 12 months (MT) 1 March 2019 – 29 February 2020</b>
FFB	349,887	220,948.46
CSPO	80,474	50,153.22
CSPK	15,745	9,054.79

Based on table above there is no over production of CSPO and CSPK.

**iii. The mill shall have a mechanism in place for handling non-conforming oil palm products and/or documents**

In the SCCS manual it is mentioned that the handling of nonconforming products is as follows:

- If the validity of the certificate has expired, the Commercial Dept. The head will clarify the certificate owner, and if there is no proof of extension of the validity period, then the product is treated as a Non-Certified product
- Regarding external FFB products if the quality of the products sent is below the standard that has been determined, then the provisions of deductions (fines) for external FFB refer to IK-AGR-LAB-01 regarding grading

**3.8.8**

Documentation for the Sustainable Crude Palm Oil (Sustainable CPO), consist of: daily record of the FFB acceptance, daily record of CPO production, which classified as the CSPO, CPO (RSPO) sale record, stock record that has been reconciled with the FFB acceptance, monthly production and sale and annual recapitulation.

Documentation for the Sustainable Palm Kernel (Sustainable PK), consist of: FFB dispatch record, which further will be counted the daily production of the Sustainable PK, daily production record of the PK, which classified as the Sustainable PK, monthly recapitulation of the Sustainable PK's sale, stock record, which has been reconciliation with the FFB acceptance record, monthly sale production and annual recapitulation.

Documents verifications and interview with management units obtained information if in last 12 months before audit (March 2019 – February 2020 there is no CSPO that sold as certified products. CPO products sold as conventional. All CSPK produces sold PT Dharma Satya Nusantara (Kernel Crushing plant). PT Dharma Satya Nusantara (Kernel Crushing plant) has been registered and met the requirement for reporting supply chain through RSPO IT Platform, describes below:

- o Member name : PT Dharma Satya Nusantara (Kernel Crushing plant)
- o Member ID: RSPO\_PO100002087

Documents verifications and field observation in POM 4 it's known the CSPK that delivered to PT Dharma Satya



Nusantara (Kernel Crushing plant) using conveyor. Every CSPK production will be sent directly to KCP via conveyor and measured through a baskulator. Reconciliation is carried out periodically related to the sending and receiving. Based on documents verifications its known if claim related CSPK products is no longer than 3 months. For example for shipping announcements with transaction id TR-e0a27ccc-2970 dated 16 December 2019, volume 773.21 MT is based on shipping on 1 – 30 November 2020.

**3.8.9**

POM 4 has imposed provisions that must be applied by contractors as contained in the work agreements or Work Instruction of Traceability of CPO, PK and PKO in MB Model (No. IK-AGR-MS-04-R11 dated 27 May 2019) which has been socialized on 4 February 2019, these provisions include:

- The cooperation is bound by a work agreement
- The CPO transported only comes from POM 4
- CB has the right of access to the contractors to verify the implementation of RSPO SCCS.
- The contractors must be given socialization about SCCS at least once a year.

The contractors have been bound in a work agreement, for example, work agreement with Theodorus Telat No. 007/DSN/PKS4/2020 dated 02 January 2020. On article 4 states that it is willing to provide access to an accredited certification body appointed by the first party to its operations and systems, along with all necessary information including the commitment of the second party in carrying out obligations under that agreement

**3.8.10; 3.8.11**

The mill has been record the names and contact details of all contractors used for the processing or physical handling of RSPO certified oil palm products. Based on review list of transporters verified on ASA 4 with this recertification, there is no new contractor added. There are 5 outsourcers which physical handling of RSPO certified oil palm products. It will be verified on next surveillance, if any new contractor

**3.8.12**

POM 4 have maintain accurate, complete and up-to-date for the FFB receives, process and CPO & PK production from its supply bases.

The record keeping saves in “Mass Balance Report” for example periods March 2019- February 2020. Within this record, the certificate holders maintain the FFB’s sources based on monthly bases.

Months	FFB Received (MT)		Total
	Certified	Non-certified	
Mar-19	18,625.75	6,869.09	25,494.84
<b>Total</b>	<b>18,625.75</b>	<b>6,869.09</b>	<b>25,494.84</b>
Apr-19	18,877.86	6,124.98	25,002.84
May-19	19,282.25	8,311.64	27,593.89
Jun-19	17,120.85	6,889.82	24,010.67
<b>Total</b>	<b>55,280.96</b>	<b>21,326.44</b>	<b>76,607.40</b>
Jul-19	18,884.25	7,151.59	26,035.84
Aug-19	22,831.73	8,950.66	31,782.39
Sep-19	18,674.73	6,969.32	25,644.05
<b>Total</b>	<b>60,390.71</b>	<b>23,071.57</b>	<b>83,462.28</b>
Oct-19	20,627.89	9,579.93	30,207.82
Nov-19	18,886.10	8,358.30	27,244.40

Dec-19	18,470.21	9,190.51	27,660.72
<b>Total</b>	<b>57,984.20</b>	<b>27,128.74</b>	<b>85,112.94</b>
Jan-20	13,792.56	6,335.88	20,128.44
Feb-20	14,874.28	6,934.62	21,808.90
<b>Total</b>	<b>28,666.84</b>	<b>13,270.50</b>	<b>41,937.34</b>
<b>TOTAL</b>	<b>220,948.46</b>	<b>91,666.34</b>	<b>312,614.80</b>

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

**CPO production and Dispatch for POM 4**

DATE	CPO Production (MT)		Total	DISPATCH CPO (MT)		Total
	certified	non-certified		Conventional	RSPO	
Mar-19	4,183.24	1,560.87	5,744.11	4,228.65	-	4,228.65
Apr-19	4,080.93	1,298.35	5,379.28	4,139.74	-	4,139.74
May-19	4,139.50	1,801.91	5,941.40	4,376.41	-	4,376.41
Jun-19	3,749.49	1,517.47	5,266.96	3,777.82	-	3,777.82
Jul-19	4,172.83	1,517.82	5,690.65	4,163.58	-	4,163.58
Aug-19	5,305.67	2,140.09	7,445.76	5,010.08	-	5,010.08
Sep-19	4,449.66	1,589.40	6,039.06	4,275.04	-	4,275.04
Oct-19	4,774.32	2,266.63	7,040.95	4,821.87	-	4,821.87
Nov-19	4,314.85	1,947.44	6,262.28	4,459.88	-	4,459.88
Dec-19	4,232.50	2,127.49	6,359.99	4,161.18	-	4,161.18
Jan-20	3,236.94	1,424.82	4,661.75	3,280.83	-	3,280.83
Feb-20	3,513.31	1,641.56	5,154.87	3,424.98	-	3,424.98
<b>TOTAL</b>	<b>50,153.24</b>	<b>20,833.85</b>	<b>70,987.06</b>	<b>50,120.06</b>		<b>50,120.06</b>

**PK production and Dispatch for POM 4**

Dated	PK Production (MT)		Total	Dispatch CSPK (MT)		
	certified	non-certified		Volume	License ID	Transaction ID
Mar-19	705.29	262.57	967.86			
Apr-19	735.37	229.99	965.36	593.02	CB67209 (Expired)	TR-1cbeac2b-7c3e
May-19	776.21	337.37	1,113.58	1,225.32	CB67209 (Expired)	TR-7b203fa6-675c TR-91188d1c-7b6a
Jun-19	620.73	251.09	871.82			
Jul-19	772.01	279.06	1,051.07	960.87	CB85839 (Active)	TR-bb8ef84f-c2b9
Aug-19	1,071.86	430.66	1,502.53			

Sep-19	854.19	303.75	1,157.94	960.87	CB85839 (Active)	TR-9825d566-9d8a
Oct-19	872.73	409.74	1,282.47	1,170.87	CB85839 (Active)	TR-665ec309-8de3
						TR-122d4355-be06
Nov-19	773.21	347.05	1,120.27		CB85839 (Active)	TR-bd56803e-94f9
Dec-19	746.50	374.23	1,120.74	755.18	CB85839 (Active)	TR-e0a27ccc-2970
Jan-20	544.41	238.34	782.75	746.50	CB85839 (Active)	TR-2504442e-584e
Feb-20	582.28	271.01	853.30	1,170.87	CB85839 (Active)	TR-15500db9-73fb
<b>TOTAL</b>	<b>9,054.79</b>	<b>3,734.87</b>	<b>12,789.66</b>	<b>7,558.68</b>		

**3.8.13; 3.8.14**

Not applicable. POM 4 only conduct FFB processing up to CPO and PK. Based on RSPO SCCS Manual, it is explained that the conversion factors of CPO and PK are based on actual extraction.

**3.8.15**

POM 4 applied SCCS – module MB since its received and processing the FFB from certified and uncertified sources, verification is done through field observation and interview to security and weigh-bridge operator as well as management representative. The mill claims only the volume of oil palm products produced from certified FFB as MB.

**3.8.16**

Documentation for the Sustainable Crude Palm Oil (Sustainable CPO), consist of: daily record of the FFB acceptance, daily record of CPO production, which classified as the CSPO, CPO (RSPO) sale record, stock record that has been reconciled with the FFB acceptance, monthly production and sale and annual recapitulation.

Documentation for the Sustainable Palm Kernel (Sustainable PK), consist of: FFB dispatch record, which further will be counted the daily production of the Sustainable PK, daily production record of the PK, which classified as the Sustainable PK, monthly recapitulation of the Sustainable PK's sale, stock record, which has been reconciliation with the FFB acceptance record, monthly sale production and annual recapitulation. Based on Work Instruction of Traceability of CPO, PK and PKO in MB Model (No. IK-AGR-MS-04-R10) stated that the retention time of the documents minimum 2 years. Based documents verifications the mill can presented documents from 2018 for instance mass balance records, weighbridge tickets etc.

Documents verifications for period March 2019 – February 2020 there is no CSPO products sold under RSPO Scheme. All CSPO products sold as conventional. Related to that's matter the unit of certification can presented evidence that CSPO that sold has been allocated as credit.

For CSPK for period March 2019 – February 2020 there are 7,558.68 MT sold as CSPK with the recapitulation of sales as follows:

Transaction ID	Dated	Volume (MT)	License ID	Buyers
TR-15500db9-73fb	04/02/2020	543.09	CB85839 (Active)	PT. DHARMA SATYA NUSANTARA, Tbk (Kernel Crushing Plant)
TR-2504442e-584e	08/01/2020	746.5	CB85839 (Active)	
TR-e0a27ccc-2970	16/12/2019	773.21	CB85839 (Active)	

TR-bd56803e-94f9	12/11/2019	790.62	CB85839 (Active)	
TR-665ec309-8de3	31/10/2019	704.62	CB85839 (Active)	
TR-122d4355-be06	01/10/2019	466.25	CB85839 (Active)	
TR-9825d566-9d8a	05/09/2019	755.18	CB85839 (Active)	
TR-bb8ef84f-c2b9	11/07/2019	960.87	CB85839 (Active)	
<b>Total Licensed period 1 June 2019 – 1 May 2020</b>		<b>5,740.34</b>		
TR-7b203fa6-675c	10/05/2019	621.23	CB67209 (expired)	PT. DHARMA SATYA NUSANTARA, Tbk (Kernel Crushing Plant)
TR-91188d1c-7b6a	10/05/2019	604.09	CB67209 (Expired)	
TR-1cbeac2b-7c3e	01/04/2019	593.02	CB67209 (Expired)	
<b>Total Licensed period 1 June 2018 – 1 May 2020</b>		<b>1,818.34</b>		
<b>Grand Total</b>		<b>7,558.68</b>		

Documents verifications and field observation in POM 4 it's known the CSPK that delivered to PT Dharma Satya Nusantara (Kernel Crushing plant) using conveyor. Every CSPK production will be sent directly to KCP via conveyor and measured through a baskulator. Reconciliation is carried out periodically related to the sending and receiving. Based on documents verifications its known if claim related CSPK products is no longer than 3 months. For example for shipping announcements with transaction id TR-e0a27ccc-2970 dated 16 December 2019, volume 773.21 MT is based on shipping on 1 – 30 November 2020.

**3.8.17**

Based on transaction report documents, all CSPO and CSPK are claims as Mass Balance. The POM 4 did not use RSPO logo or trademark on product or off product.

**Status: Comply**

**PRINCIPLE #4 RESPECT COMMUNITY AND HUMAN RIGHTS AND DELIVER BENEFITS**

**4.1**

**The unit of certification respects human rights, which includes respecting the rights of Human Rights Defenders.**

**4.1.1**

The company has policies related to non-discrimination and equal opportunities in the Internal Memorandum (No.:0017/HCO/IM/III/2016) concerning the Declaration of Human Rights Recognition established by Human Capital Group Head on March 14, 2016. In the memorandum explain, among others:

- The company will wholeheartedly uphold the Human Rights of all employees who work at the Company.
- The company treats employees in accordance with the principle of equality and will not carry out acts of discrimination or do any direct or indirect limitation, harassment or isolation based on differentiating humans or religious principles, ethnicity, race, ethnicity, group, class, social status, status economy, genitalia, language, political beliefs.
- The company does not discriminate in employee recruitment. And provide jobs for all employees in accordance with their fields of expertise and without a system of forced labor.
- Every employee who works in a company is recognized as a personal human being who has the freedom of religion, thought, opinion and uses his conscience in accordance with the dignity of his humanity based on company regulations and applicable laws.

Based on interview with local contractor, worker union and committee gender, it is known that they already understand about the policy. Interview with worker in estate and mill informed that there is no complaint related to violation of human rights.

**4.1.2**

The company holder has an Operation Director Memorandum (No. 0030/MS/XI/2016 dated 1 November 2016) related to the policy of not using violence, intimidation, or the use of paramilitaries in resolving disputes/conflicts, as well as SOP for Conflict Handling (No. SOP-AGR-007-R00 dated 15 February 2012), state that the stages of conflict resolution are conducted by deliberation or by legal means.

Based on interviews with stakeholders (National Land Agency, Plantation Agency, Muara Wahau Village Officials, Diaklay village and Local Contractors) were found that the Certificate Holder had never used violence or intimidation in resolving disputes, but was deliberated first.

**Status: Comply**

**4.2**

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

**4.2.1**

The company can also show the Employee Complaint Handling Procedure (Number: SOP-AGR-054-R02, July 3, 2017) and the External Complaint Communication and Handling Procedure (Number: 044-R01, July 3, 2017) that has been completed with the Complaint Form. The procedure states that the response period for complaints received is 4 days. The time needed to resolve the problem is as fast as possible, but also depends on complaints / problems raised. If the problem/complaint that has been brought to the HC Group Head has not yet been resolved, then one party or both parties can submit it to the local Manpower Office to request assistance for settlement. Beside that based on interview with management representative, if the problem still continue and not finish, it is possible to bring the problem to the RSPO Complain System.

The officer responsible for handling Employee complaints (Internal) is the Human Capital Operating (HCO) Department Head. Complaints can be made via SMS (24 hours) and telephone (during working hours and weekdays), the complaint phone number has also been included in the procedure.

Whereas requests for information or External Complaints are submitted in writing and documented by the Legal Department / CSR Operation Dept. Head.

Based on the results of interviews with representatives of trade unions, gender committees, and representatives of surrounding village communities such as the Diaklay Village Community, it is known that at the time of the recertification assessment there were no complaints or disputes. As stated by company representatives, specific mechanisms agreed by the parties will be developed if there are significant disputes or complaints.

As for complaints during 2019, the majority of complaints came from repairing damage to infrastructure such as on December 24, 2019 there were complaints of clogged water. This was responded to on the same day (December 24, 2019) with the realization of the provision of pipes and taps to repair water installations. In addition, there is information on complaints on 10 September 2019 related to housing lights that went out, it was responded to on the same day (10 September 2019) by providing the required materials.

**4.2.2 and 4.2.4**

Based on the results of interviews with representatives of trade unions, gender committees, and representatives of surrounding village communities such as the Diaklay Village Community, it is known that at the time of the recertification assessment there were no complaints or disputes. As stated by company representatives, specific mechanisms agreed by the parties will be developed if there are significant disputes or complaints.

**4.2.3**

As for complaints during 2019, the majority of complaints came from repairing damage to infrastructure such as on December 24, 2019 there were complaints of clogged water. This was responded to on the same day (December 24, 2019) with the realization of the provision of pipes and taps to repair water installations. In addition, there is information

on complaints on 10 September 2019 related to housing lights that went out, it was responded to on the same day (10 September 2019) by providing the required materials.

**Status: Comply**

**4.3**

**The unit of certification contributes to local sustainable development as agreed by local communities.**

**4.3.1**

The results of interviews with management, conveyed that the CSR program was prepared based on the participation of the surrounding community. The company shows examples of Social Visit recordings, such as:

- Records on September 8, 2018 in the village of Muara Wahau.
- Records on September 6, 2018 in the village of Muara Wahau (BPD Muara Wahau)

From the results of meetings with the community, a CSR program was prepared in 2019. For the CSR program in 2019, the company arranged a CSR program in the fields of Economy, Environment, Education, and social culture. The company has also shown the CSR realization record to the communities. For example:

- Honorary teacher assistance is realized on July 2019
- Assistance with Islamic activities on May 2019
- Heavy equipment assistance on September 2019
- Etc.

The results of interviews with representative of Muara Wahau Village and Diaklay Village revealed that the company regularly visits the surrounding community. From the interview results, it was conveyed that the company had provided CSR assistance to the surrounding community in accordance with the identification needs.

**Status: Comply**

**4.4**

**Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their FPIC.**

**4.4.1**

For the total cultivated area covering 16,850 ha has been owned legally by PT SWA through HGU Certificate No. 1 year of 1998, issued based on BPN Decree No. 135/HGU/BPN/1997 dated 28 October 1997, valid for 35 years. All document is kept in head office (Jakarta) and copies are available in unit. POM 4 (under PT. DSN) was established in the land of PT. SWA which has a cooperation agreement between PT. DSN and PT. SWA No. 437/SWA/Dir-Arf/JKT/V/14 on the Granting of Right and Authority to Use Land and Establish the Building of POM and Other Facilities in Muara Wahau Village, Muara Wahau Sub-district, Kutai Timur Regency. Both Mill and Estates has own the plantation permit issued by Kutai Timur Regent, for the plantation area of 16,850 ha (Decree No. 188.4.45/038/Eko.1-III/2012 dated 21 March 2012) and Mill capacity of 60 ton FFB/hour (Decree No. 188.4.45/038/Eko.1-XII/2012 dated 7 December 2012).

From the total land use title (HGU Certificate) covering 16,850 Ha, the scope of certification under POM 4 is 11,729 ha and the rest of the area covering 5,121 Ha under the scope of certification POM 1

**4.4.2; 4.4.3; 4.4.4; 4.4.5; 4.4.6**

The unit of certifications land is not obtained from land acquisition from individual rights, customary rights, or traditional rights. In the Decree of the HGU, it was explained that the entire area of PT SWA originated from the forest area which was released through Decree of Forestry Ministry (No. 174/Menhut-VII/1996 dated 9 February 1996 and letter No. 152/Kpts-II/1997) covering an area of 17,500 ha. There is no information that the land acquisition were from legal compensation from the community. As well as in SIA and HCV document and stakeholder's consultation stated that there is no customary rights and traditional rights within Certificate Holder's area. Based on consultation with Village Head of Diaq Lay and Subdistrict of Muara Wahau, known that the land is not obtained from land acquisition of individual rights, customary rights, or traditional rights.

Based on management interviews, it is known that the unit of certifications has no plans to expand the land by legal compensation for community. However, the company has procedures related to land identification, acquisition, and compensation in FPIC manner that is SOP of Land Acquisition (No. SOP-AGR-071-R02 dated 1 August 2017), and SOP Land Compensation (No. SOP-AGR-058-R02 dated 2 June 2018).



	<b>Status: Comply</b>	
<b>4.5</b>		
<b>No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.</b>		
4.5.1; 4.5.2; 4.5.3; 4.5.4; 4.5.5; 4.5.6; 4.5.7; 4.5.8		
There is no change / new development in the area of PT DSN-POM 4 until Recertification		
In the Decree of the HGU, it was explained that the entire area of PT SWA originated from the forest area which was released through Decree of Forestry Ministry No. 174/Menhut-VII/1996 dated February 9, 1996 and letter No. 152/Kpts-II/1997 covering an area of 17,500 ha. There is no information that the land acquisition were from legal compensation from the community. As well as in SIA and HCV document stated that there is no customary rights as well as traditional rights within CH's area.		
	<b>Status: Comply</b>	
<b>4.6</b>		
<b>Any negotiations concerning compensation for loss of legal, customary or user 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.</b>		
4.6.1; 4.6.2; 4.6.3; 4.6.4		
The unit of certifications land is not obtained from land acquisition from individual rights, customary rights, or traditional rights. In the Decree of the HGU, it was explained that the entire area of PT SWA originated from the forest area which was released through Decree of Forestry Ministry (No. 174/Menhut-VII/1996 dated 9 February 1996 and letter No. 152/Kpts-II/1997) covering an area of 17,500 ha. There is no information that the land acquisition were from legal compensation from the community. As well as in SIA and HCV document and stakeholder's consultation stated that there is no customary rights and traditional rights within Certificate Holder's area. Based on consultation with Village Head of Diaq Lay and Subdistrict of Muara Wahau, known that the land is not obtained from land acquisition of individual rights, customary rights, or traditional rights.		
Based on management interviews, it is known that the unit of certifications has no plans to expand the land by legal compensation for community. However, the company has procedures related to land identification, acquisition, and compensation in FPIC manner that is SOP of Land Acquisition (No. SOP-AGR-071-R02 dated 1 August 2017), and SOP Land Compensation (No. SOP-AGR-058-R02 dated 2 June 2018).		
	<b>Status: Comply</b>	
<b>4.7</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 FPIC and negotiated agreements.</b>		
4.7.1; 4.7.2; 4.7.3		
The unit of certifications land is not obtained from land acquisition from individual rights, customary rights, or traditional rights. In the Decree of the HGU, it was explained that the entire area of PT SWA originated from the forest area which was released through Decree of Forestry Ministry (No. 174/Menhut-VII/1996 dated 9 February 1996 and letter No. 152/Kpts-II/1997) covering an area of 17,500 ha. There is no information that the land acquisition were from legal compensation from the community. As well as in SIA and HCV document and stakeholder's consultation stated that there is no customary rights and traditional rights within Certificate Holder's area. Based on consultation with Village Head of Diaq Lay and Subdistrict of Muara Wahau, known that the land is not obtained from land acquisition of individual rights, customary rights, or traditional rights.		
Based on management interviews, it is known that the unit of certifications has no plans to expand the land by legal compensation for community. However, the company has procedures related to land identification, acquisition, and compensation in FPIC manner that is SOP of Land Acquisition (No. SOP-AGR-071-R02 dated 1 August 2017), and SOP Land Compensation (No. SOP-AGR-058-R02 dated 2 June 2018).		
	<b>Status: Comply</b>	
<b>4.8</b>		

**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.**

**4.8.1; 4.8.2; 4.8.3; 4.8.4**

Based on field observation, review of hectare statement and interview with Diaq lay Village and head of Subdistrict of Muara Wahau, known that there is no land dispute within the area of PT SWA since 2012. Nevertheless, the CH has an Operation Director Memorandum (No. 0030/MS/XI/2016 dated 1 November 2016) related to the policy of not using violence, intimidation, or the use of paramilitaries in resolving disputes/conflicts, as well as SOP for Conflict Handling (No. SOP-AGR-007-R00 dated 15 February 2012), state that the stages of conflict resolution are conducted by deliberation or by legal means.

Results of interviews with Diaq lay Village head and head of Subdistrict of Muara Wahau were found that the Company never used violence or intimidation in resolving disputes, but was deliberated first.

**Status: Comply**

**PRINCIPLE #5 SUPPORT SMALLHOLDER INCLUSION**

**5.1**

**The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.**

**5.1.1; 5.1.2; 5.1.3; 5.1.4; 5.1.5; 5.1.6**

The unit of certification has a plasma (scheme smallholder), such as Min Sun Lekut Cooperative and Min Bea Glang Mandiri, as well as cooperating with many local contractors/businesses. Current and previous prices paid for Fresh Fruit Bunches (FFB) are publicly available. The price of FFB determined by following the Provincial price issued by the Plantation Agency of Kalimantan Timur. The price of FFB can be accessed directly by the public through the website [www.disbun.kaltimprov.go.id](http://www.disbun.kaltimprov.go.id) or through circulars letter that sent by Plantations agency of Kalimantan Timur Province all smallholders and partner companies. All cooperative members can also access price information posted on the cooperative office notice board or ask the assistant partner directly.

The pricing mechanism above has been explained and regulated in a partnership agreement with scheme smallholders. In the agreement, there is a clause that regulates that the FFB pricing follows the price set by the government. This is consistent with the results of public consultations with representatives of village communities. In addition, in MoU article 4, the purchase of FFB from the smallholders' scheme is based on the price that is determined by the plantation agency

The results of public consultations with village officials and administrators of village cooperatives revealed that the payment of FFB for smallholders' scheme was in accordance with the FFB prices set by the Plantation Agency of Kalimantan Timur pricing team. So far, the payment process has been carried out transparently and there has never been a grievance related to the payment. An example of payment verified by the auditor is invoice and proof of payment in January 2020 where the calculation of payment is in accordance with the amount of FFB production of farmers and the price set. Furthermore into the local contractor the company can demonstrate that the payment is in accordance with the agreed agreement, which is 15 working days after submitting the payment request, for example in for work agreement no SPK No 005/SWA/LJ1/2019 for transporting of FFB, payment for December was paid on 23 January 2020 with the payment request on 08 January 2020.

Based on the review of work agreements, interviews with Head of Cooperatives as well as local contractors, it is known that the work agreement has explained the pricing of each work unit. The parties have understood the provisions of work contracts, the contracts have been made fairly, transparently and legally.

**5.1.7**

The results of observations and interviews with the weighbridge operators obtained information that the certification unit has routinely calibrated the weighing equipment carried out by the government (Metrology Bodies Samarinda). The certification unit has also shown documents on the weighbridge calibration carried out in October 2019.

**5.1.8**

The company does not receive FFB from independent smallholders or out-growers.



**5.1.9**

The unit certification has a procedure of communication and external complaints handling document No.SOP-AGR-044-R00 issued date 15 Feb 2013 (mechanism refers to document No. 0215B / SWA-CSR-WHU / VI 2012). The document presents a flow diagram of communication and handling of external complaints at the Jakarta head office, a flow diagram of handling external complaints at the site and attaching forms (requesting information, handling complaints, monitoring requests for information and monitoring external complaints).

The results of interviews with members of the cooperative/kemitraan as well as representatives of the villages of Diak Lay and Muara wahau Sub-district head conveyed that stakeholders have understood the mechanism if there are complaints to the company. From the results of interviews with stakeholders, it was found that there were no complaints in the last 2-3 years.

**Status: Comply**

**5.2**

**The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.**

**5.2.1, 5.2.2 5.2.3 5.2.4 & 5.2.5**

The certification unit supports the improvement of interested smallholders level of livelihood and participation in the sustainable palm oil explained by Cooperation Agreement for the development of smallholder plantations in form agricultural equipment credit Number MoU No.077/DIR-ND/SWA/JKT/IV/10 10 April 10 2010. Described on MoU the company will carry out agronomic guidance and technical guidance for BMP (not full manage) for cooperative Min Sun Lekut, *Muara Wahau* Village, *Muara Wahau* District, Regency *Kutai Timur*.

The company shows programs to improve the level of livelihoods, including at least an increase in the ability to increase productivity, quality, organizational and managerial skills that are explained in the work program of smallholder for period 2019, for example:

- Training related Traceability.
- Training related pesticides and fertilizing application.
- Training related IPM.

The support for legality FFB production for independent smallholder collaborated with government is National Land Agency program for freehold title (SHM) to cooperative Min Sun Lekut on 2019 there will be recapitulation data from 881 landowners, already 749 freehold title by government.

There is a work program of scheme smallholder period 2019, explains pesticides management to cooperative Min Sun Lekut September 7, 2019 related to anticipation of fire caterpillar pests using fogging tools.

The unit of certification regularly review and publicly report on progress of the smallholder support programmed until 2019, based on partnership department review management report in 2020, for example of 881 landowners (cooperative Min Sun Lekut) 749 farmers has freehold title by government, remainder become work programs on 2020.

**Status: Comply**

**PRINCIPLE #6 RESPECT WORKERS' RIGHTS AND CONDITIONS**

**6.1**

**Any form of discrimination is prohibited.**

**6.1.1**

The company has a policy related to non-discrimination and equal opportunities in the Internal Memorandum (No:0017/HCO/IM/III/2016) concerning the Declaration of the Recognition of Human Rights set by the Human Capital Group Head on March 14, 2016. In the memorandum The explained, among others:

- The company will wholeheartedly uphold the Human Rights of all employees who work at the Company.
- The company treats employees according to the principle of equality and will not discriminate or carry out direct or

indirect restrictions, harassment or exclusion based on human differentiation or religious, ethnic, racial, ethnic, group, class, social status, economic status genital sex, language, political beliefs.

- The company does not discriminate in recruiting employees. And provide jobs to all employees in accordance with their fields of expertise and without a forced labor system. Every employee who works in a company is recognized as a private person who has the freedom to have religion, thought, opinion and use his conscience in accordance with his human dignity based on company regulations and applicable laws.

The policy can be easily accessed by the public because it includes information that can be freely accessed. The implementation of the policy can be seen from the composition of employees which is a combination of migrants and surrounding communities with ethnic and religious diversity.

Based on the results of interviews with worker union and spraying worker in Block B35, Afdeling II, It is known that the company has given the same treatment to every employee, there is no issue related discrimination. There has never been a difference based on the similarity of origin and similarity of trust.

#### **6.1.2**

The company has presented the Labor Statistics document for the February 2019 period. Based on this document, it is known that workers come from various religions, gender and ethnicity. The distribution of tribes includes Java, Batak, Jambi, Sundanese, Bugis, Timor, Kutai, Dayak, Bengkulu and Minang. Beside that, based on interview it is known that there is no discrimination issue and explained that in the recruitment activities there were no recruitment fees.

There are no migrant workers in the company's operational area. Although they come from various regions, migrant workers still come from one country (Indonesia).

#### **6.1.3**

The company has a recruitment procedure number SOP-AGR-012-R03 that signed by Managing Director on December 2019. The implementation of the procedure such as:

#### **Promotion and Appointment of Employees**

- Work Agreement No.082/SPK/LJ2/SK/WHU/II/2020 dated January 22, 2020 states Daily Worker with NPK (Employee Identification Number) 0057553 from those who were previously contract employees have been appointed as permanent employees as of January 23, 2020.
- Work Agreement No.071/SWA/JB1/SK/WHU/III/2020 dated February 14, 2020 states Daily Worker with NPK (Employee Identification Number) 0059175 from those who were previously contract employees have been appointed as permanent employees as of February 15, 2020.

#### **Employee Assessment**

- Trial employee evaluation form for NPK 0031370, date of entry to work January 19, 2015. Date of assessment on April 18, 2015 by appraisal supervisor with an average rating of Good so it is recommended to be appointed as permanent employees.
- Trial employee evaluation form for NPK 0060287, date of entry to work January 16, 2019. Date of assessment on June 15, 2019 by appraisal supervisor with an average rating of Good so it is recommended to be appointed as permanent employees (3 down).

#### **6.1.4**

A pregnancy test conducted by the company is not discriminatory but is a form of protection of the reproductive rights of women workers, for example in the case of taking H-1 and H-2 leave. The pregnancy test is carried out once a month by means of urine testing. In addition, H-1 monitoring is always carried out. If a female worker is found to be pregnant, it will be transferred to light work such as child care. Pregnant and nursing mothers are not allowed to do work that is in direct contact with pesticides and fertilizers.

Based on interview with sprayer in Block B35, Afdeling II Long Jenew 1 Estate, the workers said that pregnancy test

was conduct every once a month for all the spraying worker. The worker mentioned the pregnant test was helping the worker to ensure of their capability handling the chemicals.

**6.1.5**

Unit of certification had already a Gender Committee. The purpose of this organization is to facility women worker know related gender issue. Board of management for period 2019 – 2021 namely:

- Committee Head : Nurjaena
- Assistant of Committee Head : Hernis Jovita, Margaretha and Adolfina
- Secretary : Agustina, Fitri and Safri M
- Coordinator : each one person who is a representative of each affiliate and representative of each emplacement

In addition to the women's committee, attention is paid to the development and empowerment of women committee by trade unions. Gender committee programs include:

- Socialization related to the prevention of sexual harassment in the company area
- Dissemination of employee complaints report procedures
- Empowering women in the company area through gymnastics competitions and classes of pregnant women in collaboration with company clinics.

Based on the results of interviews with women workers, for example in Block B35, Afdeling II Long Jenew I Estate, it is known that routine activities carried out by the gender committee such as the socialization of gender committee, reproductive rights, labor day checks, daycare checks routine children and socialization about reproductive health.

**6.1.6**

The company has shown the payment salary document for all the worker and that state on *Daftar Gaji Karyawan* document. Based on that document, there is no issue related salary. The payment was equivalent for the same scope of work. For example :

Salary Document for *Syarat Kerja Umum*/Permanent Worker

Employee Number : 0002997 (Maintenance Operator – Male Worker in Jabdan I Estate)

Basic Wage : Rp 3,140,100

Work Attendance Incentives and Work Period Incentives : Rp 240,000

Employee Number : 0003549 (Maintenance Operator – Female Worker – Long Jenew I Estate)

Basic Wage : Rp 3,140,100

Work Attendance Incentives and Work Period Incentives : Rp 240,000

Employee Number : 0005680 (Maintenance Operator – Female Worker – Long Jenew II Estate)

Basic Wage : Rp 3,140,100

Work Attendance Incentives and Work Period Incentives : Rp 240,000

Based on interview with worker in Block 41/42, Afdeling III Long Jenew I, the worker said that salary payment was following the District Basic Wage (Rp 3,140,000) and there is no difference between male or female worker. Thus it can be concluded that the wages received by each worker are equivalent to their position, years of service and expertise.

**Status: Comply**

**6.2**

**Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).**

**6.2.1**

The company has presented a joint statement letter dated August 5, 2019 signed by 6 union leaders under the DSN group such as worker union of PT Swakarsa Sinarsentosa, worker union of PT Dharma Intisawit Nugraha, worker union of PT Dharma Agrotama Nusantara, worker union of PT Dewata Sawit Nusantara, worker union of PT Karya Prima Agro

Sejahtera, and worker union of PT Dharma Satya Nusantara. The agreement meant is that as long as they have not used the Collective Labor Agreement, the company is used as a reference in Company Regulation. Company regulations was active for period 2020-2022.

The company has been approved the company regulations, including:

- PT Swakarsa Sinar Sentosa according to No. TAR.43 / PHIJSK-PK / PP / I / 2020 which was approved by on behalf of Director General Director of Work Requirements on 10 January 2020
- PT Dharma Satya Nusantara according to No. TAR.51 / PHIJSK-PK / PP / I / 2020 which was approved by on behalf of Director General Director of Work Requirements on 10 January 2020

Besides that, the company has conducted socialization related Company Regulation at POM 4 (on December 14, 2019). The socialization was followed with 147 members.

### **6.2.2**

The rules of the labor force that are used and agreed upon are in the form of company regulations. The contents of the company regulations themselves include the following:

- CHAPTER I: General
- CHAPTER II: Reception, Placement, Transfer and Promotion of Work
- CHAPTER III: Rules of Procedure
- CHAPTER IV: Wages: Wages and Wage Systems, Wage and Rank Review, Overtime Wages, Wages During Suspension, Wages During Pain
- CHAPTER V: Social Security
- CHAPTER VI: Holidays, Leave and Permission to Leave Work
- CHAPTER VII: Education and Training
- CHAPTER VIII: Chapter of work
- CHAPTER IX: Termination of Employment Relations
- CHAPTER X: Miscellaneous

The basis for remuneration used by the company is in reference to the Decree of the Governor of East Kalimantan regarding the stipulation of the Minimum Wage in Kutai Timur Regency No. 561/K.609/2019 dated 18 November 2019 Regency minimum wage that was set was Rp 3,140,098.

The company has a Decree of the Board of Directors on Changes to the Minimum Wage No. 083 / DIR / XII / 2018 and No. 845 / DIR / XII / 2019 wage determination by the company has referred to the government wage stipulation of Rp 3,140,100. Beside that, HCO Dept. Head also always set wage scale according to the group that will be re-set every year, namely 2020 period, the lowest wage in group 1A is Rp. 3,140,100 while IF group's lowest wage is Rp. 3,552,760. The difference is influenced by years of service and class of employees.

The company also shows examples of work agreements for example with NPK 0060287 workers as a compound crew. The agreement is valid from March 15, 2019. The clauses in the employment agreement regulate the rights and obligations of workers such as working time, wage system, BPJS program, termination of employment and facilities obtained.

### **6.2.3**

Based on interviews with worker union, mill workers (Sterilizer Stations, Boilers, Kernels and Engine rooms) and Harvest Workers in Block B41 / 42 Long Jenew 1 Estate, it is known that the company has implemented company regulations properly such as issues regarding working hours, wages, overtime calculations, leave annual leave, pregnancy leave, H-1 policy and other predetermined rules.

The legal fulfilment of labor obligations such as the rules of working hours, overtime rules and other industrial relations issues is ensured by the HC (Human Capital) team. Meanwhile the fulfilment of the reproductive rights of women workers is monitored by the OHS team with clinical assistance.

Based on document verification, it is known that the company comply with the wage regulation such as:  
Salary Document (Mill Security)

Employee Number : 0051735  
 Group : 1B  
 Status : Monthly  
 Basic Wage : 3,201,000  
 Work Accident Insurance : Rp 28,489  
 Death Insurance : Rp 9,603  
 Health Insurance : Rp 128,040  
**Over time : Rp 758,618**

Overtime calculation is in accordance with regulations. If simulated is as follows:  
 Overtime period 16 January 2020 – 15 February 2020 is 22 hours with converted overtime to be 41 hours.  
 - Overtime for 1 hour is Rp 3,201,000 : 173 = Rp 18,502.89

**6.2.4**

The welfare facilities and infrastructure provided by the company to its workers include residential houses, religious facilities, sports facilities and other welfare facilities such as day care facilities, clean water facilities, and availability of electricity. In addition there are also health post facilities.

Based on the results of interviews and field visits to Block B41/42, daycare worker and housing complex, it is known that the housing conditions are in good condition. Waste is managed and will be disposed of in landfills. Sanitary conditions are in good condition and there are no blocked waterways.

**6.2.5**

Based on the results of interviews with residents of housing employees in LJ1, LJ2, and JB1 as well as representatives of gender committees and unions it is known that access to food can be easily reached. The distance from the unit to the regency city is around 1 hour. The company also provides bus vehicles every two weeks for employee shopping needs. Periodically there are sellers of food ingredients, especially for vegetables and side dishes that enter the plantation area at the most every two weeks. In addition there is also the Mandiri Sejahtera Cooperative, which one of the fields of business is in terms of supplying basic goods (basic needs) Based on this it can be concluded that the certification unit has made efforts to improve workers' access to getting decent, adequate and affordable food.

**6.2.6**

The wage eligibility standard referred to by the certification unit is the Regency Minimum Wage. A detailed explanation of Regency Minimum Wage is shown in indicator 6.2.2. The DLW Benchmark for Indonesia has not been established yet, however, the company has done a simulation of calculating the Prevailing Wage. The components included in the calculation of decent living wages include the following:

Regency Minimum Wage for 2020: Rp. 3,140,000

Decent Living Wage (Calculation)

- Eat : Rp 2,100,000
- Housing, electricity, clean water needs are provided free of charge by the company. If estimated in rupiah, the value is around Rp1,460,000.00
- Non Food and House : Rp 1,046,000
- Unexpected Costs : Rp 230,000
- Total DLW : Rp 3,530,100

**6.2.7**

Based on a review of documents and interviews with representatives of trade unions and the human capital division, it is known that the composition of employees in the certification unit is 3Down and SKU. 3Down itself is a term for a trial employee (3 months) and is declared successful in qualifying to become a permanent employee. Which is classified into the 3down is the foreman above. SKUs are also permanent employees but are intended for implementing employees. Thus it can be concluded that all core work has been carried out by permanent/full time workers.

<b>Status: Comply</b>	
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**6.3**

**The unit of certification respects the rights 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.**

**6.3.1**

Unit of certification has Memo Number 0014 / HCO / M / V / 2016 dated May 12, 2016 concerning the Implementation of Industrial Relations and Association which is approved by the Human Capital Group Head of DSN. The memo included mentioning the freedom of employees to be independent, open, accountable and democratic to establish Trade Unions as stipulated in government regulations.

Unit of certification has shown evidence of worker union officials such as:

- Worker union of PT Swakarsa Sinarsentosa according to No. 560/1099/HIJ on September 5, 2019, which approved by Labor Agency Kutai Timur.
- Worker union of PT Dharma Satya Nusantara according to No. 560/747/HIJ on July 23, 2018, which approved by Labor Agency Kutai Timur.

The company has presented a joint statement letter dated August 5, 2019 signed by 6 union leaders under the DSN group such as worker union of PT Swakarsa Sinarsentosa, worker union of PT Dharma Intisawit Nugraha, worker union of PT Dharma Agrotama Nusantara, worker union of PT Dewata Sawit Nusantara, worker union of PT Karya Prima Agro Sejahtera, and worker union of PT Dharma Satya Nusantara. The agreement meant is that as long as they have not used the Collective Labor Agreement, the company is used as a reference in Company Regulation. Company regulations was active for period 2020-2022. Besides that, the company has conducted socialization related Company Regulation at POM 4 (on December 14, 2019). The socialization was followed with 147 members.

**6.3.2**

Records of internal meetings of worker unions or between worker unions and companies include:

- Meeting procedure for member complaints handling on February 14, 2020 with 18 participants (PT Swakarsa Sinarsentosa).
- Meeting of worker union work program meeting in 2020 on January 10, 2020 with a total of 20 participants (PT Swakarsa Sinarsentosa).
- Meeting of competition for Independence Day in POM 4 on August 13, 2019 was attended by 16 participants (PT Dharma Satya Nusantara).
- Worker union coordination meeting, gender committee and bipartite (PT Dharma Satya Nusantara).

**6.3.3**

Based on the results of interviews with worker unions, it is known that the management does not interfere with the formation or activities of registered organizations/ worker unions. Worker union representatives are freely chosen for all workers or contract workers.

**Status: Comply**

**6.4**

**Children are not employed or exploited.**

**6.4.1; 6.4.2; 6.4.3 and 6.4.4**

The policy regarding the age limit of workers is contained in the company regulations 2020-2022 article 5 which states that one of the requirements in the recruitment process is adults and at least 18 years of age at the time of admission. In addition, a work contract with a clause contractor without child labor has also been included.

The unit of certification has also made warnings related child labor including prohibition of employing workers under the age of 18 years. The implementation such as making a warning sign at security post, residential area and block area regarding the prohibition of employing workers under the age of 18 years.

Based on interviews with Long Jenew I Estate, Long Jenew II Estate and Jabdan I Estate 3 workers, it was known that



socialization regarding the age limit of workers is always conveyed, both through morning briefings and when working. In addition there is regular supervision from staff to ensure compliance with these policies. The results of a list of employee registration documents, employee interviews and site visits revealed that there were no workers under the age of 18.

**Status: Comply**

**6.5**

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

**6.5.1**

The certification unit can show the SOP on Prevention of Sexual Violence Against Women (No: SOP-AGR-049-R01) which was ratified on November 1, 2013. The procedure, among others, has explained the stages of handling in the event of cases of violence or sexual harassment and who is responsible for escorting and resolving the problem.

The form of policy socialization can be seen from the warnings set in strategic areas such as plantation/office offices, division offices, and housing areas.

Based on the results of interviews with women workers in block B35 Afdeling II Long Jenew 1 Estate and Gender Committee it is known that during the 2019 period there were no issues regarding sexual harassment and violence. Women workers also know about the existence and function of the women's committee and the field of women's union empowerment.

**6.5.2**

The reproductive rights policy is regulated in Memorandum (No: 0011 / HCO / M / III / 2016) concerning Pregnant and Breastfeeding Women Workers which was established on March 14, 2016. The memorandum explains:

- Female workers who feel they have signs/symptoms of pregnancy, are obliged to go to the nearest clinic. The doctor / paramedic will issue a certificate of pregnancy for female workers who have been diagnosed positively pregnant.
- Female workers who are breastfeeding are required to check themselves to the nearest clinic periodically and ensure the status of breastfeeding until a 9 months old baby.
- Pregnant and breastfeeding women are prohibited from working in jobs related to chemicals.
- The company provides a place to breastfeed for female workers who breastfeed their toddlers.
- Female workers are not required to work if they are sick on the first and second days so they cannot do work with full wages.

Based on the results of interviews with women workers in block B35, Afdeling II, Long Jenew I Estate it is known that the policy has been implemented such as the transfer of pregnant and breastfeeding workers to lighter jobs and not in direct contact with chemicals. In addition, the provision of menstruation and birth day off has also been given to workers in accordance with the actual conditions and targeted by the medical team.

**6.5.3**

Based on field visit and interview with worker (especially young mother) in Afdeling II Long Jenew I Estate, it is known that the unit of certification was accommodate young mother needs especially privacy in breastfeeding to children, beside that company provide a special place for breastfeeding. In addition, information obtained from young mothers is given a special time for 1 hour to provide breastfeeding for their children. May be done at breastfeeding corner and their respective homes.

**6.5.4**

The company has a communication and consultation document system number 0215B / SWA-CSR-WHU / VI 2012. This document explains and regulates the procedures for the company and the community, local NGOs and other local organizations / individuals to communicate and consult with each other about mutual interests as well as existing problems so that good dialogue, discussion, discussion and deliberation can be achieved and can be accepted by all parties.



In point 3 the mechanism for reporting violations that would be kept confidential (whistle blowing and anonymity) states that any violations and other unethical actions can be reported confidentially in good faith for the benefit of the company or stakeholders.

The company also has an Employee Complaints Handling mechanism, namely Procedure Number SOP-AGR-054-ROO. The purpose of this SOP is to ensure that employees receive appropriate treatment in accordance with company regulations and applicable laws and regulations and minimize dissatisfaction or injustice felt by employees.

As for complaints during 2019, the majority of complaints came from repairing damage to infrastructure such as on December 24, 2019 there were complaints of clogged water. This was responded to on the same day (December 24, 2019) with the realization of the provision of pipes and taps to repair water installations. In addition, there is information on complaints on 10 September 2019 related to housing lights that went out, it was responded to on the same day (10 September 2019) by providing the required materials.

**Status: Comply**

**6.6**

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

**6.6.1 and 6.6.2**

Based on document verification and interview with worker, it is known that there is no migrant worker in the company. All the worker is from one nation (Indonesia). Besides that, all the worker has a work contract. Workers' rights and obligations are also clearly stated in company regulations.

**Status: Comply**

**6.7**

**The unit of certification ensures that the working environment under its control is safe and without undue risk to health.**

**6.7.1**

The management unit has guiding committee for occupational health and safety organization (P2K3) and personnel in charge on implementing the occupational health and safety program. Guiding Committee of Occupational Safety & Health Board has drafted an OHS working program and evaluates the implementation of OHS program in the field. In order to ensure that the OHS program has been implemented effectively, the board of Guiding Committee of Occupational Safety & Health performs a monthly meeting with workers. The interview result with Manpower and Transmigration Agency in Kutai Timur Regency revealed that the management unit has submitted the guiding committee for occupational health and safety's periodic report every 3 months. The guiding committee for occupational health and safety report covers the entire occupational health and safety activity within company's operation activity.

The P2K3 structure shown by the company is as follows:

Mill

Decree of the Head of the Manpower and Transmigration Office of East Kalimantan Province No: KEP.566 / 0195 / P2K3 / PPK / DTKT / 2019 concerning the Approval of P2K3 of PT Dharma Satya Nusantara – POM 4 on 23 January 2019 with Chairman Fredy Doni Irawan Zulfikar and Secretary of Silvester Romavid Moa. The company can show proof that the Secretary is an OHS Expert based on the Certificate of Appointment of the OHS Expert on behalf of the Silvester Romavid Moa No.21598 / AK3 / U / VIII / 2018 with a validity period until August 1, 2021.

Estate

Decree of the Head of the Manpower and Transmigration Office of East Kalimantan Province No: KEP.566 / 0194 / P2K3 / PPK / DTKT / 2019 concerning the Approval of P2K3 of PT Swakarsa Sinarsentosa on January 23, 2019 with Chair Mulyadi and Secretary Ekolesmana Ginting. Companies can show evidence that the Secretary is a OHS Expert based on the Certificate of Appointment on behalf of Ekolesmana Ginting No. KEP.P.862/NAKER-BINWASK3/III/2018 concerning Appointment of OHS Experts on behalf of Eko Lesmana Ginting issued on February 12, 2018, is valid for 3 years.

The P2K3 team holds regular meetings every month to formulate a P2K3 quarterly report that is routinely sent to the relevant agencies. The contents of the discussion include discussing the OHS work program, evaluating if there are

work accidents, OHS Inspection, recording routine meetings, the results of periodic health checks, and a list of company employees as a basis for monitoring OHS plans.

### 6.7.2

Unit of certification has a procedure for emergency response, for example Procedure of First Aid, Procedure of Handling Accidents and Work Diseases and Procedure of Emergency Preparedness. Based on field observation to POM 4 and Jabdan I Estate, it was found that hydrant, fire extinguisher, first aid box was properly monitored and maintained. Moreover, hydrant was satisfactory works during simulation. Based on field visit, company has pointed the evacuation path and concentration point in order to smooth the evacuation process in emergency situation. The evacuation path is available in office and mill and has been completed with map and other *signboards*. At the time of the field visits it is known that in the mill, warehouse, workshop and division offices have supplied First Aid box which monitored regularly.

As for the operational activities in the field, supervisors was carrying first aid kits during his work in the field, and mill was also equipped with first aid kits. Based on interview with supervisor, it is known that he understood the first aid mechanism in case of emergency.

The company can show the records of first aid training as follows :

- First aid training on 14 February 2019 for Emplacement Officer (Jabdan I Estate)
- First aid training on 11 March 2019 for Mechanic (Jabdan I Estate)
- First aid training on 11 March 2019 for Division Assistant (Jabdan II Estate)

### 6.7.3

Based on the results of field visits on Estate and Mill (operational activities), it is known that PPE has been provided free of charge for each worker. PPE given is adjusted to the location and type of work provided, for example at the Sterilizer station, PPE is given in the form of safety shoes, masks, and helmets. In PPE activities, PPE is given in the form of face shields, gloves, boots, aprons, and masks while PPE is given in the form of helmets, shoes, and glasses. This is also in accordance with the risk analysis documents owned by the company.

The company also shows the OHS compliance inspection document which is carried out every month by the EHS team. In addition the company has also actually provided a reserve PPE stock for both estate and mill workers such as helmets, masks, boots, safety shoes, etc.

The company has a document to identification PPE according to the job, for example the spraying activity needs ... for PPE. The company also give PPE to worker such as :

- PPE for harvester (initial H) in Afdeling 4 on December 2, 2019. The worker gives a booth shoes, uniform, helmet and *egrek* cover.
- PPE for harvester (initial R) in Afdeling 4 on November 2, 2019. The worker gives a booth shoes, uniform, helmet and *egrek* cover.
- PPE for harvesting clerk (initial A) in Afdeling 4 on October 29, 2019. The worker gives a booth shoes.
- PPE for sprayer (initial SM) in Afdeling 10 Long Jenew Estate on February 27, 2020. The worker gives an apron.
- PPE for sprayer (initial S) in Afdeling 10 Long Jenew Estate on February 27, 2020. The worker gives an apron and rubber gloves.
- PPE for sprayer (initial VF) in Afdeling 10 Long Jenew Estate on February 27, 2020. The worker gives an apron, mask, helmet and rubber gloves.

Based on field visit to warehouse in Jabdan 1 Estate, it is known that there are PPE stock such as helmet, shoes and rubber gloves. Besides that, based on interview with sterilizer worker (PKS 4), it is known that the worker gets a PPE for free and the company will replace the broken PPE immediately.

### 6.7.4

The form of health protection and work accident insurance provided by the company is in the form of the inclusion of all employees in the *BPJS ketenagakerjaan* and *BPJS Kesehatan* programs. There is evidence of participation in the form

of payment of the following contributions:

*BPJS Ketenagakerjaan*

- LJ1  
Payment on February 10, 2020 for the January 2020 period through a BRI bank with transaction number 000005322481 for 465 employees
- LJ2  
Payment on February 10, 2020 for the January 2020 period through a BRI bank with transaction number 000005322496 for 450 employees
- JB1  
Payment on February 10, 2020 for the January 2020 period through a BRI bank with transaction number 000005322467 for 417 employees
- POM- 4  
Payment on February 10, 2020 for the January 2020 period through a BRI bank with transaction number 000005322572 for 146 employees

*BPJS Kesehatan*

- LJ1  
Company had already payment of *BPJS Kesehatan* for the period of January 2020 for 465 employees and dependents.
- LJ2  
Proof of transfer number 63066026 through BRI bank for the payment of *BPJS Kesehatan* for the period of January 2020 for 451 employees and 483 dependents.
- JB1  
Company had already payment of *BPJS Kesehatan* for the period of January 2020 for 417 employees and dependents.
- POM- 4  
Proof of transfer number 63067956 through BRI bank for the payment of *BPJS Kesehatan* for the period of January 2020 for 151 employees and 138 dependents.

Based on the results of interviews with 12 chemist employees in block B35 and 4 harvesters in block B41/42 Long Jenew 1 Estate, it is known that the person concerned has been registered in both programs. Furthermore, based on the list of employees of PT DSN POM-4 and PT Swakarsa Sinarsentosa (LJ1; LJ2; and JB1), all employees have been registered in the program.

**6.7.5**

The recording of work accidents has been done regularly and is always recorded in the P2K3 report which is reported routinely every quarter to the relevant agency. In addition, the company also has an annual LTA calculation table for each unit (mill and estate). The person in charge of LTA calculation is the P2K3 team with the main PIC being the P2K3 secretary who has taken OHS training.

The company has showed the Annual Monitoring Work Accident, based on that document it is known that in 2019, there are 8 days Lost Time Accident in POM 4, 19 days in Jabdan 1 Estate, 1 day in Long Jenew 1 Estate and 16 days in Long Jenew 2 Estate.

	<b>Status: Comply</b>	
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**PRINCIPLE #7 PROTECT, CONSERVE AND ENHANCE ECOSYSTEMS AND THE ENVIRONMENT**

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

**7.1.1**  
The Unit of Certification has had an IPM procedure as follows:

- Work instruction of Early detection pest and diseases (IK-AGR-OLP-13-R00) who described if early detection conducted every month in all blocks and observe leaf eater caterpillar
- Work instruction Pest and Diseases Control (IK-AGR-OLP-14-R00) who described the activity of pest and diseases control and the critical threshold for all pest that's observed, for instance:
  1. Critical threshold for leaf eater caterpillar is between 10 – 40 depends on the type of caterpillar
  2. Critical threshold for rats is 5 % from the sample that's observed
  3. Critical threshold for a termite is 5 % from the sample that's observed

The Unit of Certification has a record of detecting pests and diseases once a month on each plantation, which is carried out for nettle caterpillars, bagworms, rats and spike moths (*Tiratabha* sp.). while for the detection of symptoms of the disease is done every three months.

The integrated pest management program is implemented by the Unit of Certification and is monitored and evaluated monthly. Evaluations are recorded in the form of a pest infestation matrix and disease symptoms that describe the type of pest; attack rate; attack analysis, level to threshold; conclusion to determine control techniques if needed. Based on data and summary of the 2019 census in Long Jenw 1, Long Jenew 2 and Jabdan 1, it is known that there are no pests and symptoms of disease that exceed the economic threshold. Therefore, companies do not need to control chemically. Based on field observations in LJ1, LJ2 and JB1, visually there were no symptoms of attack of leaf eating caterpillars in the canopy, or attack of rat pests on FFB collected in the FFB platform.

The Unit of Certification also applies biological pest management methods such as planting beneficial plants such as *turnera* sp and *Antigonon leptopus*. which attracts natural predators of leaf-eating insects. Planting of *Turnera* species is planted along most of the plantation's main roads. In addition, the company has a program and the realization of spraying the *Cordyceps militaris* fungus on blocks white endemic eater caterpillars with a dose of 100 grains of pupae attacked per liter of water. Meanwhile, to prevent rat attacks, the Unit of Certification also installed barn owl. Verification of documents is known to have 71 barn owl in Jabdan 1, 104 barn owl in Long Jenew 1 and 88 barn owl in Long Jenew 2.

Training for IPM workers has been carried out by the certification unit. This training was held by the human resources development department on 19 December 2019, with the theme of training on pest and disease control.

**7.1.2; 7.1.3**

Based on document review and field observations, the Unit of Certification applies several biological control practices to suppress pest and disease attacks such as the barn of the owl (*Tyto alba*) and *Antigonon* and are well managed. example for *Antigonon* is planted at the intersections of the block using wood as a place to grow. The results of verification on the cabi.org website are known that the species was declared not invasive in Indonesian. Based on document review, field observation, as well as interview with the workers and external stakeholders, known that the company did not use fire for pest control.

	<b>Status: comply</b>	
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**7.2**  
**Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.**

**7.2.1; 7.2.5**

The unit of certification has had work Instruction *Penentuan Jenis Dosis dan Aplikator Pestisida* (IK-AGR-OLP-16-R01) that's described agrochemical that's in accordance with weed that found. Documents verifications the pesticide that's used are specific characteristics for certain targets, for example, Glyphosate for narrow and wide leaf weeds and methyl metsulfuron for woody growth. Since 2013 the company no longer use "direct Pesticide like paraquat that can eradicate all of the weeds. Furthermore the results of document review and field observation in the chemical storage obtained information if the unit of certification does not use pesticide in categories WHO 1A and 1B. In the list of pesticides used, it was known that the pesticides used were categorized in WHO Class III and uncategorized. The pesticides used were Ally 20 WG™ (a.i Methylmetsulfuron), Kleen Up 480 SL™ (a.i Isopropilamina glyphosate), and Starane 480 EC™ (a.i Fluroksipir).

The unit of certification used the chemicals that registered and allowed by the Government as [www.pesticide.id](http://www.pesticide.id). Based

on documents verifications, field visit to pesticide storage and interview with management and pesticide applicator obtained information if the company didn't use the pesticide that prohibited by the government as mentioned in Annex II Regulation of Ministry of Agriculture No 39 the year of 2015 about Pesticide Registration. Example Paraquat dichloride, aluminium phosphide, diquat dibromide

**7.2.2**

The certification unit conducts routine pesticide applications to control weeds in circles and path every 4 months. The Unit of Certification shows a record of the use of pesticides which explains the active ingredients used, the dosage of LD-50 and the number of active ingredients applied per hectare. For example, in the period of 2019, for the toxicity of Isopropyl amine Glyphosate at 0.000047 Ltr / ha and Flurosciping of methyl heptyl ester toxicity amount of 0.00003 Ltr / Ha

**7.2.3; 7.2.4; 7.2.9**

The Unit of Certification has carried out the IPM quite effectively, with no use of chemicals for pest control, except for routine weed control. The Unit of Certification does not use pesticides as prophylaxis. If the conditions of the circle and path are still quite standard, weed control will be suspended. Based on observation on spraying activities, the application method is not a preventive application, but is more selective for location that have weeds. Spraying circles and path is carried out by the certification unit three times a year using selective pesticides. based on observations and interviews with spray workers in Block E41 division 11 LJ 1 and B37 JB 2 division 3, it is known if the worker already knows the method of selective spraying for example only spraying a circle or path with weeds and if there is no weed it should not be sprayed, then based on document review , field observations, and consultations with stakeholders, it is known that the Certification Unit does not use pesticides from the air.

**7.2.6**

Based on field observation, interview with workers in Block E41 LJ2 dan B37 JB 1 as well as interview with management, the unit of certification can be presented that pesticide application carried out by trained persons and in accordance with applicable guidelines in product label and storage, as evidenced with:

- The workers equipped with PPE like shoes, helmets that equipped with face-protection glass, apron, shirts and trousers, masks and nitrile gloves. The type of PPE has been in accordance with the recommendation of MSDS for Glyphosate and methyl metsulfuron.
- The workers were able to explain and demonstrate the job in accordance with the procedure, such as justification of pesticide usage, considering wind flows during spraying, pesticide mixing, pesticides and its target, prohibited areas to be sprayed (for example HCV area and riparian zone)
- Pesticide solutions are mixed in pesticide warehouses and transported by special vehicles for safety aspect and to reduce environmental pollution.
- related the food that brought to the field, the management unit has been provided a special box to minimize risk of negative impacts
- The spraying activity conducted in selective manner by knapsack sprayer that the nozzle regularly calibrated. After work, knapsack sprayer and PPE are stored in a special storehouse at the Estate.

**7.2.7**

The storage of all pesticide has been in accordance with Indonesian recognized best practices, that was stipulated in Labor Minister Regulation No. 3 of 1986 regarding OHS requirements in pesticides management. Based on field observation in pesticide storage in Long Jenew 1, Long Jenew 2, and Jabdan 1 it was known the pesticide has been stored properly in accordance with the procedure. Pesticides are stored in a special place separate from others and placed in accordance with the characteristics. chemical storage has been equipped with signboards and hazardous symbols for the chemical by category, complete series Material Safety Data Sheet, chemical logbook, emergency response manual, first aid kit and personal protective equipment for storage office

**7.2.8**

The Company established procedure for Toxic and Hazardous waste handling including ex agrochemicals management listed on IK-AGR-SHE-09-R02 dated on October 19 2015. These procedure stated that all ex chemicals containers were kept on temporary hazardous storage at mill/estates.

The record management Hazardous Waste, included in reporting management hazardous waste quarterly to environment agency. The Training And socialization to spraying workers, about ex pesticide container disposal. All discarded containers of chemicals from by Estate and Mill, placed in hazardous waste warehouse.

Based on interview with worker on Block A20, division 1 Circle and Path Spraying (Pesticide Applicator) JB1 and Pesticide mixing officer LJ2 they understand the mechanism well. In housing complex, ex pesticide waste has been handled well and observation on plantation block and workshop show that there is no agrochemical ex-container in the plantation working area

**7.2.10;7.2.11**

the Unit of Certification conducts regular health checks every 6 months for workers using chemicals. The latest health examination was carried out on 24-28 January 2020 by Permata Medika Clinic. The unit of certification has to conduct medical checkups for spraying twice a year. The type of analysis was consisting of physical parameters and cholinesterase (blood check). According to last medical check-up record in shows that all workers are in good condition were considered normal and fit to conduct agrochemical works and there are no cases of low blood cholinesterase levels

The Unit of Certification has work Instructions IK - AGR-OPL-17-R01 part 3 concerning Policies for pregnant or breastfeeding women workers. It was explained that pregnant or breastfeeding women workers and workers who are not good may not work for pesticide activities. Based on interviews with spray workers in JB 1, LJ 1 and LJ 2 and management it is known that if women are pregnant, nursing mothers and young workers are not allowed to work for jobs that use pesticides.

**Status: Comply**

**7.3**

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

**7.3.1**

The registry for waste (included toxic and hazardous waste) products produced from mill and estates are identified and listed on 2019 identification and evaluation of pollution source document for example mill waste water are managed at waste water treatment plant before it distributed as land applications, hazardous waste were kept at temporary hazardous waste storage.

Ex chemicals and their containers including hazardous waste are disposed responsibly based on procedure IK-AGR-SHE-09-R02. Inventory for all chemicals usage and it containers are available on chemicals storehouse / temporary hazardous storage. All ex chemicals containers kept on temporary hazardous storage at POM 4, JB1, LJ1 and LJ2 estate. The company has a permit for hazardous and toxic waste storage issued by decree of Kutai Timur regent No 660/K.151/2018 for estate and decree Number 503/07/DPMPSTSP-PPNP/TPS-LB3/VII/2018 for POM 4, until recertification audit the permit still valid.

Document review shown that company has sent all toxic and hazardous waste to PT Sumber Rezeki Abadi Jaya (licensed collector by decree of national environmental minister) on 20 January 2019 (manifest is available and checked by auditors). Observation during audits at temporary hazardous & toxic waste storage shown that all of hazardous waste are compliant with the periods in permit (< 180 days).

**7.3.2 & 7.3.3**

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 reduces the carbon emission from the combustion of fossil fuel.
- POME use for 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 Kaltim Medika Utama.

Based on field observation and interview with workers in Landfill block D 37 afdeling 5. Long Jenew 1 it was known if the workers has been revealed several training related environmental management. The workers can demonstrated the procedure related waste management, environmental aspect and etc. furthermore every morning before works te supervisors / assistant provide briefings related to work methods / techniques and other important information. Based on document review and field observation found that Company shown proper management ways for Ex chemical containers, medical waste, and other hazardous / non hazardous waste disposal, based on procedures and based on waste management plan 2019. Field observation on JB1, LJ1 and LJ2 housing for example found that companies managed settlements/housing domestic waste by provide landfill on each afdeling and sort the organic/an-organic waste, no open fire for waste disposal.

**Status: Comply**

**7.4**

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

**7.4.1**

The certification unit has a best practice mechanism for maintaining and increasing long-term soil fertility, stipulated in Preservation SOP (No. IK-AGR-OLP-09-R03), POME Soil Application SOP (No. IK-AGR-OLP -10-R02 ), EFB Application SOP (No. IK-AGR-OLP-11-R02). Verification of documents obtained information if during 2019 it was found that the certification unit carried out inorganic fertilization in accordance with fertilizer recommendations. These procedures establish many strategies for maintaining and increasing long-term fertility, by combining efficient and measurable organic fertilization, taking into account the age of oil palm and soil nutrients by taking leaf and soil samples. Inorganic fertilizers used by the 2019 certification unit are Hikay and borate with the average fertilizer input for each palm tree is 8.26 kg / year. Fertilizer intake is sufficient for this crop. Visually, there are no symptoms of nutrient deficiencies in the Block that has been visited and the potential for production in 2019 is 30.86 tons / ha / year.

Efficient and non-excessive inorganic fertilization is very important to maintain the structure and texture of the soil, combined with fertilization with POME soil applications and EFB mulch applications. Fertilization is carried out mainly in soils with low nurse characteristics, to improve soil structure and texture, microbiological properties, and to minimize inorganic fertilization if possible. There is no replanting activity, but the procedure stipulates that the biomass in replanting will return to the soil for the nutrient cycle strategy.

**7.4.2**

The management unit routinely been conducting of soil and leaf analysis periodically conducted as follows (1) (Soil Analysis, which is done regularly every 6 years measuring the following parameters; texture, acidity (pH), contents of P, K, Mg, Ca, Mn, Zn, Cu, dan Fe. (2) Leaf Analysis, which is done every year as a guide to determine the fertilizing recommendation, by monitoring the following parameters; Indicator Major elements namely N, P, K, Mg and Ca and Indicator Minor elements namely B, Cu, Zn, Mn, Fe, S and Cl and (3) Visual Analysis, which is done as part of the points in determining the fertilizing recommendation, identifying nutrient deficiency symptoms, and analyzing the disease attacks that are potential in becoming an endemic of certain disease. The last soil analysis conducted on 2017 and the leaf analysis conducted in 2019 for fertilizer recommendation in 2020, both analysis carried out by PT Nusa Pusaka Kencana Analytical & QC Laboratory

**7.4.3; 7.4.4**

Nutrient recycling strategy as a part of increasing soil fertility has been conducted, such as EFB mulching application and POME land application. The result from the field visit indicated that such activity has been correctly done in accordance with the provided recommendation with a dosage of 40 Tonnes/Ha. Field observation in LK1 Block E31, it is known that the EFB mulching application has been implemented especially in a sandy area with a dosage of 40 tonnes/ha/year. Whereas in LK 3 Block F41, POME land application with a dose of 750 tonnes/ha/year in three rotation (250 tonnes/ha/rotation) has been implemented.

Records of fertilization have been shown in the document of records fertilizer progress of 2019, which includes the program and realization of fertilization. Based on document review in each Estate, it shows that the manuring activity (time, location, dose, and amount) has been in accordance with the recommendation. The anorganic fertilizer used by the unit of certification is Hikay, with average fertilizer input for each palm tree is 8,26 kg.

Overall, the unit of certification has made efforts to maintain and improve soil fertility. Visually, there is no symptom of nutrient deficiency at the blocks that have been visited. Based on production data from 12 months before assessment (January – December 2019), showing reasonable productivity, that is average 30.86 ton/ha/year with an average planting age for PT Swakarsa Sinar Sentosa, the oldest planting years of 1998 and 1999 and the youngest planting year of 2011.

**Status: comply**

**7.5 Practices minimise and control erosion and degradation of soils.**

**7.5.1, 7.5.2, 7.5.3**

The Unit of Certification has a map of land with a scale of 1: 70,000 in the Soil Survey Survey Report compiled by the R&I DSN group in 2013. Based on the map shows the types of soil that are generally of *Kanhapludults*, *Kandiudult* and *Udifuluents*. There is no peat soils, fragile or marginal soils that are widespread in the company area, the main type of soil is alluvial soil with good drainage and there is no peat soil. Most of the area of PT Swakarsa Sinar Sentosa is in the Land Class 2. A brief distribution of land survey areas is: class S2 : 16,353 ha, S3 : 424 ha, N : 73 ha.

The Unit of Certification has a slope map with a scale of 1; 100,000 (source: source: SRTM data (Shuttle Radar Topographic Mission Indonesia) Sheet N01E116), which shows a flat area with a major contour of 2 meters, an intermediate contour of 2 meters, a minor contour of 2 meters. Based on document review and interviews, the Unit of Certification stated that there was no replanting and new planting on the sloped land

**Status: comply**

**7.6 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.**

**7.6.1, 7.6.2, 7.6.3**

The Unit of Certification has had soil map with scale 1:70.000 in Soil Detail Survey Report compiled by R&I DSN group on 2013. Based on that's map showing soils types which are generally of types *Kanhapludults*, *Kandiudults* and *Udifuluents*. There is no widespread peat, fragile or marginal soils in companies land area, soils types are primarily alluvial soils with good drainage and no peat soils. Most of area of PT Swakarsa Sinar Sentosa is at Soil Class 2. Briefly distribution of land class areal survey are: class S2 : 16,353 ha, S3 : 424 ha, N : 73 ha.

The Unit of Certification has a slope map with a scale of 1; 100,000 (source: source: SRTM data (Shuttle Radar Topographic Mission Indonesia) Sheet N01E116), which shows a flat area with a major contour of 2 meters, contour intermediate 2 meters, minor contours of 2 meters. Based on document review and field observation in LJ1, LJ2 and JB1, it is known that the area is relatively flat and there is no contour terrace, but individual terrace in certain area.

The existence of soil map containing information on soil classification, texture, drainage, limiting factors, rocks, and suitability information for the development of oil palm plantation has helped the company used by the company to arrange the block, roads, drainage, bridge, etc. The company also has a Road Maintenance Program equipped with the proper infrastructure and facilities to do such work. According to the result of field visit, the roads are in good condition and the FFB harvested are smoothly transported to the mill. The oil palm in operational area were first cycle, neither replanting nor new planting activity

**Status: comply**

**7.7 No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.**

**7.7.1; 7.7.2; 7.7.3; 7.7.4; 7.7.5; 7.7.6; 7.7.7**

Based on the company's Soil Map on Detailed Soil Survey document, and field observation, known that there is no

peatland in the operational area. Soil types which are generally of types *Kanhapludults, Kandiodults and Udifluvents*.

**Status: comply**

**7.8 Practices maintain the quality and availability of surface and groundwater**

**7.8.1**

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 2<sup>nd</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.

The company also conducted regularly water quality testing every semester for Wahau river based on RKL/RPL matrix. Document review shown that 2<sup>nd</sup> semester 2019 testing result for Wahau river quality and Telen river quality (upstream and downstream) are still compliant with standard quality (governor's regulations Kalimantan timur Number 2 year 2011). Based on workers interview on estate housing shown that drinking water for them originated from refill water and POM 4 Mill also provides clean water access for all workers.

**7.8.2**

The company has identified rivers and wetlands inside plantation area. Analysis of HCV containing distribution maps of the river in the area of PT DSN - POM 4. The HCV identification conducted by using HCV identification guides in Indonesia on 2011.

Company provided procedures for riparian areas protection/conservations listed on IK-AGR-SHE-06-R02 dated 17 January 2019 document.

Field visit during audit, for examples on Kenden Besar River Riparian Area, Block VI, Block A28 JB 1 dan Long Sengat River Riparian Area, Block G32 Afdeling 09 LJ2, acquired information that company shown proper ways for maintain and protect the catchment area for example manual weeding and marking the chemical boundary border. Company has identified and shown the maps for catchment areas (including riparian) with 1:120.000 scale. HCV identification document shown there is some river flow on estate such as Kenden kecil river, Kenden besar river, and Sengat river.

**7.8.3**

Mill effluent produced by POM 4 processed at waste water treatment plant (WWTP) based on POME management procedures, until it complying with standards before it discharged to LJ2 estate as land applications based on decree of Kutai Timur regent Number 503/06/DPMP/TSP-PPNP/L.A/V/2019 valid 5 years.

Waste water quality testing document review shown for July to December 2019, all of POME testing parameters are compliant to the standards quality, and all of waste water management and monitoring has been reported to related institutions per 3 months regularly. Base on observation on POM 4 POME treatment plant during audit found there is no leakage indications and this area are managed well.

**7.8.4**

Based observations on POM 4 water treatment plant found monitoring for raw and process water usage was done by WTP officer periodically, and flowmeters at inlet/outlet serves normally. Procedure for Mill water usage and monitoring are provided and has been listed on procedure no IK-AGR-PRO-17-R01 (Water Treatment).

The standards of water usage for FFB process has defined on 2019 budget projected 1.71 m<sup>3</sup>/mt FFB processed. Water usage monitoring was done recorded and summarized every month. The company recorded its actual water use. The average water use per tonne FFB for period of January – December 2019 is 1.24 m<sup>3</sup>/ton FFB, while budget for water consumption for period 2019 is 1.71 m<sup>3</sup>/ton FFB.

**Status: Comply**

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

The CH already maximizing the use of renewable energy (fiber & shell) as boiler fuel. For example, use of shells and fiber period January to December 2019 POM-4 has produces 1,165,584 kWh of electricity from turbine. Renewable energy use per ton of palm product in the mill is 18.21 kwh / ton CPO. Result Direct fossil fuel used is 0.12 kWh/ ton CPO.  
Based on field visit on POM 4 known the company utilized POME as a biogas plan / methane capture and would operate on April 2020.

**Status: Comply**

**7.10 Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.**

**7.10.1**

Based on auditor verification result during audit known data pesticides usages monitoring, data diesel fuel monitoring, HCV identification, data POME, total planted area and etc. found that accurate data has been put into the RSPO palm GHG Calculator. Meanwhile this GHG calculation using options No 1 (apply full version).

Fossil fuel reducing on POM 4 palm oil mill have been implemented by fiber/shell usage for boiler. POM Waste water has been monitored every months and monitoring periods January to December 2019 shown that all of waste water testing parameters is compliant to the standards quality.

Based on document review for examples: pesticides usages monitoring, diesel fuel monitoring, HCV identification and etc found that accurate data has been put into the RSPO palm GHG Calculator.

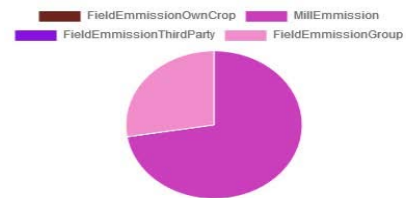
GHG calculation on 2018 shown net emission of GHG are decreasing compared to 2019 net GHG is 0.46 tCO<sub>2</sub>e/t Product meanwhile for year 2018 period while period 1.04 tCO<sub>2</sub>e/t Product and this indicates reduction. The company has implemented well plan to reduce emission.

Calculation of GHG and its monitoring has conducted by EHS department. GHG emission calculated using RSPO palm GHG calculator 4.0 Summary of GHG emission for POM 4 and its supply base are listed as follows :

Summary Emission

Product	tCO <sub>2</sub> e / tProduct	Action
CPO	0.46	
PK	0.46	
PKO	0.00	
PKE	0.00	

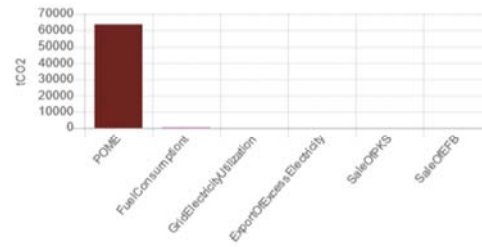
Description	Unit	Value	Action
Oil palm planted on mineral soil	Ha	19849.56	<input type="checkbox"/>
Oil palm planted area on peat	Ha	0.00	<input type="checkbox"/>
Total oil palm planted area	Ha	19849.56	<input type="checkbox"/>
Conservation area (Forested)	Ha	0.00	<input type="checkbox"/>
Conservation area (Non-Forested)	Ha	490.00	<input type="checkbox"/>
FFB Production per hectare	t/ha	27.83	<input type="checkbox"/>
OER	%	22.43	<input type="checkbox"/>
KER	%	4.01	<input type="checkbox"/>



### Mill Emissions and Credits

Description	tCO2	tCO2e/t FFB	Action
<b>Emission Sources</b>			
POME	63872.71	0.20	
Fuel Consumption	571.16	0.00	
Grid Electricity Utilisation	0.00	0.00	
<b>Credits</b>			
Export of Excess Electricity to Housing & Grid	0.00	0.00	
Sale of PKS	0.00	0.00	
Sale of EFB	0.00	0.00	
<b>Total</b>	<b>64443.86</b>	<b>0.20</b>	

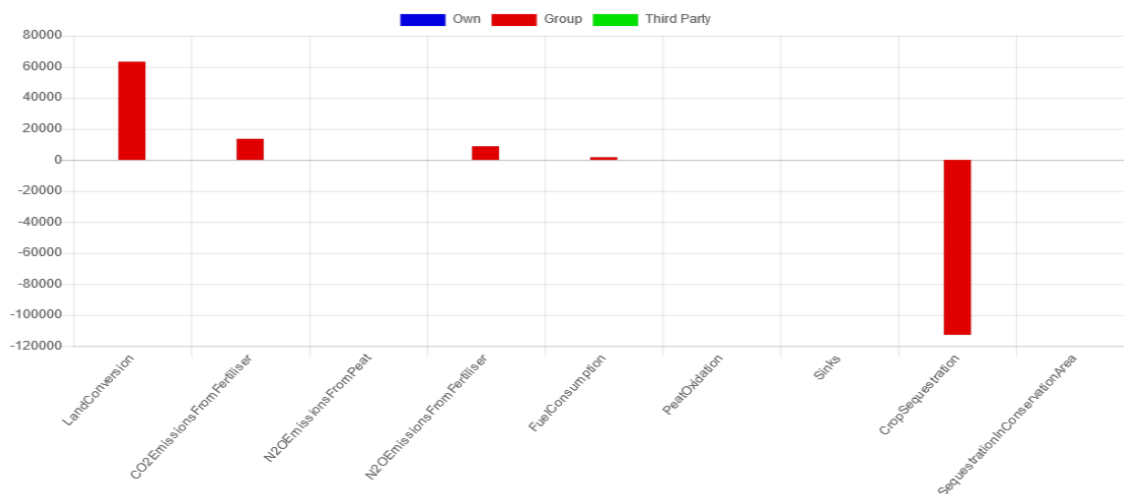
Emission Source/Credit



### Estate/Plantation field emissions and sinks

Description	Own			Group			3rd Party			Total
	tCO2e	tCO2e/ha	tCO2e/t FFB	tCO2e	tCO2e/ha	tCO2e/t FFB	tCO2e	tCO2e/ha	tCO2e/t FFB	
<b>Emission Source</b>										
Land Conversion	0.00	0.00	0.00	63604.72	3.20	0.20	0.00	0.00	0.00	63604.72
CO2 Emissions from Fertiliser	0.00	0.00	0.00	13867.29	0.70	0.04	0.00	0.00	0.00	13867.29
N2O Emissions from Peat	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
N2O Emissions from Fertiliser	0.00	0.00	0.00	9081.15	0.46	0.03	0.00	0.00	0.00	9081.15
Fuel Consumption	0.00	0.00	0.00	2004.47	0.10	0.01	0.00	0.00	0.00	2004.47
Peat Oxidation	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>Sinks</b>										
Crop Sequestration	0.00	0.00	0.00	-113079.09	-5.70	-0.35	0.00	0.00	0.00	-113079.09
Sequestration in Conservation Area	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>Total</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>-24521.47</b>	<b>-1.24</b>	<b>-0.08</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>-24521.47</b>

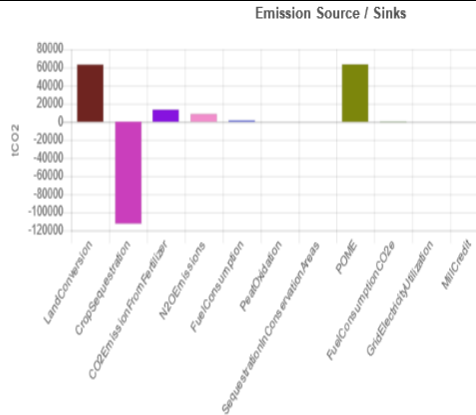
### Field Emission and Sinks



Emissions from Palm Kernel Crusher

Emission Source	tCO2e
PK from own mill	0.00
PK from other sources	0.00
Fuel Consumption	0.00
Total Crusher Emissions	0.00

This mill has no kernel crusher operation



**7.10.2 & 7.10.3**

Based on environmental document, history of land use and area statement, known the company planted 1996 finished on 2004. Until recertification audit conducted, no new planting activities above 15 November 2018.

The company has identified pollutions and emissions sources of POM 4 for period 2020, such as CO<sub>2</sub> (boiler, generator, transportation), CH<sub>4</sub> (POME), hazardous waste (WTP, chemical storage), noise (machinery). The sources of pollution and emissions for estate are listed on the identification documents and management plans for pollution sources for the period 2019, such as: emissions (CO<sub>2</sub>, CO), noise, chemical waste, organic and inorganic waste and infectious waste. Plans to reduce or minimize has been implemented and monitored as explained on RKL-RPL semester II year 2019.

Fossil fuel reducing on POM 4 palm oil mill have been implemented by fiber/shell usage for boiler. POME has been monitored every months and monitoring periods July to December 2019, shown that all of POME testing parameters is compliant to the standards quality.

**Status: Comply**

**7.11**

**Fire is not used for preparing land and is prevented in the managed area.**

**7.11.1, 7.11.2 & 7.11.3**

During recertification audit, company do not conduct any new development and replanting activities. Zero burning policy has been developed and listed on DSN Group Sustainability policy and also listed on procedures land clearing IK-AGR-OLP-01-R02. No evidence of burning of land in the operational area visited by the auditor.

The company has involved stakeholders on locations border operational areas as an effort to prevent and control fires through socialization and simulation of land fires on 30 August 2019 involving Muara Wahau and Jabdan villages.

**Status: Comply**

**7.12**

**Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.**

**7.12.1, 7.12.2 & 7.12.3**

Based on environmental document, history of land use and area statement, known the company planted 1996 finished on 2004. Until recertification audit conducted, no new planting activities above 15 November 2018.

The Company has been conducted HCV assessment for the entire area of operations which done by the RSPO Approve Assessor on 2012. The process of HCV identification conducted by using HCV identification guides in Indonesia on June 2008 and involving local stakeholders by stakeholder consultation on 2011.

The area of PT SWA consists of 4 estate namely JB1, JB2, LJ1 and LJ2 Estate. For conservation area PT SWA



consists of 3 (three) areas, namely:

- Conservation Area of Block VI, with an area of 325 Ha located in JB1 and JB2 Estate adjacent to the east with Long Kejiak 1 Estate (PT DIN)
- The conservation area of block VII, with an area of 165 Ha located in JB2 Estate
- Riparian Kenden Kecil River, with an area of 132 Ha where the upstream flow comes from Puhus 2 Estate (PT DAN), crossing JB1, LJ1, JB2 and LJ2 Estate, and its flow to Wahau River (outside *HGU*)

For scope audits POM 4 and supply base (JB1, LJ1, and LJ2 Estate), areas CH with HCV are:

- Riparian Kenden Kecil River area of 29 Ha, 20.58 Ha (including planting area LJ1) and 5.59 Ha (including planting area LJ2).
- Riparian Kenden Besar River (including planting area) of 30.60 Ha (JB1 Estate).
- Riparian Long Sengat River (including planting area) of 13.30 Ha (LJ2 Estate).
- Conservation area VI (325 hectare secondary forest).

All of indicates HCV areas was mapped by 1:50000 scale and this HCV identifications covered all estates/mill operational areas including surrounding landscape and RTE species presence.

Base on document submitted by Proforest namely RSPO No deforestation consultancy: high forest cover countries, Consultancy report on definitions and recommendations to the RSPO June 2018 as known not set HFCL for Indonesia.

#### **7.12.4, 7.12.5, 7.12.6**

Company established HCV management plan to maintain the HCV areas in operation area of PT SWA, listed on Management plan HCV 2019 documents. HCV management activities that taken by the management unit are maintain HCV attributes (HCV boundary, sign board), HCV socialization (community and worker), maintain HCV area, regular patrols for maintain HCV security, species monitoring, enrichment in riparian.

Field visit during audit, for examples on Kenden Besar River Riparian Area, Block VI, Block A28 JB 1 dan Long Sengat River Riparian Area, Block G32 Afdeling 09 LJ2, found that companies have marked buffer zone, perform revegetation with vertiver grass, and HCV signboard placement. During field visit also found riparian condition were managed well and there is no chemical activity indications on those riparian that become sampling audit.

Policy related to HCV and RTE species also develop by company and listed on SOP-AGR-052-R00 related Spices protections and Memorandum No 0028/SHE/XII/2011 related RTE protections. Based on field visit on worker housing on JB1, LJ1 and LJ2 found there is no RTE species reared by workers, and RTE/HCV socialization for workers have been conducted on July 2018.

Results of the verification documents, field visits and interviews with villagers obtained information that there are no areas of HCV-related and affect the local community.

The company have established HCV management plan, and implemented it well. Regularly patrols record shown company has been monitored illegal hunting, and other illegal activities. All of records for daily patrols on each estate are available and verified by auditors.

For example, patrols summary results on 23 December 2019 for Conservation PT SWA area such as babi rusa (*sus scrofa*), kijang (*muntiacus muntjak*), burung madu sepah raja (*aethopyga siparaja*), elang alap jambul (*accipiter trivirgatus*), rangkong badak (*buceros rhinoceros*) meanwhile wild species trap is not presence. The result of monitoring also reported to government institution every six month in environmental implementation report.

As the results of 2019 HCV management and monitoring output, company has plan feed back into the management plan 2020 i.e conduct water quality testing for Kenden besar, every year for maintain surface water quality.

#### **7.12.8**

Based on environmental document, history of land use and area statement, known the company planted 1996 finished on 2004. Until recertification audit conducted, no new planting activities above 15 November 2018.

According to Environmental Impact Assessment documents, HCV documents and the use of plantation areas history documents such as maps and other corporate documents, planting activities at PT Swakarsa Sinarsentosa started in 1996 and completed in 2004. The management unit has not expanded or re-established the plantation. For planting in 2011 in LJ2, is the ex-nursery area that are not used again so that the planting is conducted on 2011. The Unit Certification has reported Liability disclosure to the RSPO Secretariat on April 23, 2015.

<b>Status: Comply</b>
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**3.2 Conformity Checklist of Certificate and Trademark Use**

<b>1.</b>	<b>Evidence of permission or approval certificate and trademark from Certification Body which submitted by Client</b>	<b>X or√</b>
<b>RC</b>	POM 4 of PT Dharma Satya Nusantara do not use RSPO Trademark and CB Logo on its product (on-product) and non-product (off-product).	√
	<b>Status: Comply</b>	
<b>2.</b>	<b>Implementation of certificate and trademark used by Client comply with size and type (shape) against Guideline of trademark Use</b>	<b>X or√</b>
<b>RC</b>	POM 4 of PT Dharma Satya Nusantara do not use RSPO Trademark and CB Logo on its product (on-product) and non-product (off-product).	√
	<b>Status: Comply</b>	
<b>3.</b>	<b>Implementation of Certificate and Trademark is not used on product</b>	<b>X or√</b>
<b>RC</b>	POM 4 of PT Dharma Satya Nusantara do not use RSPO Trademark and CB Logo on its product (on-product) and non-product (off-product).	√
	<b>Status: Comply</b>	
<b>4.</b>	<b>Controlling of Certificate and Trademark, including withdrawing inappropriate trademark.</b>	<b>X or√</b>
<b>RC</b>	POM 4 of PT Dharma Satya Nusantara do not use RSPO Trademark and CB Logo on its product (on-product) and non-product (off-product).	√
	<b>Status: Comply</b>	

**3.3 Summary of RSPO Partial Certification.**

Compliance of the uncertified management units of PT Dharma Satya Nusantara 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.

PT Dharma Satya Nusantara Time Bound Plan is explained in table 1.10. PT Dharma Satya Nusantara has thirteen (13) management units with six (6) mills. PT Dharma Satya Nusantara has informed the Time Bound Plan progress, MUTU has considered that PT Dharma Satya Nusantara is complied with the RSPO requirement for Time Bound Plan. The Time Bound Plan was revised and declared by PT Dharma Satya Nusantara on 02 January 2020

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

MUTU Auditor has verified company partial certification and concludes that:

- There 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

2.1 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>DSN had implemented an audit internal</p> <p><i>Auditor verification</i></p> <p>Based on the document review, there is a company internal audit for uncertified unit that was conducted on 2019 and the positive assurance is at this table that is also been verified.</p>
2.1.2	No replacement of primary forest or any area identified as containing High Conservation Values (HCVs) or required to maintain or enhance HCVs in accordance with RSPO criterion 7.3 (it has changed be Criterion 7.12 in P&C 2018)	<ul style="list-style-type: none"> <li>• LUCA PT Dharma Intisawit Lestari and PT Karya Prima Agro Sejahtera was sent on February 4, 2016 to RSPO and is a review process. MS Dept. Head have got confirmation by email from the RSPO Executive Compensation that PT DIL has been completed under review and is being submitted for approval letter from the Compensation panel.</li> <li>• LUCA PT Agro Andalan, PT Dharma Persada Sejahtera, PT Kencana Alam Permai, and PT Prima Sawit Andalan was sent to RSPO and is a review process. Letter of approval of the Panel RSPO yet received.</li> <li>• LUCA PT Putra Utama Lestari and PT Pilar Wanapersada was sent on February 11, 2016 to RSPO and is a review process and clarification</li> </ul>

		<ul style="list-style-type: none"> <li>• POM 5 and POM 6 there is no new land clearing of new planting after November 2005.</li> <li>• Smallholders (KM5, KM8, KM9, KM10A, KM10B, KM10C), and clearing was conducted after November 2005 but has been first conducted HCV identification before land clearing.</li> <li>• LUCA PT Bima Palma Nugraha on process to statement by Aksenta will be conduct on November 2019.</li> <li>• LUCA PT Bima Agri Sawit, on process to statement by Aksenta will be conduct on October 2019.</li> </ul> <p><b>Auditor Verification:</b> Auditor has verified the supporting evidence of above the company statement. The above statement in accordance with the supporting evidence provided.</p>
2.1.3	Any new plantings since January 1 <sup>st</sup> 2010 must comply with the RSPO New Plantings Procedure.	<ul style="list-style-type: none"> <li>• There are 8 plantations have conducting NPP process (under RSPO review)</li> <li>• Smallholders (KM5, KM9) planting year before 2010.</li> <li>• Smallholders (KM8, KM10A, KM10B, KM10C), no need NPP because no landbank in the area.</li> </ul> <p><b>Auditor Verification:</b> Based on auditor verification, not all uncertified unit conduct new clearing after January 2010 but for all uncertified unit with land clearing after January 2010 has follow NPP. Detail information of uncertified unit are:</p> <ul style="list-style-type: none"> <li>• NPP Verification PT Dharma Intisawit Lestari and PT Karya Prima Agro Sejahtera has been performed by TUV from 21-24 March 2016 and waiting results of the review by RSPO</li> <li>• NPP Verification PT Putra Utama Lestari has been performed by Mutuagung Lestari from 2 – 5 June 2016 and waiting results of the review by RSPO</li> <li>• PT Agro Andalan, NPP has been approved on 26 June 2018.</li> <li>• PT Kencana Alam Permai, PT Prima Sawit Andalan and PT Dharma Persada Sejahtera, verification of the NPP has been carried out by PT MAL and refereed RSPO. There are questions regarding the report of the RSPO NPP. Currently the company is working on a response / confirmation to the RSPO</li> </ul>
2.1.4	Land conflicts, if any, are being resolved through a mutually agreed process, such as the RSPO	No any land conflicts.

	Complaints System or Dispute Settlement Facility, in accordance with RSPO criteria 2.2, 6.4, 7.5 and 7.6 (it has changed be Criterion 4.8, 4.7 and 4.5 in P&C 2018).	<p><i>Auditor verification</i></p> <p>There is no information from public source and RSPO website on any land conflict for uncertified unit of the group subsidiaries.</p>
2.1.5	Labour disputes, if any, are being resolved through a mutually agreed process, in accordance with RSPO criterion 6.3 (it has changed be Criterion 4.2 in P&C 2018).	<p>No any labour disputes.</p> <p><i>Auditor verification</i></p> <p>There is no information from public source and RSPO website on any labour conflict for uncertified unit of the group subsidiaries.</p>
2.1.6	Legal non-compliance, if any, is being addressed through measures consistent with the requirements of RSPO P&C criterion 2.1 (it has changed be Criterion 4.2 in P&C 2018).	<p>Legal non compliance, there is process for land legality PT Dharma Intisawit Lestari, PT Karya Prima Agro Sejahtera, PT Putra Utama Lestari, PT Prima Sawit Andalan and PT Dharma Persada Sejahtera.</p> <p><i>Auditor verification</i></p> <ul style="list-style-type: none"> <li>• PT Pilar Wanapersada, HGU No. 2/HGU/BPN/99, 06 January 1999 with area 15,153 Ha.</li> <li>• PT Karya Prima Agro Sejahtera, Cadastral BPN Map No. 006-16.09-2016 (504.5 Ha), Land Permit No. 525.26/K.105/HK/2014 (2,563 Ha)</li> <li>• PT Dharma Intisawit Lestari, HGU No. 73/HGU/KEM-ATR/BPN/VIII/2019 area 3,366 Ha</li> <li>• PT Putra Utama Lestari, Cadastral BPN Map No. 8/2018 luas 1272 Ha, Location Permit with endorsement from Regent No. 525.29/K.1049/2012 year of 30 November 2012 area 17,000 Ha</li> <li>• PT Agro Andalan, Land Use Title No. 35/HGU/BPN RI/2011 date 21 July 2011 area 6,993.2 Ha</li> <li>• PT Kencana Alam Permai, Land Use Title No. 46/HGU/KEM-ATR/BPN/2016 area 5,511.83 Ha. Land Permit No. 525/1065/KEP-DPRP.C/2019 (851 Ha)</li> <li>• PT Prima Sawit Andalan, Location Permit No. 525 year of 2012 area 9,588 ha, Location Permit (added) No. 525/702/KEP-PERTANAHAN/2013 Keputusan Bupati Sintang dated 22 July 2013, area 1,030 ha</li> <li>• PT Dharma Persada Sejahtera, Location Permit No. 525/631/KEP-PERTANAHAN/2014 area 3,972 ha</li> <li>• Smallholders (KM5), MoU with Sawit Usaha Tani Sejahtera No. 104/DIR-ARF/DWT/JKT/III/08 dated March 31 2008</li> <li>• Smallholders (KM8), MoU with Sawit Wehea</li> </ul>



		<p>Tani Sejahtera No. 103/DIR-ARF/DWT/JKT/IV/12 dated April 25th 2012</p> <ul style="list-style-type: none"> <li>• Smallholders (KM9), MoU with Karya Sejahtera No. 01/SPK-KPAS/X/2010 dated October 22th 2010</li> <li>• Smallholders (KM10A, KM10B, KM10C), MoU with Jengea Bong Pet Kuq No. 321/DIR-ARF/DWT/JKT/XII/12 dated December 3rd 2012</li> <li>• PT Bima Palma Nugraha, (SK HGU PT.BPN) SK HGU PT.BPN : SK Kepala BPN No.29-HGU-BPNRI-2007, area : 11,661.9 Ha</li> <li>• PT Bima Agri Sawit, SK HGU PT.BAS : SK Kepala BPN No.14-HGU-BPNRI-2008, area : 5,222 Ha</li> </ul>
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**3.4 Identification of Findings, Corrective Action, Observations, Opportunity for Improvement and Noteworthy Positive Components.**

**3.4.1. Identification of Findings, Corrective Actions and Observations at ASA-4 Assessment**

<b>NCR No.</b>	:		<b>Issued by</b>	:	
<b>Date Issued</b>	:		<b>Time Limit</b>	:	
<b>NC Grade</b>	:		<b>Date of Closing</b>	:	
<b>Standard Ref. &amp; Requirement</b>	:				
<b>Evidence observed</b> (filled by auditor):					
<i>THERE WAS NO NONCONFORMITY RAISED DURING ASA 4</i>					
<b>Non-Conformance Description</b> (filled by auditor):					
<b>Root Cause Analysis</b> (filled by organization audited):					
<b>Correction</b> (filled by organization audited):					
<b>Corrective Action</b> (filled by organization audited):					
<b>Assessor Evaluation and Conclusion</b> (filled by auditor):					
<b>Verified by</b>	:				

**3.4.2. Identification of Findings, Corrective Actions and Observations at Re-Certification Assessment**

<b>NCR No.</b>	:		<b>Issued by</b>	:	
<b>Date Issued</b>	:		<b>Time Limit</b>	:	
<b>NC Grade</b>	:		<b>Date of Closing</b>	:	
<b>Standard Ref. &amp; Requirement</b>	:				
<b>Evidence observed</b> (filled by auditor):					
<i>THERE WAS NO NONCONFORMITY RAISED DURING Recertification</i>					
<b>Non-Conformance Description</b> (filled by auditor):					
<b>Root Cause Analysis</b> (filled by organization audited):					
<b>Correction</b> (filled by organization audited):					
<b>Corrective Action</b> (filled by organization audited):					
<b>Assessor Evaluation and Conclusion</b> (filled by auditor):					
<b>Verified by</b>	:				

**3.4.3. Opportunity for Improvement**

No	Ref. Std.	Description
1	2.1.2	Based on document review, field observations, and interviews with management and contractors, it was known related to compliance with laws and regulations (aspects of OHS, labor, and environment) had been fulfilled by the contractor (detailed explanation in Criterion 2.2), furthermore in the work agreement with the contractor clause related to the compliance of law aspect has been regulated in article 4. In this regard, the company has an opportunity for improvement to create a system for assessing third parties (contractors) regarding compliance with applicable legal regulations

**3.4.4. Noteworthy Positive Components**

No	Ref. Std.	Description
1	-	Received PROPER HIJAU period of 2018 -2019, ISCC Certificate.
2	-	Has been implemented mechanization in operational activity.
3	-	Commitment and contribution in local development.
4	-	Very good team work and document presentations

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

Public Issues	Auditor Verification
<p><b>Environmental Agency of Kutai Timur Regency</b></p> <p>Certification unit has been complied with applicable regulations, among others has had license of hazardous temporary warehouse, license of POME Land Application, environment permit, and etc. Every mandatory report related environmental has been reported to agency. There is no complaints from stakeholder related environmental issue.</p>	<p>There is no negative issue that need further verification. Based on document review and field observations, the certification unit has demonstrated legal compliance related environmental, and no indications of environmental pollution.</p>
<p><b>National Land Agency of Kutai Timur Regency</b></p> <p>Certification unit has been complied with applicable regulations related land legality, among others has had location permit, plantation business permit (IUP), land title (HGU), and has routinely sent land use reports. There is no complaints from stakeholder related land disputes.</p>	<p>There is no negative issue that need further verification. Based on document review and field observations, the certification unit has demonstrated legal compliance related land legality, and no indications of land disputes.</p>
<p><b>Plantation Agency of Kutai Timur Regency</b></p> <p>Certification unit has a good relationship with the agency, besides that the company has also complied with applicable regulations, among others: already has a location permit, plantation business permit (IUP), and has routinely sent plantation business reports. Further explained that until now there has never been a land dispute involving the agency or fire incident in certification unit operational area.</p>	<p>There was no negative issue that need further verification. Based on document review and field observations, the company has demonstrated legal compliance regarding plantation legality, and no indications of land disputes or fire incident.</p>
<p><b>Manpower &amp; Transmigration Agency of Kutai Timur Regency</b></p> <p>There are no negative issues related to labor, industrial relations and child labor. The labor reports for contract workers has been reported periodically. Certification unit has been implemented minimum wage, overtime and others labor standard in accordance with government regulation. Every labor union has been verified by agency and still active in certification unit.</p>	<p>There are no negative issues that need further verification. The company has paid minimum wages, overtime and others labor standard in accordance with the government regulations.</p>
<p><b>Muara Wahau Sub-District</b></p> <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</p>	<p>There are no negative issues that need further verification. The company has made efforts to develop the surrounding community through CSR programs, the use of local workers</p>

Public Issues	Auditor Verification
<p>through CSR programs, recruitment of local workers. local contractors, the creation of plasma plantations and so on.</p> <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>and local contractors</p>
<p><b>Min Sun Lekut Cooperative</b></p> <p>The company has collaborated with the community in the development of plasma plantations under the KKPA scheme. Land distribution with a 70: 30 system. Is currently in production and the farmers are still in the stage of paying off credit.</p> <p>The price of FFB uses the price determination from Disbun. The farmers can find out the price easily. FFB payments from the company are paid via bank transfer once a month. The number of plasma members is 466 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>There are no negative issues that need further verification. The company has established good cooperation between the management of cooperatives and cooperative members.</p>
<p><b>Village Official Diak Lay Local Contractor of Transportation (on behalf of personal)</b></p> <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>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>There are no negative issues that need further verification. The company has made efforts to develop the surrounding community through CSR programs, the use of local workers and local contractors.</p>
<p><b>Gender Committee (PT Swakarsa Sinarsentosa)</b></p> <p>Gender Committee activities include socialization of sexual harassment, complaints, general health and so on. There are no issues related to sexual harassment.</p>	<p>There are no negative issues that need further verification. The company was formed a Gender Committee. Described in Criteria 6.1.</p>



Public Issues	Auditor Verification
<p>Female workers have the right to get menstruation leave (H1) and maternity leave (H2).</p> <p>The gender committee had a <i>Rumah Belajar Project</i> (Education House) for children.</p>	
<p><b>Gender Committee (PT DSN)</b></p> <p>Gender Committee activities include socialization of sexual harassment, complaints, general health and so on. There are no issues related to sexual harassment.</p> <p>Female workers have the right to get menstruation leave (H1) and maternity leave (H2).</p> <p>The gender committee had a <i>Rumah Belajar Project</i> (Education House) for children.</p>	<p>There are no negative issues that need further verification. The company was formed a Gender Committee. Described in Criteria 6.1.</p>
<p><b>Head of Worker Union PT DSN</b></p> <p>The worker union had 200 member. The last meeting was held in January 2020 which discussed the health insurance. The salary implementation is in accordance with the Kutai Timur Minimum Wage which is equal to Rp. 3.140,098/month, besides that the salary payment is in accordance with the stipulated time and through the transfer. There are no issues related to employment. All the worker had a insurance (Health and Employment)</p>	<p>There are no negative issues that need further verification. The company has Worker Union. Described in Criteria 6.2.</p>
<p><b>Worker Union PT SWA</b></p> <p>The company supports and facilitates association activities and freedom of opinion. The employment reference used is a Company Regulation. there were no industrial relations issues during the 2019 period. So far the company has always been open for communication</p>	<p>There are no negative issues that need further verification. The company has Worker Union. Described in Criteria 6.2.</p>

**4.0 CERTIFIED ORGANISATION'S ACKNOWLEDGEMENT OF INTERNAL RESPONSIBILITY****4.1 Formal Sign-off of Assessment Findings**

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.

Signed on behalf of:

PT Dharma Satya Nusantara  
Management Representative



**Agustinus Triwibowo**  
Friday, 06 March 2020

Mutuagung Lestari  
Lead Auditor



**Moh Arif Yusni**  
Friday, 06 March 2020

**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	Manpower & Transmigration Agency	Sangata, Kutai Timur Regency	-	Direct Interview	14 January 2020	✓	
2	Plantation Agency	Sangata, Kutai Timur Regency	-	Direct Interview	14 January 2020	✓	
3	National Land Agency	Sangata, Kutai Timur Regency	-	Direct Interview	14 January 2020	✓	
4	Environmental Agency	Sangata, Kutai Timur Regency	-	Direct Interview	14 January 2020	✓	
5	Gender Committee of PT DSN	PT DSN	-	Direct Interview	03 March 2020	✓	
6	Worker Union of PT DSN	PT DSN	-	Direct Interview	03 March 2020	✓	
7	Gender Committee of PT Swakarsa Sinarsentosa	PT Swakarsa Sinarsentosa	-	Direct Interview	04 March 2020	✓	
8	Worker Union of PT Swakarsa Sinarsentosa	PT Swakarsa Sinarsentosa	-	Direct Interview	04 March 2020	✓	
9	Muara Wahau sub district	Muara Wahau	-	Direct Interview	03 March 2020	✓	
10	Min Sun Lekut Cooperate	Muara Wahau	-	Direct Interview	03 March 2020	✓	
11	Village Official of Benhes (*No person in the village office)	Muara Wahau	-	Direct Interview	03 March 2020		✓
12	Sawit Watch	Jakarta	info@sawitwatch.or.id	Questionnaire via email	26 February 2020		✓
13	WALHI	Jakarta	<a href="mailto:info@walhi.or.id">info@walhi.or.id</a>	Questionnaire via email	26 February 2020		✓
14	IARI	Jakarta		Questionnaire via email	26 February 2020		✓
15	AMAN	Jakarta	<a href="mailto:rumahaman@cbn.net.id">rumahaman@cbn.net.id</a>	Questionnaire via email	26 February 2020		✓
16	Local Contractor of Transportation	Muara Wahau	-	Direct Interview	03 March 2020	✓	
17	<b>POM 4</b> - Sterilizer Station: 1 Operator - Press Station : 1 Operator - Kernel Station : 1 Operator - Engine Room : 1 Operator - Weighbridge: 1 operator - 2 warehouse officer - 1 hazardous waste warehouse officer - 1 WTP operator - 1 ETP operators. - 1 mechanic workshop	PT DSN	-	Field observation and direct interview	03 March 2020	✓	

18	<p><b>Jabdan 1 Estate</b></p> <ul style="list-style-type: none"> <li>- Harvesting :: 4 worker and 1 supervisor</li> <li>- Spraying Team : 11 worker and 1 supervisor</li> <li>- Pest and disease : 2 worker</li> <li>- Warehouse : 1 worker</li> <li>- Temporary Hazardous Waste : 1 worker</li> <li>- Chemical &amp; Fertilizer Warehouse : 1 Worker</li> <li>- Emergency Response Team : 1 worker</li> <li>- Workshop : 1 worker</li> <li>- Health Post : 1 worker</li> <li>- Labor Union : 1 worker</li> <li>- Gender Committee : 1 worker</li> <li>- Daycare &amp; Housing Resident : 2 workers.</li> </ul>	PT Swakarsa Sinarsentosa	-	Field observation and direct interview	04 & 05 March 2020	✓	
19	<p><b>Long Jenew 2 Estate</b></p> <ul style="list-style-type: none"> <li>- Manual Upkeep 6 workers and 1 supervisor</li> <li>- Harvesting 4 workers and 1 supervisor</li> <li>- EFB application 6 workers</li> <li>- Circle and path spraying. 10 and 1 Supervisor workers</li> <li>- Pest and disease : 2 worker.</li> <li>- Land application 2 worker.</li> <li>- Storage : 2 workers</li> <li>- Daycare : 1 persons</li> <li>- Generator room: 1 operator.</li> <li>- Housing complex 1 resident.</li> <li>- Generator room: 1 operator</li> <li>- Washing/rinse house 1 worker.</li> <li>- 3 mechanic workshop</li> </ul>	PT Swakarsa Sinarsentosa	-	Field observation and direct interview	04 Maret 2020	✓	
20	<p><b>Long Jenew 1 Estate</b></p> <ul style="list-style-type: none"> <li>- Spraying : 12 workers</li> <li>- Harvesting : 4 workers</li> <li>- Storage : 2 workers</li> <li>- Daycare : 1 persons</li> </ul>	PT Swakarsa Sinarsentosa	-	Field observation and direct interview	5 March 2020		

	<ul style="list-style-type: none"> <li>- Generator room: 1 operator.</li> <li>- Housing complex 1 resident.</li> <li>- Generator room: 1 operator</li> <li>- Washing/rinse house 1 worker.</li> <li>- 3 mechanic workshop.</li> </ul>					✓	
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**Appendix 2. Assessment Program**

DATE	02 – 07 March 2020	
PROGRAM	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
<b>Monday, 02 March 2020</b>		
04.55 - 08.05 08.50 – 09.45 10.00 – 16.00	Jakarta → Balikpapan Balikpapan → Berau Berau → Site	All Auditor
<b>Tuesday, 03 March 2020</b>		
08.00 – 09.00	Opening meeting <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>	All Auditor
09.00 – 12.00	Stakeholder consultation to affected communities surrounding the plantations and previous land owner	ARB / RPJ
09.00 – 12.00	Stakeholders consultation to Sub district of Muara Wahau Field Observation to POM 4 <ul style="list-style-type: none"> <li>• Supply Chain verification (FFB Receiving, Weighbridge, FFB Sorting, Processing Activity, Despatch CPO)</li> <li>• Inspection to Chemical Storage, Hazardous Waste Storage, Fire Control Simulation,</li> <li>• Observation of WWTP, WTP, LA, EBA</li> </ul>	<ul style="list-style-type: none"> <li>• MAY</li> <li>• SAP</li> </ul>
12.00 – 14.00	Break	All Auditor
14.00 – 17.00	<ul style="list-style-type: none"> <li>• Verification of stakeholder consultation result and field visit.</li> <li>• Document review and completing audit checklist.</li> <li>• Verification of Basic Information Mill and Estate</li> <li>• Confirmation of Time Bound Plan</li> <li>• Review of Partial Certification</li> </ul>	All Auditor
<b>Wednesday, 04 March 2020</b>		
08.00 – 12.00	Field Observation to Long Jenew 2 Estate <ul style="list-style-type: none"> <li>• Implementation of Legal Aspect (Land Ownership, Legal Boundaries);</li> <li>• Implementation of Agronomy Aspect (Harvesting &amp; Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application)</li> <li>• Implementation of Environmental, Conservation/HCV and Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management)</li> <li>• Observation of Workers Facilities (Housing, School, Worship Place).</li> </ul>	All Auditor
12.00 – 14.00 14.00 – 17.00	Break <ul style="list-style-type: none"> <li>• Verification of stakeholder consultation result and field visit.</li> <li>• Document review and completing audit checklist.</li> </ul>	All Auditor All Auditor



<b>Thursday, 05 March 2020</b>		
08.00 – 12.00	Field Observation to Jabdan 1 Estate and Long Jenew 1 Estate <ul style="list-style-type: none"> <li>• Implementation of Legal Aspect (Land Ownership, Legal Boundaries);</li> <li>• Implementation of Agronomy Aspect (Harvesting &amp; Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application)</li> <li>• Implementation of Environmental, Conservation/HCV and Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management)</li> <li>• Observation of Workers Facilities (Housing, School, Worship Place).</li> </ul>	All Auditor
12.00 – 14.00	Break	All Auditor
14.00 – 17.00	<ul style="list-style-type: none"> <li>• Verification of stakeholder consultation result and field visit.</li> <li>• Document review and completing audit checklist.</li> </ul>	All Auditor
<b>Friday, 06 March 2020</b>		
08.00 – 11.30	<ul style="list-style-type: none"> <li>• Continue Field Observation to Estate; Mill and Public Consultation to Company surrounded village and community leader (if needed)</li> <li>• Completion of checklist and RSPO Document Review</li> </ul>	All Auditor
12.00 – 16.00	Internal discussion by auditor team preparing for Closing Meeting	All Auditor
16.00 – 17.00	Closing Meeting: <ul style="list-style-type: none"> <li>• Presentation of audit findings (Noteworthy Positive Component, Non Conformities, OFI, Timelie of CAR's, Conclusion)/ Comments, Responses and Questions</li> </ul>	All Auditor
<b>Saturday, 07 March 2020</b>		
03.00-09.00	PT DSN → BERAU	All Auditor
10.25-14.15	BERAU → BALIKPAPAN → JAKARTA	