

*Roundtable on Sustainable Palm Oil Certification
RSPO*

[✓] Surveillance

Name of Management Organisation : Rantau Panjang Factory – PT Guhtrie Pecconina Indonesia, Sime Darby Plantation Bhd
 Plantation Name : PT Guhtrie Pecconina Indonesia: Rantau Panjang Estate, Bumi Ayu Estate, Napal Karang Ringin Estate and Mangun Jaya Estate
 Location : Rantau Panjang Village, Lawang Wetan Sub-District, Musi Banyuasin District, Sumatera Selatan Province, Indonesia
 Certificate Code : **MUTU-RSPO/017**
 Date of Initial Registration : 15 March 2012
 Date of Certificate Issue : 20 November 2017 Date of License Issue : 16 June 2020
 Date of Certificate Expiry : 15 March 2022 Date of License Expiry : 15 March 2021

Assessment	Assessment Date	PT. Mutuagung Lestari Auditor	Reviewed by	Approved by
ASA-1.3	24 to 28 February 2020	Ardiansyah (Lead Auditor), Sandra Purba, Yudhi Yuniarto Tallutondok, Briyogi Shadiwa	Leonada	Octo HPN Nainggolan

Assessment	Approved by MUTUAGUNG LESTARI on:
ASA-1.3	10 June 2020

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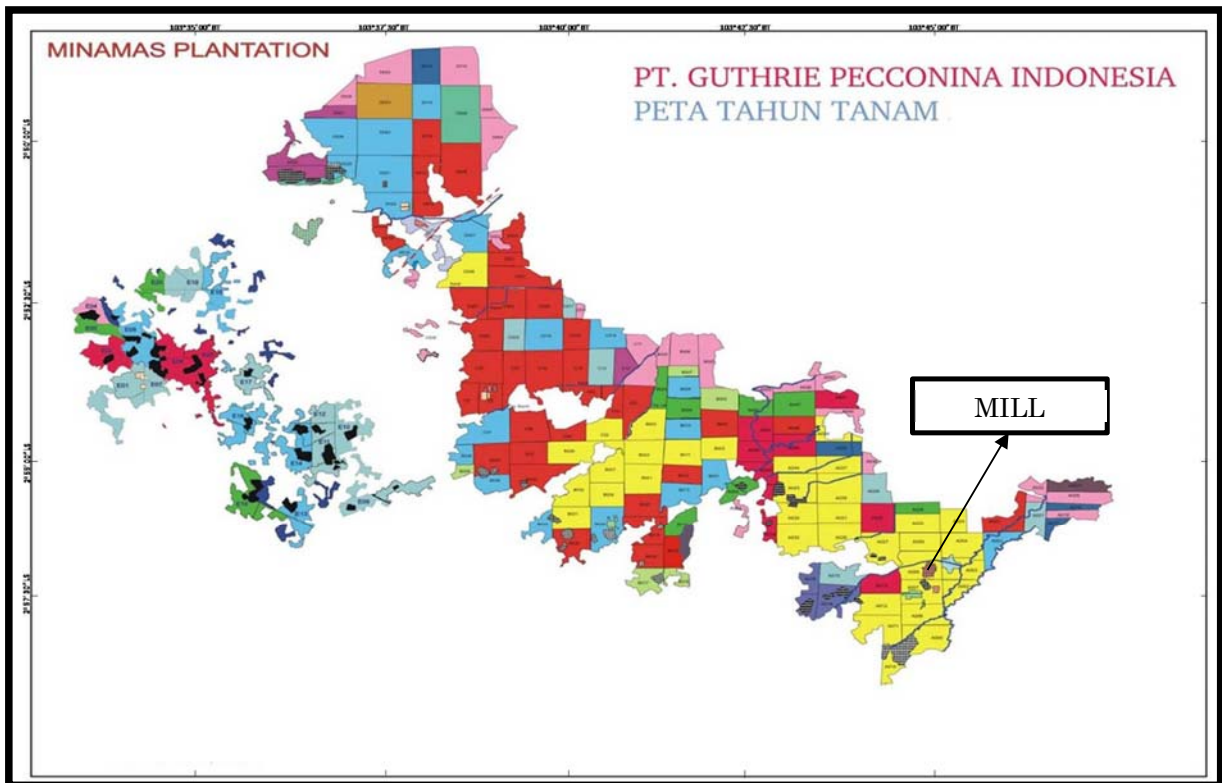
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Figure 1. Location Map of PT Guthrie Pecconina Indonesia



Figure 2. Operational Map of PT Guthrie Pecconina Indonesia



Abbreviations Used

ASA	:	Annual Surveillance Assessment
BKSDA	:	<i>Balai Konservasi Sumberdaya Alam (Nature Conservation Body)</i>
BMS	:	Block Manuring System
BPJS	:	Badan Penyelenggara Jaminan Sosial (<i>Social Assurance of Labor</i>)
BSS	:	Block Spraying System
CH	:	Certificate Holder
CLA	:	Collective Labor Agreement
CPO	:	Crude Palm Oil
CSPK	:	Crude Sustainable Palm Kernel
CSPO	:	Crude Sustainable Palm Oil
CSR	:	Corporate Social Responsibility
EFB	:	Empty Fruit Bunch
ESH	:	Environment, Safety and Health
FFB	:	Fresh Fruit Bunch
GHG	:	Green House Gases
GPI	:	Guthrie Pecconina Indonesia
HCV	:	High Conservation Value
HGU	:	<i>Hak Guna Usahat Land Use Permit</i>
HIRAC	:	Hazard identification Risk Assessment Risk and Control
HR	:	Human Resource
IPM	:	Integrated Pest Management
ISO	:	International Organization for Standardization
ISPO	:	Indonesian Sustainable Palm Oil
KKPA	:	<i>Koperasi Kredit Primer Anggota (Cooperative Credit Scheme)</i>
KUD	:	<i>Koperasi Unit Desa</i>
LLRP	:	Long Range Replanting Programme
LUCA	:	Land Use Change Analysis
MB	:	Mass Balance
MUSREMBANG	:	<i>Musyawahar Perencanaan Pembangunan Desa</i>
NGO	:	Non-Government Organization
OFI	:	Opportunity For Improvement
OHS	:	Occupational Health & Safety
P2K3	:	<i>Panitia Pelaksana Kesehatan dan Keselamatan Kerja (OHS Guiding Committee)</i>
PIC	:	Person In Charge
PK	:	Palm Kernel
PKO	:	Palm Kernel Oil
PKWT	:	<i>Perjanjian Kerja Waktu Tertentu (Temporary Appointment Work Agreement)</i>
POM	:	Palm Oil Mill
POME	:	Palm Oil Mill Effluent
PPE	:	Personal Protective Equipment
PSQM	:	Plantation Sustainability Quality Management
PSD	:	Plantation and Services Department
RKL	:	<i>Rencana Pengelolaan Lingkungan (Environment Management Plan)</i>
RPF	:	Rantau Panjang Factory
RPL	:	<i>Rencana Pemantauan Lingkungan (Environment Monitoring Plan)</i>
RSPO	:	Roundtable Sustainable Palm Oil
RTE	:	Rare, Threatened or Endangered
SCCS	:	Supply Chain Certification System

SIA	:	Social Impact Assessment
SOP	:	Standard Operational Procedure
SOU	:	Strategic Operation Unit
WTP	:	Water treatment Plant
WWTP	:	Waste Water Treatment Plan

1.0	SCOPE of the CERTIFICATION ASSESSMENT		
1.1	Assessment Standard Used	<ul style="list-style-type: none"> Principles and Criteria for the Production of Sustainable Palm Oil 2018, endorsed by the RSP0 Board of Governors and adopted at the 15th Annual General Assembly by RSP0 Member on 15 November 2018. RSP0 Certification System for Principles and Criteria, 14 June 2017 	
1.2	Organisation Information		
1.2.1	Organisation name listed in the certificate	PT Guthrie Pecconina Indonesia subsidiary of Sime Darby Plantation Bhd.	
1.2.2	Contact person	Alagendran Maniam	
1.2.3	Organisation address and site address	RSP0 registered company: No 2, Plantation Tower, PJU 1A/7Street, Petaling Jaya, Malaysia 47301. Liaison Office: The Plaza Office Tower, 36 th Floor JL. MH Thamrin Kav. 28-30, Jakarta 10350.	
1.2.4	Telephone	(+62-21)-29926000	
1.2.5	Fax	(+62-21)-29922686	
1.2.6	E-mail	alagendran.maniam@sime-darbyplantation.com	
1.2.7	Web page address	www.sime-darbyplantation.com	
1.2.8	Management Representative who completed the application for certification	Alagendran Maniam (Head of Sustainability – Minamas Plantation)	
1.2.9	Registered as RSP0 member	1 – 0008 – 04 – 000 – 00 7 September 2004	
1.3	Type of Assessment		
1.3.1	Scope of Assessment and Number of Management Unit	One Palm Oil Mill and four supply bases: Rantau Panjang Factory (RJF), Rantau Panjang Estate (RJE), Bumi Ayu Estate (BYE), Napal Karang Ringin Estate (NAE), Mangun Jaya Estate (MJE).	
1.3.2	Type of certificate	Single	
1.4	Locations of Mill and Plantation		
1.4.1	Location of Mill		
	Name of Mill	Location	Coordinate
			Latitude Longitude
	Rantau Panjang Factory	Rantau Panjang Village, Lawang Wetan Sub District, Musi Banyuasin District, Sumatera Selatan Province, Indonesia	S 02° 54' 59" E 103° 44' 52"
1.4.2	Location of Certification Scope of Supply Base		
	Name of Supply Base	Location	Coordinate
			Latitude Longitude
	Rantau Panjang Estate	Rantau Panjang Village, Karang Anyar Village, Talang Piase Village; Lawang	S 02° 55' 20" E 103° 44' 43"

	Wetan Sub District; Musi Banyuasin District; Sumatera Selatan Province, Indonesia		
Bumi Ayu Estate	Bumi Ayu Village; Lawang Wetan Sub District; Musi Banyuasin District; Sumatera Selatan Province, Indonesia	S 02° 53' 49"	E 103° 40' 37"
Napal Karang Ringin Estate	Napal Village, Karang Ringin Village and Ulak Teberau Village; Lawang Wetan Sub District; Musi Banyuasin District; Sumatera Selatan Province, Indonesia	S 02° 51' 35"	E 103° 38' 49"
Mangun Jaya Estate	Rantau Kasih Village and Pangkalan Jaya Village; Lawang Wetan Sub District; Musi Banyuasin District; Sumatera Selatan Province, Indonesia	S 02° 51' 11"	E 103° 34' 16"

1.5	Description of Area Statement					
1.5.1	Tenure					
	• State				10,139.91 Ha	
	• Community				- Ha	
1.5.2	Area Statement					
	• Total area				10,139.91 Ha	
	• Mature area				5,568.73 Ha	
	• Immature area				1,991.91 Ha	
	• Mill				12.88 Ha	
	• Emplishment and Infrastructure				46.90 Ha	
	• Infrastructure (road, trench, sport facility, drain, water catchment)				425.90 Ha	
	• Nursery				28.22 Ha	
	• Occupation				1,898.29 Ha	
	• HCV				88.03 Ha	
	• Water body (river)				33.26 Ha	
	• Enclave				45.79 Ha	
1.6	Planting Year and Cycles					
1.6.1	Age profile of planting year					
		Hectarage (Ha)				
	Planting Year	Rantau Panjang Estate	Bumi Ayu Estate	Napal Karang Ringin Estate	Mangun Jaya Estate	Total
	1998	963.94	757.18	61.84	-	1,782.96
	1999	224.75	551.10	974.32	139.45	1,889.62
	2000	127.53	317.64	648.10	-	1,093.27
	2001	47.44	-	5.64	-	53.08
	2002	-	54.37	-	-	54.37
	2003	-	-	131.90	-	131.90

	2004	-	-	132.11	-	132.11	
	2007	-	-	16.86	-	16.86	
	2008	-	18.26	-	-	18.26	
	2015	214.89	-	-	-	214.89	
	2016	181.41	-	-	-	181.41	
	Sub Total Mature	1,759.96	1,698.55	1,970.77	139.45	5,568.73	
	2016	-	61.91	-	-	61.91	
	2017	280.64	244.77	274.57	-	799.98	
	2018	111.95	172.88	383.56	-	668.39	
	2019	-	126.22	294.10	-	420.32	
	2020	-	-	41.31	-	41.31	
	Sub Total Immature	392.59	605.78	993.54	-	1,991.91	
	TOTAL	2,152.55	2,304.33	2,964.31	139.45	7,560.64	
1.6.2	New Planting area after January 2010		- Ha				
1.6.3	Planting Cycle		2 nd Cycle				
1.7	Description of Mill and Supply Base						
1.7.1	Description of Mill						
	Name of Mill	Capacity (tonnes/ hour)	FFB Processed (tonnes/year)	CPO		Palm Kernel	
				Out put (tonnes)	Extraction (%)	Out put (tonnes)	Extraction (%)
	Rantau Panjang	60	183,962.24	41,276.23	22.44	11,166.74	6.07
	<i>*Production data source from February 2019 to January 2020</i>						
1.7.2	Description of Certification Scope of Supply Base						
	Name of Estate	Total Area (Ha)	Planted Area (Ha)	FFB (tonnes/year)	Yield (tonnes/ ha/year)	Supplied to Mill	
						FFB (tonnes/year)	%
	Rantau Panjang	2,679.74	1,759.96	28,097.96	15.97	28,097.96	100
	Bumi Ayu	2,960.98	1,698.55	38,116.37	22.44	38,116.37	100
	Napal Karang Ringin	4,359.74	1,970.77	36,132.38	18.33	36,132.38	100
	Mangun Jaya	139.45	139.45	1,503.20	10.78	1,503.20	100
	TOTAL	10,139.91	5,568.73	103,849.91	18.65	103,849.91	100
	<i>*Production data source from February 2019 to January 2020</i>						
1.7.3	FFB description from other source						
	Name of sources/Organisation	Type of Organisation		number of smallholders	Production Area (Ha)	Supplied to Mill FFB (tonnes/year)	
	Rantau Panjang (non-certified)	Subsidiary of Sime Darby Plantation		-	728.70	24,129.64	
	Napal Karang Ringin (non-certified)	Subsidiary of Sime Darby Plantation		-	385.28	7,193.25	

	Mangun Jaya (non-certified)	Subsidiary of Sime Darby Plantation	-	1,237.28	20,770.70			
	Sungai Jernih Estate (non-certified)	Subsidiary of Sime Darby Plantation	-	875.16	12,938.34			
	Guthrie Pecconina Plasma (non-certified)	Scheme Smallholder	1,146	1,003.91	15,080.40			
	TOTAL				80,112.33			
	<i>*Production data source from February 2019 to January 2020</i>							
1.7.4	Product categories	FFB, CPO, PK						
1.8	Tonnage of Product							
1.8.1	Past Annual Claim Certified Product	Last Year Projected Certified Volume (MT)		Last Year Actual Certified Volume (MT)				
	FFB Processed	122,077		103,849.90				
	CPO Production	26,246		25,606.75				
	Palm Kernel (PK) Production	6,920		6,926.64				
	<i>Period: Feb 2019 to Jan 2020</i>							
1.8.2	Product selling	Actual selling product for last year (MT)						
	Type of selling product							
	CSPO sold as RSPO certified product	-						
	CSPK sold as RSPO certified product	-						
	CSPO sold under other scheme	-						
	CSPK sold under other scheme	-						
	CSPO sold as conventional	25,472.48						
	CSPK sold as conventional	6,858.63						
	<i>Period: Feb 2019 to Jan 2020</i>							
1.8.3	Estimate of Certified FFB Claim							
	Name of Estates	Total Area (Ha)	Planted Area (Ha)	FFB (tonnes/year)	Yield (tonnes/ha/ year)			
	Rantau Panjang	2,679.74	1,759.96	28,000	15.91			
	Bumi Ayu	2,960.98	1,698.55	38,000	22.37			
	Napal Karang Ringin	4,359.74	1,970.77	38,500	19.54			
	Mangun Jaya	139.45	139.45	1,500	10.76			
	TOTAL	10,139.91	5,568.73	106,000	19.03			
	<i>*Projected FFB production for 12 months of certificate (16 March 2020 to 13 March 2021)</i>							
1.8.4	Estimate of Certified Palm Product Claim							
	Name of Mill	Capacity (tonnes/ hour)	FFB Processed (tonnes/year)	CPO		Palm Kernel		Supply Chain Module
				Out put (tonnes)	Extraction (%)	Out put (tonnes)	Extraction (%)	
	Rantau Panjang	60	106,000	23,800	22.5	6,400	6.0	MB
	<i>*Projected CSPO and CSPK production for 12 months of certificate (16 March 2020 to 13 March 2021)</i>							
1.9	Other Certifications							
	Others				ISPO			

1.10 Time Bound Plan						
1.10.1 Time Bound Plan for Other Management Units						
	Management Unit		Estate (Supply Base)	Time Bound Plan	Location	Status
	Mill	Time bound				
INDONESIA						
1	Sekunzir. PT. Indotruba Tengah	2010	Sekunzir	2010	Seruyan and West Kotawaringin District – Central Kalimantan	Certified
			Seruyan	2010		Certified
2	Manggala. PT. Tunggal Mitra Plantations	2010	Manggala 1	2010	Rokan Hilir District – Riau	Certified
			Manggala 2	2010		Certified
			Manggala 3	2010		Certified
3	Bukit Ajong PT. Sime Indo Agro	2010	West	2010	Sanggau District –West Kalimantan	Certified
			West (HGU on process)	2019		-
			East	2010		Certified
			East (HGU on process)	2019		-
			East Plasma	2010		Certified
			West Plasma	2010		Certified
			Sei Mawang	2019		-
4	Teluk Siak. PT Aneka Inti Persada	2011	Teluk Siak	2011	Siak District – Riau	Certified
			Pinang Sebatang	2011		Certified
			Aneka Persada	2011		Certified
5	Sungai Pinang. PT. Bina Sains Cemerlang	2012	Sungai Pinang	2012	Musi Rawas District – South Sumatera	Certified
			Sungai Pinang (HGU on process)	2020		-
			Bukit Pinang	2012		Certified
			Bukit Pinang (HGU on process)	2020		-
6	Pematang. PT. Teguh Sempurna	2011	Pematang	2011	Seruyan and East Kotawaringin District – Central Kalimantan	Certified
			Kawan Batu	2011		Certified
			Hatan Tiring	2011		Certified
			Batang Garing	2011		Certified
7	Alur Dumai. PT Lahan Tani Sakti	2011	Alur Dumai	2011	Rokan Hilir District – Riau	Certified
8	Teluk Bakau. PT. Bhumireksa Nusa Sejati	2011	Teluk Bakau	2011	Indra Giri Hilir District – Riau	Certified
			Nusa Perkasa	2011		Certified
			Nusa Lestari	2011		Certified
9	Mandah PT. Bhumireksa Nusa Sejati	2014	Mandah	2011	Indra Giri Hilir District – Riau	Certified
			Rotan Semelur	2011		Certified

10	Angsana. PT Ladangrumpun Suburabadi	2011	Angsana	2011	Tanah Bumbu District – South Kalimantan	Certified
			Gunung Sari	2011		Certified
			Pantai Bonati	2011		Certified
			KKPA-1 PT.SHE	2013		Certified
			KKPA-4 PT.SHE	2013		Certified
11	Mustika. PT Sajang Heulang	2013	Mustika	2013	Tanah Bumbu District – South Kalimantan	Certified
			KKPA-2 PT.SHE	2013		Certified
			KKPA-3 PT.SHE	2013		Certified
			KKPA-5 PT.SHE	2013		Certified
			SAP 1	2020		-
12	Gunung Aru. PT Bersama Sejahtea Sakti	2011	Gunung Aru	2011	Kotabaru District – South Kalimantan	Certified
			Gunung Kemasam	2011		Certified
			Laut Timur	2011		Certified
			Pantai Timur	2011		Certified
			KKPA BSS	2020		-
13	Bebunga. PT. Langgeng Muaramakmur	2011	Bebunga	2011	Kotabaru District – South Kalimantan	Certified
			Bakau	2011		Certified
			Sungai Cengal	2011		Certified
14	Sukamandang PT Kridatama Lancar	2011	Sukamandang	2011	Seruyan and East Kotawaringin District – Central Kalimantan	Certified
			Sapiri	2011		Certified
			Barasdanum	2011		Certified
			Kuala Kuayan	2011		Certified
15	Pondok Labu. PT Paripurna Swakarsa	2012	Binturung	2012	Kotabaru District – South Kalimantan	Certified
			Pondok Labu	2012		Certified
			Rampa	2012		Certified
			Sesulung	2012		Certified
16	Rantau. PT Laguna Mandiri	2012	Rantau	2012	Kotabaru District – South Kalimantan	Certified
			Matalok	2012		Certified
			KKPA Sungai Cengal (1,382 SH)	2014		Certified
			Selabak (PT SAA)	2012		Certified
			Randi (PT SAA)	2012		Certified
			Sangkoh (PT SAA)	2012		Certified
			Lanting (PT LMR)	2012		Certified
17	Betung. PT Laguna Mandiri	2014	Betung	2012	Kotabaru District – South Kalimantan	Certified
			Sekayu	2012		Certified
18	Ungkaya. PT Tamaco Graha Krida	2012	Ungkaya	2012	Morowali District – Sulawesi Tengah	Certified
			Plasma TGK	2020		-

19	Ladang Panjang. PT Bahari Gembira Ria	2012	Ladang Panjang	2012	Muaro Jambi District - Jambi	Certified
			Ladang Panjang (HGU on process)	2020		-
			Plasma BGR	2020		-
20	Rantau Panjang. PT Guthrie Pecconina Indonesia	2012	Rantau Panjang	2012	Musi Banyuasin District – South Sumatera	Certified
			Rantau Panjang (HGU on process)	2020		-
			Bumi Ayu	2012		Certified
			Karang Ringin	2012		Certified
			Napal	2012		Certified
			Napal (HGU on process)	2020		-
			Mangun Jaya	2012		Certified
			Mangun Jaya (HGU on process)	2020		-
			Sungai Jernih	2020		-
			GPI KKPA	2020		-
21	Blang Simpo. PT Perkasa Subur Sakti	2013	Tamiang (PT PPP)	2013	Aceh Tamiang and East Aceh District – Aceh	Certified
			Batang Ara (PT PSK)	2013		Certified
			Blang Simpo-01	2013		Certified
			Blang Simpo-02	2013		Certified
22	Lembiru. PT Sandika Nata Palma	2014	Lembiru	2014	Ketapang District – West Kalimantan	Certified
			Awatan	2014		Certified
			Karya Palma	2020		-
			KKPA SNP	2020		-
			Pelanjau (PT BAL)	2019		Certified
			Sungai Putih (PT BAL)	2020		-
			Baturus (PT BAL)	2020		-
			KKPA BAL	2020		-
MALAYSIA						
1	Sg Dingin SOU 1	2010	Bukit Hijau	2010	Kerangan, Kedah	Certified
			Padang Buluh	2010		Certified
			Bukit Selangor	2010		Certified
			Sg Dingin	2010		Certified
			Jentayu	2010		Certified
			Anak Kuli	2010		Certified
			Somme	2010		Certified
2	Chersonese SOU 2	2011	Chersonese	2011	Kuala Kurau, Perak	Certified
			Holyrood	2011		Certified
			Kalumpang	2011		Certified

			Tali Ayer	2011		Certified
3	Elphil SOU 3	2011	Kinta Kellas	2011	Sg Siput, Perak	Certified
			Elphil	2011		Certified
			Kamuning	2011		Certified
4	Flemington SOU 4	2011	Flemington	2011	Teluk Intan, Perak	Certified
			Bagan Datoh	2011		Certified
			Sabak Bernam	2011		Certified
			Sg Samak	2011		Certified
5	Seri Intan SOU 5	2011	Seri Intan (Main Division)	2011	Teluk Intan, Perak	Certified
			Sabrang	2011		Certified
			Sg Wangi	2011		Certified
			Sogomana (Main Division)	2011		Certified
6	Selaba SOU 5	2011	Seri Intan (Selaba Division)	2011	Teluk Intan, Perak	Certified
			Sogomana (Cashwood & Sg Beruas Division)	2011		Certified
			Bikam	2011		Certified
			Clumy	2011		Certified
7	Tennamaram SOU 6	2011	Tennamaram	2011	Bestari Jaya, Selangor	Certified
			Sungei Buloh	2011		Certified
			Bkt Talang	2011		Certified
8	Bkt Kerayong SOU 7	2011	Bkt Kerayong	2011	Kapar, Selangor	Certified
			Bkt Cherakah	2011		Certified
			Bkt Rajah	2011		Certified
			Bkt Lagong	2011		Certified
			Elmina	2011		Certified
9	East SOU 8	2010	East	2010	Carey Island, Selangor	Certified
			Dusun Durian	2010		Certified
			Sepang	2010		Certified
10	West - SOU 9	2010	West	2010	Carey Island, Selangor	Certified
11	Bukit Putri - SOU 10	2011	Bukit Putri	2011	Raub, Pahang	Certified
12	Kerdau SOU 11	2011	Kerdau	2011	Temerloh, Pahang	Certified
			Jentar	2011		Certified
			Mentakab	2011		Certified
			Sg Mai	2011		Certified
			Chenor	2011		Certified
13	Jabor - SOU 12	2011	Jabor	2011	Kemaman, Trengganu	Certified
14	Labu SOU 13	2011	Labu	2011	Nilai, Negeri Sembilan	Certified
			New Labu	2011		Certified

			Bradwall	2011		Certified
15	Tanah Merah SOU 14	2010	Tanah Merah	2010	Port Dickson, Negeri Sembilan	Certified
			Sua Betong	2010		Certified
			Bukit Pelandok	2010		Certified
16	Sua Betong SOU 15	2014	Salak	2014	Port Dickson, Negeri Sembilan	Certified
			Sengkang	2014		Certified
			Siliau	2014		Certified
			PD Lukut	2014		Certified
			Sungai Baru	2014		Certified
			Tampin Linggi	2014		Certified
17	Kok Foh SOU 16	2011	Bukit Pilah	2011	Bahau, Negeri Sembilan	Certified
			Kok Foh	2011		Certified
			Muar River	2011		Certified
			St. Helier	2011		Certified
			Pertang	2011		Certified
			Sg Gemas	2011		Certified
			Sg Sebaling	2011		Certified
			Sg Senarut	2011		Certified
18	Kempas SOU 17	2010	Kempas	2010	Jasin, Melaka	Certified
			Kemuning	2010		Certified
			Tangkah	2010		Certified
19	Diamond Jubilee SOU 18	2011	Bukit Asahan	2011	Jasin, Melaka	Certified
			Diamond Jubilee	2011		Certified
			Serkam	2011		Certified
20	Pagoh SOU 19	2014	Pagoh	2014	Muar, Johor	Certified
			Lanadron	2014		Certified
			Pengkalan Bukit	2014		Certified
			Welch	2014		Certified
21	Chaah SOU 20	2010	North Labis	2010	Chaah, Johor	Certified
			Cha'ah	2010		Certified
			Sg Simpang Kiri	2010		Certified
22	Gunung Mas SOU 21	2010	Gunung Mas	2010	Kluang, Johor	Certified
			Kempas Klebang	2010		Certified
			Bukit Paloh	2010		Certified
			Yong Peng	2010		Certified
23	Bukit Benut SOU 22	2011	Bukit Benut	2011	Kluang, Johor	Certified
			CEP Niyor	2011		Certified
			Lambak / Elaeis	2011		Certified

24	Ulu Remis SOU 23	2011	Pekan	2011	Layang-layang, Johor	Certified
			Sembrong	2011		Certified
			Tun Dr. Ismail	2011		Certified
			Ulu Remis	2011		Certified
			Bukit Badak	2011		Certified
			Cenas	2011		Certified
25	Hadapan SOU 24	2011	CEP Rengam	2011	Layang-layang, Johor	Certified
			Kulai	2011		Certified
			Layang	2011		Certified
			Seri Pulai	2011		Certified
26	Sandakan Bay SOU 26	2008	Tun Tan Siew Sin	2008	Sandakan, Sabah	Certified
			Tunku	2008		Certified
			Tigowis	2008		Certified
			Sentosa	2008		Certified
			Saguliud	2008		Certified
27	Melalap SOU 27	2011	Melalap	2011	Tenom, Sabah	Certified
			Sapong	2011		Certified
28	Binuang SOU 28	2009	Tingkayu	2009	Kunak, Sabah	Certified
			Sungang	2009		Certified
			Jelata Bumi	2009		Certified
			Binuang	2009		Certified
29	Giram SOU 29	2009	Mostyn	2009	Kunak, Sabah	Certified
			Giram	2009		Certified
30	Merotai SOU 30	2009	Imam	2009	Tawau, Sabah	Certified
			Merotai	2009		Certified
			Table	2009		Certified
			Tiger	2009		Certified
31	Lavang SOU 31	2011	Belian	2011	Bintulu, Serawak	Certified
			Kelida	2011		Certified
			Lavang	2011		Certified
			Lavang (SE)	2011		Certified
			Rasan	2011		Certified
			Chartquest	2011		Certified
			Dulang	2011		Certified
			Peroh	2011		Certified
			Pekaka	2011		Certified
			Ruai	2011		Certified
32	Rajawali	2011	Rajawali	2011	Bintulu, Serawak	Certified

	SOU 32		Samudera	2011		Certified
			Semarak	2011		Certified
			Bayu	2011		Certified
33	Derawan SOU 33	2011	Takau	2011	Bintulu, Serawak	Certified
			Damai	2011		Certified
			Derawan	2011		Certified
			Sahua	2011		Certified
LIBERIA						
1	Grand Cape Mount	2018	Matambo	2018	Grand Cape Mount, Liberia	IC
			Grand Cape Mount	2018		IC
			Zodua	2018		IC
			Bomi	2018	Bomi, Liberia	IC
			Lofa	2018		IC
P & G (New Britain Palm Oil)						
1	Poliamba	2012	Kara	2012	Kevieng, New Ireland Province, P&G	Certified
			West Coast	2012		Certified
			Nalik	2012		Certified
			Noatsi	2012		Certified
			Madak	2012		Certified
			North (Smallholders)	2012		Certified
			South (Smallholders)	2012		Certified
			West (Smallholders)	2012		Certified
2	Tetere	2011	Tetere	2011	Gudaicanal, Slomon Island	Certified
			Ngalimbiu	2011		Certified
			Mbalisuna	2011		Certified
			West Zone (Smallholders)	2011		Certified
			Central Zone (Smallholders)	2011		Certified
			MBA East (Smallholders)	2011		Certified
			MBA West (Smallholders)	2011		Certified
3	Sangara, Sambiripa & Mamba	2013	Sangara	2013	Higaturu, Popondetta, Oro, P&G	Certified
			Sumberipa	2013		Certified
			Ambogo	2013		Certified
			Embi	2013		Certified
			Mamba	2013		Certified
			Sorovi (smallholders)	2013		Certified
			Igora (smallholders)	2013		Certified

			Saiho (smallholders)	2013		Certified
			Aeka (smallholders)	2013		Certified
			Ilimo (smallholders)	2013		Certified
4	Gusap	2010	Dumpu	2010	Madang, P&G	Certified
			Surinam	2010		Certified
			Jephcott	2010		Certified
			Gusap	2010		Certified
			Paddox	2010		Certified
			Ngaru	2010		Certified
			Madang VOP (smallholders)	2010		Certified
			Morobe VOP (smallholders)	2010		Certified
5	Hagita	2013	Giligili	2013	Milne Bay, P&G	Certified
			Hagita	2013		Certified
			Waigani	2013		Certified
			Sagarai	2013		Certified
			Padipadi	2013		Certified
			Mariawatte	2013		Certified
			East Gurney	2013		Certified
			West Gurney	2013		Certified
			East Sagarai	2013		Certified
			West Sagarai	2013		Certified
6	Mosa Kumbango Kapiura Namumdo Waraston	2008	Bebere	2008	West New Britain	Certified
			Kumbango	2008		Certified
			Togulo	2008		Certified
			Dami	2008		Certified
			Waisisi	2008		Certified
			Kautu	2008		Certified
			Karausu	2008		Certified
			Moroa	2008		Certified
			Bilomi	2008		Certified
			Loata	2008		Certified
			Haella	2008		Certified
			Garu	2008		Certified
			Daliavu	2008		Certified
			Sapuri	2008		Certified
			Malilimi	2008		Certified
Rigula	2008	Certified				

		Nomundo	2008		Certified
		Navarai / Karato ME	2008		Certified
		Volupai . Lotomgam / Natupi / Goruru	2008		Certified
		Lolokoru	2008		Certified
		Silovoti	2008		Certified
		LSS Hoskin (1,877 Smallholders)	2008		Certified
		VOP East (1,815 Smallholders)	2008		Certified
		VOP Central (1,958 Smallholders)	2008		Certified
		VOP West (1,277 Smallholders)Kaulong / Akamie / Pusiki / Repamira / Sakapei / KDC ME (21 large smallholders)	2008		Certified
		LSS Kapiura (847 Smallholders)	2008		Certified
		VOP Kapiura (551 Smallholders)	2008		Certified
	<p>Sime Darby has achieved 34 management units in Malaysia, 25 management units in Indonesia, 10 management units in P&G that RSPO certified. Total management unit in Sime Darby Plantation Bhd are 34 in Malaysia, 25 in Indonesia and 10 in P&G. In the year of 2016 & 2017 there are three Mill that are no longer operating, and for the supplying base (Estate) is diverted to a mill that is still operating and has been certified RSPO. The mills are:</p> <ol style="list-style-type: none"> 1. Angsana Mini Mill, PT Sajang Heulang: Mill stop operate since 2016 and the supply bases is transfer to Angsana POM, PT Ladangrumpun Subur Abadi. 2. Selabak Mill, PT Swadaya Andhika: Mill stop operate since 2017 and the supply bases is transfer to Rantau POM, PT Laguna Mandiri 3. Pekaka, SOU 34: Mill stop operate since 2017 and the supply bases is transfer to Lavang, SOU 31 <p>A new mill will be set up in Liberia and planned for commissioning in February 2016. Preparation to undergo the RSPO Certification process is in progress and Sime Darby Plantation Bhd targets to undergo RSPO Certification by end 2017. RSPO NPP process has been completed in 2011. Internal assessment against the draft Liberia NI has been completed on 2018.</p> <p>There was change of the Time Bound Plan under Sime Darby on July 2019 cause the Sime Darby postpone the others certification process. Change of the Time Bound Plan explanation: PT Mitra Austral Sejahtera, the properties was sold and currently Sime Darby Plantation Bhd have no control in the management.</p>				
1.10.2	Progress of Associated Smallholders and Outrovers for Certifiable Standard				
	<p>PT GPI has Gutrie Pecconina Plasma which is associated smallholder and supplied to Rantau Panjang Factory. This associated smallholder is not yet certified due to the land right is still on process. This smallholder is fully managed by company and the planning for certification is follow time bound plan. Interview with representative of smallholders known that the company has process the land title, the update process is Plantation Agency of Musi Banyuasin District on process of technical assessment for each smallholders.</p>				

2.0	ASSESSMENT PROCESS
2.1	Assessment Team
ASA-1.3	<p>1. Ardiansyah (Lead Auditor). Indonesian citizen, Bachelor of Forest Resources Conservation, Department of Forestry. Had work experience in Environmental NGO for 6 month (2007) and consultant for making EIA Document and KLHS for 3 years (2009 – 2012). Had attend training such as RSPO Lead Auditor course, Lead Auditor ISPO, OHSAS (SIO 18001 – 2007), land cover crop mapping and Management System Certification (ISO 9001-2008), Environmental Management System Certification (ISO 14001-2004), Social Auditing and Conflict Resolution. Had many times following audit activities related to sustainable palm oil certification system which is ISPO as an auditor since 2012 for legal, environmental aspect, conservation and social. Fluent in Bahasa and Malay. During this audit, he assigned to verify legal aspect land dispute, HCV, environmental and social aspect.</p> <p>2. Yudhi Yuniarto Tallutondok (Auditor). Indonesian citizen, Bachelor of Fisheries, Padjadjaran University. Have experience of working over three years since 2013 as plantation operations staff in private palm oil plantation companies in Indonesia. Training have been followed including Lead Auditor of Roundtable on Sustainable Palm Oil (RSPO) P&C, Auditor of Indonesian Sustainable Palm Oil (ISPO), Lead Auditor of ISO 9001:2015, ISO 14001:2015, ISO 22000:2009, ISO 19011:2011, Social Accountability 8000, Basic Management Development Program Agronomy, Fire Anticipation on Land and Forest, Potential Mapping and Conflict Resolution in Production Forests, Awareness ISO 17021 and ISO 17065. Has participated in audit activities for the ISPO and RSPO scheme since 2017 for agronomy, OHS, labor, social and legality aspects. In this audit activity performs the assessment of worker welfare and transparency aspect.</p> <p>3. Briyogi Shadiwa (Auditor). Indonesian citizens. Diploma 3 of Oil Palm Plantation. He has 7 years working experience since 2009 as Agronomy Assistant and Agronomy Quality Control in several private oil palm plantation companies in Indonesia. The training has been followed include: ISPO Auditor Training, RSPO Lead Auditor Course by Checkmark Training, Lead auditor ISO 9001: 2015, Awareness SMK3, Lead Auditor ISO 14001: 2015, Awareness OHSAS 18001: 2007 and OHS Expert. During this audit, he assigned to verify third party aspect, OHS and BMP.</p> <p>4. Sandra Purba (Auditor). Graduated from Forestry Faculty Bachelor Degree, majored in Forest Product Technology. Have experience working in industrial forest company, mining and oil palm plantations company for 6 (six) years as EHS and Sustainability Assistant. Has been certified as General OHS Expert, attend and passed the several trainings of management system (OHS, environment and quality management), has been attend the training of waste management, GHG verification and validator training, and conflict resolution and mapping training. Have been successfully passed the Indonesian Sustainable Palm Oil (ISPO) Lead Auditor training course, RSPO lead auditor training course and auditor of RSPO Next. Involve in many audit activities of similar scheme (ISPO) since April 2013 covering the Legal Aspect, Environmental aspect, Social Aspect, Health and Safety Aspect, conservation and Worker Welfare. During this audit, she assigned as lead auditor witness and also verify SCCS aspect.</p>
2.2	Assessment Methodology, Assessment Process and Locations of Assessment
2.2.1	Figure of person days to implement assessment
ASA-1.3	<p>Number of auditors : 4 auditor Number of days for ASA-1.3 at site : 5 days Number of working days for ASA-1.3 at site : 20 Working days</p>
2.2.2	Assessment Process
ASA-1.3	<p>The assessment was conducted by measuring the sufficiency of implementation with the consistency done by the PT. Guthrie Pecconina Indonesia subsidiary of Sime Darby Plantation Bhd to the requirements of Principles and Criteria for the Production of Sustainable Palm Oil 2018, endorsed by the RSPO Board of Governors and adopted at the 15th Annual General Assembly by RSPO Member on 15 November 2018 and RSPO Certification System for Principles and Criteria, 14 June 2017.</p> <p>The assessment was conducted in three methods: (1) document review, aiming to observe the sufficiency of types or</p>

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

Public Stakeholder Notification was made on PT Mutuagung Lestari 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

Structured worker interviews with male and female workers and staff were held in private at the workplace in the mill and the estate. Fieldworkers were interviewed informally in small groups and personal in the field. In addition, the workers family were interviewed in informal meetings at their housing. Company officials were not present at any of the internal or external stakeholder interviews. A list of Stakeholders contacted is included as Appendix I.

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. Document review was conducted in Rantau Panjang Estate and auditor team stay in this estate. The farthest estate takes one hours from Rantau Panjang Estate. Previously there are 5 estate, but since January 2020 two estate (Napal Estate and Karang Ringin Estate) is merge become one estate i.e. Napal Karang Ringin Estate.

Some opportunities for improvement of the results **ASA-1.3** delivered by the MUTU auditor to the management unit and the results are the subject will be verified at the next assessment phase **ASA-1.4**. Improvement of findings from **ASA-1.2** findings were observed by auditors at this **ASA-1.3** assessment. All information obtained was recorded in Check List of PT Mutuagung Lestari (MUTU) and part of **ASA-1.3**.

The assessment program please find Appendix 2

2.2.3	Locations of Assessment
ASA-1.3	<p>Mill</p> <ol style="list-style-type: none"> 1. Security and weighbridge. Observation and interview regarding to the RSPO SCCS implementation and worker welfare. 2. Grading. Observation of FFB grading and quality, OHS and worker welfare implementation. 3. Sterilizer Station. Observation and interview with operator related personnel understanding over the applicable SOP, infrastructure in mill, the implementation of occupational health and safety, medical examination, trainings from company and worker welfare. 4. Pressing Station. Observation and interview with operator related personnel understanding over the applicable SOP, infrastructure in mill, the implementation of occupational health and safety, medical examination, trainings from company and worker welfare. 5. Clarification Station Observation about infrastructure in mill, the implementation of occupational health and safety, medical examination, trainings from company and worker welfare. 6. Boiler Station . Observation and interview with operator related personnel understanding over the applicable SOP, infrastructure in mill, the implementation of occupational health and safety, medical examination, trainings from company and worker welfare. 7. Engine Room Station. Observation and interview with operator related personnel understanding over the applicable SOP, infrastructure in mill, the implementation of occupational health and safety, medical examination, trainings from company and worker welfare. 8. Chemical store. Observation and interview regarding management of chemical. 9. Fertilizer store. Observation and interview regarding management of fertilizer. 10. Water Treatment Plant (WTP) station. Observation related to water consumption and implementation of OHS, and understanding of safe working

11. **Workshop.** Observation and interview regarding activities, OHS, worker welfare and environment aspects.
12. **Oil Store.** Observation and interview related oil management.
13. **Security.** Observation and interview on procedure implementation, safety and worker welfare aspect.
14. **Weigh bridge.** Observation and interview related SCCS implementation and employment.
15. **WTP.** Observation and interview related to water management, recording of water use, waste management, safety and worker welfare aspect.
16. **Empty Bunch Area (EBA).** Observation and interview related to the management of EFB.
17. **Scheduled Waste Storage.** Observations and interviews related to hazardous waste management, and including OHS implementation.
18. **WWTP.** Observation on WWTP, indication of waste overflow, OHS implementation, and interview with worker about worker.

Bumi Ayu Estate (BYE)

19. **Riparian area of Langgaran (HCV 4.1), block of J19 Div 1.** Observation related to HCV and riparian are management.
20. **Riparian area of Latas River, block of K26B, Div 1.** Observation related to HCV and riparian are management.
21. **Chemical store.** Observation and interview related to OHS, waste management and worker welfare.
22. **Fertilizer store.** Observation and interview related to OHS, waste management and worker welfare.
23. **Satellite store of Schedule waste.** Observation and interview related to OHS, waste management and worker welfare.
24. **Workshop.** Observation and interview related to OHS, waste management and worker welfare.
25. **Washing and PPE space facility.** Observation and interview related to OHS, waste management and worker welfare.
26. **Housing and crèche.** Observation and interview related to workers facility, domestic waste handling, complaint and grievance mechanism and emergency response mechanism.
27. **Landfill.** Observation and interview related to domestic waste handling
28. **Harvesting, Block B026.** Observation and interview on procedure implementation, safety and worker welfare aspect.
29. **FFB transportation. Block B026.** Observation and interview on procedure implementation, safety and worker welfare aspect.
30. **Subsidence pole and piezometer.** Observation of peat instrument to monitor and analyzed peat subsidence.
31. **Census of caterpillar pests. Block I028.** Observation and interview on procedure implementation, safety and worker welfare aspect.
32. **HGU Poles No.97, 98 and 99.** Observation related to boundaries management and company operational area.
33. **Water Gate.** Observations related to water level monitoring and water pumps used when river water levels are high to prevent flooding.

Mangun Jaya Estate (MJE)

34. **Chemical store.** Observation and interview related to OHS, waste management and worker welfare.
35. **Fertilizer store.** Observation and interview related to OHS, waste management and worker welfare.
36. **Satellite store of Schedule waste.** Observation and interview related to OHS, waste management and worker welfare.
37. **Workshop.** Observation and interview related to OHS, waste management and worker welfare.
38. **Washing and PPE space facility.** Observation and interview related to OHS, waste management and worker welfare.
39. **Housing and crèche.** Observation and interview related to workers facility, domestic waste handling, complaint and grievance mechanism and emergency response mechanism.
40. **Landfill.** Observation and interview related to domestic waste handling
41. **Harvesting, Field E007.** Observation and interview on procedure implementation, safety and worker welfare aspect.
42. **HGU Poles No. 4 and 129, Field E005.** Observation related to boundaries management and company operational area.
43. **Riparian area, field E005.** Observation related to HCV and riparian are management.

- 44. **Road maintenance, Field E005.** Interview related to road maintenance, OHS aspect and worker welfare.
- 45. **EFB application, Field E018.** Observation in EFB application area and interview related to worker welfare, OHS aspect and BMP.

Rantau Panjang Estate (RJE)

- 46. **HGU Poles No. 62 and 64.** Observation related to boundaries management and company operational area.
- 47. **Chemical Warehouse.** Observation and interviews related to chemical and pesticide storage area, hazardous waste management, employment, and implementation OHS.
- 48. **Fertilizer warehouse.** Observation and interviews related to hazardous management, waste management and implementation OHS.
- 49. **Spare part Warehouse.** Observation related material storage including PPE.
- 50. **Workshop.** Observation and interview regarding to the OSH aspect, employment aspect and waste management.
- 51. **Herbicide Application, Field A006.** Observation spraying activities and interviews with workers spray related to the duties and responsibilities (job description), work procedures, a dose of agrochemical application, safe work practices, use of PPE, periodic medical examinations, P3K foreman, wage system, labor protection (Health Insurance and employment), training in the use of pesticides is limited and transportation workers.
- 52. **Block Spraying System House.** Observation related to chemical spraying facilities (rinse house).
- 53. **Nurseries Block.** Observation of nursery area and condition of available seed stock.

Napal Karang Ringin Estate (NKE)

- 54. **HGU Poles No. 249 and 248.** Observation related to boundaries management and company operational area.
- 55. **Collector, Field C025.** Observation and interview related to implementation of operational procedure, worker welfare, OHS and environment aspect.
- 56. **HCV (Riparian), Field C030.** Observation regarding to the HCV management activities.
- 57. **Watergate, Field M037.** Observation related to water management.
- 58. **Housing and crèche.** Observation and interview related to workers facility, domestic waste handling, complaint and grievance mechanism and emergency response mechanism.
- 59. **Policlinic.** Observation and interview related facilities of policlinic.
- 60. **Chemical Warehouse.** Observation and interviews related to chemical and pesticide storage area, hazardous waste management, employment, and implementation OHS.
- 61. **Fertilizer warehouse.** Observation and interviews related to hazardous management, waste management and implementation OHS.
- 62. **Spare part Warehouse.** Observation related material storage including PPE.
- 63. **Block Spraying System House.** Observation related to chemical spraying facilities (rinse house).
- 64. **Landfill.** Observation and interview related to domestic waste handling
- 65. **Warehouse Fire Extinguisher.** Observations and interviews related to facilities, infrastructure, and fire control personnel
- 66. **Block Spraying System.** Field observations on the condition and management of chemicals.
- 67. **Chemical mixing place.** Observation and interview related management of chemical mixing.
- 68. **Fuel tank.** Observation regarding management of fuel.
- 69. **Schedule waste store.** Observation and interview related management of hazardous waste.
- 70. **Workshop.** Observation and interview regarding to the OSH aspect, employment aspect and waste management.
- 71. **Daycare.** Observation and interview related facilities daycare and others.
- 72. **Generator house.** Observation related management of generator house.

Stakeholder Consultation

- 73. Committee Gender of PT GPI
- 74. Worker Union of PT GPI
- 75. Contractor of FFB Transporter
- 76. Government institution of Musi Banyuasin District (Manpower Agency and Environment Agency)
- 77. Cooperative of smallholder (KUD Muda Rasan Jaya)

	78. PT GPI Communities (Gajah Mati Village and Talang Piase Village).
2.3	Stakeholder Consultation and Stakeholders Contacted
2.3.1	Summary of stakeholder consultation process.
ASA-1.3	<p>Summary of stakeholder consultation process Consultation of stakeholders for PT. Guthrie Pecconina Indonesia was held by:</p> <ol style="list-style-type: none"> 1. Public announcement at web www.mutucertification.com on 11 February 2020. 2. Consultation meeting and interview with government agencies in Musi Banyuasin District (Manpower Agency and Environment Agency) on 25 February 2020. 3. Consultation meeting and interview with Surrounding Village (Talang Piase, Gajah Mati) on 25 February 2020. 4. Consultation meeting and interview with Internal Stakeholder (Committee gender, labour union and local contractor) on 25 February 2020 5. Consultation by email with NGO (Sawit Watch, WWF, WALHI) 17 February 2020. <p>Numbers of input from stakeholders were clarified by PT. Guthrie Pecconina Indonesia</p>
2.3.2	Stakeholder contacted
	<i>Please find appendix 1</i>
2.4	Determining Next Assessment
	The next visit (ASA-1.4) will be determined eight (8) up to ten (12) month after date of certificate.

3.0 ASSESSMENT FINDINGS

3.1 Summary of Assessment Report of the RSPO Certification

MUTUAGUNG LESTARI has conducted an assessment of **Rantau Panjang POM – PT Guthrie Pecconina Indonesia subsidiary of Sime Darby Plantation Bhd** consisting of one (1) mill and four (4) oil palm estates.

During the assessment, there were nine (9) Nonconformities were assigned against Critical/ Major Compliance Indicators; three (3) Nonconformities were assigned against Non Critical/ minor Compliance Indicators and six (6) opportunities for improvement were identified.

Further explanation of the non-conformities raised and corrective actions taken by the company are provided in section 3.5. The company has already prepared and implemented the corrective actions that had been reviewed and accepted by Auditors in form of documentation evidences e.g. (document record/photographic/etc...). Those corrective actions taken that consist of nine (9) Critical/ Major non-conformities and two (2) Non-critical Minor non-conformities had been closed out shall be verified during next assessment.

MUTUAGUNG LESTARI found that **Rantau Panjang POM – PT Guthrie Pecconina Indonesia subsidiary of Sime Darby Plantation Bhd** complied with the requirements of *Principles and Criteria for the Production of Sustainable Palm Oil 2018, endorsed by the RSPO Board of Governors and adopted at the 15th Annual General Assembly by RSPO Member on 15 November 2018 and RSPO Certification System for Principles and Criteria, 14 June 2017.*

Therefore MUTUAGUNG LESTARI Recommends RSPO Certification of compliance is *Continued*.

Ref Std.	VERIFICATION RESULT of MUTU-Certification	
PRINCIPLE #1 BEHAVE ETHICALLY AND TRANSPARENTLY		
1.1 The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.		
<p>1.1.1; 1.1.2; 1.1.3; 1.1.4 and 1.1.5 The company has a Procedure of Information Request with document number SOP-001/GPI/2012 and was approved by all Unit Managers on December 1, 2012. The procedure explains the purpose and objectives of the incoming mail and the period of time to respond to the letter. Further explained in the procedure that the documentation of incoming letters from stakeholders will be responded to through outgoing letters.</p> <p>The company has a list of information that can be accessed by stakeholders listed in the Procedure of Information Access Rights with document number SOP-008/GPI/2012 revision 1 dated 20 February 2016 and has been approved by all Unit Managers. The procedure explained that stakeholders can access some information related to the company with management approval, including: legality documents, environmental documents, Occupational Safety and Health documents, employee data, production data, waste data, factory engine specifications, vehicle specifications, and human rights policies .</p> <p>The company has a Procedure of Communication and Consultation with document number RSPO/6.2/KKM. The procedure explains related to the person in charge of communication, recording of communication results to the company response to community/stakeholder communication.</p> <p>The company has a 2020 list of stakeholders consisting of the central government, local governments, community leaders, local contractors, NGOs, schools, hospitals, insurance and banking</p>		

The CH shows the evidence of mandatory reports to the government as follows

- Employment Mandatory Report of Mangun Jaya Estate for the period of 2019 to the Manpower and Transmigration Office of South Sumatra Province on February 26, 2020 and the obligation to re-register on February 26, 2021.
- Employment Mandatory Report of Napal Karang Ringin Estate for the period of 2019 to the Manpower and Transmigration Office of South Sumatra Province on February 12, 2020 and the obligation to re-register on February 12, 2021.
- Employment Mandatory Report of Bumi Ayu Estate for the period of 2019 to the Manpower and Transmigration Office of South Sumatra Province on February 26, 2019 and the obligation to re-register on April 1, 2020.
- Employment Mandatory Report of Rantau Panjang Estate for the period 2019 to the Manpower and Transmigration Office of South Sumatra Province on 19 November 2019 and the obligation to re-register on 19 November 2020.

Based on document verification of external entry for 2019 - 2020 in each unit are known that there isn't request for information from stakeholders, there is only a letter of loan of goods, and requests for financial assistance from the surrounding community. The results of interviews with Musi Banyuasin Regency Government Agencies and Bumi Ayu Village Officials known that the village has known the procedure for requesting information, communication procedures as well as responsible company officers.

Status : Comply

1.2

The unit of certification commits to ethical conduct in all business operations and transactions.

1.2.1 and 1.2.2

The company has a Procedure of Business Ethics Code with document number 440/HRM-COC/07 dated May 24, 2007 and has been approved by the General Manager, Senior General Manager, Head of Plantation Operations, and Head of Plantation Upstream Indonesia. The procedure explains the company's commitment to doing business in all operations and transactions.

The company has conducted socialization related to the business ethics code to all employees by showing a sample of minutes and attendance of socialization participants on January 21, 2020. The socialization was carried out at the plantation office to 16 employees of Bumi Ayu Estate

The company also shows the Minamas Plantation Partner Statement document between the company and the contractor which explains the ethical behavior of the contractor who will not offer or give bribes or improper benefits to any individual from Minamas Plantation or any individual as inducements, incentives, rewards, prizes or bonuses to be selected and / or for other purposes connected to a business transaction.

To monitor the implementation of compliance and implementation of company policies both internally and externally, the company has a system listed in Chapter VI Enforcement of the Code of Conduct in Part A related to monitoring the implementation of the code of conduct and reporting violations that occur. In the procedure also the telephone numbers and email addresses of each PIC were formulated.

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 company has shown compliance with regulations, including:

- Manpower Mandatory Report of Mangun Jaya Estate in 2019 to the Manpower and Transmigration Office of South Sumatra Province on February 26, 2020 and the obligation to re-register on February 26, 2021.
- Manpower Mandatory Report of Napal Karang Ringin Estate in 2019 to the Manpower and Transmigration Office of South Sumatra Province on February 12, 2020 and the obligation to re-register on February 12, 2021.
- Manpower Mandatory Report of Bumi Ayu Estate in 2019 to the Manpower and Transmigration Office of South Sumatra Province on February 26, 2019 and the obligation to re-register on April 1, 2020.
- Manpower Mandatory Report of Rantau Panjang Estate in 2019 to the Manpower and Transmigration Office of South Sumatra Province on November 19, 2019 and the obligation to re-register on 19 November 2020.
- Company has business permit on 27 October 2004 for HGU area (10,139.91 Ha) and mill capacity for 270,000 MT FFB/ year.

The CH has paid employee wages in accordance with Decree of South Sumatra Governor number: 664/KPTS/DISNAKERTRANS/2019 regarding Musi Banyuasin 2020 Minimum Wage dated on November 19, 2019. Based on document verification and interviews with estate and mill employees show that the CH has paid employee wages in accordance with applicable regulations.

The CH guarantees the application and continuity of OHS in operational activities, one of which is by establishing OHS committees, OHS evaluation meetings and the distribution and replacement of employee PPE. Based on field observations and interviews with estate and mill employees revealed that the CH had provided PPE to ensure employee safety at work and could be replaced if the PPE had been damaged by work before the replacement period.

2.1.2

The company has a legal requirement procedure with document number SOP-003/GPI/2012 dated December 1, 2012. In point 6.2, it is explained related to compliance with regulatory summary updates. The company also has an 2020 Compliance Evaluation Document dated January 13, 2020. Based on the document verification, it is known that there are regulations that have not been identified by the company, including but not limited to:

- Permenaker No. 4 of 2019 concerning mandatory procedures for reporting employment in the network.
- Permenaker No. 5 of 2018 concerning environmental OHS.
- Permenaker No 6 of 2016 concerning holiday benefits.
- Permenaker No. 15 of 2018 concerning minimum wages.

Based on this, it is known that the implementation of changes in applicable law has not been fully run in accordance with the Legal Requirements Procedure. **Non-conformity No. 2020. 01**

2.1.3

The company has a map of land area No.01/2002 with a scale of 1: 30,000 and monitoring of *HGU* stakes in 2020 for example for Bumi Ayu Estate and Rantau Panjang Estate conducted in February 2020. From the monitoring results known that the *HGU* stake is in a well-maintained and complete condition. In addition, the company also has guidelines for the maintenance of *HGU* stakes issued on October 25, 2016, the document explains that routine inspections are conducted every 6 months.

Based on field observations at Bumi Ayu Estate found that *HGU* stakes number 97, 98, 99 and stakes *HGU* numbers 62 and 64 at Rantau Panjang Estate were in a well-maintained condition and could be found.

2.1.2 Status: Non-conformity No. 2020. 01 with Non Critical category

2.2

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

2.2.1;2.2.2;2.2.3

Unit certification already had list of contractors for each unit. The list consists of various types of contractors such as FFB transporter, empty bunch transporter, replanting activities and many more. The list updated when there's a new contract.

Based on document verification results of Work agreements with the contractor, stated that "The second party must provide personal protective equipment for workers, and must comply with applicable laws and regulations". In addition, all contractors also signed a Partner Statement for Minamas Plantation stating that the contractor complied with all legal provisions, laws, regulations and books with anti-bribery and corruption issues.

The third party (contractor) has been able to demonstrate the implementation of employment such as a Work Agreement between the contractor, evidence of registration of BPJS for Workers (including BPJS cards) and payment of wages in accordance with minimum wages. The contractors have been able to show list of workers' names, work agreements, wage slips, BPJS employment card, etc.

Also, the auditor consulted with contractor workers, found out that contractor workers had been given OSH-related training by the company, monitored OSH implementation by the company and earned an income exceeding the district minimum wage.

Status: Comply

2.3	
All FFB supplies from outside the unit of certification are from legal sources.	
2.3.1;2.3.2	
The company currently accept FFB from outside parties. External FFB received outside the PT GPI scope is Sungai Jernih Estate and Guthrie Peconina Plasma. Sungai Jernih Estate and Guthrie Peconina Plasma are a plantation that directly managed by PT GPI but is still in the process of establishing an HGU.	
	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 company shows the long-term plan documents for 2018-2022 (for each unit) which contain estimates / projections for the coming year, including: Maintenance costs, Fertilization costs, Production projections, production costs (harvesting and transportation), estimation of CPO and kernel yields, and replanting plans.	
Also, the company already has a replanting program contained in the Long-Range Replanting Program (LRRP). Bumi Ayu Estate Estate has planting plans for 2017 to 2027 and Rantau Panjang Estate has replanting plans for 2017 to 2030. For examples, there's a replanting program for 2019/2020 period with amount of 174.31 ha at Bumi Ayu Estate, 102.36 ha at Rantau Panjang Estate and 218.93 ha at Karang Ringin Estate.	
3.1.3	
Based on document review, the program always be reviewed every year by the top management (records attached). The review results related to capital expenditures, running accounts, area statement, man power, crop production, fertilizing management, Replanting, Stock Management, emplacement management, Social / Security Management and Environmental Management.	
	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 certification unit has regularly monitored and reviewed the company's operational performance through routine annual activities such as internal audit (2 October 2019) and the management review meeting, which was last held on 29 January 2020. Some of the implementation of corrective actions from the results of management review are:	
<ul style="list-style-type: none"> • Updating documents Risk and hazard assessment. • Control the PPE stock that is ready to use. • Complete the environmental permit application documents in accordance with the latest field facts. • Extending hazardous waste storage permit. 	
3.2.2	
The RSPO metrics template is not yet available.	
	Status: Comply
3.3	
Operating procedures are appropriately documented, consistently implemented and monitored.	
3.3.1;3.3.2	
The certificate holder has a documented procedure for the mill and plantation. The plantation procedure starts from the plant material procedure, then the technique of nursery, fertilization, weed control, integrated pest management to harvesting and its transport is stated in the document of Standard Operating Procedure (SOP) of <i>Referensi Manual Agronomi Penanaman Kelapa Sawit</i> , document number 110 / EST-ARM / 13, September 2013 signed by the Head of Upstream Plantation Indonesia. This document has been distributed on September 16, 2013 to all plantation and factory unit leaders. The certificate holder also has procedures for the process of receiving fresh fruit bunches to send the CPO and kernels listed in the document of <i>Pedoman Teknik Pabrik Kelapa Sawit</i> of the Part I and II palm oil mills Minamas Plantation dated April 30, 2007.	

Generally, operational procedures have been socialized to all employees in accordance with their respective fields of work. Based on field observations at Rantau Panjang and Napal Karang Ringin Estate on harvesting and pesticide application, found that employees can show how to work in accordance with existing procedures, such as harvest workers can explain the criteria of the harvest and spray workers can explain the workings of the start preparation until finish of work.

3.3.3

The certificate holder routinely conducts activities of inspection or monitoring of activities in accordance with the operating procedures carried out by direct supervisors of the workers, for example the foreman, foreman I, assistant, senior assistant, manager and so on. There are some records of the monitoring activities of SOP implementation by the company, for example:

- Report of the Minamas Management Committee Meeting held in December 2019.
- Records of the Conclusion Examination Working Paper conducted on February 10, 2020.
- ESH Assessment Checks conducted on 23 October 2019 (Napal Karang Ringin Estate), 28 August 2019 (Mangun Jaya Estate), 12 August 2019 (Rantau Panjang Estate).

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

The company has an EIA document that has been approved by the relevant agencies, namely:

- ✓ ANDAL document approved by the Head of Department of Agribusiness-Agriculture Agency No. 01 / ANDAL / RKL-RPL / BA / II / 1999 dated February 8, 1999, covering a plantation area of 87,000 Ha and mill of 9 units with each capacity of 60 Tons of FFB / hour, on behalf of oil palm plantations and processing mills of PPA-trans KKPA PT GPI, and UKL/UPL documents of oil palm plantation and processing were published in 1998, approved by the Ministry of Agriculture on 8 February 1999.
- ✓ Additional document of RKL and RPL for PT GPI plantation and processing activities, endorsed by the Environmental Agency of Musi Banyuasin Regency with No. 1198 of 2010 dated 05 November 2010. The study area covers plantation area of 15,425.32 ha and mill with a capacity of 80 tons / hour and production of FFB 60 tons / hour.

The document has been covering all operational activities of the plantation and factory including replanting activities.

The certificate holder has had document of Social Impact Assessment for scope of plantations & palm oil mill. The assessment process carried out in January 2010 by AKSENTA consultant. The document describes the social impact management of estate and mill, among others: employment, health and safety, facilities and benefits of workers, consultancy and communication, stability of employment, business opportunities, revenues, income household, institutional, perception at the company, socio-cultural changes, health workers and the public, and tenure. The process of data collection is done through discussions with the parties, the employee and community. The Social Impact Assessment has been done with involve of related party, consist of community surround, head of village and informal leader (customary leader). There was showed documentation of assessment process, for instance the Attendant List of data gathering in village surround of PT Guthrie Pecconina Indonesia on 5 Januari 2010 and also in surround area of Sungai Jernih Estate and smallholder program (Guthrie Pecconina Plasma) on 23 July 2011.

At October 2015 was conducted Study of Social and Environment Impact of Replanting of PT Guthrie Pecconina Indonesia Period of 2015 – 2018 in Karang Ringing and Rantau Panjang Estate. Through in August 2016 also was conduct of Study of Social and Environment Impact of Replanting of PT Guthrie Pecconina Indonesia Period of 2016 – 2019 in Bumi Ayu and Napal Karang Ringin Estate. This study was carried out by Aksenta consultant, The report describes the stages of replanting, and indication of any impact replanting which can affect to the environmental and social conditions, both in the around of replanting area and area surround of plantation area. The study is aim to identify the environmental and social impacts, activities that become the source of the impact, components and or the parties potentially affected, options to mitigate environmental and social impacts. Based on interview with communities found that all social impact has been identified.

3.4.2 & 3.4.3

Environmental management and monitoring plans are listed in the environmental document, consisting of management and monitoring of air quality and noise, surface water and soil quality, quality of wastewater/solid/hazardous waste, potential of fires,

disruption of flora and fauna, public unrest, soil quality, soil erosion rate, flood, impact of runoff water, a decrease in surface of water-level and disruption of animal migration. Based on field observation, interview and document review found that environmental management has been implemented by CH such as machine maintenance, manage POME in WWTP before applied in estate, etc.

CH has had social management plan for 2019 and has been implemented such as road maintenance, transportation assistance for schooling, basic needs assistance, electrical assistance etc. CH need to ensure that the plan for managing and implementing social impacts is in accordance with the issues in the field, such as for illegal drilling around company area (OFI).

Monitoring result of environmental has been informed in implementation report of RKL-RPL. Based on implementation report of RKL-RPL semester II of 2019, known that all environmental parameter has been accordance with regulation such as air quality, emission, water quality, POME quality, etc. The company using questionnaire to monitor social impact and the last monitoring was conducted in semester II of 2019.

Status: Comply

3.5

A system for managing human resources is in place.

3.5.1 and 3.5.2

The company has HR Management System, including: employee recruitment procedures with document number 431/ HRM-RCT/07, career path system with document number 287-HRM-i1-V-11, and collective labor agreement for the period of 2019-2020 in which regulates the payroll system, giving incentives, employee promotions, employee pensions, termination of employment, etc.

Based on document verification known that in 2019-2020 there are employee recruitment and employee promotions, for example employee recruitment with agreement number 03/PKWT/PT-GPI/RJE/II/2020 dated January 2, 2020 and employee promotions in January 2020 from employee group F1 to F2. It was further explained that there were no employees entering retirement or employees who were terminated in 2019-2020

Based on interviews with the Department of Manpower and Transmigration related to HR management, explained that the company has shown efforts in the management and reporting related to HR, for example reporting and recording contract labor, health insurance payments, employment reporting, wage adjustments and so forth

Status : Comply

3.6

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

Policy related to OHS still the same as previous assessment, namely policy OHS passed by CEO Minamas Plantation dated December 2011. Based on interview with workers known that they have been known about the OHS policy. They also said that assistant perform morning briefing every day before starting work. CH constantly ensure that the Occupational Health and Safety Plan Program documents in the RSPO secretariat are in good condition by the CH Sustainability Administration Office PIC.

Based on the results of the document review, worker interviews and field observations, the company carries out OSH effectiveness monitoring activities, including:

- Conduct PPE checks on every morning briefing activity.
- Conduct periodic health checks for all workers and special health checks for employees who work with chemicals.
- Conducting P2K3 monthly meetings.
- Conduct a ESH Assessment Checklist regularly.
- Examination of emergency response facilities such as Fire extinguisher, First Aid Box and checkpoint facilities.

The company has HIRAC documents for plantation and mill operations. Based on field observations it is known that there are activities of picking caterpillars, monitoring the boundary stakes and monitoring the HCV areas. Based on the review of the Hazard Identification Risk Assessment and Control (HIRAC) Evaluation Document, it has not included an analysis of hazard sources and risk assessment related to activities (but not limited):

- Picking of larvae
- Monitoring and management of boundaries.

- Monitoring and Management of HCV areas

Also, the results of public consultation and document review are known that the company provides PPE to workers free of charge every 1 year, but if there are damage the workers will provide PPE themselves. This was also seen during field visits, where workers used different types of PPE that were provided by the company. Based on the procedure, it is known that damaged PPE can be replaced by the applicable terms and conditions. In addition, the certification unit has also monitored the use of PPE in the field.

Based on above explanation, the company has not been able to show evidence that the risk assessment has covered all operational activities of the plantation, implemented and monitored for its effectiveness and the OHS plans have not been effectively communicated and implemented to all workers. **Non-conformity No. 2020. 02**

3.6.1 Status: Non-conformity No. 2020. 02 with critical category

3.7

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

3.7.1 and 3.7.2

The company has set up 2020 training program for estate, mill, plasma and contractor employees to increase understanding and competency in work. The type of training is adjusted to the employee category and work location. The training program arranged covers agronomy, OHS, operational standards and certification systems.

The company shows training records for each employee and contractor in 2019 which explains the type of training, the names of the employees who took part and the types of training attended. For example:

- The mouse census training and rodenticide application were held on September 11, 2019 and were attended by 30 employees of estate and plasma.
- Training on the use of first aid boxes was attended by 15 employees of estate, mill and contractor on November 8, 2019

Based on field observations and interviews with estate, mill and plasma employees revealed that the company has provided training to employees regularly to improve the competency in working.

Based on the foregoing, the company has good documentation and implementation in improving employee competence in working

3.7.3

Regular training including refreshing has been done to the all personnel who involves in RSPO SCCS implementation, the latest are held on 6 Feb 2020, topic of training: explanation of SCCS (system and document standard) and explanation of SCCS model applied in RPF (MB).

Based on the attendance list, the personnel attending the training is: Head Adm. of mill, PSQM staff, asst. process, asst. lab, production clerk. During observation it was shown that the PIC has been aware regarding to the SCCS standard and procedure in mill.

Sighted the training report of SCCS in estates, involving field assistant, EM, harvesting foreman, and harvesting clerk, held in 8 December 2019, total participants 33. The training material including SCCS SOP and memorandum on separation of FFB from certified sources and non-certified sources. During field observation to FFB transport in RJE it seen that the transport clerk not fully understand regarding to the FFB consignee coding, has been raised as non-conformity in indicator 3.8.5.

Status : Comply

3.8

Supply Chain Requirements for Mills

3.8.1, 3.8.2

The mill is receiving and processing FFB from certified and uncertified sources, hence, the RSPO SCCS Module E (MB) are applied.

3.8.3

The estimates of certified product for last 12 months are listed in the ASA 1.2 annex 1, the actual tonnages for each product are verified during ASA 1.3 audit, as well as the estimate for next 12 months, the detail below:

	Last 12 months estimation (MT)	Actual production in last 12 months (MT)
CSPK	6,920	6,926.64
CSPO	26,246	25,606.75
FFB-estates	122,077	103,849.90

3.8.4

The mill has been registered in the RSPO IT Platform, license id CB91087, RSPO member id: RSPO_PO100000320, member name: Sime Darby Plantation - Rantau Panjang POM, PT GPI.

During the license period of ASA 1.2 (23 Sept 2019 – 25 Feb 2020), verified on the palm trace (stock overview) it seen that the stock (estimation) of RJF has not been reduced. Based on a review of sales documents and interviews with POM representatives, it was stated that in the ASA 1.2 period there were no sales of products with RSPO claims, but there were conventional sales taken from sustainable stocks and the amount had not been deducted from the palmtrace quota.

Hence, RJF has not been able to show evidence that it has fulfilled all registration and reporting requirements for the supply chain as it should through the RSPO supply chain management organization (RSPO IT platform). **Non-conformity No. 2020.03**

3.8.5

The Certificate Holder has RSPO SCCS Manual- RSPO Supply Chain Certification Standard No. SCCS-Std/RSPO/PSQM/02 dated on 02 January 2018. The scope of RSPO Supply Chain System: FFB Certificate processing from raw material acceptance to storage and delivery process produces Certified Sustainable Palm Oil (CSPO) and CSPK with module D (IP) and/or module E (MB) both physical and office administration. The procedure covers all the requirements for implementation of all elements of the established supply chain model and has referred to the latest standards, including explaining the roles of people who have overall responsibility and authority for the implementation of these requirements. For example, it was stated in the procedure regarding to the task of security, WB operator, Mill Head and mill secretary, and so on.

In addition, there is memorandum of Sumatra / Sulawesi PSQM Head dated September 3, 2015 memo number 013 / PSQM-UM / 1 / 2015 explained regarding Mass Balance, labeling supply chain raw materials, identify of FFB, labeling of FFB Document and officer related, labeling of CPO, PK and shell supply chain products, identify of product, and others.

During observation to WB station and interview with operator and security, it was known that they has been aware regarding to the SOP and has implemented accordingly.

Based on field observations and document verification known that the core estate area is divided into certified and non-certified areas, observations on Rantau Panjang Estate transport activities and checks on FFB delivery document sighted that there are FFB sent from non-certified blocks but coded with RSPO stamps, namely from block A035, delivery note on February 24, 2020. Review of documents on the FFB delivery note from block A035 for the whole Feb 2020 are done by the auditor and known that there is delivery of FFB mixed with other blocks (certified and/or non-certified) and marked with RSPO Certified stamp.

So that, the certification unit has not been able to demonstrate that the SOP of product separation specified has been implemented and its effectiveness are monitored. **Non-conformity No. 2020.04**

3.8.6

Internal Audit procedure has been included on SOP of RSPO SCCS Manual- RSPO Supply Chain Certification Standard No. SCCS-Std/RSPO/PSQM/02 dated on 02 January 2018 which describes Internal audits are conducted at least annually to ensure: the organization complies with RSPO SCCS requirements and RSPO Market Communication & Claim documents.

The latest audit of SCCS are conducted on 20 Feb 2020, audit done refer to RSPO SCCS standard 2017, there are 2 NCs raised during internal audit namely related to contract document. The action plan has been taken by the mill.

3.8.7

Mill has verified all FFB receipts from certified and non-certified sources, FFB from core estates (non-certified and certified) is

verified through RSPO and Non RSPO stamps listed on the delivery document (listed by transport clerk). The auditor has verified FFB received records over the last 12 months, the total FFB certified received was 103,849.909 MT and non-certified 80,112.331 MT.

RJF does not purchase RSPO certified oil palm products. RJF is the producer of RSPO certified palm oil products

The estimates of certified products for the last 12 months and actual tonnages produced for each product are verified at the ASA 1.3 audit. During the audit, the mill has exceeded the estimation for CSPK product, since it has been identified prior to closing meeting, the mill has immediately reported to CB on 27 Feb 2020.

3.8.8

Based on verification on the RSPO palm trace and WB tickets, known that there were no sales of products with RSPO claims within ASA 1.2 licensing period (23 Sept 2019 - ASA Audit 1.3). In the Weighing tickets and sales contracts have been informed the buyer's name, volume, DO number, contract number, delivery date, quality (lab results), document date, buyer's address. If sold as an RSPO product, a supply chain model will be displayed. For e.g., dispatch ticket no. 044154, date 24 Feb 2020, and buyer name: PT Sinar Alam Permai, product: CPO (conventional), volume: 19.51 MT, contract / DO no.: 00540/00513/02/20 / L-GPI-MKS.

3.8.9, 3.8.10, 3.8.11

The physically handling of product are conducted by mill itself since FFB receive in grading station and processed to CPO and PK, except the transportation of product and storage tank at bulking are sourced to third party, which bonded by the agreement. The product is legally owned by the mill since it produced and delivered to specific buyer, and / or the product shipped from bulking.

The agreement to third parties is sighted during audit, there was 2 transporter and 1 bulking, namely:

- Transporter PT Mitra Insan Persada → agreement no. 022/pengangkutan CPO-PK/GPI-MIP/XI/2017 (addendum 1) on 30 Oct 2018, valid until 31 Oct 2019.
- Transporter Semanus Indah Express, no. 012/Jasa Pengangkutan CPO-PK/BSC-SIE/XI/2017 on 30 Oct 2018 valid until 31 Oct 2019.
- Agreement with bulking of PT Patisindo Sawit no. Addendum/PTPS/BSC/001/2019 on 1 Jan 2019 valid until 31 Dec 2019.

All the contract has exceeded the expiration date, according to the Management Representative stated that currently regarding to the third parties are under tender process, the mill (through logistic dept.) and contractor are agreed to extend the current contract, proposed to extend up to 31 Jan 2020 (3-month period). In the minutes of meeting between logistic and tender team stated that currently they are in the midst of tender process and the contract expected to be drawn in Feb 2020. It will be verified in next ASA.

OFI

The name of contractor and its detail address, contact person and phone number are listed in the agreement letter, and there were no additional contractors since ASA 1.2.

3.8.12

All records of the RSPO SCCS requirements are updated and can be accessed by the auditor, all records are kept in the factory office. In accordance with company SOPs, document retention is carried out for 10 years. Book keeping mass balance since Feb 2019 – Feb 2020 are verified by the auditor, can be seen below:

	FFB RSPO (MT)	FFB Non RSPO (MT)	CPO RSPO (MT)	CPO Non RSPO (MT)	PK RSPO (MT)	PK Non RSPO (MT)	CSPO dispatch as RSPO (MT)	CSPO dispatch as conventional (MT)	CSPK dispatch as RSPO (MT)	CSPK dispatch as conventional (MT)
TOTAL	103,849.91	80,112.33	25,606.75	15,669.48	6,926.64	4,240.10	-	25,472.48	-	6,858.63

Based on field observations it is known that the GPI' core area is divided into certified and non-certified areas, observations on RJE' transport activities and checks on FFB delivery documents seen that there are FFB sent from non-certified blocks but marked with RSPO stamps, namely from block A035 on delivery document of February 24, 2020. Based on the review of documents on the delivery note from block A035 for the whole Feb 2020 known that there are FFB mixed with other blocks (certified and/or non-certified) and marked with RSPO Certified stamp.

POM has not been able to show evidence that verification and recording of the number of tonnages and sources for certified FFB, and the number of tonnages for uncertified FFB has been carried out accurately. **Non-conformity No. 2020.05**

3.8.13, 3.8.14, 3.8.15

RJF only performs FFB processing 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. RJF only applying module E (MB).

3.8.16, 3.8.17

Rantau Panjang POM has been registered in the RSPO IT Platform, based on verification on the palmtrace (stock overview) it seen that the quota stock on RJF has not been reduced. Based on a review of sales documents and interviews with POM representatives, it was stated that during the ASA 1.2 license there were no sales of products with RSPO claims, but there were conventional sales taken from sustainable stocks and the amount had not been deducted from the palmtrace quota.

Hence, RJF has not been able to show evidence that it has fulfilled the RSPO certified volume reduction requirements sold through other schemes or in the conventional way as well as deletion in the RSPO IT Platform. **Non-conformity No. 2020.06**

The mill not use trademark on it sales activities and communication.

3.8.4	Status: Non-conformity No. 2020.03 with critical category	
3.8.5	Status: Non-conformity No. 2020.04 with critical category	
3.8.12	Status: Non-conformity No. 2020.05 with critical category	
3.8.16	Status: Non-conformity No. 2020.06 with critical category	

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 Human Rights Policy listed in the Memorandum issued by the Chairman of SOU 23 PT GPI on June 25, 2015. The policy states the company's commitment to pay special attention in fulfilling the protection of human rights in accordance with *Undang – Undang* No. 39 of 1999.

Based on interviews with estate, mill and contractor employees revealed that each employee knew the human rights policy set by the company and was implemented quite well in the operational area, further explained that the company routinely socialized the human rights policy to employees when morning parade.

4.1.2

The company has prepared security policy in the operational units listed in Inter Office Number: 043/GRAS-IM/II/2016 dated February 2, 2016 which explains that the company did not initiate violence or use any form of interference, including the use of mercenaries and paramilitaries in its operations. However, the company only uses a security management system that is carried out by security members who are employees of the company.

In addition, there is a Conflict Resolution Procedure with document number SOP-004/GPI/2012 dated December 1, 2012 which explains that the resolution of land issues will be resolved through consultation by involving parties consisting of government, community leaders, and also involving mediators based on agreement of the parties.

Based on field observations and interviews with estate, mill and contractor employees revealed that there were no land disputes/conflicts that occurred in the company's operational area and there were no indications of paramilitary use in the company's operational area.

	Status : Comply	
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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 & 4.2.2

CH has procedure of handling complaint mechanism for all stakeholder, among others SOP Public Complaints and SOP Handling Employee Complaints on December, 1 2012 and the management must provide protection against the complainant or the complainant.

In the procedure stated that those responsible for receiving grievances and complaints from community by Head of Section were subsequently forwarded and responded to by Manager Estate/Mill. Based on interviews with employees, village representatives, and union leaders, it is known that they have understood the mechanism to complaint. This is effectively implemented where every complaint can be submitted verbally / written through the chairman of the union to be discussed later in bipartite routine meetings. In addition, employees can also convey complaints through direct supervisors or through complaint boxes available throughout the division / estate office.

4.2.3 & 4.2.4

Based on stakeholder consultation (communities, government agency, union) known that there is no land conflict, but there is a grievance. Complaints made to CH have been recorded by the relevant section. For complaints from workers will be recorded by each unit, while for complaints from outside parties recorded by PSD. Records of recap incoming letters / complaints need to complete with response time and the section who give the response (OFI).

CH can show the record of complaint and follow up of complaint, such as complaint from “*Forum Masyarakat Tujuh Desa*” which start in 2017 about request of plasma. The last meeting was conducted with Musi Banyuasin Government in 16 January 2020, which conclude the plasma will develop as long as comply with technical and economical aspect, and the other request cannot be accommodate by company.

Status: Comply

4.3

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

4.3.1

The company has contributed to the development of the surrounding community by collaborating with local transactions and local contractors. Some examples of cooperation with local contractors are transfer and pick up school children and transportation of empty bunch.

Based on interviews with local contractors obtained information about the cooperation contract agreement, payment, payment term and rights of obligations between the two parties have been carried out properly and there are no obstacles in terms of payment to date.

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

There are no changes related to land rights owned by the certificate holder with the following details:

- Land rights with evidence of the Decree of the Head of the National Land Agency No. 11 / HGU / BPN / 2003 dated January 31, 2003 with an area of 10,139.91 Ha.
- Plantation Business Permit from the Investment Coordinating Board No. 336 / T / Agriculture / Industry / 2004 dated October 27, 2004 with an area of 10,139.91 hectares and a factory with a processing capacity of 270,000 tons of FFB / year

All certification scope has had land title with total 10,139.91 Ha. Total area that managed by CH is more than land rights due to there is some area that still on process to obtain land rights/ HGU. The uncertified area has been verify during partial certification. CH is encouraged to reassure operational areas included in the HGU as well as details of land use (OFI).

4.4.2, 4.4.3, 4.4.4, 4.4.5, 4.4.6

There were no changes to the FPIC procedures listed in the Occupational Land Acquisition Procedure (No. 343 / PSD-OKUP / 10) which explained that land acquisition activities were carried out through stages of negotiations between the company and the party claiming the land.

<p>From ASA-1.2 to 1.3, there are no new land expansion activities in the company's operational area. Based on interviews with communities, it was explained that the PT GPI entirely from private land ownership of the community and compensation had been made for the land. The previous landowner explained that the compensation process was carried out without coercion.</p>	
<p>Status: Comply</p>	
<p>4.5 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.</p>	
<p>4.5.1; 4.5.2; 4.5.3; 4.5.4; 4.5.5; 4.5.6; 4.5.7; 4.5.8 The results of the document review and field visits revealed that since the ASA-1.2 activities until ASA-1.3 the company had not carried out the development of new area.</p> <p>Based on SIA and HCV documents it is found that there are no other customary rights and traditional rights within the operational area of PT GPI. The entire compensation process has been settled by the company and evidence of compensation has been verified. The compensation process involved all community witnessed also by the Village Head, head of sub district and etc.</p>	
<p>Status: Comply</p>	
<p>4.6 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.</p>	
<p>4.6.1; 4.6.2; 4.6.3; 4.6.4 There are no changes related to the mechanism to identify legal rights and compensation payment procedures listed in the Occupational Land Acquisition SOP Number 343/PSD-OKUP/11. The procedure is a reference in conducting compensation processes for land acquisition.</p> <p>From ASA-1.2 to 1.3, there are no new land expansion activities in the company's operational area. The land compensation process has been start on 1997. Based on interviews with communities, it was explained that the PT GPI entirely from private land ownership of the community and compensation had been made for the land. The previous landowner explained that the compensation process was carried out without coercion. There is some area which not yet compensate by company and until ASA-1.3 this area is not managed by CH.</p>	
<p>Status: Comply</p>	
<p>4.7 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.</p>	
<p>4.7.1; 4.7.2; 4.7.3 The results of the document review and field visits revealed that since the ASA-1.2 activities until ASA-1.3 the company had not carried out the development of new area. The land compensation process has been start on 1997. Based on interviews with communities, it was explained that the PT GPI entirely from private land ownership of the community and compensation had been made for the land. The previous landowner explained that the compensation process was carried out without coercion.</p>	
<p>Status: Comply</p>	
<p>4.8 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.</p>	
<p>4.8.1, 4.8.2, 4.8.3 and 4.8.4 The results of the document review and field visits revealed that since the ASA-1.2 activities until ASA-1.3 the company had not carried out the development of new area. The land compensation process has been start on 1997. Based on interviews with communities, it was explained that the PT GPI entirely from private land ownership of the community and compensation had been made for the land. The previous landowner explained that the compensation process was carried out without coercion.</p>	
<p>Status: Comply</p>	
<p>PRINCIPLE #5 SUPPORT SMALLHOLDER INCLUSION</p>	

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

Based on the letter of the Cooperation Agreement with the Sinar Delima and Mudah Rasan Jaya cooperatives, the determination of the purchase price of FFB from the plasma estate follows the determination of the FFB price by the Government of Musi Banyuasin Regency. Pricing is done twice a month.

Based on the KKPA plantation management report, it is known that the FFB price information is contained in the document and every month the cooperative knows and approves the calculations in the Management Report.

The company also showed evidence of the recording of routine coordination meetings between the companies with the KUD Sinar Delima on February 11, 2020. The activity discussed about:

- Submission of recapitulation of LPKP KUD Sinar Delima TT 2009 July 2012 to June 2019.
- KUD Sinar Delima proposes again the addition of 1 independent supervisor to oversee fertilization.
- The management proposed to PT GPI to reduce operational costs by 40%.

The coordination meeting was attended by the company, the Head of the Sinar Delima KUD, Sinar Delima Management and the Head of the Musi Banyuasin District Plantation Office.

Based on above evidences, the certification unit has involving all farmers (smallholders' representative) in decision making.

5.1.6 & 5.1.7

The company also shows the latest payment receipt for KUD Sinar Delima in the form of a Bank Voucher (No : BV / GPP / 12/19/01) on December 6, 2019. The payment details include:

- Payment value.
- Records of Transferring via BRI Bank.
- Minutes of Handover of Plasma Farmers signed by the Head of KUD Sinar Delima.
- CPO and Palm Oil sales details.
- The price of FFB that has been set by the relevant agencies (Department of Agriculture in South Sumatra Province).

From the results of public consultations with the KUD it is also known that there are no issues or problems related to paying for FFB to plasma farmers.

The company has tested or calibrated the bridge scales by a third party that is carried out by the Legal Metrology UPTD of the Department of Trade and Industry of the Musi Banyuasin Regency on 4 December 2019 (No.: 44 / DAGPERIN / UPT-MET / XII / 2019). The certificate is valid until December 2020. The test results state *"Ratified on 2019 based on RI Law No.2 of 1981 concerning Legal Metrology by affixing the legal mark of 2019 in the form of number 19 in a regular order and guarantee"*.

5.1.8

The external suppliers at the Rantau Panjang factory are not independent smallholders, but KUD Mudah Rasan Jaya and Sinar Delima KUD which are Smallholder Scheme or plantations with a "Full Manage" system. Both KUDs are managed directly by the operational technical side of PT GPI and will be certified in the RSPO scheme in 2020 (according to the time-bound plan sime darby group).

5.1.9

The company has procedures related to the complaint mechanism in the Whistleblowing Reporting Document issued by the Group Compliance Office on March 7, 2018. The company also has a record of external incoming letters, and from the results of the review of the document, there were no incoming letters from scheme smallholder farmers.

Status: Comply

5.2

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

The external suppliers at the Rantau Panjang factory are not independent smallholders, but KUD Mudah Rasan Jaya and Sinar Delima KUD which are Smallholder Scheme or plantations with a “Full Manage” system. Both KUDs are managed directly by the operational technical side of PT GPI and will be certified in the RSPO scheme in 2020 (according to the time-bound plan sime darby group).

The company has conducted training activities related to the best cultivation techniques to KKPA, the following records are shown:

- Socialization of Human Rights, Environmental, Social and Gender Policies on March 19, 2019.
- Fertilizing application training system, measuring equipment calibration and managing used fertilizer sacks on November 19, 2019.
- Chemical Training, Introduction to HIRAC Spray and SOP for the Use of PPE on November 19, 2019.

From the results of public consultations with the KUD it is also known that they have confirmed that they have received training from the company.

Status:

PRINCIPLE #6 RESPECT WORKERS' RIGHTS AND CONDITIONS

6.1

Any form of discrimination is prohibited.

6.1.1

The company has a policy on non-discrimination, equality and employment opportunities listed in the social policy signed by Head of Plantation Upstream Indonesia (HPUI) in December 2011. Point 1 stipulates a commitment that every staff/employee must be treated fairly in matters relating to recruitment, promotion, limits and conditions of work without regard to personal problems such as race, rank, ethnicity, gender, physical skin color (disabilities/imperfects), organizational membership, political views, and religion.

Based on interviews with labor unions, estate and mill workers known that the company has provided equal employment opportunities for all workers. There is no discrimination in employment or employment.

6.1.2

The company shows a sample employee list for the period of January 2020 for Rantau Panjang Estate which informs employee status, position, gender, marital status, date of birth, ethnicity, region, religion and address with the following details:

- Local employees : 406 people
- Non-local employees : 17 people
- Women : 66 people
- Men : 357 people

Based on interviews with union administrator and gender committees, known that employees and work groups including local communities do not experience discrimination, both in terms of work or the recruitment of new employees.

In addition, based on interviews with estate and mill workers known that they had not received discrimination from companies in employment relations so far.

6.1.3

The company shows evidence that there is no discrimination in terms of recruitment, job training and employee promotion. This is stated in the employment procedures, collective labor agreements and non-discriminatory policies which explain that the recruitment of employees is based on the workforce needs for each type of work, while job training is carried out to improve employee competency in working and employee promotions are carried out based on company needs with reference to the results of the work assessment by the direct supervisor within a certain period. Furthermore, the company also showed a record of providing evidence of equal opportunities and treatment in employment opportunities.

Based on document verification known that the company has a good documentation of company's employment documents in each unit. In addition, the company explicitly stated a non-discriminatory policy during the recruitment selection process, appointment of employees, training and promotion of employees.

Based on interviews with estate and mill workers known that workers consisted of several tribes and religions. This shows that the company provides equal opportunities and treatment for its workers without discriminating against ethnicity, religion and race. The company also promotes employees according to their needs, expertise and quality.

6.1.4

The company does not discriminate against female employees who are pregnant to work, for example: there are no monthly pregnancy tests for all female employees. Pregnancy tests are only done to ensure that no female employees apply pesticides in pregnancy, not as a basis for discriminating women workers who are pregnant. If there are employees who are pregnant, the employee will be moved to a safer job (not using pesticides) and continue to receive the same salary and benefits, so there is no discriminatory action in this case.

Based on interviews with women workers and gender committees, known that pregnancy checks are carried out every month only to female employees who apply pesticides. Checks are carried out to ensure that no female workers work with chemicals in pregnancy/breastfeeding conditions. It was further explained that checking for pregnancy was not a discriminatory act.

6.1.5

The company has a Sustainable Plantation Management Guidelines listed in Social Policy with document number 724/ TQEM-SPMS/09 dated August 27, 2010. The policy describes the development and implementation of policies to protect female workers from crime and sexual harassment and protect the rights that are relating to women 'reproductions, among others by establishing a Gender Committee. Based on document verification revealed that in each unit a gender committee was formed.

The company showed a sample document meeting of Bumi Ayu Estate Gender Committee which was held on December 27, 2019 and was attended by 17 employees. The meeting discussed the dangers of using tea bags for the long term. When the audit activity takes place, the company can show documentation, attendance list and meeting material.

Based on interviews with the Gender Committees in each unit and representatives of women workers revealed that the company had formed a gender committee to deal with issues of female labor, women's workers' rights and filing complaints.

Based on interviews with Bumi Ayu Estate female workers who work census of pest diseases explained that workers already knew of the existence of a gender committee. Workers can also explain the provisions for spray female workers who are pregnant, breastfeeding and rest periods when breastfeeding.

6.1.6

The company shows evidence that there is no discrimination to employees in terms of wage payments. Payment of employee wages is in accordance with applicable government regulations. In addition, the company also considers the ability, performance, expertise, length of work, and other factors as a basis for payroll so that the payment of wages given in accordance with the burden / duties / types of work respectively.

Based on verification document of employee salary slip for the January 2020 period reveal that the company has paid employee salaries in accordance with applicable regulations starting from basic salary, overtime, to social assurance. This is in line with the interviews with estate and mill employees stating that the company has paid employees' wages quite well and until now there has never been a violation of employee wage payments.

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, 6.2.2 and 6.2.3

The company has a Collective Labor Agreement (CLA) period of 2018 – 2020 between Sumatran Plantation Company Cooperation Agency (Provinces of Aceh, North Sumatra, Riau and Jambi) with Labor Union Members of the Federation of Agricultural and Plantation Labour Unions All Over Indonesia. The CLA is in accordance with available labor regulations and has been approved by the local government. The CLA is available in clear language and has been socialized to all workers. The CLA also explained related to payment of wages and work requirements for new employees.

The company also shows a sample document of work agreement between the employee and the company that explains the type of work, wages, duties and responsibilities, working hours, deductions, overtime, sick leave, maternity leave, health insurance, and termination. The work agreement is written in Indonesian and has been reported to the local government. Based on interviews with estate and mill workers, known that the workers have understood the substance of the employment agreement.

Based on document verification of the Work Agreement number 069/PKWT/PT-GPI/BYE/IX/2018, POM/RJF/PKWT/VI/2018/033 and employee salary slips for the period of January 2020 known that the company pays employee wages in accordance with labor regulations applicable work and provide social assurance and leave to all employees.

Based on interviews with estate and mill employees are known that each employee has understand related to work agreements. Further explained that the company has also paid employee wages in accordance with applicable regulations ranging from basic wages, overtime, leave until the provision of social security.

6.2.4

The CH has provided facilities and infrastructure to support the worker welfare in each management unit, such as permanent housing, electricity sources through generator sets available in each housing, clean water, clinics available in each unit, there is a place for kindergarten.

Based on field observations and interviews with estate and mill workers known that public facilities provided by the company include: housing, worship places, schools, clean water and lighting in good condition. Besides that, in the housing area there are also several stalls belonging to employees that provide basic daily necessities at affordable prices.

6.2.5

The company has documented locations of reasonable food sources at affordable prices that explain the distance from locations to employee housing. Workers have many choices to fulfill their daily basic needs, by shopping in the village, sub-district, or Sekayu City with a travel time of 30-60 minutes. In addition, daily needs can also be met from stalls and vegetable sellers in employee housing. Based on interviews with estate and mill employees known that workers had many choices to meet their daily needs.

Based on public consultations with the Gender Committee and Labour Union Committees revealed that the company had shown an effort to increase workers' access to meet the necessities of life by providing vehicles on a regular basis to take workers shopping after receiving salary each month.

6.2.6

Currently in Indonesia, there is no established standard of living wages, so companies still apply the national minimum wage for all types of workers. In addition to the payment of the minimum wage, the company has assessed the applicable wages and benefits in the form of goods given to workers in accordance with the RSPO Guidelines for implementing a living wage. The company has compiled the prevailing wage valuation and all types of benefits for living wage in 2020 have been included in the calculation of food costs, housing facility costs, non-food costs, non-housing costs, living baskets, and other costs. The results of this calculation are known that the living wage standard currently provided/simulated by the company is above the minimum wage requirement (IDR 3,147,036), which is IDR 3,980,459. The simulation will be carried out in stages in 2020 while awaiting the adoption of the RSPO Prevailing Living Wage benchmark for Indonesia.

Employee remuneration is in accordance with applicable regulations whereby employee remuneration is based on yield units and time units. When employees do not get the target results but have met the target hours of work, the employee still gets full wages on that day, in other words there is no deduction of employee wages as long as the employee has fulfilled working hours on that day.

6.2.7

The company has used permanent and full time workers for the main types of activities, namely harvesting and processing FFB in accordance with *Permenakertrans* No. 19 of 2012 and *GAPKI* Decree with number SK/002/PPG/II/2013. The verification results of the January 2020 employee registration document show that the company has used permanent and full time workers for the main types of activities, namely harvesting and processing FFB, besides that the company also does not use workers with daily status.

Based on interviews with estate and mill workers found that workers understood their status as permanent workers with fairly fair processes and provided equal opportunities for all employees to work according to the abilities, expertise, and achievements of workers.

Status : Comply

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; 6.3.2 and 6.3.3

The company has a policy related to the labor union stated in the social policy signed by the HPUI in December 2011, in point 5 explained that Plantation Upstream Indonesia respects the rights of each staff/employee to form and join the Labor Union according to their choice and to bargain collectively .

The company shows the formation documents of labor unions carried out without interference from the company, for example Work Unit Conference of GPI-1 Labor Union on the selection of new administrators for 2019-2024 period, which was held on May 9, 2019 and took place at the division office and was attended by 75 management and members. Furthermore, the company also showed evidence the recording of RJE Labor Union to the Musi Banyuasin Regency Manpower and Transmigration Office on November 18, 2013 and the Federation of Agriculture and Plantation Workers of Musi Banyuasin Regency Decree with number 56-100/PC F-SP PP SPSI/MUBA/V/2019 dated May 20, 2019 concerning the ratification and confirmation of the personnel of the management unit of the Rantau Panjang Estate labor union and the 2019-2024 period.

The company shows evidence of labor union internal meeting of as follows:

- The meeting on May 9, 2019 took place at the Rantau Panjang Estate Division 1 Office regarding financial accountability and the selection of new labor union management for the 2019-2024 period. The meeting was attended by 75 people who were administrators and members of the union.
- The meeting on October 19, 2019 took place at the BYE Office regarding employee discipline, employee housing security, road housing, residential fences and residential electricity.

The company also shows evidence that there is no company interference in the selection of management and operational activities of the labor union, this is based on the results of interviews with workers and union officials stating that in

Based on interviews with labor union officials and workers at mill and estate, known that they have understood that employees are free to associate, there is no coercion, obstacles, and facilitate the ongoing union organization, such as allowing employees if there is union activity by applying for permission in advance. It was further explained that the selection process, decision making and work programs were entirely carried out by the management and union members without any interference or intimidation from the company.

Status : Comply

6.4

Children are not employed or exploited.

6.4.1; 6.4.2; 6.4.3 and 6.4.4

Policies related to child protection and the prohibition of employing children are listed in the Collective Labor Agreement for the period 2018 – 2020 in Article 16 regarding recruitment of workers which explains that the general requirements that must be met in the recruitment of prospective workers include at least 18 years of age at the time of receipt or already married. The policy was socialized to workers on November 13, 2019 and to the contractor when signing the work agreement.

The company shows the Inter-Office Mail document related to the protection of workers and children issued by the Head of PSQM on January 31, 2018. The document explains that the company does not employ children and will conduct socialization to all workers not to bring children and families while working

The company shows an example of proof of the socialization prohibition on the employment of children under the age of 18 carried out on 4 January 2020 at the RJE warehouse office. The socialization was attended by 28 care employees.

Based on field observations and interviews with estate and mill workers found that there were no workers below the specified minimum age of 18 years. Based on the results of verification of company and contractor workers' documents for the period of January 2020 known that the age of the youngest worker in the data at the time of starting work is 20 years.

Based on public consultations with the Muba Regency Manpower and Transmigration Office revealed that up to now there has been no reporting on the use of underage child labor in the operational area of PT GPI.

Status : Comply

6.5

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

6.5.1 and 6.5.2

The company has a Sustainable Plantation Management Guidelines stated in Social Policy with document number 724/TQEM-SPMS/09 dated August 27, 2009. The policy explains that the company develops and implements policies to protect female workers from sexual harassment and protect the rights related with the women reproduction, among others, by forming a Gender Committee

The company has provided gender committee socialization to employees, for example, which was held on February 28, 2019 at the BYE. In this activity socialized about the gender committee and the socialization of how to submit employee complaints.

The auditors conducted interviews with gender committees in each unit and representatives of women workers. From the interview results it was found that the company had formed a gender committee to deal with issues of female labor, the rights of women workers and the submission of complaints at work.

6.5.3

The company has a policy for pregnant and lactating women with document number 08/RJE//2020 dated January 13, 2020. The policy explained regarding the prohibition of heavy work and using chemicals for pregnant women while for nursing mothers given a special time to breastfeed their children in the place provided.

The company has identified the needs for young mothers by holding meetings between the company and mothers (not young mothers). From the results of the identification, known that several things are needed, among others: special facilities and time for breastfeeding in day care centers and providing education about the importance of breastfeeding for the first 6 months until the age of 24 months.

Based on document verification and interviews with women workers and gender committee representatives found that in the company area there are no employees in the category of young mothers. It was further explained that the company had provided a special place for breastfeeding at the daycare/office and had given a special time for breastfeeding. In addition, there is no prohibition from supervisors in the field regarding the specific time for breastfeeding and especially workers in the field who do not bring a vehicle will be picked up by the foreman at the time of breastfeeding their child.

6.5.4

The company has a grievance mechanism listed in the Code of Conduct Procedure with number 440/HRM-COC/07 in the procedure stated that management must provide protection for the reporter. Based on interviews with workers; labor union representatives and contractor representatives conveyed that they knew that Management had provided protection for each complainant.

The company shows the sample documentation of employee complaints recorded in the Employee Complaint Book for Bumi Ayu

Estate. In the document there are employee complaints in 2020 as follows:

- Complaints on January 3, 2020 related to employee home improvement. The company has responded to the complaint by making improvements on January 9, 2020
- Complaints on January 5, 2020 related to repairs to employee toilets. The company has responded to the complaint by making improvements on January 9, 2020

Based on field observations and interviews with estate and mill employees revealed that each employee knew and understood the mechanism for grievance and the person responsible for making complaints.

Status : Comply

6.6

No forms of forced or trafficked labour are used.

6.6.1 and 6.6.2

Based on document review and interviews with estate and mill employees, government agencies and external affected parties are known that until the audit activity was carried out there were no workers indicated as forms of trafficking or forced labor in any form, not hiring foreign workers, and labor migrants for operations in the field.

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

P2K3 has been legalized for PT Guthrie Pecconina Indonesia (No. / KEP-P2K3 / NAKERTRANS-SS-MUBA / 2020) by the Department of Manpower and Transmigration of South Sumatra Province, with A. Rakhmatullah (No. Reg. 69210 / PK3 / AJ / 14 / 2019 / P0, validity period May 10, 2020) and Tomson Manurung as secretary (No. Reg. 5241 / PK3 / AJ / 31/2016 / P1, validity period October 24, 2019). At the moment the license extension for Tomson Manurung is still in process. (evidenced by a certificate by PJK3).

The organization routinely conducts monthly meetings on OHS issues in the workplace. The minutes of the meeting were recorded and stored well. Based on interviews to workers who are members of the OHS organization it is known that monthly meetings are always routinely conducted to discuss about OHS such as consistency of PPE usage, work accident report, medical checkup, safe working practices etc.

6.7.2

Company has made efforts to prevent emergencies and accidents. Company has procedures related to the handling of emergencies and accident investigation in SOP Emergency Response Situation (No.7309/GPI/11). Company has emergency facilities and infrastructure such as fire extinguisher, first aid kit, hydrant, water tank, and other supporting equipment. Based on field observation in mill for e.g. at boiler station known that hydrant is functioned properly and the fire extinguishers there check and monitored every month (checklist of inspection provided in each fire extinguisher).

Based on field observation at Rantau Panjang Estate, Bumi Ayu Estate, Napal Karang Ringin Estate and Rantau Panjang POM, it is known that the contents of first aid box are available as determined by the company. As well as interviews with foreman in each unit, that foreman are also able to explain the function of each tool in the first-aid box. Monitoring first aid kit has been conducted regularly every month, if there is use of it must be noted on the form provided, and first aid kit that is used it must be replenished and reported Sustainability staff. Based on field observation in POM and each Estates office, it is known that the company already provided evacuation road and muster point.

6.7.3

Result of field observation in Mill and Estate and interviews with personnel's, it is known that the management unit has provided PPE and have been given training in safe work practices. This was evidence that the personnel's have understood their duties and responsibilities and also can demonstrate how to work correctly and appropriately in accordance with the procedures. Furthermore, based on field visit in estate and mill and interview with personnel, it is known that the management unit has provided PPE for personnel. For instance, for example the sprayer using personal protective equipment in accordance with specified hazard identification and risk analysis. In addition, employees are also informed about the steps of secure work in each morning briefing before start working.

6.7.4

The management unit provided accident insurance for personnel based on the applicable regulation. The insurance such as manpower insurance is paid monthly to national social insurance for manpower/ BPJS. Meanwhile, for medical insurance, the company has registered its entire personnel in manpower medical insurance/ BPJS. Based on interview with some personnel, it is known that the entire personnel have been registered in manpower medical insurance/ BPJS. Moreover, based on interview and documents verifications with contractor workers revealed that contractor's personnel have been registered in manpower insurance/ BPJS.

6.7.5

The company has shown accident records in each company unit in the Work Accident Monitoring Document in the Plantation / Mill. The document explains the details of the accident such as: name of the victim, gender, employee status, place of accident, type of accident, number of people, lost work days, accident category and cause of accident. From the results of the review of the document, there were no major accidents causing loss of workdays. Accident records only consist of minor accidents such as: abrasions due to falls, small torn wounds, and pierced by palm spines.

Status: Comply

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.

The company has work procedures related to chemicals such as spray work and pest control. The procedure is contained in the Agricultural Reference Manual (ARM) No. Policy 110 / EST-ARM / 13. Section 15 concerning plant protection from pests and diseases consisting of control of horn beetles, caterpillars, nettle caterpillars, rat pest control and Ganoderma control for base rot and stem rot diseases, Section 16 concerning general weed control. The estate management has a program of integrated pest management and its realization which presented in monthly committee meeting report.

From the results of document review, interviews and field observations, the company does not use certain species in order to control pests and diseases.

In addition, from interviews with management, field workers and the surrounding community, there was no indication of the use of fire material for pest control. From the results of field observations, no burn marks were found from the area visited by the auditor.

Status: Comply

7.2

Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.

7.2.1, 7.2.2, 7.2.4, 7.2.5

The certificate holder has work procedures related to chemicals including spray work and pest control. The procedure is contained in the Agricultural Reference Manual (ARM) No. Policy 110 / EST-ARM / 13. Section 15 deals with the protection of plants from pests and diseases. In section 16 it also explains general weed control.

Each estate shows the document list of chemicals used in the estate, which explains trademarks, active ingredients, LD 50, properties and targets of weeds, for example trademark Kenlon 480 EC, active ingredients trichopir, active ingredient 480 g / l, LD 50 > 1480 mg / kg, systemic properties and target weeds, broad and narrow leaf weeds.

Unit certification already had the records of pesticides use in Document Monitoring Pesticide Usage per Hectare Period 2019. The document has included information about active ingredients used and their LD50, area treated, amount of active ingredients applied per Ha and number of applications.

From the document observations and interviews with officers in the chemical warehouse, each estate team auditor got information that no use of chemicals (pesticides) was used prophylactically. The use of pesticides is only done if the pest attack has passed the specified threshold. For example, the company used pesticides with cyphetrin active ingredients for Field A020, A019, A018, A001 and A024 in December 2019 because the census results had passed the threshold of >5 caterpillars (immature area).

The certificate holder does not use parakuat pesticides and pesticides that are classified as class 1A or 1B. This is confirmed by the policy not to use Paraquat as contained in the memorandum document from the Head Plantations Operation (number: POD-

UM-127 / X / 2008, 4 November 2008) regarding Recommendations to Substitute the Application of Paraquat Active Ingredients in the Minamas Environment.

7.2.3

Unit of certification applying integrated pest management to collaborate on biological and chemical control. Use of chemical engineering was not done in a preventive, but based on the results of early warning systems that detect and census. Biological pest control is done by applying the development of natural enemy's owls to control the rat population. The development of useful plants like *Turnera* and *Antigonon leptopus* also be used as a biological control technique as a nettle caterpillar predator live.

From these pesticide usage data, it is known that the use of herbicides with active ingredients of triclopyr and ammonium glufosinate is higher in 2019 than in 2018. The company explains, the use of these herbicides is due to the extensive area of replanting in PT GPI (2,536.47 ha). It is known that the replanting area is an immature plant (2016-2020 planting year) that does not yet have an extensive canopy (canopy), so that weeds in the area grow and develop rapidly.

7.2.6 & 7.2.9

Based on the results of interviews with spraying workers, it is known that the PPE is given free of charge by the company (Gloves, Apron, Glasses, and masks). Workers also keep and wash the work tools at the washers that have been provided at BSS House (not taken home appliance). Workers also understand the technical activities of workers by explaining technical work ranging from spraying, weed targeting, and avoiding spraying in riparian areas. Based on field observation the spraying team used appropriate PPE and in accordance with risk identification (HIRAC Document).

Document verification results and field observations at Rantau Panjang Estate and Bumi Ayu Estate, interviews with managers and spray workers, that the company does not carry out activities by applying aerial pesticides spraying. All pesticides are applied using the knapsack spray tool.

7.2.7

Based on the results of field observation in the central warehouse (agrochemical warehouse), in the Rantau Panjang and Bumi Ayu Estate it is known that the chemical materials are stored well, officers conduct periodic monitoring for each incoming and outgoing material as well as expired chemicals. For example, a chemical monitoring report for chemicals in 2019 made by a warehouse clerk and reported to the estate manager, found that there were several types of pesticides being monitored in the warehouse.

Based on interviews with Rantau Panjang Estate spray and foreman workers, it is known that workers have understood the management of pesticide packaging, which is to be rinsed in a pesticide packaging container and then collected at an authorized hazardous waste storage. Based on the results of the field observation at the estate office, it is known that the washing place used by pesticide packages is at the estate office, the used washing water is collected and reused for mixing pesticides.

7.2.8

Pesticide containers in all estates, except Bumi Ayu Estate, have been managed properly and stored in a special place before being sent to the Hazardous Waste Warehouse. This has been confirmed based on field visits and document review.

7.2.10 & 7.2.11

The results of interviews with pesticide operators in Rantau Panjang Estate and Bumi Ayu Estate, submitted that all pesticide operators have been checked health periodically once a year cooperation with Company Paramedics. Last tested on December 2019 for all estates. Also, workers have known the results of the examination. Based on field observation, no worker has an indication of exposure to chemicals such as itching, skin irritation, poisoning or anything else.

The auditor conducted field observations and interviews with spray workers in the Rantau Panjang and Bumi Ayu unit, it was found that there were no pregnant workers and the workers knew the prohibition of breastfeeding and pregnant women from applying pesticides. The foreman also stated that if there are female workers experiencing signs of pregnancy then the person concerned will report to the foreman or staff and immediately go to the clinic.

Status: Comply

7.3

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

7.3.1; 7.3.2

CH has identified waste in the Mill and the Estate including the type of waste (hazardous waste, domestic waste, infectious waste, and solid waste), waste sources, and actions taken in efforts to reduce waste. The management plan of waste has been consider type of waste such as solid waste/ by product from mill is collected and reused. Hazardous waste generated from operational activities such as Mill and Estate likes used filters, used oil, battery, pesticides containers, used lamp, etc are stored in the Hazardous Waste Warehouse. There is permit from Government of Musi Banyuasin District on 1 February 2019 with a validity period of 5 years.

The company has conducted socialization about hazardous waste to workers, for example on 20 December 2019 at Napal Karang Ringin Estate. But, the results of the field visit and document review note that the waste has not been managed according to procedures, such as:

- Hazardous waste (pesticide container, used batteries) at Bumi Ayu Estate which is stored in a used goods warehouse
- Hazardous waste in Mangun Jaya Estate (pesticide container) for the April and May 2019 periods is not sent to the hazardous waste warehouse
- Domestic waste in the Napal Karang Ringin Estate housing is scattered about.
- Used oil drums are used as water reservoirs and oil trap covers.

This is raised as **Non-conformity No. 2020.08 with Non-critical category**.

7.3.3

The results of field visits and interviews revealed that the company did not use fire for waste management. It is also prohibited in accordance with the procedures that are owned

7.3.2 Status: Non-conformity No. 2020.08 with Non-critical category

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 & 7.4.2

The company has an SOP related to fertilizing activities contained in the Agricultural Reference Manual (ARM) No. Policy 110 / EST-ARM / 13 Section 8 regarding Fertilization of Palm Oil Plants which includes: technical fertilization, application of empty bunch and compost applications on immature plants (TBM) and mature plants I, placement of fertilizers and fertilizer applications.

In order to maintain the number of plants and achieve production, the company carries out maintenance activities such as organic and inorganic fertilizing activities, manufacture of drainage ditches for water management, and soil and leaf analysis. Based on the results of field visits related to fertilizer application, it is known that fertilizer application has been carried out properly, placed between the trees, applied to all oil palm trees and no fertilizer fell into the water flow or employee emplacement.

The company shows a leaf analysis record by the MRC Team (Minamas Research Center) for each unit in 2019, for example:

- Rantau Panjang Estate on August 19, 2019.
- Mangun Jaya Estate on 31 October 2019.
- Bumi Ayu Estate on the 19th of August 2019.
- Napal Karang Ringin Estate on October 21, 2019.

The monitored indicators are the content of N, P, K, Mg, Ca, N, B, Fe, Cu and Zn.

For soil analysis, the company showed the Semi Detailed Land Survey and Land Suitability for Oil Palm Plants for the 2015-2020 Period, which was made in February 2015. Based on the results of an assessment of PT GPI's soil analysis, it was concluded that the nutrient content, especially base cations, was less balanced (Na, Ca and Mg), as well as for N and P. The addition of N, P and K fertilizers and other fertilizers must be done with a balanced dose between the needs of plants and nutrients that come out through harvesting, budding or loss due to leaching. Run-off and volatilization.

7.4.3 & 7.4.4

The following also displays some records of the realization of fertilization of each unit for the 2019 period, for example:

- Kebun Mangun Jaya: CCM 44 semester 1 totaling 525.37 ton; HGFB of 12.25 ton; CCM 44 semester 2 of 120.55 ton.
- Bumi Ayu Estate: 441th semester CCM 441.5 ton; HGFB of 9.91 ton; CCM 44 semester 2 totaling 459.43 ton; Kieserite totaling 7.70 ton.
- Rantau Panjang Estate: MOP of 1.5 ton; HGFB of 13.10 ton; Kieserite as much as 69.36 ton.

Fertilization realization shown by the company is in accordance with fertilizer recommendations set by the Minamas Research Center.

Based on the results of the field visit, the company also carried out organic fertilizer activities in the form of empty fruit bunches applications. For examples in Block B011. The auditor also saw no indication of the application of empty bunches outside the company's procedures. Empty bunches are placed near the base of oil palms and nothing falls in the watercourse or settlement area.

Status: Comply

7.5

Practices minimise and control erosion and degradation of soils.

Based on the document verification, known that the certificate holder has a semi-detailed soil survey document by Param Agricultural Soil Surveys in 2008 which has a marginal land map of 1:100,000 scale. From the map, it was identified about 31 types of soil (Malaysian land nomenclature). Of the types of soils are grouped into four groups of "management soil" ie groups A, B, C, and E in each estate, for example in Rantau Panjang Estate has four land groups (A, B, C, E).

The certificate holder has a slope protection policy and a river buffer zone, document number SOP 724 / TQEM-SPMS / 09 dated August 27, 2010 authorized by the CEO. Procedures explain slope criteria, slope policy and erosion prevention. In the Rantau Panjang Estate, Bumi Ayu Estate, and Napal Karang Ringin Estate is relatively flat so there is no terrace. Based on the results of field observation in the replanting area of Rantau Panjang Estate and Napal Karang Ringin Estate, is known to have planted covercrop with *Mucuna bracteata*, *Pueria Javanica* and *Calopogonium mucunoides*.

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.

From the results of interviews and field observations it is known that there are no new land development activities or land expansion activities. The company only replanting activities for blocks of plants that are not productive.

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; 7.3.2 & 7.7.7

The results of the document review and field visit revealed that there was no new planting after 15 November 2018 on peat areas, but there is oil palm planted before 15 November 2018 in peat area of PT GPI.

Sime Darby Plantation Bhd as a parent company of PT GPI has sent peat inventory to RSPO on 14 November 2019. Information in the report consisted of company name, country, planting area, use of peat area (planting, HCV, rehabilitation, other), map and shapefile.

7.7.3

CH has been monitoring peat subsidence consistently in accordance with the procedure, which is every 6 months. Based on the map and field visit, it is known that there are 6 monitoring pole of peat subsidence in peat land consisting of 2 in Bumi Ayu Estate (Block K27, J31) and 4 in Napal Karang Ringin Estate (R55, R57, Q57, Q54). Based on monitoring result in 2019 found that the range of peat subsidence between 0.1 to 0.25 cm/ six months.

7.7.4 & 7.7.6

The company has documented water management in PT GPI, especially for Napal Karang Ringin Estate with the most area of peatlands. This water management has been follow RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2018). Water management in Napal Karang Ringin Estate is divided into 4 zones. The purpose of zoning is to facilitate operational actions. The management activities carried out include:

- Dam blocks (weirs). Reservoir in each block with an overflow system to maintain the ground water level.
- Watergate. The gate function is to prevent water entering from outside the block or removing water from the block.
- Making dike in river side.

The results of the field visit at Napal Karang Ringin Estate revealed that CH has managed peatland in accordance with its plans such as:

- Maintain land cover in inter-row.
- Water level monitoring by using a piezometer and water level stick on each block which is measured twice a month. The water level in the canal at the time of the field visit was 40 cm.

7.7.5

CH has conducted a drainability assessment for an area of 892.6 Ha. This activity was carried out by the Minamas Research Center (MRC) in February 2019. Based on peat inventory that reported to RSPO, it is known that the total planted area of peat is 1180.3 Ha. Based on this information, there are still areas that have no explanation related to drainability assessment. This is become **Non-conformity No. 2020.09 with critical category**.

7.7.5	Status: Non-conformity No. 2020.09 with critical category
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7.8

Practices maintain the quality and availability of surface and groundwater

7.8.1 & 7.8.2

CH has implemented a water management plan consisting of:

- Not apply chemicals on riparian area
- Not dispose of POME into rivers, but use it on estate. Before being used, POME is managed in the WWTP so that the quality meets the standards set by the government
- Utilize water for mill process in accordance with standards set by the company

Riparian area are given dike with a width of 5-10 meters and this is according to regulations. For riparian area without dike, the riparian area is 50 meters from river. This has been confirmed during field visit in Rantau Panjang Estate. Interview with pesticide applicators at Bumi Ayu Estate, it was found that workers already knew that the border area of the river should not be applied to chemicals. The management plan has refer to RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017).

7.8.3

POME has been managed in accordance with applicable national regulations. Permit for the utilization of POME is issued by Government of Musi Banyuasin on 28 May 2019 and valid for 3 years. The area that can be applied is cover 200 hectares, located in Blocks A006, A011, A012, A013. Based on data on the utilization of POME in the period of January – December 2019, it is known that the applied area is Block A012 and A013. This was also ensured through field visits to the same block and has been accordance with the permits owned.

The quality of POME, especially Biochemical Oxygen Demand (BOD) requirements has been monitored every month and the results meet environmental quality standards according to regulations which is never excess 5000 mg/l.

7.8.4

Water usage in mill has been monitored and recorded in daily basis. The result of water monitoring for 2019 is average 1.1 M³/ ton FFB and this has been accordance with CH budget. The results of the field visit revealed that the water usage gauges in the WTP were well function.

	Status: Comply
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7.9	
Efficiency of fossil fuel use and the use of renewable energy is optimised.	
7.9.1	
The plan to increase the efficiency of fossil fuel utilization and optimize the use of renewable energy by the company is to use shells and fiber as boiler fuel, where boilers are used to generate turbines to produce electricity. The use of energy produced from turbine has been monitored every day. Based on monitoring result on December 2019 found that energy from turbine used is 108,575 kWh (5.31 kWh/ Ton FFB) and energy from generator is 12,454 kWh (0.61 kWh/ Ton FFB).	
	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	
CH has been calculate GHG 2019 by using GHG calculator version 4. Based on data verification it is known that the data on palmghg is not in accordance with the actual conditions such as total planted area, total planted on peat, FFB production, etc. this is become Non-conformity No. 2020.10 with Critical category.	
7.10.2	
The results of the document review, interviews and field visits revealed that there had been no new developments since 2014. The last development activity was carried out in 2007.	
7.10.3	
The results of field visits and interviews revealed that the company has made management efforts to reduce / minimize pollutants such as:	
<ul style="list-style-type: none"> • Perform routine maintenance on machinery in mill, generators and vehicles • Conducting POME management in the WWTP before using in estate 	
Monitoring results every semester shows the quality of air, emissions (from generators and boilers) in accordance with applicable regulations.	
7.10.1	Status: Non-conformity No. 2020.10 with Critical category
7.11	
Fire is not used for preparing land and is prevented in the managed area.	
7.11.1	
The company has a Minamas Plantation Environmental Protection Policy Document with document number KPL/04/2003 compiled in 2003 by the Minamas Plantation Environmental Protection Policy Committee. The policy regulates the following matters:	
<ul style="list-style-type: none"> • Utilization of Palm Oil Mill Effluent (POME) for land applications (point 2.1). • Utilization of other by-products from palm oil processing activities (point 2.3). • Air Pollution Management (point 3) which includes: zero burning policy, open burning for certain and controlled activities, concentrated black smoke, factory air pollution management (management of solid particles, gas, pungent odors, chimney construction, combustion equipment, monitoring and monitoring). 	
Based on field observations on the 2019 replanting area in Napal Karang Ringin Estate, known that replanting is done by chopping up oil palm trunks and stacked in holes. There is no indication of any burning activity in the replanting area.	
7.11.2	
The company has compiled efforts to prevent, monitor and handle fires, including:	
<ul style="list-style-type: none"> • The existence of procedures for controlling land fires. • There is a fire department. • Dissemination of land fires to employees. • Monitoring fire-prone areas. • Conduct fire fighting team simulations, for example land fire and work environment simulations, fire fighting equipment has also been tested with simulation and testing activities for example on August 3, 2019 to test the fire extinguisher in the form 	

- of 4 suction machines and 2 units of portable pumps in good condition
- Routinely inspect fire fighting equipment on a monthly basis.

The company also has a firefighting organizational structure in each unit consisting of advisors, responsible persons, public relations, coordinators, deputy coordinators, equipment, medical, security and transportation. In addition, the company also demonstrated fire control facilities and infrastructure consisting of main equipment, supporting equipment, and early detection equipment. Preventive actions taken by the company to avoid damage to the land are carried out by conducting routine monitoring, especially in the dry season and performing image conversion.

The company can provide the Forest, Plantation and Land Fire Control Report for the December 2019 period. The report was submitted to the Musi Banyuasin District Agriculture and Environmental Service Office on January 6, 2020. The report explained the things that the company had done were the socialization of fires to workers and the community, fire simulations, routine check of fire dam equipment etc.

7.11.3

The company presented an Inter-Office Mail document with document number 100/GPI-BYE/IV/16 dated April 4, 2016 concerning the Establishment of Fire Concerned Communities. In the document explained that the company submitted 10 member of community cares about fire taken from Bumi Ayu Village.

The company also has a village based fire prevention program in collaboration with Sriwijaya University as a form of PT Guthrie Pecconina Indonesia commitment to dealing with land and forest fires and changing people’s mindsets about the dangers of burning and environmentally friendly farming.

Company socialization and collaboration to avoid fires has been carried out by the company, for example, the socialization of forest and land fire suppression on March 30, 2019 at the Main Office of Rantau Panjang Estate which was attended by 53 participants consisting of representatives of employees and surrounding village communities.

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 & 7.12.8

PT GPI did not open new land after 15 November 2018.

Based on the results of the document review it is known that HCV identification was carried out in 2009 and land clearing was carried out before HCV identification. Based on land cover analysis, it is known that no area with coefficient 1 was cleared by the company in the period after Nov. 1, 2005.

PT GPI cleared the land after November 2005 without conducting an HCV assessment, in which the HCV assessment was carried out in 2009. Sime Darby Plantation Bhd as the parent of PT GPI has conducted disclosure of liability according to a letter from the Head of the PSQM Department dated 15 July 2015 explaining that in PT GPI there was land clearing without prior HCV assessment for the period of November 2005 – Nov 2007 covering 225.69 Ha and land opening for the period of Dec 2007 – Dec 2009 covering 319.74 Ha. Based on the updated data, the FCL reported for PT GPI is 356.82 Ha. But until audit conducted on February 2020 the LUCA process has not been completed and there has been no approval for LUCA results, so the RaCP has also not been completed. This is become **Non-conformity No. 2020.12 with the Major / Critical category.**

7.12.2

The company has conducted HCV assessments covering all operational areas (10,139.91 Ha), which was carried out by the RSPO Approve Assessor on 4-13 November 2009. In the document the HCV area is set of 109.11 Ha (actual 54.40 Ha and potential 54.71 Ha). The Company defined an HCV area within the HGU covering an area of 55.38 Ha, but due to replanting there is a change in HCV area. Area that has been planted in first cycle is reduced and converted become HCV area such as in riparian and for ASA-1.3 the HCV area is 88.03 Ha.

HCV assessment has been involving the affected parties during public consultation such as local community, smallholders and related agencies, on July 23, 2011 and July 27, 2011, it was evidenced by the photograph of the activity and attendance list. It was including identification of RTE species-based conservation status according to IUCN, CITES and Regulation No. 7 of 1999, flora such as: *Koompasia malaccensis*, *Koompasia excelsa*, *Baccaurea macrocatpa*, *Lagerstomia 50ilakuka*, *Fragrae fragrans*. Identified fauna such as: *Macaca fascicularis*, *Felis bangalensis*, *Alceda atthis* and *Varanus nebulosus*.

The HCS assessment was not conducted by the company because the company did not conduct new land clearing after 15 November 2018 and the company identified HCV in 2009.

7.12.3

Based on the notice on the RSPO website it is known that the High Forest Cover Landscapes and High Forest Cover Countries have not been established by the RSPO. So that this standard has not yet been assessed.

7.12.4

The results of the field visit and document review, it is known that the HCV identified areas have been protected by the company by:

- Make a border marking in riparian area
- River border areas are planted with tree crops / forests
- Socialize information about the prohibition on HCV areas, either through the posting of notice / prohibition boards or direct socialization to workers and workers' families.
- Not doing replanting activities on riparian areas that have already been planted with oil palm.

The management plan has been evaluated in 2019 based on the results of monitoring in 2018. The evaluation results have been included for the 2019 and 2020 HCV programs.

7.12.5

There is no HCV set aside in PT GPI.

7.12.6

The company has an HCV program in which one of the annual programs undertaken is to install name of RTE species. The results of interviews with workers revealed that they already knew about the types of RTE species. In addition, during the field visit information boards were also found regarding the types of RTE species.

The results of the visit in the housing area are known that there are no workers who keep RTE species. The workers' families also explained that they already knew about the types of RTE species.

7.12.7

The results of interviews with the Department of Environment of Musi Banyuasin District revealed that there had been an issue of the presence of RTE species, namely Tigers in the area of PT GPI. This can also be found on social media where it is stated that on February 17, 2020 there was a suspected trail of Tiger in the housing of PT GPI Karang Ringin Village 2. This is has been followed up by reporting to the Sumatra Selatan BKSDA on February 17, 2020 to ensure animal traces found in employee housing. In addition, the PSD also communicated via handphone by sending the trace photos to BKSDA personnel and confirmed that the BKSDA will conduct a field visit on February 19, 2020. This observation was made by 3 BKSDA officers from Sumatera Selatan Province accompanied by the District Government (Environmental Agency), Police (head of district and head of sub-district), Head of Lawang Wetan Sub-district, Head of Karang Ringin-2 Village and company representatives. Based on the results of the field visit it was known that the trail was not a tiger trail, it was allegedly a forest cat trail.

In addition, the company also conducts routine monitoring of HCV and RTE species in the company's area. The results of monitoring in 2019 showed that the types of protected species that were still found were

- *Simpai*
- *Siamang*
- *Monyet ekor panjang*

- *Macan akar*
- *Landak*
- *Trenggiling*
- *Musang*
- *Burung Raja Udang*

Based on document review and interview, it is known that CH has conducted HCV monitoring. The items monitored are flora, fauna and sign boards. While based on the results of HCV identification, it is known that the HCV in PT GPI is mostly riparian area and CH cannot show the result of monitoring for riparian area. This is become **Non-conformity No. 2020.11 with Non-critical category.**

7.12.7	Status: Non-conformity No. 2020.11
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7.12.8	Status: Non-conformity No. 2020.12
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3.2 Conformity Checklist of Certificate and Trademark Use

1.	Evidence of permission or approval certificate and trademark from Certification Body which submitted by Client	X or√
ASA-1.3	PT GPI do not use RSPO Trademark and CB Logo, However PT GPI has had a trademark license under Sime Darby Plantation Berhard Group number RSPO – 1106024.	
	Status: Comply	
2.	Implementation of certificate and trademark used by Client comply with size and type (shape) against Guideline of trademark Use	X or√
ASA-1.3	PT GPI do not use RSPO Trademark and CB Logo, However PT GPI has had a trademark license under Sime Darby Plantation Berhard Group number RSPO – 1106024.	
	Status: Comply	
3.	Implementation of Certificate and Trademark is not used on product	X or√
ASA-1.3	PT GPI do not use RSPO Trademark and CB Logo, However PT GPI has had a trademark license under Sime Darby Plantation Berhard Group number RSPO – 1106024.	
	Status: Comply	
4.	Controlling of Certificate and Trademark, including withdrawing inappropriate trademark.	X or√
ASA-1.3	PT GPI do not use RSPO Trademark and CB Logo, However PT GPI has had a trademark license under Sime Darby Plantation Berhard Group number RSPO – 1106024.	
	Status: Comply	

3.3 Summary of RSPO Partial Certification.

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

Sime Darby Plantation Bhd Time Bound Plan is explained in table section 1.10. Sime Darby has achieved 34 management units in Malaysia and 24 Management Units in Indonesia that RSPO certified. Total management unit in Sime Darby Plantation Bhd are 34 in Malaysia, 25 in Indonesia and 1 in Liberia. Sime Darby Plantation Bhd has informed the Time Bound Plan progress through representative’s office in Indonesia. MUTU has considered that Sime Darby Plantation Bhd is comply with the RSPO requirement for Time Bound Plan. The Time Bound Plan was revised and declared by the Sime Darby Plantation Bhd Indonesian representative on July 2019 by the Head of Sustainability.

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

MUTU Auditor has verified company partial certification and concludes that:

- PT Budidaya Agro Lestari waiting for land title process.
- The company has follow RSPO requirement related to New Planting Procedure and Remediation and Compensation Procedure.
- There is no labour disputes that are not being resolved through an agreed process
- All plantations established since 2005 have been done so in accordance with the applicable laws of the country and that there is no evidence of non-compliance with law in any of the non-certified holdings which has not been declared above

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><i>Company Group/Holding Statement:</i> Companies are already doing internal audits. There are internal audit reports for each company, latest partial internal audit held in 2019, for five units and three smallholder scheme.</p> <p><i>Auditor Verification:</i> Internal Audit report available for uncertified management unit, latest partial internal audit is held in 2019, for five units and three smallholder scheme.</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)	<p><i>Company Group/Holding Statement:</i> HCV assessment has been conducted for uncertified units i.e. PT Mitra Austral Sejahtera (by Aksenta in March 2009) and Sime Darby Plantation Liberia operations (by RSPO approved assessors – Dr SK Yap in 2011).</p> <p><i>Auditor Verification:</i> Sime Darby Plantation Bhd sent disclosure of liability including LUCA analysis to RSPO Secretariat on 2 December 2014 and 2nd revision on 24 June 2016. Current status of LUCA report</p>

		of SDP Bhd is having been sent the 19 report of LUCA to RSPO on Aug 2018, responded by RSPO with need clarification. The companies ensuring reporting of disclosure of liability progress to RSPO and according to the CB's correspondence with RSPO Remediation and Compensation.
2.1.3	Any new plantings since January 1 st 2010 must comply with the RSPO New Plantings Procedure.	<p>Company Group/Holding Statement: A new mill will be set up in Liberia and planned for commissioning in February 2016. Preparation to undergo the RSPO Certification process is in progress and SDP targets to undergo RSPO Certification by end 2017. RSPO NPP process has been completed in 2011. Internal assessment against the draft Liberia NI has been completed and closing of gaps is in progress. *Note: RSPO NPP Announcements for SDP can be found at http://www.rspo.org/certification/new-planting-procedures/public-consultations/ page/14</p> <p>Auditor Verification:</p> <ul style="list-style-type: none"> • Karya Palma Estate (PT Sandika Natapalma) and Baturus Estate (PT Budidaya Agro Lestari) any new planting after January 1st 2010 and due to not conduct NPP. • RSPO NPP process has been completed in 2011 for a new mill in Liberia.
2.1.4	Land conflicts, if any, are being resolved through a mutually agreed process, such as the RSPO 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>Company Group/Holding Statement: Sime Darby (Liberia) Plantation Inc. Status: Box G – Close for Monitoring Further details please refer to: http://www.rspo.org/members/complaints/status-of-complaints/view/46</p> <p>Auditor Verification: Auditor has verified the supporting evidence of above the company statement. There are land conflict in: PT Bina Sains Cemerlang, this issue was raised on 22 April 2017 and still being process to resolve.</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>Company Group/Holding Statement: No stakeholder comments or complaints received.</p> <p>Auditor Verification: Auditor has verified the supporting evidence of above the company statement. There are no labour dispute in company unit.</p>
2.1.6	Legal non-compliance, if any, is being addressed	Company Group/Holding Statement:

	<p>through measures consistent with the requirements of RSP0 P&C criterion 2.1 (it has changed be Criterion 4.2 in P&C 2018).</p>	<p>None noted. No stakeholder comments or complaints received.</p> <p><i>Auditor Verification:</i> Auditor has verified the supporting evidence of above the company statement. There is any legal non-compliance for company under SDP waiting for land title process, i.e.:</p> <ul style="list-style-type: none"> • PT Sime Indo Agro 1,652 Ha • PT Aneka Inti Persada 421.31 Ha • PT Bina Sains Cemerlang 308.25 Ha • PT Bersama Sejahtera Sakti 765 Ha • PT Langgeng Muaramakmur 1,162 Ha • PT Paripurna Swakarsa 1,120 Ha • PT Swadaya Andika 63 Ha • PT Bahari Gembira Ria 1,639 Ha • PT Guthrie Pecconina Indonesia 4,133 Ha • PT Perkasa Subur Sakti 1,286 Ha
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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-1.2

NCR No.	: 2019.01	Issued by	: Dwi Haryati
Date Issued	: 01 March 2019	Time Limit	: 31 May 2019
NC Grade	: Major	Date of Closing	: 06 March 2019
Standard Ref. & Requirement	: 1.1.2 Record of request for information and responses to the information requested shall be available		
<p>Evidence observed (filled by auditor): The results of stakeholder consultations to the Village of Napal, it was known that the village had sent a request for information in the form of a tent and chair assistance request on 13 April 2017. From the results incoming letter of the NAE registration document study and the results of interviews with management representatives there was no evidence that the request for information it has been responded to.</p> <p>Non-Conformance Description (filled by auditor): This is not in accordance with company procedures No. SOP-001 / GPI / 2012 concerning the procedure for requesting information stating that the operational management will send an answer letter to the parties in accordance with adequate requests.</p> <p>Root Cause Analysis (filled by organization audited): - There is no official appointed to update the letter that came out or entered. - Not yet updated the outgoing mail register used to forward complaints / proposals from the villagers of Napal.</p> <p>Correction (filled by organization audited): - Re-update the letter that came from Napal Village, dated 13 April 2019. - Visiting the Head of the Napal village office and notifying him that the letter that entered NAE was received and informed him that the proposal had not been able to be given. - Will forward the proposal letter to the PSD Department to be processed as CSR from PT GPI, NAE to Napal Village, in this 2019 budget period.</p> <p>Corrective Action (filled by organization audited): - The administration system of the entry and exit of the letter already exists but there needs to be an appointed officer to record and up-date the incoming letters and letters that come out, both from the community and from employees. - Ensure that the letter in the form of a proposal or request, can be forwarded to the authorized department by updating the handover of the letter in the form of an internal mail register.</p> <p>Assessor Evaluation and Conclusion (filled by auditor): Auditor verification (March 6, 2019) The company shows proof of improvement as follows: 1. Documentation of the visit from the company to the office of the village head of Napal and notifying that the letter that entered NAE was received and informed that the proposal had not been able to be given. 2. Update the handover of letters from the village of Napal in the form of an internal mail register. Intern Office Mail Number 041/MGR-NKRE/III/2019 dated March 4, 2019 from the NKRE Acting Manager to the Village Chief of Napal. IOM informed that the application for inventory assistance for the village community in the form of tents, chairs and wireless addressed to the company dated April 13, 2017, because the miss-communication has not</p>			

been realized and this will be requested / proposed to the CSR Department for follow up in the future.

The company has shown evidence of correction as well as an explanation of the root cause analysis, corrective action and correction. But there is still a response from the auditor on Correction that the company needs to add an explanation.

Non conformity has not been fulfilled (Open).

Auditor verification (March 6, 2019)

The company shows a follow-up evidence of correction in the form of Inter Office Mail dated March 4, 2019 regarding the Decision Letter Officer Receiving the Napal Karang Ringin Estate Garden Letter on behalf of Ms. Nurbaiti Bt Simat (41851) signed by the Acting Senior Manager of NAE. It was explained that the general jobdesk of the letter reception staff was:

- Carrying out incoming and outgoing letters on the Receipt Register book.
- Monitoring the incoming letters that have not yet been responded to by the management of the estate.
- Examination of outgoing letters related to Letter Number updates to stakeholders.

Based on evidence of improvement shown, nonconformities are stated as fulfilled (closed).

Verified by : **Dwi Haryati**

NCR No.	2019.02	Issued by	Dwi Haryati
Date Issued	01 March 2019	Time Limit	Surveillance-1.3
NC Grade	Minor	Date of Closing	06 May 2019
Standard Ref. & Requirement	4.7.5. A procedure for emergency and work accident shall be available in Indonesia Language; and the workers, who have attended first aid training, are available in the available in the working areas.		
<p>Evidence observed (filled by auditor): The results of field visits were found as first aid box facilities as follows:</p> <ul style="list-style-type: none"> - First aid kits in warehouses and workshops Bumi Ayu Estate have monitoring of usage and of completeness is not in accordance with the actual conditions. - First aid kits for harvest foreman at the Bumi Ayu Estate have monitoring of usage and of completeness is not in accordance with the actual conditions. 			
<p>Non-Conformance Description (filled by auditor): Based on this, the management unit has not been able to demonstrate the effectiveness of monitoring the first aid kit in accordance with the OHS procedure, Chapter 26 concerning first aid documents which explains the person in charge stated that first aid workers record activities in the activity book and first aid facility according to established procedures.</p>			
<p>Root Cause Analysis (filled by organization audited):</p> <ul style="list-style-type: none"> - There is still a lack of understanding regarding monitoring the use of first aid kits. - There is no special officer for monitoring first aid kits. 			
<p>Correction (filled by organization audited):</p> <ul style="list-style-type: none"> - Provide guidance to employees and first aid officers regarding the contents, regulations and functions of first aid kits. - Appoint first aid officers to monitor first aid at BYE. 			

- Fill out and refill the contents of the first aid kit
- Ensure monitoring of usage, drug condition checklist, first aid box inventory can be traced and always maintained and can be used according to its designation
- First aid officers will carry out their duties and functions every day to ensure all inventory of first aid kits are in good condition through the first aid box monitoring checklist to ensure that drug conditions exist or not

Corrective Action (filled by organization audited):

- To ensure the condition of the first aid kit runs according to the procedure, the first aid officer will conduct a checklist on the condition of the first aid kit as a whole according to the existing schedule,
- Report the condition of all first aid kits to the local leadership to ascertain whether there is a shortage of drugs or inventory of damaged first aid kits etc.
- Disseminate the benefits and functions of first aid kits to all workers at BYE during the morning apples and while working on the field every day.

Assessor Evaluation and Conclusion (filled by auditor):

Auditor verification on April 25, 2019

The company shows correction, namely:

- o IOM Number 084/EM-BYE/II/17 dated February 24, 2017 from EM BYE regarding the appointment of first aid workers at Bumi Ayu Estate on behalf of Nopriansyah.
- o There is an RSPO ISPO Corrective Action Issues first aid box in BYE which explains that it has carried out socialization regarding first aid kits and completes first aid kits, but has not yet been shown evidence of implementation and has not shown evidence of improvements in monitoring first aid box use in the foreman first aid facilities or bags.
- o Monthly recapitulation of the First Aid Kit Checklist at the RPF facility, but there is no evidence of usage monitoring for each first aid box unit.
- o Instructions for using drugs in the first aid kit
- o Letter of Appointment for First Aid Officer in the RPF in March 2019, Mus Mulyadi
- o Certificate of Guidance for First Aid at the workplace of Mus Mulyadi dated 29 February 2019
- o Dissemination regarding the use of first aid kits and recording the use of first aid kits to RPF staff and workers on March 18, 2019.

But the company has not been able to show:

- It has not shown monitoring of the use of first aid kits either in first aid facilities or bags foreman at BYE & RPF.
- Have not shown evidence of socialization of monitoring the use of first aid kits and bags at BYE for each personnel responsible for first aid kits and bags

In addition, the company needs to re-identify corrective and corrective actions according to the auditor's response.

Based on this explanation, this non conformity is stated to have not been fulfilled

Auditor verification dated 2 May 2019

The company shows evidence of correction action:

1. The first aid manual that will be provided in each first aid kit.
2. First aid kit checklist form (completeness) in 2019 at Bumi Ayu Estate, for example in the traction division which informs about the type of contents of first aid kit, month of checking with a V mark: according to the standard, and X: not standard. Inspections are carried out every month. The results of the examination of the first aid box contents in April 2019 stated that in the box there was no 5 cm bandage, bioplacenton, scissors, tweezers, flashlights, safety pins. There is monitoring of the use of first aid items, for example in April 2019 which explained that there were uses for items such as scissors, tweezers, flashlights, and safety pins.
3. Monitoring the table of contents of the first aid kit (completeness) for forging BYE every month explaining the completeness of the contents of the first aid kit and explaining the condition of the goods.
4. Register for presentations and BYE first aid training on April 29, 2019 which was attended by 20 employees (foreman, chief of staff, head of warehouse), training was provided by garden medical personnel.

5. Layout of first aid kits in public infrastructure.
6. Documentation of training and socialization of BYE first aid that explains photos of handover of first aid kit for harvest supervisor
7. Inter Office Mail (IOM) BYE from Bumi Ayu Estate Estate Manager on February 24, 2017, Number 084 / EM-BYE / II / 17 regarding Appointment of First Aid Officer on Bumi Ayu Estate on behalf of Nopriansyah.

However, the company has not shown the duties and responsibilities of first aid officers and there is no explanation regarding the auditor's response in Corrective Action.

Based on this explanation, this non conformity is stated to have not been fulfilled

May 6, 2019

The company shows the duties and responsibilities of first aid officers, including:

- o Implement first aid actions
- o Caring for first aid facilities
- o Record each first aid activity in a workbook
- o Conduct training at least once every 6 months
- o Checking and monitoring each first aid kit on public infrastructure and those carried out by field supervision.

Based on this explanation, this discrepancy is stated to be fulfilled

Verified by : Dwi Haryati

<i>NCR No.</i>	: 2019.03	<i>Issued by</i>	: Yohanes Hardian
<i>Date Issued</i>	: 1 st Mach 2019	<i>Time Limit</i>	: 31 May 2019
<i>NC Grade</i>	: Major	<i>Date of Closing</i>	:
<i>Standard Ref. & Requirement</i>	: 7.3.1 There shall be evidence that no new plantings have replaced primary forest, or any area required to maintain or enhance one or more High Conservation Values (HCVs), since November 2005. New plantings shall be planned and managed to best ensure the HCVs identified are maintained and/or enhanced (see Criterion 5.2).		

Evidence observed (filled by auditor):

The company shows the RaCP process for all Sime Darby Plantation subsidiaries, Bhd. As follows:

- Liability and Disclosure to RSPO on December 2, 2014
- Concep Note was sent to RSPO on March 25, 2016 and was responded to on December 5, 2016.
- The revised LUCA report is sent back on December 8, 2017.
- The Compensation Plan was sent to RSPO on March 8, 2018

Based on the results of communication between PT Mutuagung Lestari and RSPO February 13, 2019, information was obtained that "" A preliminary review of the Compensation Plan has been done. However, no further action can be taken from the LUCA is still a finalization and is pending clarification from Sime Darby. "In this regard, the company has not been able to show that the RaCP compensation plan has been approved by the RSPO.

Non-Conformance Description (filled by auditor):

The company has not been able to show evidence that the RaCP compensation plan has been approved by the RSPO.

<p>Root Cause Analysis <i>(filled by organization audited):</i> The unit has not received information from SimeDarby regarding the progress of LUCA PT GPI</p>	
<p>Correction <i>(filled by organization audited):</i> The time line check list submission has been submitted LUCA SimeDarby (attached file)</p>	
<p>Corrective Action <i>(filled by organization audited):</i> Continue to update to SimeDarby to convey the progress of the LUCA PT GPI progress</p>	
<p>Assessor Evaluation and Conclusion <i>(filled by auditor):</i> Verification on May 11, 2019, The company has shown evidence of communication with the RSPO Secretariat in May 09, 2019 which informed that there had been a meeting with the RSPO on May 8, 2019, at the meeting agreed: <u>Considering the historical involvement and events (as presentation slides and documents attached), SDP is given a one year time extension period to address all outstanding matters (including the approval of compensation plan) related to non-conformity raised on 7.3.1 during the RSPO Re-certification/Annual Surveillance Audits for the affected units. (The timeframe of one year whether from May 2019 or maybe staggered according to the certification dates of each Unit of Certification will be advised by RSPO Secretariat.).</u></p>	
<p>Based on explanation above, this non conformity still open until next ASA.</p>	
<p>Verified by</p>	<p>: Yohanes Hardian</p>

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

NCR No.	: 2020.1	Issued by	: Yudhi Yuniarto Tallutondok
Date Issued	: 28 February 2020	Time Limit	: ASA-1.4
NC Grade	: Non Critical	Date of Closing	: 10 April 2020
Standard Ref. & Requirement	2.1.2 A documented system for ensuring legal compliance is in place. This system has a means to track changes to the law and also includes listing and evidence of legal due diligence of all contracted third parties, recruitment agencies, service providers and labour contractors.		
Evidence observed (filled by auditor): 1. SOP of Legal Requirements with document number SOP-003 / GPI / 20122 dated December 1, 2012. In point 6.2, it is explained related to compliance with the renewal of the summary of regulations. 2. Evaluation Document for Fulfillment of Regulation Year 2020 dated January 13, 2020. Based on the document verification, it is known that there are regulations that have not been identified by the company, including but not limited to: <ul style="list-style-type: none"> • Permenaker No. 4 of 2019 concerning mandatory procedures for reporting employment in the network. • Permenaker No. 5 of 2018 concerning environmental OHS. • Permenaker No 6 of 2016 concerning holiday benefits. • Permenaker No. 15 of 2018 concerning minimum wages. 			
Non-Conformance Description (filled by auditor) The implementation of legal changes that have not been fully implemented in accordance with the Legal Requirements SOP.			
Root Cause Analysis (filled by organization audited): There is no PIC in charge of updating and evaluating compliance with regulations.			
Correction (filled by organization audited): <ul style="list-style-type: none"> - Assign PIC to update and evaluate compliance with regulations - Update the latest regulations in accordance with the regulations that still apply. 			
Corrective Action (filled by organization audited): <ul style="list-style-type: none"> - Ensuring that the related PIC understands the latest regulations and evaluates compliance with regulations on a regular basis (once a year). - Coordinate with the local government office regarding the list of the most current and current regulations. 			
Assessor Evaluation and Conclusion (filled by auditor): Auditor Verification April 10 2020, The CH shows evidence of improvement in the form of establishing the PIC and determining the time period (1 year 1 time) to evaluate the regulations that are still relevant and have just been issued. From the evidence of improvements sent, it is known that 182 government regulations have been updated. Based on the foregoing, the non-conformity is stated to have been fulfilled by observing the notes on the next assessment.			
Verified by	: Yudhi Yuniarto		

NCR No.	: 2020.2	Issued by	: Briyogi Shadiwa
Date Issued	: 28 February 2020	Time Limit	: 28 May 2020

NC Grade	: Critical	Date of Closing	: 13 May 2020
Standard Ref. & Requirement	3.6.1 Risk assessment must be carried out to identify Occupational Health & Safety (OHS) in all operations. Mitigation plans & procedures must then be established, recorded & implemented.		
<p><i>Evidence observed (filled by auditor):</i></p> <p>The company has HIRAC documents for plantation and mill operations. Based on field observations it is known that there are activities of picking caterpillars, monitoring the boundary stakes and monitoring the HCV areas. Based on the review of the Hazard Identification Risk Assessment and Control (HIRAC) Evaluation Document, it has not included an analysis of hazard sources and risk assessment related to activities (but not limited):</p> <ul style="list-style-type: none"> • Picking of larvae • Monitoring and management of boundaries. • Monitoring and Management of HCV areas <p>Also, the results of public consultation and document review are known that the company provides PPE to workers free of charge every 1 year, but if there are damage the workers will provide PPE themselves. This was also seen during field visits, where workers used different types of PPE that were provided by the company. Based on the procedure, it is known that damaged PPE can be replaced by the applicable terms and conditions. In addition, the certification unit has also monitored the use of PPE in the field.</p> <p><i>Non-Conformance Description</i></p> <p>Based on above explanation, the company has not been able to show evidence that the risk assessment has covered all operational activities of the plantation, implemented and monitored for its effectiveness and the OHS plans have not been effectively communicated and implemented to all workers.</p>			
<p>Root Cause Analysis (filled by organization audited):</p> <ul style="list-style-type: none"> - Not all activities have been identified by the management unit, so they are not listed in the HIRAC document. - There's no PIC appointed to conduct monitoring and evaluation of the entire HIRAC - The current HIRAC has not been managed centrally. - Employees do not fully understand the damaged PPE replacement procedure. - Lack of socialization in PPE changes to employees. 			
<p>Correction (filled by organization audited):</p> <ul style="list-style-type: none"> - Appointed PIC to update and evaluate the whole HIRAC (Sustainability Assistant). - Inventory and re-identification HIRAC document then be evaluated and standardized according to the HIRAC SOP. - Redistributing HIRAC document to all units in PT GPI - Conducting updates and compiling risk analysis in accordance with plantation and mill operational activities. - The management unit provides PPE stock in warehouses of at least 10% of total needs. - Providing socialization to all employees regarding the identification of HIRAC in both plantation and factory operations. 			
<p>Corrective Action (filled by organization audited):</p> <ul style="list-style-type: none"> - The management unit coordinates with the relevant PIC to identify all activities in the plantation and Mill operations. - Monitoring PPE giving & checking to all employees and conducting socialization regarding PPE replacement procedures if damaged. 			

- Ensure that all HIRAC has been installed in the operational area of the plantation and factory and that it is understood by all plantation unit workers and Mill.
- Make attendance at every distribution of PPE to employees.
- Conduct visual inspection and PPE documentation in every morning circle for all employees (including PPE eligibility).

Assessor Evaluation and Conclusion (filled by auditor):

Verification April 10th, 2020

CH has been showed improvement evidences, such as:

- Records of PPE Replacement Socialization conducted on 9-10 March 2020 (documentation attached).
- PT GPI's HIRAC document which has been updated with all activities in the company's operations.

But the company still has to complete an explanation related to the root cause of the problem, corrective actions and preventive actions. And also, please provide evidence that the latest HIRAC documents have been understood and carried out by the employees concerned in each unit.

Verification April 26th, 2020

CH has been showed improvement evidences, such as:

- HIRAC Renewal Officer Decree (April 10, 2020)
- Evidence of PPE handover for each unit.
- Records of HIRAC's socialization to workers for each unit.

However, auditor still need explanation related to prevention action. Please explain the detail mechanism related to PPE monitoring and inspection.

Verification May 13th, 2020

The company has demonstrated and explained the matter of monitoring & inspection PPE as a preventive action in the Mechanism & Monitoring of the PPE of Estate and Factories in the Work Environment Document determined by the Chairman of the RSPO PT GPI. In general, companies are required to carry out a visual inspection and PPE documentation in every morning circle for all employees, including whether the PPE is appropriate or not suitable for use. The company is also committed not to employ employees who do not use PPE in accordance with company regulations.

Based on the explanation above, the non-conformities have been closed with observation.

Verified by : **Briyogi Shadiwa**

NCR No.	: 2020.3	Issued by	: Sandra Purba
Date Issued	: 28 February 2020	Time Limit	: 28 May 2020
NC Grade	: Critical	Date of Closing	: 28 April 2020
Standard Ref. & Requirement	3.8.4 The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform		
<p><i>Evidence observed (filled by auditor):</i> During the license period of ASA 1.2 (23 Sept 2019 – 25 Feb 2020), verified on the palm trace (stock overview) it seen that the stock (estimation) of RJF has not been reduced. Based on a review of sales documents and interviews with POM representatives, it was stated that in the ASA 1.2 period there were no sales of products with RSPO claims, but there were conventional sales taken from sustainable stocks and the amount had not been deducted from the palmtrace quota.</p>			

<p>Non-Conformance Description Hence, RJF has not been able to show evidence that it has fulfilled all registration and reporting requirements for the supply chain as it should through the RSPO supply chain management organization (RSPO IT platform).</p>	
<p>Root Cause Analysis <i>(filled by organization audited):</i> The mill management unit and the Marketing have not coordinated well with information about reporting sales stock data in the palm trace</p>	
<p>Correction <i>(filled by organization audited):</i> Coordinate with Jakarta marketing to remove CPO / PK stock on Palm Trace data (RSPO IT Platform) and monitor sales stock data</p>	
<p>Corrective Action <i>(filled by organization audited):</i> Coordinate with the Monitoring regarding monitoring of RSPO sales data and remove stock in Palm Trace</p>	
<p>Assessor Evaluation and Conclusion <i>(filled by auditor):</i> <p>Verification 10 April 2020 The company has shown proof of registration at Palmtrace, that is, removing stock for the sale of certified products but not claimed as certified products. But the company still has to complete an explanation related to the root cause, correction and corrective actions. Based on that matter, the non-conformity is not yet closed.</p> <p>Verification 27 April 2020 The company has demonstrated a coordinating mechanism for monitoring CPO and PK stock sales between the PSQM Dept and the Jakarta GTM Dept, which among others explains:</p> <ul style="list-style-type: none"> • PSQM Dept monitors CPO and PK sales stock at Mill every 6 months • The PSQM Dept coordinates with the Jakarta GTM/ Marketing Dept regarding RSPO certified products sold on the Palm Trace IT platform every 6 months via email. • The Jakarta GTM/ Marketing Dept. will remove RSPO certified volumes sold under other schemes that are sold conventionally or if there is a lack of production and inform if there is a certified volume allocated as credit sales. • The Jakarta GTM/ Marketing Dept. sends proof of products that have been removed or allocated as credit sales in the Palm Trace IT platform to the PSQM Dept. via email <p>Based on this explanation, the non-conformity is closed.</p> </p>	
<p>Verified by</p>	<p>: Sandra Purba</p>

<p>NCR No.</p>	<p>: 2020.4</p>	<p>Issued by</p>	<p>: Sandra Purba</p>
<p>Date Issued</p>	<p>: 28 February 2020</p>	<p>Time Limit</p>	<p>: 28 May 2020</p>
<p>NC Grade</p>	<p>: Critical</p>	<p>Date of Closing</p>	<p>: 13 May 2020</p>
<p>Standard Ref. & Requirement</p>	<p>: 3.8.5 Documented procedures The mill shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <ol style="list-style-type: none"> Complete and up to date procedures covering the implementation of all elements of the supply chain model requirements. Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all 		

	<p>applicable requirements. This person shall be able to demonstrate awareness of the mill's procedures for the implementation of this standard.</p> <p>d. The mill shall have documented procedures for receiving and processing certified and non-certified FFBs including ensuring no contamination in the IP mill.</p>
<p><i>Evidence observed (filled by auditor):</i> Based on field observations and document verification known that the core estate area is divided into certified and non-certified areas, observations on RJE' transport activities and checks on FFB delivery document sighted that there are FFB sent from non-certified blocks but coded with RSPO stamps, namely from block A035, delivery note on February 24, 2020. Review of documents on the FFB delivery note from block A035 for the whole Feb 2020 are done by the auditor and known that there are delivery of FFB mixed with other blocks (certified and/or non-certified) and marked with RSPO Certified stamp.</p> <p><i>Non-Conformance Description</i> So that, the certification unit has not been able to demonstrate that the SOP of product separation specified has been implemented and its effectiveness are monitored</p>	
<p><i>Root Cause Analysis (filled by organization audited):</i> Lack of clerk understanding in the administration of FFB delivery in certified and non-certified areas.</p>	
<p><i>Correction (filled by organization audited):</i></p> <ul style="list-style-type: none"> Shows map area of certified and non certified blocks. Socialize understanding to all harvesters and FFB loader regarding certified and non certified areas Socialize to Weighbridge officer regarding Certified and Non-Certified blocks. 	
<p><i>Corrective Action (filled by organization audited):</i></p> <ul style="list-style-type: none"> Put up a map of certified and non certified blocks in the Weighbridge officer room and ensure the officer have a good understanding of the use of RSPO stamps for certified areas and Non-RSPO for non-certified ones. Conduct periodic monitoring of RSPO & Non RSPO sales data. 	
<p><i>Assessor Evaluation and Conclusion (filled by auditor):</i></p> <p>Verification 10 April 2020 The company has shown evidence of socialization related to the RSPO and Non-RSPO blocks conducted on 9 – 10 March 2020. This activity was attended by 73 people consisting of representatives of the Rantau Panjang Estate, Bumi Ayu Estate, Napal Karang Ringin Estate, Sungai Jernih Estate, Mangun Jaya Estate, Staff Area Controller, PSQM, ADM RSPO and factory. However, the company has not yet shown a map of certified and non-certified block areas, so that non-conformity is not yet closed.</p> <p>Verification 26 April 2020 The company has shown RSPO and Non RSPO Block maps for each estate, but based on the information on the map it is not yet in accordance with other supporting document such as:</p> <ul style="list-style-type: none"> On the RJE map it appears that Fields A048, A042, A038, A037, A036, A035, A034, A031, A029, A026, A013, are Non RSPO fields. While based on production data it is known that the Non RSPO field consists of A009, A025, A026, A027, A028, A029, A030, A031, A032, A033, A035, A036, A037, A038, A039, A043, A044, A030, A031, A032, A033, A035, A036, A037, A038, A039, A043, A044, A045. There are several differences in Non RSPO Block between maps and production data, namely Field A048, A045, A044, A043, A042, A039, A034, A033, A032, A030, A028, A027, A025, A013, A009. On the NAE map, it can be seen that Fields D004 (2019), D005 (2019), C010 (2017), C012 (2017), C013 (2017), C014 (2017), C015 (2017), C016 (2017), C017 (2017) , C019 (2000), C020 (2019), C028 (2020) are Non-RSPO fields. Based on the statement area data it is known that there is a Non RSPO area in 1999 planting area of 236.47 Ha, planting year 2000 covering 95.41 Ha, planting year 2001 covering 53.40 Ha, planting year 2017 covering 414.94 Ha and planting year 2019 covering 88.21 Ha. There are several differences in the Non RSPO Block between the map and the statement area, namely: 	

- 2019: the map shows that there is no RSPO area but in the statement area there is an RSPO area of 294.10 Ha.
- 2020: the map shows that there is no RSPO area, but in the statement area there is an RSPO area of 41.31 Ha or 100%.
- 2001: the map shows that the entire area is the RSPO area, but in the statement area there is a Non RSPO area of 53.40 Ha or 90%.

Non-conformities is not yet closed.

Verification 12 May 2020

The company has shown consistent RSPO and non RSPO fields between maps and other supporting data, such as:

- Rantau Panjang Estate: The RSPO Field consists of A001, A002, A003, A004, A005, A006, A007, A008, A010, A011, A012, A013, A014, A015, A016, A017, A034, A040, A010, A010, A011, A012, A013, A014, A015, A017, A017, A034, A040, A041, A041, A041, A041, A041, A041, A041, A041, A041, A041, A041, A041, A041, A047, A049, A050, A051, A052 and A055.
- Napal Karang Ringin Estate: The RSPO Field consists of C001, C002, C003, C004, C005, C006, C007, C008, C009, C011, C027, C028, D001 – D030.

Based on this evidence, the non-conformity is closed

Verified by : **Sandra Purba**

NCR No.	: 2020.5	Issued by	: Sandra Purba
Date Issued	: 28 February 2020	Time Limit	: 28 May 2020
NC Grade	: Critical	Date of Closing	: 13 May 2020
Standard Ref. & Requirement	<p>3.8.7 Purchasing and Goods in a. The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received. b. The mill shall inform the CB immediately if there is a projected overproduction of certified volume. c. The mill shall have a mechanism in place for handling of nonconforming FFB and/or documents</p>		
<p><i>Evidence observed (filled by auditor):</i> Based on field observations and document verification known that the core estate area is divided into certified and non-certified areas, observations on RJE' transport activities and checks on FFB delivery document sighted that there are FFB sent from non-certified blocks but coded with RSPO stamps, namely from block A035, delivery note on February 24, 2020.</p> <p>Review of documents on the FFB delivery note from block A035 for the whole Feb 2020 are done by the auditor and known that there are delivery of FFB mixed with other blocks (certified and/or non-certified) and marked with RSPO Certified stamp.</p> <p><i>Non-Conformance Description</i> Mill has not been able to show evidence that verification and recording of the number of tonnages and sources for certified FFB, and the number of tonnages for uncertified FFB has been carried out accurately.</p>			
<p>Root Cause Analysis (filled by organization audited): Lack of clerk understanding in the administration of FFB delivery in certified and non-certified areas.</p>			
<p>Correction (filled by organization audited):</p>			

- Shows map area of certified and non certified blocks.
- Socialize understanding to all harvesters and FFB loader regarding certified and non certified areas
- Socialize to Weighbridge officer regarding Certified and Non-Certified blocks.

Corrective Action (filled by organization audited):

- Put up a map of certified and non certified blocks in the Weighbridge officer room and ensure the officer have a good understanding of the use of RSPO stamps for certified areas and Non-RSPO for non-certified ones.
- Conduct periodic monitoring of RSPO & Non RSPO sales data.

Assessor Evaluation and Conclusion (filled by auditor):

Verification 10 April 2020

The company has shown evidence of socialization related to the RSPO and Non-RSPO blocks conducted on 9 – 10 March 2020. This activity was attended by 73 people consisting of representatives of the Rantau Panjang Estate, Bumi Ayu Estate, Napal Karang Ringin Estate, Sungai Jernih Estate, Mangun Jaya Estate, Staff Area Controller, PSQM, ADM RSPO and factory. However, the company has not yet shown a map of certified and non-certified block areas, so that non-conformity is not yet closed.

Verification 26 April 2020

The company has shown RSPO and Non RSPO Block maps for each estate, but based on the information on the map it is not yet in accordance with other supporting document such as:

- On the RJE map it appears that Fields A048, A042, A038, A037, A036, A035, A034, A031, A029, A026, A013, are Non RSPO fields. While based on production data it is known that the Non RSPO field consists of A009, A025, A026, A027, A028, A029, A030, A031, A032, A033, A035, A036, A037, A038, A039, A043, A044, A030, A031, A032, A033, A035, A036, A037, A038, A039, A043, A044, A045. There are several differences in Non RSPO Block between maps and production data, namely Field A048, A045, A044, A043, A042, A039, A034, A033, A032, A030, A028, A027, A025, A013, A009.
- On the NAE map, it can be seen that Fields D004 (2019), D005 (2019), C010 (2017), C012 (2017), C013 (2017), C014 (2017), C015 (2017), C016 (2017), C017 (2017), C019 (2000), C020 (2019), C028 (2020) are Non-RSPO fields. Based on the statement area data it is known that there is a Non RSPO area in 1999 planting area of 236.47 Ha, planting year 2000 covering 95.41 Ha, planting year 2001 covering 53.40 Ha, planting year 2017 covering 414.94 Ha and planting year 2019 covering 88.21 Ha. There are several differences in the Non RSPO Block between the map and the statement area, namely:
 - 2019: the map shows that there is no RSPO area but in the statement area there is an RSPO area of 294.10 Ha.
 - 2020: the map shows that there is no RSPO area, but in the statement area there is an RSPO area of 41.31 Ha or 100%.
 - 2001: the map shows that the entire area is the RSPO area, but in the statement area there is a Non RSPO area of 53.40 Ha or 90%.

Non-conformities is not yet closed.

Verification 12 May 2020

The company has shown consistent RSPO and non RSPO fields between maps and other supporting data, such as:

- Rantau Panjang Estate: The RSPO Field consists of A001, A002, A003, A004, A005, A006, A007, A008, A010, A011, A012, A013, A014, A015, A016, A017, A034, A040, A010, A010, A011, A012, A013, A014, A015, A017, A017, A034, A040, A041, A041, A041, A041, A041, A041, A041, A041, A041, A041, A041, A041, A047, A049, A050, A051, A052 and A055.
- Napal Karang Ringin Estate: The RSPO Field consists of C001, C002, C003, C004, C005, C006, C007, C008, C009, C011, C027, C028, D001 – D030.

Based on this evidence, the non-conformity is closed

Verified by : Sandra Purba

NCR No.	: 2020.6	Issued by	: Sandra Purba
Date Issued	: 28 February 2020	Time Limit	: 28 May 2020
NC Grade	: Critical	Date of Closing	: 13 May 2020
Standard Ref. & Requirement	<p>3.8.12 Record keeping</p> <ol style="list-style-type: none"> i. The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements. ii. Retention times for all records and reports shall be a minimum of two (2) years and shall comply with relevant legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock iii. For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis iv. For Mass Balance Module, the mill: <ol style="list-style-type: none"> a. shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis. b. All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO. c. The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock.) 		
<p><i>Evidence observed (filled by auditor):</i> Based on field observations it is known that the GPI' core area is divided into certified and non-certified areas, observations on RJE' transport activities and checks on FFB delivery documents seen that there are FFB sent from non-certified blocks but marked with RSPO stamps, namely from block A035 on delivery document of February 24, 2020. Based on the review of documents on the delivery note from block A035 for the whole Feb 2020 known that there are FFB mixed with other blocks (certified and/or non-certified) and marked with RSPO Certified stamp.</p>			
<p><i>Non-Conformance Description</i> POM has not been able to show evidence that verification and recording of the number of tonnages and sources for certified FFB, and the number of tonnages for uncertified FFB has been carried out accurately.</p>			
<p><i>Root Cause Analysis (filled by organization audited):</i> Lack of understanding of harvest workers and weighbridge officer in the administration of certified and non certified FFB delivery.</p>			
<p><i>Correction (filled by organization audited):</i> Compiling and revising the recording of certified and non-certified tonnage of FFB.</p>			
<p><i>Corrective Action (filled by organization audited):</i></p> <ul style="list-style-type: none"> • Put up a map of certified and non certified blocks in the Weighbridge officer room and ensure the officer have a good understanding of the use of RSPO stamps for certified areas and Non-RSPO for non-certified ones. • Socialize understanding to all harvesters and FFB loader regarding certified and non certified areas 			
<p><i>Assessor Evaluation and Conclusion (filled by auditor):</i></p>			

Verification 10 April 2020

The company has shown evidence of socialization related to the RSPO and Non-RSPO blocks conducted on 9 – 10 March 2020. This activity was attended by 73 people consisting of representatives of the Rantau Panjang Estate, Bumi Ayu Estate, Napal Karang Ringin Estate, Sungai Jernih Estate, Mangun Jaya Estate, Staff Area Controller, PSQM, ADM RSPO and factory. However, the company has not yet shown a map of certified and non-certified block areas, so that non-conformity is not yet closed.

Verification 26 April 2020

The company has recorded tonnage and FFB sources according to certified and non certified blocks, however there are some differences in the Non RSPO Block between maps and production data, namely Field A048, A045, A044, A043, A042, A039, A034, A033, A032, A030 , A028, A027, A025, A013, A009. So that non-conformity is not yet closed.

Verification 12 May 2020

The company has recorded tonnage and FFB sources according to certified and non certified blocks. In addition, based on the data, it is known that the RSPO and non-RSPO fields have been consistent between maps and other supporting data, such as:

- Rantau Panjang Estate: The RSPO Field consists of A001, A002, A003, A004, A005, A006, A007, A008, A010, A011, A012, A013, A014, A015, A016, A017, A034, A040, A010, A010, A011, A012, A013, A014, A015, A017, A017, A034, A040, A041, A041, A041, A041, A041, A041, A041, A041, A041, A041, A041, A041, A041, A047, A049, A050, A051, A052 and A055.
- Napal Karang Ringin Estate: The RSPO Field consists of C001, C002, C003, C004, C005, C006, C007, C008, C009, C011, C027, C028, D001 – D030.

Based on this evidence, the non-conformity is closed

Verified by : Sandra Purba

NCR No.	: 2020.7	Issued by	: Sandra Purba
Date Issued	: 28 February 2020	Time Limit	: 28 May 2020
NC Grade	: Critical	Date of Closing	: 28 April 2020
Standard Ref. & Requirement	<p>3.8.16 Registration of Transactions</p> <p>i. Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date.</p> <p>ii. Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform</p>		
<p><i>Evidence observed (filled by auditor):</i> Rantau Panjang POM has been registered in the RSPO IT Platform, based on verification on the palmtrace (stock overview) it seen that the quota stock on RJF has not been reduced. Based on a review of sales documents and interviews with POM representatives, it was stated that during the ASA 1.2 license there were no sales of products with RSPO claims, but there were conventional sales taken from sustainable stocks and the amount had not been deducted from the palmtrace quota.</p> <p><i>Non-Conformance Description</i> Hence, RJF has not been able to show evidence that it has fulfilled the RSPO certified volume reduction requirements sold through other schemes or in the conventional way as well as deletion in the RSPO IT Platform.</p>			

<p>Root Cause Analysis <i>(filled by organization audited):</i> The mill management unit and the Marketing have not coordinated well with information about reporting sales stock data in the palm trace</p>
<p>Correction <i>(filled by organization audited):</i> Coordinate with Jakarta marketing to remove CPO / PK stock on Palm Trace data (RSPO IT Platform) and monitor sales stock data</p>
<p>Corrective Action <i>(filled by organization audited):</i> Coordinate with the Monitoring regarding monitoring of RSPO sales data and remove stock in Palm Trace</p>
<p>Assessor Evaluation and Conclusion <i>(filled by auditor):</i> <p>Verification 10 April 2020 The company has shown proof of registration at Palmtrace, that is, removing stock for the sale of certified products but not claimed as certified products. But the company still has to complete an explanation related to the root cause, correction and corrective actions. Based on that matter, the non-conformity is not yet closed.</p> <p>Verification 27 April 2020 The company has demonstrated a coordinating mechanism for monitoring CPO and PK stock sales between the PSQM Dept and the Jakarta GTM Dept, which among others explains:</p> <ul style="list-style-type: none"> • PSQM Dept monitors CPO and PK sales stock at Mill every 6 months • The PSQM Dept coordinates with the Jakarta GTM/ Marketing Dept regarding RSPO certified products sold on the Palm Trace IT platform every 6 months via email. • The Jakarta GTM/ Marketing Dept. will remove RSPO certified volumes sold under other schemes that are sold conventionally or if there is a lack of production and inform if there is a certified volume allocated as credit sales. • The Jakarta GTM/ Marketing Dept. sends proof of products that have been removed or allocated as credit sales in the Palm Trace IT platform to the PSQM Dept. via email <p>Based on this explanation, the non-conformity is closed.</p> </p>
<p>Verified by : Sandra Purba</p>

NCR No.	: 2020.8	Issued by	: Ardiansyah
Date Issued	: 28 February 2020	Time Limit	: 28 May 2020
NC Grade	: Non Critical	Date of Closing	: 22 May 2020
Standard Ref. & Requirement	7.3.2 Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated		
<p>Evidence observed <i>(filled by auditor):</i> The results of the field visit and document review revealed that the waste had not been managed properly according to procedures, such as:</p> <ul style="list-style-type: none"> • Hazardous waste (pesticide container, used batteries) at Bumi Ayu Estate which is stored in a used goods warehouse • Hazardous waste in Mangun Jaya Estate (pesticide container) for the April and May 2019 periods is not sent to the Hazardous waste warehouse • Domestic waste in the Karangan Ringin Estate housing is scattered about • Used oil drums are used as water reservoirs and oil trap covers. <p>Non-Conformance Description The certification unit has not been able to show evidence that workers fully understand how to dispose of waste</p>			

<p>Root Cause Analysis <i>(filled by organization audited):</i></p> <ul style="list-style-type: none"> - Unit workers do not yet understand in detail the SOP for storing and handling hazardous waste - The system regarding hazardous waste management has not been implemented well in the field and there is a lack of awareness of workers regarding the management of hazardous waste
<p>Correction <i>(filled by organization audited):</i></p> <ul style="list-style-type: none"> - Hazardous waste which is still found in the field is moved to hazardous waste warehouse - Domestic waste in the household is cleaned
<p>Corrective Action <i>(filled by organization audited):</i></p> <ul style="list-style-type: none"> - The unit re-ensures that hazardous waste has been handled in accordance with applicable SOPs starting from storage and delivery - Conducting socialization to all workers regarding domestic waste management in accordance with applicable procedures - Ensure that the waste management system is understood by all workers
<p>Assessor Evaluation and Conclusion <i>(filled by auditor):</i></p> <p>Verification 22 May 2020</p> <p>The company has identified the root causes, corrective actions and preventive actions for each farm with the following information:</p> <ul style="list-style-type: none"> • Bumi Ayu Estate: transfer hazardous waste from the used goods warehouse to the hazardous waste warehouse at mill; conducting socialization to 3 people (head of warehouse, hazardous waste officer, traction clerk) related to the schedule for sending hazardous waste to the hazardous waste warehouse, not storing hazardous waste in the used goods warehouse even though sending hazardous waste to the hazardous waste warehouse was too late; monitoring every month so there is no delay in sending hazardous waste to the hazardous waste warehouse at mill. • Mangun Jaya Estate: conducts socialization to warehouse officers and warehouse leaders regarding the storage of hazardous waste; ensure delivery of hazardous waste according to schedule and SOP. • Napal Karang Ringin Estate: ensuring employees and their families through socialization that used oil drums are hazardous waste and should not be used for other purposes such as water containers and other storage areas; cleaning and quoting used oil drums from employee housing for later inclusion in the hazardous waste warehouse; ensure employees and their families that used motorcycle oil bottle are hazardous waste and should not be disposed of carelessly but collected in separate waste bins for later being sent to the hazardous waste warehouse in the estate; ensure employees and their families that domestic waste must be collected in the trash bin and then it will be taken on Tuesday and Friday to be disposed of at the final landfill. <p>Based on the corrected evidence, non-conformity is closed and the consistency of hazardous waste management will be re-observed during the next audit activity.</p> <p><i>Verified by</i> : Ardiansyah</p>

NCR No.	: 2020.9	Issued by	: Ardiansyah
Date Issued	: 28 February 2020	Time Limit	: 28 May 2020
NC Grade	: Critical	Date of Closing	: 12 May 2020
Standard Ref. & Requirement	<p>7.7.5 For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment Procedure, or other RSPO 71ilakukan71 methods, at least five years prior to replanting. The assessment result is used to set the timeframe for future replanting, as well as for phasing out of oil palm cultivation at least 40 years, or two cycles, whichever is greater, before reaching</p>		

	<p>the natural gravity drainability limit for peat. When oil palm is phased out, it is replaced with crops suitable for a higher water table (paludiculture) or rehabilitated with natural vegetation.</p>
<p><i>Evidence observed (filled by auditor):</i> The company has conducted drainability assessment for an area of 892.6 Ha in PT GPI. This activity was carried out by the Minamas Research Center (MRC) in February 2019. Based on peat inventory that reported to the RSPO in November 2019, it was known that the total planted area of peat was 1180.3 Ha. The results of interviews with the MRC revealed that the remaining areas not yet studied were peat areas scattered (spot) in two estates (RJE and BYE).</p>	
<p><i>Non-Conformance Description</i> Based on this there are still areas that have no explanation related to drainability assessment.</p>	
<p><i>Root Cause Analysis (filled by organization audited):</i> Difference in peat area has not been assessed the drainability, due to the location of peat which is spread over 2 estates and has been missed by the MRC.</p>	
<p><i>Correction (filled by organization audited):</i> Assess drainability in the 2 estates (RJE & BYE).</p>	
<p><i>Corrective Action (filled by organization audited):</i> Ensuring that the difference between the peat areas has been carried out by the MRC and reported to the RSPO.</p>	
<p><i>Assessor Evaluation and Conclusion (filled by auditor):</i> Verification 12 May 2020 The company has submitted drainability assessment for areas not yet included in the survey. The submission of the survey / assessment was sent by PT GPI to the MRC, but this could not be carried out due to Corona Pandemic. This has been explained in accordance with an email from the MRC on April 8, 2020. Based on this evidence, the implementation and results of the assessment will be re-observed during the next visit.</p>	
<p><i>Verified by</i></p>	<p>: Ardiansyah</p>

NCR No.	: 2020.10	Issued by	: Ardiansyah
Date Issued	: 28 February 2020	Time Limit	: 28 May 2020
NC Grade	: Critical	Date of Closing	: 12 May 2020
Standard Ref. & Requirement	: 7.10.1 GHG emissions are identified and assessed for the unit of certification. Plans to reduce or 72ilakuka them are implemented, monitored through the Palm GHG calculator and publicly reported.		
<p><i>Evidence observed (filled by auditor):</i> The certification unit has done the GHG calculation using the PalmGHG calculator V. 4. Based on data verification, it is known that the data on palmghg are not in accordance with actual conditions, such as peat area, HCV and production are not in accordance with actual conditions.</p>			
<p><i>Non-Conformance Description</i> The certification unit has not yet calculated the GHG according to the actual conditions.</p>			
<p><i>Root Cause Analysis (filled by organization audited):</i> There is no PIC to monitor and collect all GHG data from all units in PT GPI periodically.</p>			

Correction (filled by organization audited):

- Establish a PIC to periodically monitor and collect GHG data
- Improved GHG calculations in accordance with 2019 area statement and production data (1 year).

Corrective Action (filled by organization audited):

Coordinate with related PICs and make calculations for a period of 1 year (January – December).

Assessor Evaluation and Conclusion (filled by auditor):
Verification 12 May 2020

The company has sent GHG emission calculation results using PalmGHG Calculator Version 4. Based on the verification results it is known that the data inputted is in accordance with the actual conditions. Based on the calculation results it is known that GHG emissions for the 2019 period are 4.91 tCO₂e / tProduct. The calculation is done using the Apply November 2005 Cut off for LUC option.

Summary of Net GHG Emissions period January – December 2019

Emissions per product	tCO ₂ e/tProduct	Extraction	%	Production	ton/year
CPO	4.91	OER	22.41	FFB Processed	184,206.52
PK	4.91	KER	6.06	CPO Produced	41,276.23

Land Use	ha
OP planted area on Mineral soil	10925.05
OP Planted on peat	1180.31
Total oil palm planted	12105.37
Conservation area (Forested)	246.38
Conservation area (Non-Forested)	0.00

Summary of Field Emissions and Sinks

	Own Crop			Group			3 rd Party			Total
	tCO ₂ e	tCO ₂ e/ha	tCO ₂ e/t FFB	tCO ₂ e	tCO ₂ e/ha	tCO ₂ e/t FFB	tCO ₂ e	tCO ₂ e/ha	tCO ₂ e/t FFB	
Emissions										
Land conversion	107927.82	10.19	0.69	14983.11	9.88	0.54	0.00	0.00	0.00	1229
CO ₂ emissions from fertilizer	9079.85	0.86	0.06	979.82	0.65	0.04	0.00	0.00	0.00	1005
N ₂ O emissions from peat	8835.37	0.83	0.06	0.00	0.00	0.00	0.00	0.00	0.00	883
N ₂ O emissions from fertilizer	6207.35	0.59	0.04	673.47	0.44	0.02	0.00	0.00	0.00	688
Fuel consumption	3689.18	0.35	0.02	488.54	0.32	0.02	0.00	0.00	0.00	417
Peat Oxidation	183943.02	17.37	1.18	0.00	0.00	0.00	0.00	0.00	0.00	1839
Sinks										
Crop sequestration	-99125.21	-9.36	-0.63	-14201.98	-9.36	-0.51	0.00	0.00	0.00	-1133
Conservation Sequestration	-1403.47	-0.13	-0.01	-855.84	-0.56	-0.03	0.00	0.00	0.00	-225
Total	219153.9	20.70	1.40	2067.13	1.36	0.07	0.00	0.00	0.00	2212

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Summary of Mill Emissions and Credits									
		tCO₂e	tCO₂e/tFFB						
Emissions									
POME		36107.60	0.20						
Fuel consumption		270.67	0.00						
Grid Electricity Utilization		0	0						
Credits									
Export of Grid Electricity		0	0						
Sales of PKS		0	0						
Sales of EFB		0	0						
Total		36378.27	0.20						
Palm oil Mill Effluent (POME) Treatment									
Divert to compost		0%							
Divert to anaerobic digestion		100%							
POME Diverted to Anaerobic Digestion:									
Divert to anaerobic pond		100%							
Divert to methane capture (flaring)		0%							
Divert to methane capture (electricity generation)		0%							
Non-conformity 2020.10 is closed									
<i>Verified by</i>	:	Ardiansyah							

NCR No.	:	2020.11	Issued by	:	Ardiansyah
Date Issued	:	28 February 2020	Time Limit	:	28 May 2020
NC Grade	:	Non Critical	Date of Closing	:	
Standard Ref. & Requirement	:	7.12.7 The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.			
<i>Evidence observed (filled by auditor):</i> Based on document review and interview, it is known that the certification unit has conducted HCV monitoring. The items monitored are flora, fauna and sign boards. While based on the results of identification, it is known that the HCV in PT GPI is mostly riparian area.					
<i>Non-Conformance Description</i> Monitoring parameters do not include points in accordance with HCV identification so that the results of monitoring have not been used as feedback for the next management plan.					
<i>Root Cause Analysis (filled by organization audited):</i>					
<i>Correction (filled by organization audited):</i>					
<i>Corrective Action (filled by organization audited):</i>					

<i>Assessor Evaluation and Conclusion (filled by auditor):</i>	
Verified by	:

NCR No.	: 2020.12	Issued by	: Ardiansyah
Date Issued	: 28 February 2020	Time Limit	: 28 May 2020
NC Grade	: Critical	Date of Closing	:

Standard Ref. & Requirement	: 7.12.8 Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018, the Remediation and Compensation Procedure (RaCP) applies.
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Evidence observed (filled by auditor):
 The company shows the RaCP process for all Sime Darby Plantation, Bhd's subsidiaries as follows:

- Liability and Disclosure to RSPO on 2 December 2014
- Concep Note was sent to RSPO on 25 March 2016 and was responded to on 5 December 2016.
- The revised LUCA report will be resent on December 8, 2017.
- Compensation Plan was sent to RSPO on 8 March 2018

Based on the results of communication between PT Mutuagung Lestari and RSPO on February 13, 2019 information was obtained that "A preliminary review of the Compensation Plan has been done. However, no further action can be carried out because the LUCA is still awaiting finalization and is pending clarification from Sime Darby."

Based on the study of documents it is known that there was new land clearing after November 2005.

Non-Conformance Description
 The company has not been able to show evidence that the RaCP compensation plan has been approved by the RSPO.

Root Cause Analysis (filled by organization audited):
 PT GPI has not received information from Simerdarby Management regarding LUCA updates

Correction (filled by organization audited):
 SGM coordinates with Simerdarby for information on the LUCA reporting process and status, and progress status is obtained until 8 May 2020, the LUCA review report update (attached) and e-mail from the RSPO Secretariat as of 14 May 2020.

Corrective Action (filled by organization audited):
 Continue to communicate Simerdarby by SQM for the status and update of the LUCA Report to RSPO.

Assessor Evaluation and Conclusion (filled by auditor):
Verification, 15 May 2020.
 The company showed an email from the RSPO (aminah.ang@rspo.org) on May 14, 2020, stating that given the active involvement between SDP and RSPO, 5 companies including PT GPI were permitted by RSPO to continue certification with the following provisions:

1. NC raised to the unit with FCL = 0 can be closed and hence proceed with certification.
2. NC raised to the unit with FCL value, the NC can be left open until the next ASA in which the compensation plan needs to be approved by then

Based on LUCA submitted by SDP, for PT GPI there is an FCL covering an area of 356.82 Ha but this has not been

approved by the LUCA reviewer. **Based on this, this non-conformity will remain open until the next surveillance activity.**

Verified by : **Ardiansyah**

3.4.3. Opportunity for Improvement

No	Ref. Std.	Description
1.	2.1.3	Ensure legal boundaries are in accordance with field conditions and <i>HGU</i> maps
2.	2.2.2	All contractors implement all the clauses in the contract
3.	3.4.2	Ensure that the plan for managing and implementing social impacts is in accordance with the issues in the field.
4	3.8.12	Ensure the process of contract extension with transporter and bulking
5.	4.2.3	Records of receipt of incoming letters / complaints inform the time of response and the party to which the response was given
6.	4.4.1	Companies are encouraged to reconfirm operational areas included in the <i>HGU</i> and details of their land use

3.4.4. Noteworthy Positive Components

No	Ref. Std.	Description
1		Team collaboration and commitment in assisting RSPO certification activities




3.5 Summary of Arising Issues from Public and Auditor Verification

Public Issues (Institution/ NGO/Community)	Auditor Verification
<p>Labour union of MJE, RJE and RJM – Chairman</p> <ul style="list-style-type: none"> • The appointment of labour union boards are based on voting of members, there is no interfere from GPI's management • The new CLS not yet distributed to MJE labour union board, the latest are CLA period of 2015-2017, while labour union of RJM/RJE has hold the latest CLA (period of 2018-2020) • Labpur union of MJE, RJE and RJM are request to management to involve them in preparing of CLA, the current CLA are based on negotiation between company and BKSPPS, the labour union in unit request to develop and prepare the CLA directly between workers and company, its due to the term and condition listed in current CLA did not covering all employment issue in unit. • Preparation of PKWT contract agreement did not involve labour union board in MJE, however up to now, the PKWT are not member of labour union, but they are sometimes submit their grievance through labour union • The labour union board in MJE mentioned that PPE are distributed once a year to workers, however in last 2 years only distributed once, and mostly the workers been self-purchased their PPE. • Labour union of RJE and RJM mentioned that it seems difficult to upgrade the workers of manuring/spraying from PKWT to SKU (permanent), its due to the regulation required 21 working days per month in subsequently 3 months, while the for manuring workers the working days are less the 21 days per month. • There was a new upgrade of PKWT workers to SKU (permanent) in RJM, but the labour union mentioned that the workers not yet receive the appointment letter which informs their grade. 	<p>There are no negative issues related to labour union.</p> <p>Has become non conformity in indicators 3.6.1</p> <p>Based on interviews with management know that maintenance activities are not carried out every day but only on certain days depending on the condition of each block. Routine activities are harvesting, transporting FFB and fertilizing only.</p>
<p>Gender committee of RJE/RJM and MJE</p> <ul style="list-style-type: none"> • There were no issues regarding to the gender harassment, sexual harassment, and reproduction harassment in last 2 years • The committee has identified the need of breast-feeding mother namely place and permission to breastfeeding 	<p>There are no negative issues related to gender committee representative interview.</p>
<p>Local contractor of MJE and RJE</p> <ul style="list-style-type: none"> • There is no grievance and complaint conveyed to auditor, the company has make a payment in timely manner and conducted the project in accordance with the agreement 	<p>There are no negative issues related to local contractor interview.</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<ul style="list-style-type: none"> The contractor in MJE/RJE told that they has paid the BPJS – KES for their workers 	
<p>Representative of Committee Gender of Napal Karang Ringin Estate and Worker Union of Napal Karang Ringin Estate</p> <ul style="list-style-type: none"> There's no issue related to gender and discrimination. The committee gender has program activities plan (period 2020). PT GPI has a gender committee structure and each division of estate has a representative for employee complaints if there is violation case of women's rights There are no negative issues such as discrimination, the use of labor under 18 years, sexual abuse issues and others. Providing wages and overtime in compliance with applicable regulations. All employees have been included in the program BPJS employment and health. The Company has conducted periodic health checks to workers with high risk. The Company has also provided PPE which is provided for free. All the company's policy has been socialized to employee. 	<p>Based on document review, field observation, and interview with the worker and external stakeholder known there is no negative issue.</p> <p>However, raised NCR No. 2020.02 on indicator 3.6.1 Critical related the workers knowledge about PPE.</p>
<p>Local Contractor (Napal Karang Ringin Estate Contractor)</p> <ul style="list-style-type: none"> Company had socialized policies such as corporate codes and the use of labor over 18 years and code of conduct. Contractor's workers have given PPE by the contractors. The entire execution of the work and payment in accordance with the applicable agreement. Workers has been registered in health insurance (BPJS)There is no complaint from contractor. 	<p>Based on document review, field observation, and interview with external stakeholder known there is no negative issue.</p>
<p>Environment Agency, Musi Banyuasin Regency</p> <ul style="list-style-type: none"> There is issue of erosion in riparian area. Environmental agency has follow up the issue by field observation and give recommendation to resolve the issue. There is issue of tiger in PT GPI area. Natural resource conservation agency (<i>Balai Konservasi Sumberdaya Alam/ BKSDA</i>) and Environmental agency has investigate the issue. This issue also has been clarified in social media with conclusion the footprint found is belong to <i>Prionailurus bengalensis</i>. 	<p>There is negative issue from stakeholder and related agency has verify the issue. For erosion issue, environmental agency found that there is erosion in riparian because the high rainfall and the company has repaired the dike that has collapsed.</p> <p>This is in accordance with the criteria 1.1, 2.1 and 3.4.</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<ul style="list-style-type: none"> • The relationship between the company and the Service is well established. • All environmental permits owned by PT GPI are still valid. • Compliance goes well, each report is carried out according to time. • There is no information related to community complaints about litigation. • Permits regarding the environment such as hazardous waste storage and land application have been owned by the company. • PT GPI was awarded PRORER with blue rank in national scale. 	
<p>Manpower Agency, Musi Banyuasin Regency</p> <ul style="list-style-type: none"> • There is no issue of dispute that goes to the Manpower Agency • There is union in PT GPI as forum to communication between company and workers • There is Collective Labour Agreement and has been socialize to workers. • The relationship between the company and the service is well established • Employment reports are routinely reported every 3 months • There is contract workers, but work in plasma plantation • All workers have been registered with BPJS for Health and Employment. • No child worker issue in PT GPI 	<p>There is no negative issue. This is in accordance with the criteria 1.1, 6.5, 4.7</p>
<p>KUD Muda Rasan Jaya</p> <ul style="list-style-type: none"> • There is a Monthly Budget Work Plan (<i>Rencana Kerja Anggaran Bulanan/ RKAB</i>) discussed every month. All operational activities are informed in the RKAB (income and expenditure). KUD and company representatives who carry out the discussion. • Management of Plasma plantation is carried out by the PT GPI. • There are land claim in plasma plantation from Kayu Ara Village. The company and KUD has process the issue, and call the complaint to provide the evidance of land rights. • The current status of the area is still a location permit and the plan is to become an land title (<i>Surat Hak Milik/ SHM</i>). The current status is still <i>Surat Pengakuan Hak/ SPH</i> and <i>Surat Keterangan Tanah/ SKT</i> from villages and sub-districts. In order to improve the status to SHM, a process has been carried out, including a technical assessment from Plantation Agency of Musi Banyuasin District. 	<p>There is no negative issue. This is in accordance with the criteria 1.1, 4.4, 4.8.</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<p>Gajah Mati Village (village secretary)</p> <ul style="list-style-type: none"> • There is communities who had plasma plantation from PT GPI, but not all communities in Gajah Mati Village. The process of plasma plantation start in in 2005. • The company always communicate with head of village. • Contribution of PT GPI is 1 unit of well and the assitant of Eid Al-Adha. • The benefit of company is absorb labor and the workers in plasma plantation 30% from Gajah Mati Village. 	<p>There is no negative issue. This is in accordance with the criteria 1.2, 4.3.</p>
<p>Talang Piase Village (village secretary)</p> <ul style="list-style-type: none"> • There is no negative issue due to PT GPI operation • Relationship between the company and community is well established • Contribution of PT GPI is only the assitant of Eid Al-Adha. • PT GPI and village authority is are formulating the development of plasma plantation. 	<p>There is no negative issue. This is in accordance with the criteria 1.2, 4.3.</p>

4.0	CERTIFIED ORGANISATION'S ACKNOWLEDGEMENT OF INTERNAL RESPONSIBILITY
4.1	Formal Sign-off of Assessment Findings
	<p>Hereunder sign by management representative from inspected company to acknowledge a field assessment and agree for all content explained in this assessment report, included of non-compliance findings.</p> <p>Signed on behalf of:</p> <p>PT Guthrie Pecconina Indonesia Management Representative</p> <p> <u>Alagendran Maniam</u> 15 May 2020</p> <p>Mutuagung Lestari Lead Auditor</p> <p>  <u>Ardiansyah</u> 15 May 2020</p>

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

No	Institution/NGO/ Community	Address	Phone/E mail	Form of Communi cation	Date of Contact	Response	
						Yes	No
1	National Land Agency	Sekayu City, Musi Banyuasin Regency, South Sumatra	-	Direct Interview	25 February 2020	-	√
2	Plantation Agency	Sekayu City, Musi Banyuasin Regency, South Sumatra	-	Direct Interview	25 February 2020	-	√
3	Environment Agency	Sekayu City, Musi Banyuasin Regency, South Sumatra	-	Direct Interview	25 February 2020	√	
4	Labor Agency	Sekayu City, Musi Banyuasin Regency, South Sumatra	-	Direct Interview	25 February 2020	√	
5	Gajah mati village (secretary)	Sub District of Lawang Wetan; District of Musi Banyuasin; Province of Sumatera Selatan	-	Direct Interview	25 February 2020	√	-
6	Talang Piase Village (Head of the village)	Sub District of Lawang Wetan; District of Musi Banyuasin; Province of Sumatera Selatan	-	Direct Interview	25 February 2020	√	-
7	Bumi Ayu Estate : Harvesting – 3 workers FFB Transport – 2 workers Census of Caterpillar Pests – 1 worker HGU poles – 1 worker Water gate – 1 worker	PT GPI	-	Direct Interview	25 February 2020	√	-
8	Rantau Panjang POM : Despatch oil – 1 worker Workshop – 2 workers Warehouse complex – 2 workers Schedule waste storage – 1 worker WTP – 1 operator Security – 2 worker	PT GPI	-	Direct Interview	24 February 2020	√	-
9	Rantau Panjang Estate : Workshop – 3 workers Warehouse complex – 2 workers WTP – 1 operator Housing – 4 workers First aid post – 1 worker	PT GPI	-	Direct Interview	25 February 2020	√	-
10	Napal Karang Ringin Estate : Warehouse complex – 2	PT GPI	-	Direct Interview	26 February 2020	√	-

	workers Polyclinic – 1 worker Warehouse complex – 2 workers BSS – 2 workers Landfill – 1 worker Schedule Waste Storage – 1 worker Workshop – 1 worker Daycare – 2 worker						
11	Mangun Jaya Estate : Road maintenance – 1 workers and 1 foreman Harvester – 3 worker, 1 clerk and 1 foreman EFB application – 1 workers and 1 foreman	PT GPI	-	Direct Interview	26 February 2020	√	-
12	Gender committee	PT GPI	-	Direct Interview	25 February 2020	√	-
13	Labor union	PT GPI	-	Direct Interview	25 February 2020	√	-
14	Local contractor		-	Direct Interview	25 February 2020	√	-
15	WALHI	Jakarta	informasi@walhi.or.id	Email	17 February 2020	-	√
16	Sawit Watch	Jakarta	info@sawitwatch.or.id	Email	17 February 2020	-	√
17	WWF	Jakarta	wwf-indonesia@wwf.or.id	Email	17 February 2020	-	√

Appendix 2. Assessment Program

Date	24 – 29 February 2020	
PLANNED TIME	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
Monday, 24 Feb 2020		
05.30 – 07.00	Jakarta → Palembang	All Auditor
07.00 – 12.00	Palembang → PT GPI	All Auditor
12.00 – 14.00	Break	All Auditor
14.00 – 15.00	OPENING MEETING <ul style="list-style-type: none"> Auditee Speech (Introduction of PIC, Profile of Certified Management Unit) Auditor Team Speech (Introduction, Audit Objective, Audit Scope, Audit Plan Discussion, Determine of Audit Sample, Transparency and Confidentiality Clarification) 	All Auditor
15.00 – 17.00	Field Observation to Rantau Panjang Factory Aspect to be verified <ul style="list-style-type: none"> Supply Chain verification (FFB Receiving, Weighbridge), Implementation of Occupational Health & Safety Aspect, Implementation of Employment Procedure and Mechanism Aspect, security post, FFB Sorting, Processing Activity, Despatch CPO) Implementation of Environmental aspect, Inspection to Chemical Storage, Hazardous Waste Storage, Fire Control Simulation, POME Pond & land application 	All Auditor
Tuesday, 25 Feb 2020		
08.00 – 12.00	Field Observation to Rantau Panjang Estate Aspect to be verified : <ul style="list-style-type: none"> Implementation of Legal Aspect (Land Ownership, Legal Boundaries), HCV; Implementation of Agronomy Aspect (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application), Implementation of Occupational Health & Safety Aspect, Implementation of Employment Procedure and Mechanism Aspect Implementation of Environmental, and Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management), Observation of Workers Facilities (Housing, School, Worship Place). Stakeholders consultation to related agencies in Musi Banyuasin Regency Field Observation to Bumi Ayu Estate Aspect to be verified : <ul style="list-style-type: none"> Implementation of Legal Aspect (Land Ownership, Legal Boundaries), HCV; Implementation of Agronomy Aspect (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application), Implementation of Occupational Health & Safety Aspect, Implementation of Employment Procedure and Mechanism Aspect Implementation of Environmental, and Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste 	SNP / ARD SNP / ARD SNP / ARD SNP / ARD BSH / YYT BSH / YYT

Date	24 – 29 February 2020	
PLANNED TIME	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
	Storage, Fire Control Facilities, Waste Management), Observation of Workers Facilities (Housing, School, Worship Place). <ul style="list-style-type: none"> Stakeholder consultation to affected communities surrounding the plantations, indigenous peoples, local communities, smallholders and previous land owners. 	BSH / YYT BSH / YYT
12.00 – 14.00	Break	All Auditor
14-00 – 17.00	Documents Review <ul style="list-style-type: none"> Review of previous (Initial assessment) findings Verification of Basic Information Mill and Estate Confirmation of Time Bound Plan Review of Partial Certification Verification of P n C documents Interview with Gender Committee, Worker's Union, , Worker's Cooperative (if any), Local Contractor (for Mill and Estate), Third Party Supplier (if any), local NGO (if any) 	All Auditor
Wednesday, 26 Feb 2020		
08.00 – 12.00	Field Observation to Napal Karang Angin Estate Aspect to be verified : <ul style="list-style-type: none"> Implementation of Legal Aspect (Land Ownership, Legal Boundaries), HCV; Implementation of Agronomy Aspect (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application), Implementation of Occupational Health & Safety Aspect, Implementation of Employment Procedure and Mechanism Aspec Implementation of Environmental, and Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management), Observation of Workers Facilities (Housing, School, Worship Place). Field Observation to Mangun Jaya Estate Aspect to be verified : <ul style="list-style-type: none"> Implementation of Legal Aspect (Land Ownership, Legal Boundaries), HCV; Implementation of Agronomy Aspect (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application), Implementation of Occupational Health & Safety Aspect, Implementation of Employment Procedure and Mechanism Aspec Implementation of Environmental, and Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management), Observation of Workers Facilities (Housing, School, Worship Place). 	SNP / ARD SNP / ARD SNP / ARD SNP / ARD BSH / YYT BSH / YYT
12.00 – 14.00	Break	All Auditor
14-00 – 17.00	<ul style="list-style-type: none"> Continue Field Observation and field observation clarification (if needed) Verification of documents and completing checklist 	All Auditor
08.00 – 12.00	<ul style="list-style-type: none"> Continue Field Observation and field observation clarification (if needed) Verification of documents and completing checklist 	All Auditor

Date	24 – 29 February 2020	
PLANNED TIME	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
12.00 – 14.00	Istirahat	All Auditor
14.00 – 17.00	Verification of documents and completing checklist	All Auditor
Friday, 28 Feb 2020		
08.00 – 12.00	<ul style="list-style-type: none"> Continue Field Observation and field observation clarification (if needed) Verification of documents and completing checklist 	All Auditor
12.00 – 14.00	Istirahat	All Auditor
14.00 – 16.00	Interim Meeting (closing meeting preparation)	All Auditor
16.00 – 17.00	Closing Meeting	All Auditor
Saturday, 29 Feb 2020		
08.00 – 13.00	PT GPI – Palembang	All Auditor
15.25 – 16.35	Palembang – Jakarta	All Auditor