

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

Name of Management : Gersindo Minang Plantation POM – PT Gersindo Minang Plantation,
Organisation Subsidiary of Wilmar International Limited.

Plantation Name : Gersindo Minang Plantation Estate (PT Gersindo Minang Plantation),
Permata Hijau Pasaman-1 Estate and Permata Hijau Pasaman-2 Estate (PT
Permata Hijau Pasaman)

Location : Jorong Tanjung Pangkal, Nagari Lingkung Aur, Pasaman Sub-District,
Pasaman Barat District, Sumatera Barat Province, Indonesia

Certificate Code : **MUTU-RSPO/038**

Date of Initial Registration : 21 April 2014

Date of Certificate Issue : 13 June 2019 Date of License Issue : 21 Juli 2020

Date of Certificate Expiry : 20 April 2024 Date of License Expiry : 20 April 2021

Assessment	Assessment Date	PT Mutuagung Lestari Auditor	Reviewed by	Approved by
ASA-1.1	02 to 06 March 2020	Leonada (Lead Auditor), Hasiholan Sihombing, Asystasya Aishah Silalahi, Rahmat Abdiansyah	Ardiansyah	Octo H.P.N Nainggolan

Assessment	Approved by MUTUAGUNG LESTARI on:
ASA-1.1	03 April 2020

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Figure 1. Location Map of PT GMP and PT PHP

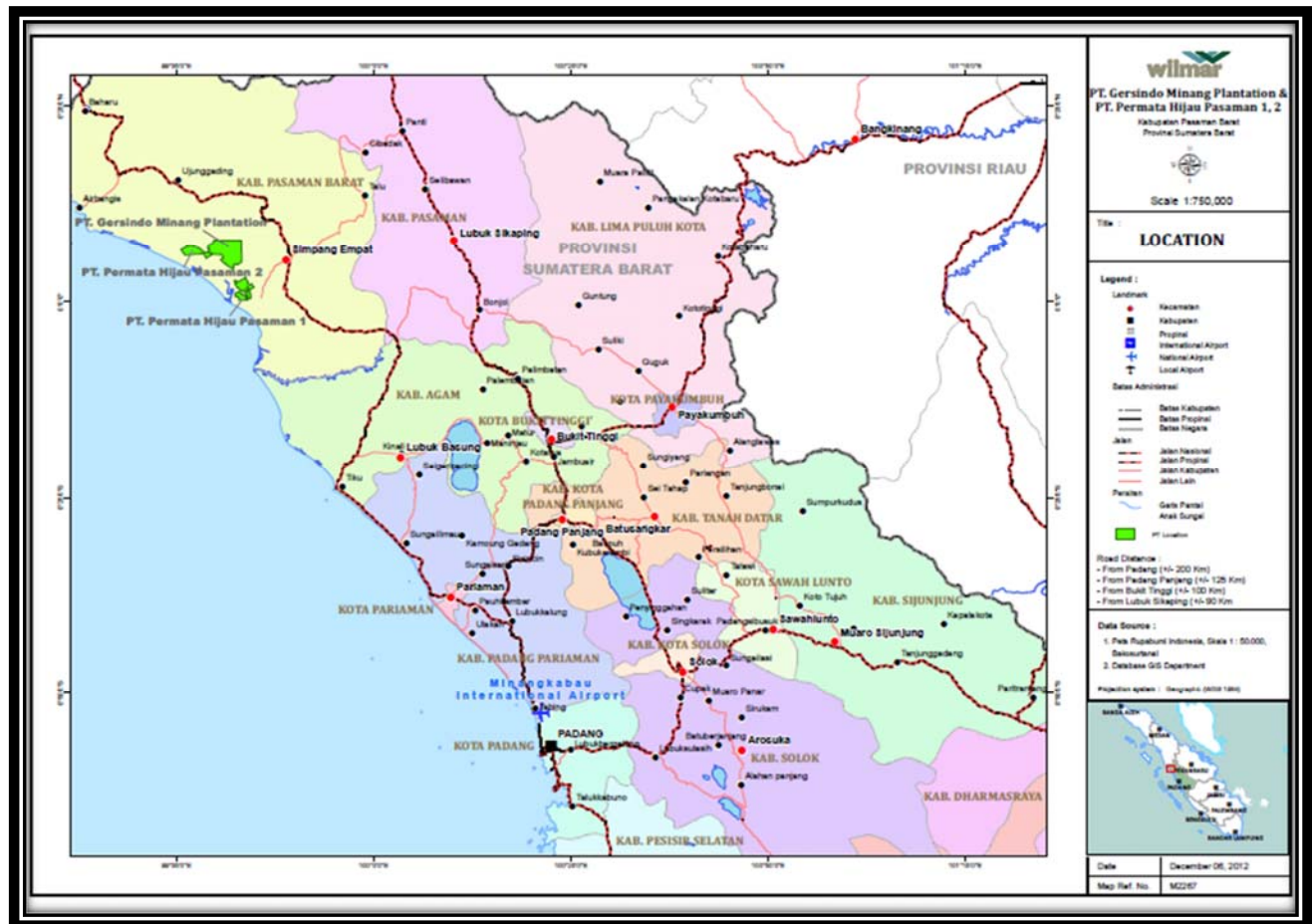
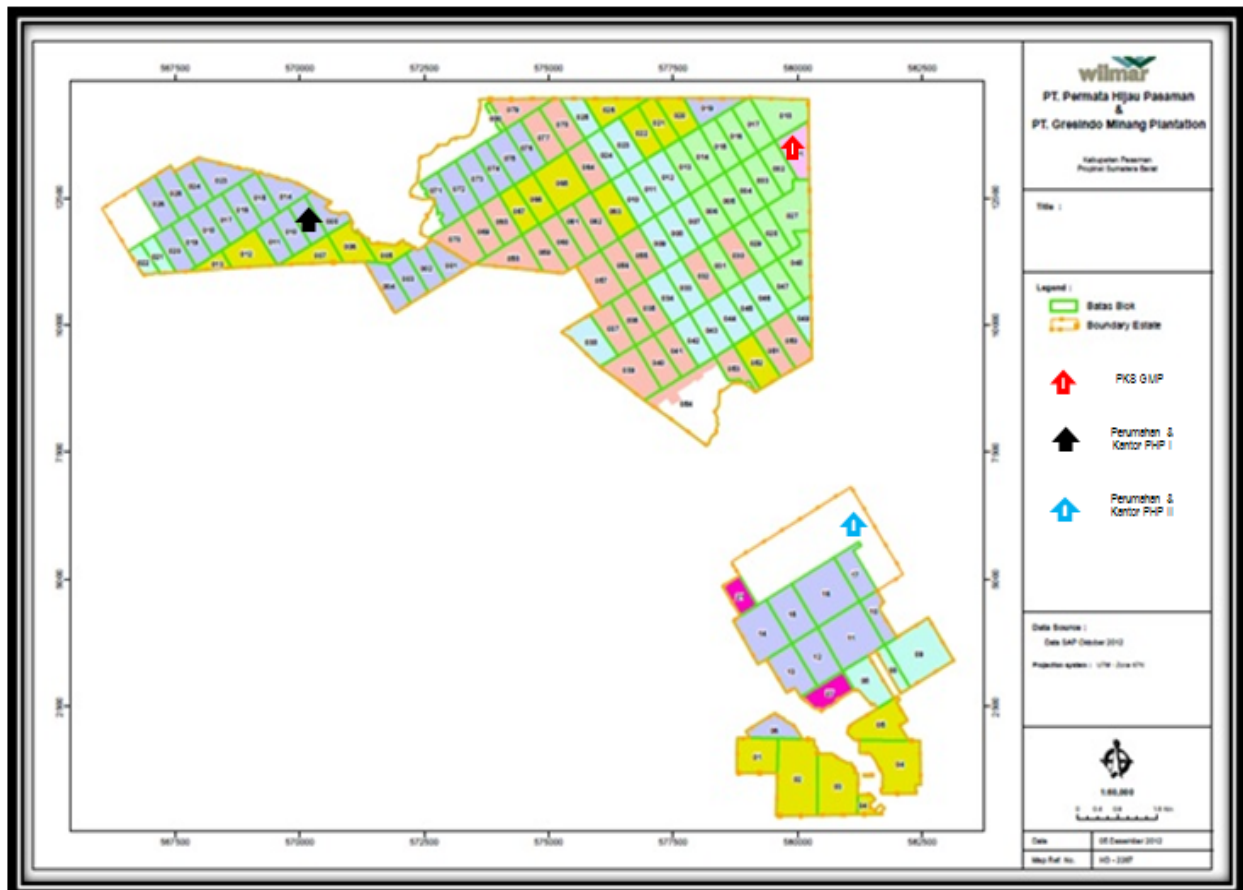


Figure 2. Operational Map of PT GMP and PT PHP



Abbreviations Used

APKASINDO	:	Asosiasi Petani Kelapa Sawit Indonesia (Indonesian Palm Oil Farmers Association)
B3	:	<i>Bahan Beracun dan Berbahaya</i> (Hazardous Material)
BOD	:	Biological Oxygen Demand
BPJS	:	<i>Badan Penyelenggara Jaminan Sosial</i> (Social Security Agency)
CB	:	Certification Body
CLA	:	Collective Labor Agreement
CPO	:	Crude Palm Oil
CSPK	:	Certified Sustainable Palm Kernel
CSPO	:	Certified Sustainable Palm Oil
CSR	:	Cooperate Social Responsibility
EBCC	:	Electronic Bunch Count Chip
EFB	:	Empty Fruit Bunch
EHS	:	Environment health and Safety
EIA	:	Environment Impact Assessment
FFB	:	Fresh Fruit Bunch
FPIC	:	Free, Prior, Informed, Consent
FR	:	Frequency Rate
GAPKI	:	<i>Gabungan Pengusaha Kelapa Sawit Indonesia</i> (Indonesian Palm Oil Association)
GHG	:	Green House Gases
GMP	:	Gersindo Minang Plantation
GPS	:	Global Positioning System
HCV	:	High Conservation Value
HGU	:	<i>Hak Guna Usaha</i> (Land Use Title)
HIRAC	:	Hazard Identification Risk Assessment and Control
HRD	:	Human Resource Department
IPM	:	Integrated Pest Management
ISCC	:	International Sustainability & Carbon Certification
ISPO	:	Indonesian Sustainable Palm Oil
IUP	:	<i>Izin Usaha Perkebunan</i> (Plantation Business Permit)
IUP-B	:	<i>Izin Usaha Perkebunan Budidaya</i> (Plantation Business Permit for Cultivation)
IUP-P	:	<i>Izin Usaha Perkebunan Pengolahan</i> (Plantation Business Permit for Processing)
KER	:	Kernel Extraction Rate
KSU	:	<i>Koperasi Serba Usaha</i> (Multipurpose Cooperative)
KUD	:	<i>Koperasi Unit Desa</i> (Village Unit Cooperative)
LB3	:	<i>Limbah Berbahaya dan Beracun</i> (Hazardous Waste)
LOTO	:	Lock Out Tag Out
LSU	:	Leaf Sampling Unit
MSDS	:	Material Safety Data Sheet
OER	:	Oil Extraction Rate
OFI	:	Opportunity For Improvement
OHS	:	Occupational Health and Safety
P2K3	:	<i>Panitia Pembina Keselamatan dan Kesehatan Kerja</i> OHS Committee
P3K	:	<i>Pertolongan Pertama Pada Kecelakaan</i> (First Aid)
PHP	:	<i>Permata Hijau Pasaman</i>
PK	:	Palm Kernel
PNC	:	Principles and Criteria
POM	:	Palm Oil Mill
POME	:	Palm Oil Mill Effluent
PPE	:	Personal Protective Equipment

RKL/RPL	:	<i>Rencana Kelola Lingkungan/ Rencana Pemantauan Lingkungan</i> (Environmental Management Plan / Environmental Monitoring Plan)
RSPO	:	Roundtable on Sustainable Palm Oil
RTE	:	Rare Threatened Endangered
SCCS	:	Supply Chain Certification Standard
Serbundo	:	<i>Serikat Buruh Indonesia</i> (Worker Union)
SH	:	Smallholder
SIA	:	Social Impact Assessment
SOP	:	Standard Operational and Procedure
SPSI	:	<i>Serikat Pekerja Seluruh Indonesia</i> (Worker Union)
SR	:	Severity Rate
SSU	:	Soil Sampling Unit
UKL/UPL	:	<i>Upaya Kelola Lingkungan/ Upaya Pemantauan Lingkungan</i> (Environmental Management Efforts / Environmental Monitoring Efforts)
WTP	:	Water Treatment Plant
WWTP	:	Waste Water Treatment Plant

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 RSPO Board of Governors and adopted at the 15th Annual General Assembly by RSPO Member on 15 November 2018. RSPO Certification System for Principles and Criteria, 14 June 2017 	
1.2	Organisation Information		
1.2.1	Organisation name listed in the certificate	PT Gersindo Minang Plantation and PT Permata Hijau Pasaman subsidiary of Wilmar International Limited	
1.2.2	Contact person	Jules Sonny Parapat	
1.2.3	Organisation address and site address	Head Office 56 Neil Road, Singapore 088830 <u>Official Liaison Office:</u> Multivison Tower Lt. 15 Jl. Kuningan Mulia Kav. 9B, Kuningan, Jakarta, 12980, Indonesia.	
1.2.4	Telephone	(62-21) 29380777	
1.2.5	Fax	-	
1.2.6	E-mail	jules.parapat@id.wilmar-intl.com	
1.2.7	Web page address	http://www.wilmar-international.com/	
1.2.8	Management Representative who completed the application for certification	Jules Sonny (Certification Lead Indonesia)	
1.2.9	Registered as RSPO member	2-0017-05-000-00 15 August 2005	
1.3	Type of Assessment		
1.3.1	Scope of Assessment and Number of Management Unit	Mill: PT GMP Mill (Gersindo Minang Plantation) Supply Bases: <ul style="list-style-type: none"> GMP Estate (PT Gersindo Minang Plantation) PHP-1 and PHP-2 (PT Permata Hijau Pasaman) 	
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
	Gersindo Minang Plantation	Jorong Tanjung Pangkal, Nagari Lingkung Aur, Pasaman Sub District, Pasaman Barat District, Sumatera Barat Province, Indonesia	N 0° 07' 10" E 99° 43' 10"
1.4.2	Location of Certification Scope of Supply Base		
	Name of Supply Base	Location	Coordinate
			Latitude Longitude
	GMP Estate (PT Gersindo Minang)	Jorong Tanjung Pangkal, Nagari Lingkung Aur, Pasaman Sub District, Pasaman Barat	N 0° 06' 48" E 99° 43' 04"

	Plantation)	District, Sumatera Barat Province, Indonesia			
	PHP-1 Estate (PT Permata Hijau Pasaman)	Jorong Pisang Hutan, Kenagarian Sasak, Sasak Ranah Pasisie Sub District, Pasaman Barat District, Sumatera Barat Province, Indonesia	N 0° 00' 39"	E 99° 44' 16"	
	PHP-2 Estate (PT Permata Hijau Pasaman)	Jorong Padang Jaya, Kenagarian Persiapan Maligi, Sasak Ranah Pasisie Sub District, Pasaman Barat District, Sumatera Barat Province, Indonesia	N 0° 06' 47"	E 99° 37' 48"	
1.5	Description of Area Statement				
1.5.1	Tenure				
	• State		5,861.40	Ha	
	• Community			Ha	
1.5.2	Area Statement				
		GMP (Ha)	PHP 1 (Ha)	PHP 2 (Ha)	Total
	• Total area	3,600.00	1,247.00	1,014.40	5,861.40 Ha
	• Mature area	2,201.51	835.22	881.39	3,918.12 Ha
	• Immature area	885.21	337.5	-	1,222.71 Ha
	• Land preparation	0.98	18.12	-	19.10 Ha
	• Mill	13.00	-	-	13.00 Ha
	• Road, trench, emplacement	143.34	56.16	28.69	228.19 Ha
	• Swamp	-	-	21.59	21.59 Ha
	• Nursery	15.33	-	-	15.33 Ha
	• Low land	25.57	-	-	25.57 Ha
	• Occupation	259.02	-	80.81	339.83 Ha
	• HCV	56.04	-	1.92	57.96 Ha
1.6	Planting Year and Cycles				
1.6.1	Age profile of planting year				
	Planting Year	Hectarage (Ha)			
		GMP Estate	PHP I Estate	PHP II Estate	Total
	1994	107.37	-	-	107.37
	1995	637.61	-	-	637.61
	1996	274.92	61.69	164.83	501.44
	1997	210.92	539.81	672.94	1,423.67
	1998	-	168.08	43.62	211.7
	1999	6.15	65.64	-	71.79
	2014	122.13	-	-	122.13
	2015	508.19	-	-	508.19
	2016	334.22	-	-	334.22
		Subtotal Mature Area	2,201.51	835.22	881.39

	2017	349.08	-	-	349.08		
	2018	298.98	-	-	298.98		
	2019	237.15	337.5	-	574.65		
	Subtotal Immature Area	885.21	337.5	-	1,222.71		
	TOTAL	3,086.72	1,172.72	881.39	5,140.83		
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 (%)
	GMP POM	60	191,803.86	34,841.57	18.17	8,964.17	4.67
	<i>*Production data source from March 2019 to February 2020</i>						
1.7.2	Description of Certification Scope of Supply Base						
	Name of Estate	Total Area (Ha)	Planted Mature Area (Ha)	FFB (tonnes/year)	Yield (tonnes/ ha/year)	Supplied to Mill	
						FFB (tonnes/year)	%
	GMP Estate	3,600.00	2,201.51	37,031.60	16.82	37,031.60	100
	PHP 1 Estate	1,247.00	835.22	19,484.61	23.33	19,484.61	100
	PHP 2 Estate	1,014.40	881.39	703.07	0.80	703.07	100
	TOTAL	5,861.40	3,918.12	57,219.28	14.60	57,219.28	100
	<i>*Production data source from March 2019 to February 2020</i>						
	<i>**Operational activities in PHP 2 start again in 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)		
	Smallholder of PT GMP (Bina Tani Sejahtera Cooperative and Lingkung Aur II Cooperative) - Non Certified RSPO	Smallholder of PT GMP	1,039	2,030.23	32,630.61		
	Smallholder of PT PHP 1 (Kapa Cooperative and Rantau Pasaman Cooperative) - Non Certified RSPO	Smallholder of PT PHP 1	1,713	1,132.11	11,743.16		
	Smallholder of PT PHP 2 (Permata Sawit Maligi and Mutiara Bosa Sikilang Cooperative) - Non Certified RSPO	Smallholder of PT PHP 2	1,708	921.12	1,669.77		
	Others (Local grower) Non Certified RSPO	Independent supplier	-	-	88,541.05		
	TOTAL					134,584.58	
	<i>*Source Production Data on March 2019 to February 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 (March 2019 to February 2020) (MT)			
	FFB Processed		99,004		57,219.28			
	CPO Production		18,316		10,621.00			
	Palm Kernel (PK) Production		4,950		2,652.53			
1.8.2	Product selling							
	Type of selling product		Actual selling product for last year (March 2019 to February 2020) (MT)					
	CSPO sold as RSPO certified product		8,300.82					
	CSPK sold as RSPO certified product		2,651.96					
	CSPO sold under other scheme		2,251.20					
	CSPK sold under other scheme		0					
	CSPO sold as conventional		0					
	CSPK sold as conventional		0					
1.8.3	Estimate of Certified FFB Claim							
	Name of Estates		Total Area (Ha)	Planted Area (Ha)	FFB (tonnes/year)	Yield (tonnes/ha/year)		
	GMP Estate		3,600.00	2,201.51	40,000	18.17		
	PHP 1 Estate		1,247.00	835.22	20,000	23.95		
	PHP 2 Estate		1,014.40	881.39	10,000	11.35		
	TOTAL		5,861.40	3,918.12	70,000	17.87		
	*Projected FFB production for 21 April 2020 to 20 April 2021							
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 (%)	
	GMP POM	60	70,000	13,300	19	3,500	5	Mass Balance
	*Projected CSPO and CSPK production for 21 April 2020 to 20 April 2021							
1.9	Other Certifications							
	ISCC		EU-ISCC-Cert-ID218-2019032 (Valid from 26 April 2019 to 25 April 2020)					
	ISPO		MUTU-ISPO/018 (Valid from 4 November 2019 to 3 November 2024)					
1.10	Time Bound Plan							
1.10.1	Time Bound Plan for Other Management Units							
	Management Unit		Estate (Supply Base)	Time Bound Plan	Location	Status		
	Mill	Time Bound Plan						
	Indonesia – Kalimantan Region							

Mustika Sembuluh 1 POM	2010	Mustika Sembuluh 1	2010	Central Kalimantan	Certified
		Mustika Sembuluh 2	2010	Central Kalimantan	Certified
Mustika Sembuluh POM 2 (PT Mustika Sembuluh)	2015	Mustika Sembuluh 3	2010	Central Kalimantan	Certified
		KUD Bitu Maju Bersama	2014	Central Kalimantan	Certified
Kerry Sawit Indonesia 1 POM	2011	Kerry Sawit Indonesia 1	2011	Central Kalimantan	Certified
		Kerry Sawit Indonesia 2	2011	Central Kalimantan	Certified
		Kerry Sawit Indonesia 3	2011	Central Kalimantan	Certified
	2015	KUD Karya Bersama	2023	Central Kalimantan	Re Audit, initial certification to process after land title process
		KUD Sejahtera Bersama	2023	Central Kalimantan	
		KUD Tabiku Makmur	2023	Central Kalimantan	
		KUD Kosudra	2023	Central Kalimantan	
Kerry Sawit Indonesia 2 POM (PT Kerry Sawit Indonesia)					
Bumi Sawit Kencana POM (PT Bumi Sawit Kencana)	2013	Bumi Sawit Kencana 1	2013	Central Kalimantan	Certified
		Bumi Sawit Kencana 2	2013	Central Kalimantan	Certified
POM 1 and POM 2 (PT Sarana Titian Permata)	2023	Sarana Titian Permata 1	2023	Central Kalimantan	-
		Sarana Titian Permata 2	2023	Central Kalimantan	-
		Sarana Titian Permata 3	2023	Central Kalimantan	-
Mentaya Sawit Mas POM (PT Mentaya Sawit Mas)	2015	Mentaya Sawit Mas 1	2015	Central Kalimantan	Certified
		Mentaya Sawit Mas 2	2015	Central Kalimantan	Certified
		KUD Karya Makmur Pahirangan	2023	Central Kalimantan	Land title issue
Rimba Harapan Sakti POM (PT Rimba Harapan Sakti)	2015	Rimba Harapan Sakti 1	2015	Central Kalimantan	Certified
		Rimba Harapan Sakti 2	2015	Central Kalimantan	Certified
		KUD Makmur Sejahtera	2023	Central Kalimantan	Land title issue
Karunia Kencana Permaisejati POM (PT Karunia Kencana Permaisejati)	2017	Karunia Kencana Permaisejati 1	2017	Central Kalimantan	Certified
		Karunia Kencana Permaisejati 2	2017	Central Kalimantan	Certified
		Karunia Kencana Permaisejati 3,	2017	Central Kalimantan	Certified
Agro Nusa Investama POM (PT Agro Nusa Investama (Sambas))	2019	Agro Nusa Investama (Sambas) Estate	2019	West Kalimantan	Certified
		KUD Cempaka Biru	2019	West Kalimantan	Certified
		KUD Sentama Lestari	2019	West Kalimantan	Certified
Bumipratama Khatulistiwa POM (PT Bumi Pratama Khatulistiwa)	2016	Bumi Pratama Khatulistiwa Estate	2016	West Kalimantan	Certified
		PT Buluh Cawang Plantation	2023	West Kalimantan	-
		KUD Tuah Jubata	2023	West Kalimantan	-
Agro Nusa Investama (Landak) POM	2023	Agro Nusa Investama (Landak) Estate	2023	West Kalimantan	-
		Pratama Procentindo Estate (PT Pratama Procentindo)	2023	West Kalimantan	-

(PT Agronusa Investama (Landak))					
Agro Palindo Sakti POM (PT Agro Palindo Sakti 2)	2023	Agro Palindo Sakti Estate	2023	West Kalimantan	-
		Putra Indotropical Estate (PT Putra Indotropical Estate)	2023	West Kalimantan	-
		Daya Landak Plantation Estate (PT Daya Landak Plantation)	2023	West Kalimantan	-
		Indoresin Putra Mandiri (PT Indoresin Putra Mandiri)	2023	West Kalimantan	-
Indonesia – Sumatera Region					
Pinang Awan POM (PT Perkebunan Milano)	2009	Sei Daun	2009	North Sumatra	Certified
		Batang Saponggol	2009	North Sumatra	Certified
		Marbau	2009	North Sumatra	Certified
Tania Selatan POM (PT Tania Selatan)	2010	Burnai Barat	2010	South Sumatra	Certified
		Burnai Timur	2010	South Sumatra	Certified
Kencana Sawit Indonesia POM (PT Kencana Sawit Indonesia)	2020	Kencana Sawit Indonesia	2020	West Sumatra	Certified
		KUD Swamata	2023	West Sumatra	-
AMP Plantation POM (PT AMP Plantation)	2011	AMP I	2011	West Sumatra	Certified
		AMP II	2011	West Sumatra	Certified
		AMP III	2011	West Sumatra	Certified
		AMP IV	2011	West Sumatra	Certified
		Primatama Mulia Jaya	2011	West Sumatra	Certified
		Koperasi Tompek Tampilan Kandise	2014	West Sumatra	Certified
		Koperasi AWM	2014	West Sumatra	Certified
		Koperasi BST,	2014	West Sumatra	Certified
		Koperasi MSJ	2014	West Sumatra	Certified
Buluh Cawang Plantation POM (PT Buluh Cawang Plantation)	2012	Bumi Arjo	2012	South Sumatra	Certified
		Dabuk Rejo	2012	South Sumatra	Certified
		Sukamulya	2012	South Sumatra	Certified
		Bambu Kuning	2012	South Sumatra	Certified
Gersindo Minang Plantation POM (PT Gersindo Minang Plantation)	2012	Gersindo Minang Plantation	2012	West Sumatra	Certified
		Permata Hijau Plantation 1	2012	West Sumatra	Certified
		Permata Hijau Plantation 2	2012	West Sumatra	Certified
		PT Permata Hijau Pasaman (block 22)	2023	West Sumatra	-
	2013	Wonosari	2013	North Sumatra	Certified

Daya Labuhan Indah POM (PT Daya Labuhan Indah)		Sei Deras	2013	North Sumatra	Certified
		Cabang Dua (PT Milano)	2013	North Sumatra	Certified
Agro Palindo Sakti POM (PT Agro Palindo Sakti)	2014	Agro Palindo Sakti Estate	2014	South Sumatra	Certified (POM has been closed down)
Murini Samsam POM (PT Murini Sam Sam)	2015	Murini Sam Sam Estate	2015	Riau	Certified
		Part of PT Murini Samsam areas (466 ha)	2023	Riau	-
Musi Banyuasin POM (PT Musi Banyuasin Indah)	2023	Sei Selabu	2023	South Sumatera	-
		Sei Jarum	2023	South Sumatera	-
		KUD Karya Gatra	2023	South Sumatera	-
		KUD Karya Makmur Sriwijaya	2023	South Sumatera	-
		KUD Panca Karya Jaya	2023	South Sumatera	-
		KUD Sumber Makmur	2023	South Sumatera	-
		KUD Tri Tunggal Karya	2023	South Sumatera	-
Sinarsiak Dianpermai POM (PT Sinarsiak Dianpermai)	2023	Sinarsiak Dianpermai Estate	2023	Riau	-
Agro Indah Persada 2 POM (PT. Agroindo Indah Persada)	2023	-	2023	Bangko – Jambi	NPP Audit
Malaysia					
Sapi POM (PPB Oil Palms Berhad)	2008	Sapi 1	2008	Sandakan, Sabah, Malaysia	Certified
		Sapi 2	2008	Sandakan, Sabah, Malaysia	Certified
		Kiabau	2008	Sandakan, Sabah, Malaysia	Certified
Reka Halus POM (PPB Oil Palms Berhad)	2008	Reka Halus	2008	Sandakan, Sabah, Malaysia	Certified
Sabahmas POM (PPB Oil Palms Berhad)	2008	Sabahmas	2008	Lahad Datu, Sabah, Malaysia	Certified
Saremas 1 POM (PPB Oil Palms Berhad)	2010	Saremas	2010	Bintulu, Serawak, Malaysia	Certified
		Saremas 2 (Div D)	2010	Bintulu, Serawak, Malaysia	Certified
		Suai	2010	Bintulu, Serawak, Malaysia	Certified
Saremas 2 POM (PPB Oil Palms Berhad)	2010	Saremas 2 (exclude Div D)	2010	Bintulu, Serawak, Malaysia	Certified
		Kaminsky	2010	Bintulu, Serawak, Malaysia	Certified

		Segarmas	2010	Bintulu, Serawak, Malaysia	Certified
Ribubonus (PPB Oil Palms Berhad)	2010	Ribubonus	2010	Sandakan, Sabah, Malaysia	Certified
Terusan POM (PPB Oil Palms Berhad)	2010	Terusan 1 + 2	2010	Sandakan, Sabah, Malaysia	Certified
		Rumidi	2010	Sandakan, Sabah, Malaysia	Certified
Sri Kamusan POM (PPB Oil Palms Berhad)	2011	Sri Kamusan	2011	Sandakan, Sabah, Malaysia	Certified
		Hibumas 1	2011	Sandakan, Sabah, Malaysia	Certified
		Hibumas 2	2011	Sandakan, Sabah, Malaysia	Certified
		Jebawang	2011	Sandakan, Sabah, Malaysia	Certified
		Sekar Imej	2011	Sandakan, Sabah, Malaysia	Certified
		Sapi Sugut	2011	Sandakan, Sabah, Malaysia	Certified
Suburmas POM (PPB Oil Palms Berhad)	2021	Suburmas	2021	Bintulu, Serawak, Malaysia	-
Africa					
BOPP POM, Biase Plantation Limited	2014	Adum Bansa	2014	Western Region, Ghana	Certified
		Scheme Smallholder	2014	Western Region, Ghana	Certified
Biase Plantation Limited	2020	Calaro	2020	Cross River State, Nigeria	Mill under construction
Biase Plantation Limited	2022	Calaro extension	2022	Cross River State, Nigeria	Mill none planned
Biase Plantation Limited	2020	Ibiae	2020	Cross River State, Nigeria	Mill construction not started
Eyop Industries	2021	Ibad	2021	Cross River State, Nigeria	Mill construction not started
Eyop Industries	2020	Kwa Falls	2020	Cross River State, Nigeria	Mill none planned
Eyop Industries	2021	Oban	2021	Cross River State, Nigeria	Mill none planned
Time bound plan on June 2020					
The revision of time bound plan because there is the change of certification time plan from year 2020 to year 2023 for some uncertified management units with reason is still in process to get land use right (Hak Guna Usaha). Some uncertified management units which changed from year 2020 to year 2023 are PT Agro Nusa Investama (Landak) and its supply based (PT Agronusa Investama 2 and PT Pratama Procentindo), PT Buluh Cawang Plantation in West Kalimantan (one of supply base from PT Bumipratama Khatulistiwa), PT Permata Hijau Pasaman (block 22), PT Agro Palindo Sakti in Sanggau District, West Kalimantan and its supply based (PT Agro Palindo Sakti, PT Putra Indotropical, PT Daya Landak Plantation and PT Indoresin Putra Mandiri), PT Sinarsiak Dian Permai in Riau and PT Musi Banyuasin Indah in South Sumatera.					

	<p>The revision of time bound plan because some scheme smallholders has paid all costs relate of develop of scheme smallholder areas so that it has excluded from the time bound plan. It are KUD Damai Sejahtera (DASTRA) I & II (scheme smallholder under PT AMP Plantation and PT Primatama Mulia Jaya), KSU Mutiara Bosa Sikilang, KUD Permata Sawit Maligi, KUD Rantau Pasaman – Sasak and KUD Kapar (its supply based from PT Gersindo Minang Plantations POM)</p> <p>The revision of time bound plan because two companies (PT Karya Agung Megah Utama & PT Perkebunan Anak Negeri Pasaman) has terminated the management agreement with PT AMP Plantation as stated in the termination agreement letter on 31 May 2019.</p> <p>The result of internal discussion referring RSPO P&C Certification System, 2017 and communicating with auditee that Auditor has not accepted the revision of time bound plan for some cooperatives (KUD Karya Bersama, KUD Sejahtera Bersama, KUD Tabiku Makmur & KUD Kosudra) as supply base from PT Kerry Sawit Indonesia be year 2023 because it is not compliance with RSPO Certification System clause 4.1.3 so auditor has issued final decision as seen on table 8 above.</p>
1.10.2	<p>Progress of Associated Smallholders and Outgrowers for Certifiable Standard</p>
	<p>In Previous Timebound plan it's known that CH has smallholders that plan to certify such as KUD Sasak, KUD Kapar, KUD Mutiara Bosa Sikilang and KUD Permata Sawit Maligi. But in Timebound plan updated on March 2020 it's known that those KUD have been removed. The removing of those KUD based on consideration that the CH do not ability to control the KUD for certification that show on evidence such as:</p> <ul style="list-style-type: none"> - Statement Letter from Cooperative which state that will not doing a RSPO certification such as Letter from KUD Cooperative with No. 27/KUD-KP/IX-2016, dated September 22, 2016. - Theres a internal conflict in Plasma Cooperative such as land dispute on Sikilang Cooperative and Lingkung AUR II Cooperative. <p>On RSPO certification system June 2017 state that the mill shall develop and implement a plan to ensure that 100% of scheme smallholders and scheme outgrowers are compliant with the standard within three years of the mill's initial certification. Then scheme smallholders it self define on annex 1 of RSPO PnC November 2018:</p> <ul style="list-style-type: none"> • Smallholders: Farmers growing oil palm, sometimes along with subsistence production of other crops, where the family provides the majority of labour and the farm provides the principal source of income and where the planted area of oil palm is usually below 50 ha in size. • Scheme Smallholder: Farmers, landowners or their delegates that do not have the: <ul style="list-style-type: none"> - Enforceable decision-making power on the operation of the land and production practices; and/or - Freedom to choose how they utilise their lands, type of crops to plant, and how they manage them (whether and how they organise, manage and finance the land). • Independent Smallholder: All smallholder farmers that are not considered to be Scheme Smallholders [see definition for Scheme Smallholders] are considered Independent Smallholder farmers. <p>Based on that consideration with clarify on scheme smallholders definition on annex 1 of RSPO P & C November 2018, it known that smallholders of PT GMP and PT PHP do not have enforceable decision-making power on the operation of the land and production practices and the farmers are have a freedom to choose how they utilise their lands, type of crops to plant, and how they manage them (whether and how they organise, manage and finance the land). So it conclude that smallholder of PT GMP and PHP are not scheme smallholders and the mill cannot implement a plan to ensure that 100% of scheme smallholders are compliant with the standard within three years of the mill's initial certification.</p>

2.0	ASSESSMENT PROCESS
2.1	Assessment Team
ASA-1.1	<p>1. Leonada (Lead Auditor). Bachelor of agriculture for plant breeding and seed technology program study, department of agronomy, faculty of agriculture in Bogor Agricultural University. Having experience of more than five years working as a plantation operations staff and sustainability in private company of Indonesian oil palm plantations and is currently working on independent certification bodies as auditor. Training have been followed are: training of Indonesian sustainable palm oil (ISPO) lead auditor, training of RSPO lead auditor, RSPO SCCS training, SA 8000, ISO 17021: 2011, ISO 17065: 2012, ISO 19011: 2011, lead auditor ISO 9001: 2008, ISO 14001: 2005, training of management development program agronomy, training of analysis base solution for operation, training of integrated pest management (IPM), use of limited pesticides training, training management of waste pesticides and fertilizers, training mediation and conflict resolution, RSPO social and worker welfare training, general safety specialist training, health and safety management system (SMK3) auditor. In this audit He conducted an assessment on legal, land dispute, social and environmental/conservation aspect.</p> <p>2. Hasiholan Sihombing (Auditor). Indonesian citizen. Bachelor of Agriculture Majoring in Agronomy, Agriculture Faculty. He has working experienced for 7 (seven) years since 2009 as an Operational Staff in an Oil Palm Plantation Company in Indonesia. The training he has followed namely: Lead Auditor ISPO, RSPO P&C Lead Auditor Course by Checkmark, SA 8000 Awareness, Quality Management Systems (ISO 9001:2015), Environmental Management Systems (ISO 14001:2015), OHS General Expert, OHSAS 18001:2007, ISO 19011:2018, ISO 17021:2011 and ISO 17065:2012. He has experienced in various audit activities related to the certification system of sustainable palm oil plantation since 2016. During this audit, he assigned to verify best management practices, long term plan, OHS aspects.</p> <p>3. Asystasya Aishah Silalahi (Auditor). Indonesia Citizen, Bachelor of Economy, Major of Agribusiness, Faculty of Economic and Management. She has one year experience in consultancy. She has followed training such as ISPO Auditor Training, Lead Auditor ISO 9001:2015, OHS General Expert, RSPO lead auditor training course, SCCS, and several in house training related to environmental, BMP, SA 8000. Has been involved in several audit activities since 2016 related to sustainable palm oil certification covering waste management aspect, Social Aspect, Health and Safety Aspect, and Worker Welfare. During this audit, she verifies transparency, worker welfare aspects, SCCS and GHG aspects.</p> <p>4. Oktovianus Rusmin (Technical Expert). Indonesia citizen. Bachelor in Social and Political Sciences from Department of Anthropology. Had working experience as a Social Supervisor on Coastal Project from 1999 to 2001, for Pilot Project of Mangrove Rehabilitation on coastal area in Sulawesi Selatan), a project under Department of Anthropology, University of Indonesia; as a Researcher from 2002 to 2014 on the Center of Anhtropology (Research and Publication) in University of Indonesia; as Social Advisor from 2004 to 2010 on The Forest Trust Indonesia, a Consultant for Sustainable Forest Management and an HCV Identification and Social Impact Assessment Consultant from 2010 to 2011 in Forest Consultant. Had participate to several trainings such as Forest Management Auditor (FSC Standard), Environmental Management System ISO 14001, ISO 9001:2008, Conflict Resolution, Human Right, Verification System of Wood Legality, Training Lead Auditor of ISPO and RSPO Scheme. Had experienced in sustainable forest certification (Eco Label Indonesia Standard), gap analysis of FSC standard and sustainable palm oil certification since 2011 for Indonesian Sustainable Palm Oil (ISPO) and RSPO Scheme in Indonesia, RSPO Scheme in Malaysia since 2014 and MSPO Scheme on 2018. During this assessment conducted as a social technical expert.</p> <p>5. Rahmat Abdiansyah (Observer). Indonesian citizen, Bachelor of Forestry from the Department of Forest Resources Conservation and Ecotourism, Bogor Agricultural University. Has experience working in the Indonesian Palm Oil Farmers Organization and Indonesian private oil palm plantation companies. Participated in ISPO and RSPO Internal Auditor training in 2018, ISPO Certification Systems IHT and P&C in 2019, and IHT ISO 19011. During this audit conducted as an observer.</p>
2.2	Assessment Methodology, Assessment Process and Locations of Assessment
2.2.1	Figure of person days to implement assessment
ASA-	Number of auditors: 3 auditors, 1 observer and 1 technical expert

1.1	Number of days for ASA-1.1 at site: 5 days Number of working days for ASA-1.1 at site: 15 Working days
2.2.2	Assessment Process
ASA-1.1	<p>The assessment was conducted by measuring the sufficiency of implementation with the consistency done by the PT Gersindo Minang Plantation and PT Permata Hijau Pasaman 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 team traveled from Jakarta to Padang by airplane and traveled to site by car in first day. After arriving on site, the team continued to held an opening meeting. The opening and closing meeting were held in Meeting Room attended by the General Manager, General Estate Manager, Estate Manager, Mill Manager, Assistants, and other related personnel. During audit activity, auditors always accompanied by management representative and the documents are presented well</p> <p>The assessment was conducted in three methods: (1) document review, aiming to observe the sufficiency of types or substances from required documents; (2) 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.</p> <p>Some opportunities for improvement as the results of ASA-1.1 delivered by the MUTU auditor to the management unit and the results are will be part of subject to verify at the next assessment phase (ASA-1.2). Improvement of observation from previous assessment were observed by auditors at this ASA-1.1 assessment. All information obtained was recorded in Check List of PT Mutuagung Lestari (MUTU) and part of ASA-1.1.</p> <p>There is no reduction or extension scope. Certification unit also agree with the audit conclusion and the audit is done according to the audit plan.</p> <p>The assessment program please find Appendix 2</p>
2.2.3	Locations of Assessment
ASA-1.1	<p>The sampling location consider the issue arise from the review documents and stakeholder's consultation that are fundamental and crucial. On this assessment sample locations that visited and respondent that interviewed by team auditor are:</p> <p>GMP POM</p> <ul style="list-style-type: none"> • Chemical material warehouse (1 Worker). Observation and interview towards technical, pesticides stored, environment, manpower and safety aspects. • Hazardous waste temporary warehouse (1 Worker). Field observations and interview related to the fulfillment of the attributes health and safety, recording, and the implementation of compliance requirements hazardous waste temporary warehouse. • First aid kit Warehouse. Observation of first aid kit provided by the company, medical and hazardous and toxic waste management. • Oil Warehouse (1 Worker). Observation Hazardouse waste management, MSDS, Symbols and the others. • Hydrant no. 5. Observation and simulation emergency response procedure. • Spare part storage (2 Worker). Observations and interviews related to safe work practices and workers welfare • Workshop (2 Worker). Observation and interviews with employees related to management of hazardous waste and hazardous material, training, provision of PPE, training, emergency response facilities • Solar tank (1 Worker). Observation Hazardouse waste management, MSDS, Symbols and the others. • WWTP (1 Worker). Field observations related to Ban to entry to WWTP, run off, testing of effluent. • WTP (1 Worker). Observations and interviews related to water management, recording of water use, health checks, PPE and waste management.

- **Security Post (1 security).** Observation and interview with security related personnel understanding over the applicable SOP, the implementation of occupational health and safety, medical examination, trainings from company and worker welfare.
 - **Loading Ramp (2 workers).** Observation and interview with sortation personnel related to personnel understanding over sortation procedure, the implementation of sortation, fruit criteria, fruit separation with ripeness and rawness criteria.
 - **Sterilizer Station (1 worker).** 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.
 - **Clarification Station (1 worker).** 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.
 - **Press Station (1 worker).** 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.
 - **Boiler Station (2 workers).** 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.
 - **Engine Room Station (1 worker).** 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.
 - **Kernel Station (1 worker).** 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.
 - **Weighbridge.** Interview and observation related to procedure, implementation of SCCS and worker welfare.
- GMP Estate.**
- **Clinic (3 Worker).** Observation and interview towards health facilities provided by company, infectious or medical waste management, housing health condition and manpower aspect.
 - **Hazardous waste temporary warehouse (1 Worker).** Field observations related to the fulfillment of the attributes health and safety, recording, and the implementation of compliance requirements hazardous waste temporary warehouse.
 - **Solar tank (1 Worker).** Observation Hazardouse waste management, MSDS, Symbols and the others.
 - **Chemical material & Fuel warehouse.** Field observations related to the fulfillment of health safety as well as interviews with a warehouse clerk of safety health.
 - **Housing of Spraying & Manuring System (1 Worker).** Field observations related storage of PPE and handling hazardous materials and toxic waste.
 - **Material Warehouse (1 Worker)** Field observations and Interview related to condition of the storge, symbols, MSDS, channels and pesticide spill containers, and pesticide stock, and management of hazardous and toxic materials.
 - **Interviews and Simulations with Emergency Response Groups** Observations related to the preparedness of the emergency response team, the ability and understanding of members, the completeness of the fire prevention equipment.
 - **Fertilizer Warehouse (1 Worker).** Observations and interview relating to the implementation of storage hazardous material, Health safety and labor management.
 - **Domestic Waste Landfill, Block 4A.** Observsation on domestic waste management.
 - **Housing Complex Division 2.** Observation the availability of infrastructure such as housing, water and electricity facilities, fire extinguisher, education facilities, religious facilities, health facilities, daycare domestic waste management, childcare and sports facilities.
 - **Day Care (2 workers).** Interview related to worker welfare, complain mechanism, and feasibility of facilities
 - **Block 132 Division 1 (EFB Application – 6 workers).** Field observations on application of empty fruit bunch and interview with the workers related to the procedure, safety and health and also worker welfare.

- **Block 132 Division 1 (Fire Tower).** Observation the conditions of fire tower and management of fire observation systems conducted by the company.
- **Block 130 Division 1 (6 Fertilizer Applicator).** Interviews with the fertilizer applicator related type of fertilizer use according to the procedure, safe working practices and also worker welfare.
- **Block 021 Division 1 (Peat Area).** Observation peat area, water management, water level monitoring, piezometer monitoring and subsidence pole conditions and staff interviews on monitoring techniques.
- **Block 127 Division 1 (Barn Owl Nest Observation).** To check Barn Owl Nest condition and management of integrated pest control systems conducted by the company.
- **Block 127 Division 1 (7 Pesticide Applicator).** Observation on safe working practices and interview with the pesticide applicator related type of pesticides use according to the procedure, safe working practices and also worker welfare.
- **Block 077 Division 2 (3 harvester).** Observation and interview with harvester related fruit ripeness, safe working practices and also worker welfare.
- **Land Application Blok 129 (1 Worker).** Observations and interviews with workers regarding the management of liquid waste.
- **HGU Poles (No. XXV block 54 and No.7 block 54).** Observation the conditions and position of legal boundary.

PHP 1 Estate.

- **Solar tank (1 Worker).** Observation Hazardouse waste management, MSDS, Symbols and the others.
- **Oil Warehouse (1 Worker).** Observation Hazardouse waste management, MSDS, Symbols and the others.
- **Spare part storage (2 Worker).** Observations and interviews related to safe work practices and workers welfare
- **Housing of Spraying & Manuring System (1 Worker).** Field observations related storage of PPE and handling hazardous materials and toxic waste.
- **Chemical material & Fuel warehouse (1 Worker).** Field observations related to the fulfillment of health safety as well as interviews with a warehouse clerk of safety health.
- **Workshop (2 Worker).** Observation and interviews with employees related to management of hazardous waste and hazardous material, training, provision of PPE, training, emergency response facilities
- **Hazardous waste temporary warehouse (1 Worker).** Field observations related to the fulfillment of the attributes health and safety, recording, and the implementation of compliance requirements hazardous waste temporary warehouse.
- **Fertilizer Warehouse (1 Worker).** Observations relating to the implementation of storage hazardous material, Health safety and labor management.
- **Domestic waste landfill.** Observation on domestic waste management.
- **Interviews and Simulations with Emergency Response Groups** Observations related to the preparedness of the emergency response team, the ability and understanding of members, the completeness of the fire prevention equipment.
- **Clinic (2 Worker).** Observation and interview towards health facilities provided by company, infectious or medical waste management, housing health condition and manpower aspect.
- **Housing Complex Phase 1.** Observation the availability of infrastructure such as housing, water and electricity facilities, fire extinguisher, education facilities, religious facilities, health facilities, daycare domestic waste management, childcare and sports facilities.
- **Day Care (1 workers).** Interview related to worker welfare, complain mechanism, and feasibility of facilities.
- **Block 16AB (9 Pesticide Applicator).** Observation on safe working practices and interview with the pesticide applicator related type of pesticides use according to the procedure, safe working practices and also worker welfare.
- **Block 08B (3 harvester).** Observation and interview with harvester related fruit ripeness, safe working practices and also worker welfare.
- **Block 08B (Loading FFB process).** Interview with foreman of FFB about loading FFB prosedure, administration, FFB sortation in platform, safety and health and worker welfare.
- **Block 02D (Barn Owl Nest Observation).** To check Barn Owl Nest condition and management of integrated pest control systems conducted by the company.
- **Block 011A (Peat Area).** Observation peat area, water management, water level monitoring, piezometer

monitoring and subsidence pole conditions and staff interviews on monitoring techniques.

- **Block 01B (6 Fertilizer Applicator).** Interview with the fertilizer applicator related type of fertilizer use according to the procedure, safe working practices and also worker welfare.
- **Block 01B (EFB Application – 3 workers).** Field observations on application of empty fruit bunch and interview with the workers related to the procedure, safety and health and also worker welfare.
- **Block 01B (Immature area – Year Plant 2019).** Observation immature area of year plant 2019 and immature area management carried out by the company.
- **Block 04 (Fire Tower).** Observation the conditions of fire tower and management of fire observation systems conducted by the company.
- **HGU Poles (No. XXVII block 0, No. XXXVIII block 6).** Observation the conditions and position of legal boundary.

PHP 2 Estate

- **Chemical material & Fuel warehouse (1 Worker).** Field observations related to the fulfillment of health safety as well as interviews with a warehouse clerk of safety health.
- **Spare part storage (2 Worker).** Observations and interviews related to safe work practices and workers welfare
- **Fertilizer Warehouse (1 Worker).** Observations relating to the implementation of storage hazardous material, Health safety and labor management.
- **Oil Warehouse (1 Worker).** Observation Hazardouse waste management, MSDS, Symbols and the others.
- **Hazardous waste temporary warehouse (1 Worker).** Field observations related to the fulfillment of the attributes health and safety, recording, and the implementation of compliance requirements hazardous waste temporary warehouse.
- **Workshop (2 Worker).** Observation and interviews with employees related to management of hazardous waste and hazardous material, training, provision of PPE, training, emergency response facilities.
- **Solar tank (1 Worker).** Observation Hazardouse waste management, MSDS, Symbols and the others.
- **Interviews and Simulations with Emergency Response Groups** Observations related to the preparedness of the emergency response team, the ability and understanding of members, the completeness of the fire prevention equipment.
- **Clinic (1 Worker).** Observation and interview towards health facilities provided by company, infectious or medical waste management, housing health condition and manpower aspect.
- **Domestic Waste Landfill Block 8.** Observation on domestic waste management.
- **Block 03B (Manual Weeding - 6 workers).** Observation on safe working practices and interview with the workers related to the procedure, safe working practices and also worker welfare.
- **Block 025 (4 harvester and 2 picker).** Observation and interview with harvester related fruit ripeness, safe working practices and also worker welfare.
- **Block 026 (Peat Area).** Observation peat area, water management, water level monitoring, piezometer monitoring and subsidence pole conditions and staff interviews on monitoring techniques.
- **Block 015 (Fire Tower).** Observation the conditions of fire tower and management of fire oobservation systems conducted by the company.
- **HGU Poles (No. BPN01 block 25, No. BTS02U block 24, No. T02 block 23).** Observation the conditions and position of legal boundary.

Stakeholder consultation with relevant agencies:

- Plantation Agency of West Pasaman District
- Land Office of West Pasaman District
- Manpower Agency of West Pasaman District
- Environmental Agency of West Pasaman District

Local communities surrounding the plantation visited to:

- Head of Cooperation Village Unit of Lingkung Aur II
- Jorong Tanjung Pangkal (Ninik Mamak Kenagarian Lingkung Aur)
- The Head of Kapa Customary Community

	<ul style="list-style-type: none"> The Head of Clan Group (Ninik Mamak Kenagarian Sasak)
2.3	Stakeholder Consultation and Stakeholders Contacted
2.3.1	Summary of stakeholder consultation process.
ASA-1.1	<p>Summary of stakeholder consultation process</p> <p>Consultation of stakeholders for PT GMP – PT PHP was held by:</p> <ul style="list-style-type: none"> Public Notification on website Mutu International (https://mutucertification.com/notification-of-rspo-asa-1-1-gersindo-minang-plantation-pom-pt-gersindo-minang-plantation-a-subsiary-of-wilmar-international-ltd/) on 20 February 2020. Public consultation meeting with government institution in West Pasaman District on 3 March 2020. Public consultation meeting with communities including previous land owner on 4 March 2020. Public consultation meeting with internal stakeholders and contractor on 3 March 2020. Consultation with NGO (Sawit Watch, Walhi, AMAN and WWF) via email on 26 February 2020. <p>Numbers of input from stakeholders were clarified by PT GMP – PT PHP as a part of this report.</p>
2.3.2	Stakeholder contacted
	Please find appendix 1
2.4	Determining Next Assessment
	The next visit (ASA-1.2) will be conducted eight (8) month to twelve (12) month after 21 April 2020.

3.0 ASSESSMENT FINDINGS

3.1 Summary of Assessment Report of the RSPO Certification

MUTUAGUNG LESTARI has conducted an assessment of Gersindo Minang Plantation POM – PT Gersindo Minang Plantation, subsidiary of Wilmar International Limited consisting of one (1) mill and three (3) oil palm estates.

During the assessment, there were zero (0) nonconformities were assigned against Critical Compliance Indicator; two (2) nonconformities were assigned against Non-Critical Compliance Indicators; and six (6) opportunities for improvement were identified. Further explanation of the nonconformities raised against Non-Critical Compliance Indicators are provided in section 3.5 and will be verify at the next assessment.

MUTUAGUNG LESTARI found that Gersindo Minang Plantation POM – PT Gersindo Minang Plantation, subsidiary of Wilmar International Limited 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.	
1.1.1 & 1.1.2	The Company has procedure Information Service Procedures for the Community and has appointed person in charge in the requests for information from stakeholders (PRO-BNM-006-Revision 2). The Company responded to information requests with maximum time of 1 month since mail received, with the types of information provided includes information of HGU, EIA document, SIA Report, OHS Program, HCV Report and Management Plan, etc. Requested information recorded in the book of information request and has been addressed in accordance with the prescribed time limit. Some information related to mandatory reporting has been submitted regularly to the relevant agencies in accordance with the results of interviews with government agencies and the receipts.	
1.1.3	Based on the verification of incoming and outgoing log book at PT GMP and PT PHP, it is known that the management unit has documented incoming and outgoing letters properly. The management unit has also responded to requests for information and requests for assistance from stakeholders properly based on the timeframe established in the existing procedures. Based on interviews with stakeholders such as related institutions (Agriculture Agency, Department of Manpower , Environment Agency and National Land Agency of Pasaman Barat Regency), surrounding villages (<i>Jorong Tanjung Pangkal; The Head Custom of Nagari Kapa, Sasak & Maligi; and the head of village unit cooperative of Lingkung Aur II</i>), local contractors, Workers Union, Gender Committee and employees. From the results of the interviews it is found that the stakeholders can access information from the company in accordance with their respective interests.	
1.1.4	The company also has the Communication, Consultation and Coordination Procedures with Stakeholders (PRO-BNM-008, dated 1 October 2011). This procedure aims to support the company's operations and to meet stakeholder demands. There has also been evidence of documentation of re-dissemination of the procedure, even though it had been socialized several years	

ago. Documentary evidence consists of Minutes of Meeting, Participant Attendance and Photographs of the implementation on 7 February 2020.

1.1.5

The company also has stakeholders list consisting of several government agencies, Non-Governmental Organizations, Village Unit Cooperatives and several suppliers of goods needed for plantation and mill operations.

Status: Comply

1.2

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

1.2.1 & 1.2.2

Company has code of conduct policy version 5 on June 2019 which describe ethical conduct into 3 principles, as follows.

- Avoid conflicts of interest
- Avoid abuse of authority / position
- Ensuring the confidentiality of information and preventing misuse of information obtained through company operational activities, both for personal gain or for purposes other than company interests

Company has a way to ensure that this policy is implemented in all business operation, for example:

- Calculation of harvest output for harvester is based on an information system established by the company (EBCC), so there is no fraud in calculating the output.
- Recruitment of employees based on the mechanism owned by the company and based on the needs of each unit.

The system to monitor the compliance and the implementation of the policy is by monitoring the record of related operational activities to the policy and also follow the related procedure. Besides, based on interview with local contractor and workers in GMP Estate, PHP 1 Estate, PHP 2 Estate, and GMP POM, it is known that they understand about ethical conduct in company. Contractor also follow the condition set by company to keep the ethical conduct in company.

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 list of regulations of 2019 that includes local regulations and national regulation updated annually. List of laws/regulations listed has covers several aspects such as land permit and legality, manpower, occupational health and safety, best management practices and environment. Some examples of regulations compliance that have been done such as plantation business permit:

- IUP-B No. 207/Menhutbun-VII/2000 dated 10 March 2000 for PT Gersindo Minang Plantation with covering area of 3,600 Ha.
- IUP-P No. 412/Y/PERTANIAN/INDUSTRI/2004 dated 13 December 2004 for PT Gersindo Minang Plantation with mill capacity of 60 Ton FFB/hour
- IUP No. 425/T/PERTANIAN/2005 dated 1 June 2005 for PT Permata Hijau Pasaman with covering area of 2,615.25 Ha

The other compliances of regulations are regarding to environment aspects are EIA management and monitoring in routinely, hazardous waste storage license approved by local government and land application permit. Compliances of workers and OHS regulations are provided the minimum wage, company safety & occupational health, transporting and forklift operator etc. Based on interview with stakeholders such as government agencies it is known that the company has comply the related regulations for example: has plantation business permit, land use right, no workers under age of 18, land application permit, hazardous waste storage permit etc.

The company has a licensed Hazardous waste temporary warehouse in accordance with Decree of West Pasaman Regent No. 188.45 / 237 / BUP-PASBAR / 2018 dated 25 April 2018 concerning Extension of Temporary Storage Permit for B3 Waste for the scope of GMP estate units with coordinates S. 00°07'03,6 "and E. 99°43'14, 4" valid for 5 years. The types of B3 waste that are permitted to be stored include used oil, used filters, used batteries, used waste, other Dangerous and Toxic waste

contaminated packaging, medical waste, used TL lamps. The shelf life of B3 waste is in accordance with PP No. 101 of 2014. The company is currently requesting changes to the coordinate point to the Office of the Environment. The company shows a letter requesting the change in the coordinates of the dangerous and toxic waste storage with letter number 004 / GMP / EXT-II / 2020 to the head of the West Pasaman Regency Environmental Services on February 26, 2020. (OFI)

There is OFI regarding training certification of welders in Recertification. Based on verification result in ASA-1.1, it is known that welders at PT GMP and PT PHP already have certificates.

2.1.2

Procedure of legal requirement which presented in document SOP No. PRO-BNM-005 dated 1 October 2011. The procedure explaining personnel who have responsibility to update the regulation and law, identification and inventory, evaluation and monitoring Information of regulation from national, provincial and district regulatory bodies, and renewal of any changes to prevailing laws and regulations and monitoring of expired regulations/licenses. A list of regulatory identifications ranging from Laws, Government Regulations, Presidential Decrees, Ministerial Regulations, Ministerial Decrees, Regional Regulations, and the ratification of the ILO. The Internal audit of regulations compliance are conducted in every six months as example on 27 December 2019. The internal audits have shown the company's compliance of legal requirements according to the list of regulations 2019.

2.1.3

Procedure of legal boundary poles monitoring and maintenance is presented in document No. 001/SOP/GIS/2014. Procedure mentioned that maintenance was carried out in every three months by foreman with supervision of Assistant Manager. Estate management were able to shows location of boundary poles map as well as its coordinate points, which presented in document of boundary poles map with scale 1:40,000. Boundary poles monitoring record period 2019 informed that from totaling 88 poles were identified as 42 poles in PT GMP and 46 poles in PT. PHP were in good condition and satisfactory maintained.

Based on field observation to Poles location in PT. PHP-1 (No. XXVII block 0, No. XXXVIII block 6), PHP-2 (No. BPN01 block 25, No. BTS02U block 24, No. T02 block 23) it could be concluded that estate management has monitor their boundary legal poles, clearly demarcated and visibly maintained. Verification using GPS indicates that the pole coordinate is in accordance with the provisions of the land title and confirmed that there has been no planting beyond the legal demarcated boundary areas of the plantation. Meanwhile, based on field observation to poles location in PT. GMP (No. XXV block 54 and No.7 block 54) it found that poles No. 7 in block 54 is missing. This matter become opportunity for improvement to the company to ensure the monitoring of boundary poles (OFI).

Status: Comply

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

Company has list of contractors for each estate and mill which informing name of contractor, address, and service provided by contractor. Besides the contractor, company also cooperate with FFB supplier from third party. All form of cooperation is based on work agreement which signed by both parties.

The company shows an example of contract with the contractor Dian RP with agreement number 005/SPK/GMP/01/2020 dated January 2, 2020, which has been signed by both parties. The agreement explains the price of work, technical specifications of work, rights and obligations of first and second parties, and others. In the agreement there is a clause that explains the fulfillment of applicable legal obligations, for example:

- The second party is required to register workers in the BPJS employment program in accordance with applicable regulations. Proof: BPJS payment paid through Bank Mandiri on March 5, 2020.
- The contractor does not employ children under the age of 18, forced labor, or trafficking. Evidence: based on the results of the field visit to the long-distance application activities, it is known that there are no workers under the age of 18.

There also available an agreement No. 035/SPK/PHPI/XI/2019 signed on 1 November 2019 between contractor DT. Nasrul and PT PHP I. The agreement explained:

- The contractor is required to register his workforce in the BPJS Employment program
- The contractor cannot employ children under the age of 18, forced labor or trafficking.

- The contractor must comply with and implement all applicable laws and regulations of OHS and the environment.

Company also received FFB from other party and showed the agreement, for example:

FFB sale and purchase agreement No.03/GMP/TBS//2020 dated 1 January 2020 between PT GMP and the FFB supplier on behalf of Netty Yosi. In the agreement, it has been explained that FFB suppliers must obey and comply with the provisions / regulations that apply in the mill. One of the provisions in force in mill includes a prohibition on employing children under the age of 18, forced labor, and human trafficking. Based on interview with contractor, they are aware about the compliance with legal requirements.

Status: Comply

2.3

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

2.3.1

The company received FFB from outside the unit of certification. All FFB supplies from outside the unit of certification are from legal sources. For all directly sourced FFB, the mill has information of geolocation of FFB origins, Proof of the ownership status and license of FFB supplier. As example for KUD Bina Tani Sejahtera with agreement on 17 February 2015 available with information of geolocation coordinate, land use title of farmers, and also has trading license No. 03.17/466/SIUP-K/DPMP2T/KOP/2017.PP-1 dated 24 August 2017. But some information of land title and license of supplier are not documented properly, this matter become opportunity for improvement to the company to tidying up the information of geolocation, land title and license of FFB supplier (OFI).

2.3.2

For FFB received indirectly such as from FFB supplier with agreement No. 02/GMP/TBS//2020 dated 1 January 2020 will verify further for the next 3 years since 15 November 2018.

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

The company can show the Projection Period 2018-2023 PT Gersindo Minang Plantation and PT Permata Hijau Pasaman documents which include projection of mature plants, immature plants, replanting, quality of planting materials, FFB production, CPO production, PK production, OER, KER, Mill Utilization, FFB Price, CPO Price, PK Price, CPO Revenue, PK Revenue, FFB Revenue, Total Revenue, Mature Upkeep, Manuring, Harvesting, Estate Overheads, Depreciation and Amortization, FFB purchase related, FFB purchase outside, total operating profit, gross operating profit, gross operating profit, profit before tax and profit after tax, and others.

3.1.2

PT GMP and PT PHP has a replanting plan until 2023. In 2019, PT GMP has already completed replanting 237.15 Ha in GMP Estate and PT PHP has already completed replanting 355.62 Ha in PHP 1 Estate. The following are outlined PT GMP and PT PHP replanting plans:

Year	GMP Estate (Ha)	PHP 1 Estate (Ha)	PHP 2 Estate (Ha)
2020	567.31	329.63	-
2021	337.35	206.57	284.49
2022	333.29	299.02	323.06
2023	-	-	273.84

The company has periodic reviews conducted monthly. The results of the review contain, among others, the progress of replanting and reporting to the Top Management.

3.1.3

The company's annual report is available in the Management Review document which informs the discussion of the annual performance achievement of monthly plantation production, CPO production, Kernel production and other achievements in both

the plantation and factory units, for example, which was carried out on 15 November 2019 by PT GMP and PT PHP Management. An evaluation of the achievements of the current year has been carried out every year, as a material consideration in the preparation of the next year's budget.

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

Environmental aspects:

The company has implemented commitments to reduce environmental impacts for continuous improvement, including:

- Management and monitoring of liquid waste, management of WWTP ponds, effluent quality testing and report to the Environmental Service Office of West Pasaman Regency.
- Management and monitoring of air quality, road maintenance, air quality testing and reporting to the Office of the Environment
- Groundwater management and monitoring. Test groundwater quality and report it to the West Pasaman District Environmental Agency.

3.2.2

The RSPO metric template for continuous monitoring and improvement has not been established. The company did not carry out remediation and compensation procedures because there was no new land development that the company did after November 2018 so it did not report the RaCP procedure to the RSPO. The company has reported GHG 2019 to the RSPO through the February, 26, 2020 GHG RSPO website.

Status: Comply

3.3

Operating procedures are appropriately documented, consistently implemented and monitored.

3.3.1

PT GMP and PT PHP has document of Agronomic Guideline and SOP for Oil Palm Plantation 2015 that was approved by Group Head of Plantation. This guideline is started from land clearing, plantation maintenance, harvesting, fertilization up to monitoring over harvesting quality through audit mechanism of quantitative agro-management system (QAMS). Moreover, GMP POM has presented processing procedures from sortation, loading ramp, sterilizer, thresher, digester, press, vibrating screen, vacuum dryer, oil transfer pump, depericarper, nut silo, ripple mill, clay bath, kernel silo, boiler, generator, turbin, water treatment plant, preventive maintenance, emergency, laboratorum, POME ponds, land application, to material store in warehouse. This SOP is effective since 1st May 2011.

The entire documents related to operation procedure has been well documented and available in each management unit in bahasa language. The entire procedure both of plantation and mill has been included of safe working instruction, other than those described in the HIRAC document.

Interviews were conducted to harvesters, pesticides applicators, and manuring workers in GMP Estate, PHP 1 Estate, PHP 2 Estate and also operators in GMP POM. Based on the results of interviews can be concluded that the workers understand the duties and responsibilities of their work in accordance with the applicable SOP.

3.3.2 and 3.3.3

The company has conducted annually internal monitoring to ensure implementation of procedures. The monitoring conducted through annually operational internal audit by internal audit department and RSPO internal audit by sustainability department. The records of internal audit on 2019 has been documented. Non compliance record of internal audit has been corrected and verified by management.

Each unit has documented the operations of the estate and mill production such as daily reports, supervisor workbooks, etc. The field visit at the mill shows that the unit has been documenting the daily activities in a daily production report that documented by using computerized systems. There is an internal audit from the company to check and monitoring the performance of contractor related to compliance to company procedure.

Status: Comply

3.4

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

3.4.1

PT GMP has environmental documents which include: Environmental Management Efforts and Environmental Monitoring Efforts (2003); Environmental Management and Monitoring Document (2008); Addendum to Analysis of Environmental Impact, Management Plan and Environmental Monitoring Plan (2014) and issuing Decree of the Regent of Pasaman Barat Number: 188.45 / 1080 / BUP-PASBAR / 2014 dated 8 December 2014 concerning Environmental Permits. PT PHP has environmental documents in the form of Environmental Management Efforts and Environmental Monitoring Efforts (2004) with a scope of 4,710 ha (PHP-I covering 2,770 ha and PHP-II covering 1,400 ha) compiled by PT Batara Citra Mandiri. Approval Letter is available from the Regent of Pasaman No. 008/06 / PLH / 2004 dated 18 February 2004. PT GMP's AMDAL Addendum in 2014 covered an entire area of 6,000 hectares with a Mill capacity of 60 tons of FFB / hour. For environmental documents, PT PHP has covered all areas with an area of 4,710 hectares and plantation activities that have an environmental impact. The Company has also conducted replanting studies with the Environmental Management Efforts and Monitoring Matrix of Replanting Activities, namely:

- Decreased surface water quality due to accumulation or spread of plants that have been chopped near surface water.
- Decreased air quality due to oil palm felling activities.
- Reduction in soil physical and chemical quality.
- Changes in biodiversity (Flora and Fauna)
- Changes in biodiversity (disturbance of aquatic biota)

Environmental documents describe the impacts caused by company operations such as land acquisition, road construction, infrastructure development, processing plant development, land preparation, crop management, oil palm cultivation, development, etc. The AMDAL document also includes plans for management and environmental monitoring of activities that must be carried out by the company.

For verification OFI in Recertification Assessment, PT GMP already has an AMDAL Addendum. PT GMP in 2014 covered all areas with an area of 6,000 hectares with a Mill capacity of 60 tons of TBS / hour. For replanting activities the company already has replanting studies and has carried out management and monitoring of the impact of replanting.

The process of changing the PT PHP environmental permit is still on progres. Based on the District Secretary Letter. Pasaman Barat No. 050/732 / BAPPEDA / XII-2018 Dated December 31, 2018 Regarding notification, it has not been able to follow up on related spatial use recommendations: Enclave HGU, river border, conservation zone, and conflict resolution agreement. Until the ASA-1.1 audit was carried out, requests for changes to the environmental permit had not yet received a recommendation, then the company again sent a clarification letter requesting the use of space recommendations to the Regent of Pasaman Barat through the CQ TKPRD of West Pasaman Regency with a letter number 15 / DM-PHP / EXT / XI / 2019 on November 25, 2019 and was received by the West Pasaman Regency Spatial Planning Coordinating Team. And until the ASA 1.1 audit was conducted the company had not received the recommendation.

Social impact assessment (SIA) of the PT GMP and PT PHP have been conducted by consultant in 2012. This assessment conducted by involving affected parties, such as: workers, business partner and local communities, including customary people and smallholders (such as KSU Mutiara Bosa Sikilang, KUD Kapa, KUD Rantau Pasaman, etc). Methodology used during this assessment is through Primary and Secondary Data collecting. For Primary Data collecting, the assessment using Focus Group Discussion, workshop and participatory mapping by interview with participants. Evidence that SIA assessment has been performed by involving affected parties is contained in annex of SIA document containing a list of attendance, photos of implementation and a list of resource persons.

In addition, the SIA assessment has also been socialized to villagers and stakeholders. Recorded evidence is available:

- Evidence of Socialization Invitation (February 20, 2013).
- Minutes of dissemination of HCV Identification Result, Traditional Activity, Social Impact Program and Procedures / SOPs Related to Company Activity, February 22, 2013 at Jambak Simpang Empat attended by parties from around plantation area.

- List of Attendance
- Photos of the implementation.

3.4.2 & 3.4.3

The company has an environmental management plan set out in the RKL-RPL documents for significant impacts are managed and monitored are as follows:

PT. GMP

The company has an environmental management and monitoring plan for 2019 in accordance with the matrix of the Addendum for environmental impact analysis in 2014 and was carried out in semester 2 of 2019, which includes:

1. Air quality (Estate and Mill + noise)
2. Surface water quality (Estate and Mill + POME)
3. Diversity of flora and fauna
4. Aquatic Biota
5. Community income
6. Community attitudes and perceptions
7. Work accidents (Estate and Mill)
8. Public health and aesthetics.

In addition, the company also has a management and monitoring plan related to the impact of replanting conducted in 2019 and has been implemented and is listed in the RKL-RPL report for semester 2 of 2019. The replanting management and monitoring plan:

- Decreased surface water quality due to accumulation or spread of plants that have been chopped near surface water.
- Decreased air quality due to oil palm felling activities.
- Impairment of soil physical and chemical quality
- Changes in biodiversity (Flora –Fauna)
- Changes in Biodiversity (disturbance of Aquatic Biota).

PT. PHP

The company has a management plan and environmental monitoring in 2019 in accordance with the matrix of the UKL-UPL document of PT. PHP in 2004 and has been implemented, which includes:

1. Socio-economic culture: community attitudes and perceptions of plantations
2. River water quality
3. Quality of drinking water for employees in the base camps of PHP I and PHP II: physical and chemical properties of drinking water
4. Worker health
5. Management of Toxic and Hazardous waste

Based on the results of the document review and interview, it is known that PT. GMP and PT. PHP is monitored regularly every 6 months. The company has also reported the results of the implementation of environmental management and monitoring in semester 2 of 2019 to the West Pasaman Regency Environmental Agency. PT. GMP was reported on January 16, 2020 and for PT. PHP was reported on January 21, 2020.

For Verification Minor NCR in previous assessment, The company shows a management and monitoring plan related to the impact of replanting conducted in 2019. The replanting management and monitoring plan:

- Decreased surface water quality due to accumulation or spread of plants that have been chopped near surface water.
- Decreased air quality due to oil palm felling activities.
- Impairment of soil physical and chemical quality
- Changes in biodiversity (Flora –Fauna).
- Changes in Biodiversity (disturbance of Aquatic Biota).

In this regard, non-conformities with this indicator have been fulfilled.

SIA Study GMP

The company has a social management and monitoring plan for 2019-2021 based on the 2016-2018 SIA Management and evaluation Review of PT GMP and PT PHP that explains the Impact, Objectives, Indicators, Target baseline (2019, 2020 and 2021) Manage Actions, Monitor Measures and The PICs carried out on March 18, 2019 are:

1. Management and Monitoring of SIA regarding Partner Development
2. Management and monitoring of SIA regarding the Environment.
3. Management and monitoring of SIA in Mill
4. Management and monitoring of SIA Clinic
5. Management and Monitoring of SIA regarding Corporate Social Responsibility (CSR)
6. Management and monitoring of SIA Plasma Farmers.

The socialization activities of the implementation of SIA, review and evaluation in 2019 were carried out on 27 February 2020 which was carried out together with stakeholders such as ninik mamak Tanjung Pangka and Aia Gadang, community leaders, Youth Chairperson, Bundo Kanduang, PKK, farmer groups, KUD Lingkung Aur II, KUD Mutiara Bosa, KSU Bina Tani Sejahtera (attendance list attached).

SIA Study PHP

The company has a social management and monitoring plan for 2019-2021 based on the 2016-2018 SIA Management and evaluation Review of PT GMP and PT PHP that explains the Impact, Objectives, Indicators, Target baseline (2019, 2020 and 2021) Manage Actions, Monitor Measures and The PICs carried out on March 19, 2019 are:

1. Management and Monitoring of SIA regarding Partner Development.
2. Management and monitoring of SIA Estate
3. Management and monitoring of SIA regarding employment
4. Management and monitoring of SIA OHS & Environmental
5. Management and Monitoring of SIA regarding Health
6. Management and monitoring of SIA Plasma Farmers.

The socialization and evaluation of the management and monitoring of social impacts in 2019 was carried out on February 13, 2020 which was carried out together with stakeholders such as representatives from ninik mamak, youth leaders, farmer groups, jorong heads and representatives of nagari guardians (attendance list attached).

Status: Comply

3.5

A system for managing human resources is in place.

3.5.1, 3.5.2

Company shows the recruitment mechanism in the Recruitment Procedure number PRO-HRD-001 on 2 September 2019, promotion mechanism in Performance Appraisal Procedure no. PRO-HRD-003 on 2 September 2019. General provisions for recruitment include not differentiating between race, caste, nationality, religion, disability, sex, not accepting prospective workers under the age of 18, and other provisions. Provisions related to termination of employment are written in the CLA. As for promotion, Employee performance appraisals are carried out 4 times a year, and for employees with class 2A and below, the appraisal is carried out according to company needs. Based on interview with worker in estate and mill, they are understand the mechanism of recruitment and worker status. Worker status in PT GMP - PHP is permanent worker.

Company shows the example of recruitment document for the latest recruitment that documented and kept in each unit office, such as:

- Application letter for harvester on May 2019 with initials UA.
- Probation period agreement between PT GMP with APP for 3 months No. 11/TK-BHT/VII/2019 on 8 July 2019
- Health certificate from the doctor of polyclinic PT PHP on 8 July 2019
- Result of performance appraisal
- Appointment letter to permanent worker No. 53/SK-PGA/Int-X/2019 on 29 October 2019

Status: Comply

3.6

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

3.6.1

The company has a policy of occupational safety and health were written in Bahasa. The policy has been legalized and updated on 22 May 2015 by Country Head. This policy is designed to control hazards in every activity that is in the working environment to prevent accidents and occupational diseases. Management have work program of occupational health safety every year. Realization of the program of work will be monitored through regular meetings Guiding Committee of Occupational Safety & Health every month. This work program applies generally to all workers in the workplace. If the plans have been made yet on target then will be evaluated in the management review to assess effectiveness.

The company shown the document of hazard identification, risk assessment and risk control which issued on January 2020. It will be reviewed if any occupational accident happen. The document describes the description/activity, potential hazards, risk assessment and risk control. Based on site observation at workshop in GMP POM and agrochemical warehouse in GMP Estate, PHP 1 Estate and PHP 2 Estate, it was clearly confirmed that workers had been aware related potential risk and hazards in the work place. Following up on this, the company has been reduce the potential risk by routine socialization about OHS, providing PPE, and OHS signboard are available in workplace.

Interviews were conducted to estate workers (harvester and pesticides applicator) and mill workers (boiler operator, engine room operator, kernel operator, etc.). Based on the results of interviews can be concluded that workers understand the OHS policy and it's recognized that every morning meeting is always affirmed about the importance of safety and the use of PPE in work.

3.6.2

The company can show the OHS program or plan that has been made in the 2019 period and for the 2020 period. For the 2019 period, the company has shown evidence that it has realized the program, for example the monitoring of fire extinguishers and the first aid kit conducted every month, conducting a fire control socialization once a year and the socialization of OHS every month. The OHS Program in 2020 is currently in progress as planned.

The effectiveness and evaluation of the realized programs is carried out through Committee of Occupational Safety and Health (P2K3) meetings which are held monthly. Based on information from the P2K3 secretary of the PT GMP and PT PHP, it is explained that if there is a program that is not achieved according to the target set, then it will be evaluated in routine monthly meetings to set a new program in the following year.

Status: Comply

3.7

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

3.7.1, 3.7.2, 3.7.3

Company has training program for workers for period of 2019 for operational training, including training for worker exposed to high noise level in mill. The aspect in the training program are such as environment, labor best management practice aspect, and others. Training for contractor is including in training program for worker and adjusted with the work of contractor. Some of training program, namely:

- Awareness of RSPO, ISPO, OHS, and ISCC on November 2020
- Training of work procedure in each station in mill on November 2020
- Training of hazardous material management in mill in July 2020
- Harvesting technique and OHS in PHP 1 on June 2020
- Firefighting simulation in PHP 2 on August 2020

Based on interview with worker in estate and mill, they have received some training related to their work, such as work procedure training, emergency response, and first aid training. The training has been documented into minutes of meeting, list of attendees, and photo activity. PT GMP PHP also has conducted training regarding awareness of RSPO P & C to the workers. Some of the example of training are:

- Socialization of ISCC, RSPO, and ISPO for contractor worker and FFB supplier on 11 November 2019
- First aid training on 20 November 2019 attended by first aider in PHP 1
- Training of OHS and manuring technique on 20 June 2019 attended by 17 worker in PHP II
- Training of pesticide management to storage operator on 6 November 2019
- LOTO training on January 2019
- Refresh training of RSPO, SCCS, and ISCC on 4 November 2019 attended by 12 participants, including weight bridge operator, management representative of SCCS, and security.

Status: Comply

3.8
Supply Chain Requirements for Mills
3.8.1 & 3.8.2

The mill is applied supply chain model Mass Balance due to it still received FFB from uncertified sources. FFB's supplied to GMP POM are:

- PT. GMP (RSPO certified)
- PT. PHP-1 (RSPO certified)
- PT. PHP-2 (RSPO certified)
- Smallholders (RSPO uncertified)
- Third parties FFB Suppliers (RSPO uncertified)

3.8.3

Estimate product certified CPO and PK for period 21 Juli 2020 – 20 April 2021 describe at ASA-1.1 report (basic info 1.8.3). Actual tonnage product certified for last year:

Products	Estimate	Actual (*March 2019 – February 2020)
FFB Certified	99,004	57,219.28
CSP0	18,316	10,621.00
CSPK	4,950	2,652.53

*There is no overproduction of estimated volume on license period.

3.8.4

All transactions have been registered in RSPO IT platform for periods 12 months including a removing stock of certified product sold under other scheme (ISCC) and there are no volumes sold as conventional, or in case of underproduction, loss or damage, as example:

- Certified CPO sold to PT. Wilmar Nabati Indonesia - Padang dated 31 January 2020 for 861.13 ton
- Certified Palm Kernel sold to PT. Usaha Inti Padang dated 31 January 2020 for 199.22 ton
- Removing stock dated 4 March 2020 for 1,096.21 ton

3.8.5

GMP POM has the documents of SCCS procedures for Mass Balance models No. SOP – MILL- O23 Rev 4 dated 2 January 2018. The procedures established and covering all elements of the supply chain model requirements, records and reports of compliance with supply chain requirements including the definition, the FFB reception process, weighing, checking quality, processing, monitoring refined products, mass balance calculations and delivery of the product. The responsibilities of each key personnel describe in procedure of traceability for CPO and PK No. SOP – MILL- O11 Rev3 dated 01 January 2018. The key personnel which are security, weighbridge operators, logistics, head of administrator and mill manager. Those procedures are according to RSPO SCCS 21 November 2014, revised 14 June 2017 and criteria of 3.8 RSPO P n C 2018.

Based on interviews in Gersindo Mill note that the weighbridge operators understands the separation between FFB certified and non certified. It also known that training and refreshment (awareness) of supply chain management system were carried out annually.

3.8.6

The Procedure to conduct annual internal audit are describe in SOP No. PRO-GEN-003 rev 01 dated 01 March 2018 covering all audit for sustainable palm oil including SCCS. In the SOP mentioned that internal audit is done annually. Internal audit of SCCS conforms to the requirements in the RSPO SCCS and the RSPO market communications and claims documents and effectively implements and maintains the standard requirements. The last internal audit is conduct at 5 November 2019.

3.8.7

The site has verified and documented the volumes of certified and non-certified FFBs received. Certified and non-certified FFB received period of 12 months before audit which is March 2019 – February 2020:

Month	FFB (ton)		
	RSPO Certified	Non Certified	Total
March 2019	5,232.03	16,041.74	21,273.77
April 2019	4,261.21	15,928.57	20,189.78
May 2019	4,601.28	19,990.10	24,591.38
June 2019	4,489.52	14,727.95	19,217.47
July 2019	5,755.47	17,401.90	23,157.37
August 2019	5,839.22	11,747.57	17,586.79
September 2019	4,091.53	3,260.44	7,351.97
October 2019	4,245.50	3,804.59	8,050.09
November 2019	4,241.66	6,433.94	10,675.60
December 2019	3,880.20	7,297.20	11,177.40
January 2020	4,736.75	8,322.19	13,058.94
February 2020	5,844.91	9,628.40	15,473.31
Total	57,219.28	134,584.58	191,803.86

The Mill has no purchased CSPO or CSPK. However, The SOP of handling non-conforming oil palm products of FFB received describe in SOP of Palm oil Purchase (No. 001/ TBS-SOP/VIII/2015 dated August 10, 2015) which describe the accepted FFB criteria including FFB weight > 3 Kg, ripe fruit according to company standard (10% of lost fruit from external surface), the lost fruit shall be clean, the stalk of FFB shall not exceed 3 cm.

3.8.8

The site has product information provided in such as document of weighbridge ticket, delivery order and other invoices as example at invoices of CPO certified delivery on 31 January 2020 for total delivery of 861.34 ton and CSPK certified delivery on 31 January 2020 for total delivery of 199.22 ton. The information provided on invoices are:

- The name and address of the buyer;
- The name and address of the seller;
- The loading or shipment / delivery date;
- A description of the product RSPO certified Mass Balance model
- The date on which the documents were issued;
- The quantity of the products delivered;
- Any related transport documentation;
- etc.

3.8.9, 3.8.10 & 3.8.11

Gersindo Mill are not outsourced activities to independent third parties. CPO and PK transporter are under contract with buyer.

3.8.12

The site has maintained accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO Supply Chain Certification Standard requirements. The retention times for all records and reports are keep in minimum 2 years According to the procedure of Making, Controlling and Changing Documents (No. SOP/GMP-DC/001/0118 dated on January 2018). The mill has RSPO certified since April 2014 and based on documents verification it's concluded that the record of supply chain is available since the mill was certified.

FFBs, CSPO and CSPK produced and/or claimed records are kept in minimum 12 months. Record of all certified palm oil / palm kernel oil volumes purchased (input) and claimed (output) for period of 12 months before audit (March 2019 – February 2020):

Period	CPO production (MT)			CSPO Dispatch (MT)			
	Cert	Non Cert	Total	RSPO	Other scheme (ISCC)	Non Cert	Total
Mar 2019	935.72	2,847.60	3,783.32	-	875.00	-	875.00
Apr 2019	727.18	2,701.01	3,428.19	643.90	149.38	-	793.28

May 2019	779.21	3,351.55	4,130.76	682.80	-	-	682.80
Jun 2019	789.73	2,618.19	3,407.92	548.30	-	-	548.30
Jul 2019	1,011.70	3,059.90	4,071.60	1,263.71	-	-	1,263.71
Aug 2019	1,082.14	2,141.94	3,224.08	1,134.76	-	-	1,134.76
Sep 2019	837.01	669.96	1,506.97	842.96	-	-	842.96
Oct 2019	853.82	764.05	1,617.87	825.90	-	-	825.90
Nov 2019	826.53	1,256.59	2,083.12	757.67	-	-	757.67
Dec 2019	748.51	1,396.39	2,144.90	791.72	-	-	791.72
Jan 2020	920.32	1,596.19	2,516.51	765.27	-	-	765.27
Feb 2020	1,109.14	1,817.21	2,926.34	43.84	1,226.82	-	1,270.66
Total	10,621.00	24,220.57	34,841.57	8,300.82	2,251.20	-	10,552.03

Period	PK production (MT)		Total	CSPK Dispatch (MT)			Total
	Cert	Non Cert		RSPO	Other scheme	Non Cert	
Mar 2019	240.92	741.08	982.00	218.02	-	-	218.02
Apr 2019	201.50	752.61	954.10	225.70	-	-	225.70
May 2019	220.27	966.48	1,186.75	216.28	-	-	216.28
Jun 2019	213.67	692.77	906.45	230.80	-	-	230.80
Jul 2019	278.12	848.20	1,126.32	231.19	-	-	231.19
Aug 2019	283.31	565.29	848.61	291.03	-	-	291.03
Sep 2019	177.80	150.86	328.66	213.09	-	-	213.09
Oct 2019	191.33	170.98	362.31	173.74	-	-	173.74
Nov 2019	189.54	275.06	464.60	190.15	-	-	190.15
Dec 2019	172.55	334.03	506.58	150.00	-	-	150.00
Jan 2020	210.18	367.98	578.16	236.05	-	-	236.05
Feb 2020	273.32	446.29	719.61	275.91	-	-	275.91
Total	2,652.53	6,311.64	8,964.17	2,651.96	-	-	2,651.96

3.8.13 & 3.8.14
The site doesn't apply a conversion rate.

3.8.15
The site is applied supply chain model Mass Balance due to it still received FFB from uncertified sources. The mill has procedure No. SOP-MIL-023 rev.4 to ensure the verification and documentation of certified and noncertified FFB, CPO, PK volume with Mass Balance scheme. Logistic and Mill Manager are responsible to monitor stock balance and the dispatch of CPO/PK.

In the FFB Admissions procedure (PRO - mill 001) Rev. 3 dated February 16, 2016) At 5.1 points explained that the weighbridge clerk ensures the validity of the certificate matches to the FFB recipient supplier list of PT Gersindo. The source of FFB certified are from PT. GMP, PT. PHP unit 1 and PT PHP Unit 2, meanwhile for FFB sourced from block 22 at PHP unit 2 is classified as uncertified product.

3.8.16 & 3.8.17
RSPO IT Platform member registration number for GMP POM is RSPO_ PO1000002133. All transactions have been registered in RSPO IT platform for periods Period of 12 months including a removing stock of certified product sold under other scheme (ISCC) and there are no volumes sold as conventional, or in case of underproduction, loss or damage, as example:

- Certified CPO sold to PT. Wilmar Nabati Indonesia - Padang dated 31 January 2020 for 861.13 ton
- Certified Palm Kernel sold to PT. Usaha Inti Padang dated 31 January 2020 for 199.22 ton
- Removing stock dated 4 March 2020 for 1,096.21 ton

Based on announcement and transaction report documents review, it concluded that all RSPO certified products submitted are in compliance with the RSPO Rules on Market Communications and Claims.

Status: Comply

PRINCIPLE #4 RESPECT COMMUNITY AND HUMAN RIGHTS AND DELIVER BENEFITS		
4.1		
The unit of certification respects human rights, which includes respecting the rights of Human Rights Defenders.		
4.1.1		
PT Gersindo Minang Plantation and PT Permata Hijau Pasaman under holding company of Wilmar International Limited group, have a Policy on Respect for Human Rights, which states that Wilmar seeks to respect and protect human rights so as to create security for everyone from all forms of harassment and violence, the creation of a safe, clean and healthy work environment and environment. Other Wilmar policies that support human rights values and commitments include: Child Protection, Occupational Health and Safety, Opportunities & Equality, Reporting on Human Rights Violations (Whistle Blowing), and Sexual Harassment, Violence and Abuse, Rights Reproductive (Last revision 2018).		
4.1.2		
Based on document verification, consultations with several related Offices in West Pasaman District (including the Department of Manpower), the results of interviews with several workers in the mill and plantation area, as well as consultations with several community leaders and residents of Jorong (Tanjung Pangkal, Sasak and Maligi) there was no indicated the use of force and mercenaries and paramilitaries in the plantation and mill operations.		
	Status: Comply	
4.2		
There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties.		
4.2.1 & 4.2.2		
The company has a Procedure for Receiving Complaints and Dispute Resolution (PRO-BNM-007-Revision 2, valid from 09 February 2017). In the procedure it is explained in point 6.2 that if requested the company guarantees the confidentiality of the whistleblower's identity and whistleblower by looking at the sensitivity level of the problem, the scale of the impact if the issue is published or the risk of retaliation. Furthermore, point 6.11 also explains that if joint resolution cannot be reached, complaints can be submitted through the RSPO Complaint System.		
There has also been showed the documentation of <i>re-dissemination</i> of the procedure, even though it had been socialized several years ago. Documentary evidence consists of: Minutes of Meeting, Participant Attendance and Photographs of the implementation on 7 February 2020.		
4.2.3 & 4.2.4		
PT Gersindo Minang Plantation and PT Permata Hijau Pasaman under holding company of Wilmar International Limited group, have a Procedure for Procedure for Receiving Complaints and Dispute Resolution (PRO-BNM-007-Revision 2, valid from 09 February 2017) and also Land Dispute Resolution Procedure (PRO -BNM-013-Revision 2, 27 January 2017).		
Based on the results of interviews with the Head of Head of Customary Community Kapar (H. Alman Gampo Ali) was informed that the resolution related to the land conflict between PT PHP I and the Cooperative Village Unit (KUD) Kapar Plasma Farmer Group and the KUD Maligi had met the agreement point on 20 February 2020 which had an agreement was reached that the operations of PT PHP's plantations would continue and were supported by the local community by consistently carrying out a plan to compensate farmers (<i>indigenous peoples</i>). Based on the results of interviews with the Traditional Head of Kapar and Maligi (Pucuk Adat), was informed that the agreement had been obtained after the two parties agreed to appoint the Impartial Mediator Network (IMN) as an agent in resolving the dispute. The Agreement document has been signed by both parties and is still awaiting signing by the Head of West Pasaman District.		
Based on verification of PT GMP & PT PHP Complaints Book documents, consultations with several related Offices in West Pasaman District (Department of Manpower, Office of Environment, Office of Plantation and Land Office), results of interviews with several workers in mill and estate areas, and consultations with several community leaders and residents of Jorong (Tanjung Pangkal, Sasak and Maligi) did not indicate complaints from parties during 2019 regarding the operations of PT GMP and PT PHP's plantations and factories.		
	Status: Comply	
4.3		

The unit of certification contributes to local sustainable development as agreed by local communities.
4.3.1

There have been shown the PT GMP and PHP 2020 CSR Program Plans. The types of activities include:

- Education assistance and facilities to workers
- Cultural & Religious Studies / Consultation
- Contribution & Aid to the Communities
- Nationality Ceremony
- Disaster Aid
- Others

Based on the documentary evidence it is known that the management of PT GMP and PHP have prepare and compile the program based on input/requests from the surrounding community (*proposai*). Some of these programs include:

- Request for Assistance from the Padang Paku Gajah Community on 17 March 2019 for Street Lighting. The request was responded to on 20 March 2019 by providing assistance with 6 sets of street lights and their installation (proof of documentation disposition and installation has been shown).
- Request for Tilapia and Feed Fish Seed Assistance from the Saiyo Jorong Batang Umpai Nagari Aia Gadang Group, Pasaman District, West Pasaman Regency, on August 27, 2019. The request for assistance was realized on 10 September 2019.
- Request for Assistance from Ninik Mamak Tanjung Pangkal on 10 December 2019 regarding heavy equipment for bridge construction. The request for assistance has been responded to on 13 December 2019 by providing heavy equipment assistance (documentary evidence has been provided in the form of photographs).

Based on the results of consultations with several Head of Clan group (Ninik Mamak) and Customary Leaders around the plantation areas of PT GMP and PT PHP, consist of Ninik Mamak-Tanjung Pangkal, Ninik Mamak Nagari Sasak, Ninik Mamak Kenagarian Kapar and also Head of Cooperative Village Unit (KUD Lingkung AUR II, they were informed that the plantation and mill operation was positive impact to community surround. The community has earn several aid by the company, for instance: aid for road maintenance, aid for Eid Mubarak and Eid Adha. The company has also carried out the development of *smallholders* program (*plasma*).

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

The Company has HGU for 5,861.40 Ha scope of certification as follow: HGU Certificate No. 1 Year 1997 for 3,600 Ha (GMP Estate), HGU Certificate No. 54 and 55 Year 2014 for 1,247 Ha (PHP-1 Estate) and HGU Certificate No. 18 Year 2005 for area 1,014.40 Ha (PHP 2 Estate). Based on information from external stakeholder and review on hectare statement of 2020 it could be concluded that there is no expansion and new planting areas. Currently, certification holder has managed area totaling for about 5,881.40 Ha, which consist of 5,861.40 Ha under HGU and 20 Ha as HGU-on process. However, scope of certification is stick on HGU area (5,861.40 Ha).

4.4.2, 4.4.3, 4.4.4, 4.4.5 & 4.4.6

PT. GMP and PT PHP are long-established plantations company since 1991. In related to the maps of an appropriate scale that showing legal, customary or user right through participatory mapping and copies of negotiated agreements detailing process of FPIC is not applicable. This is due to no longer records dating back to the time of the decision making.

The Certificate Holder has developed a mechanism of Implementation of Free Prior Informed Consent as document Process of land compensation has been appropriate with its procedure "*SOP Pembebasan Lahan (SOP-IJIN LAHAN&OPS-006)*, dated 15 October 2008". that describes the mechanism of settlement of border land disputes, land occupation disputes, social issues. In such mechanisms it has explained the procedures and methods of FPIC.

The concession of PT GMP and PT PHP are overlaps with the customary lands of the indigenous communities as follows *Hak Tanah Ulayat Nagari* Lingkuang Aur (PT GMP) , *Hak Tanah Ulayat Nagari* Sasak and Nagari Kapar PT (PHP 1) and, *Hak Tanah Ulayat Nagari* Sungai Aur (PT PHP 2), the neighboring *Nagari* communities in the district of Pasaman Barat but in different sub-districts . The former lies in the subdistrict of Luhak Nan Dua and the latter lies in the sub-district of Sasak Ranah Pesisir

The *Ninik Mamak* (Customary leader), with the full knowledge of the heads of all the villages in Nagari Kapa, handed over customary lands to the Regent of Pasaman, who further granted these areas to the oil palm investor. The handover was recorded in a land handover letter signed by the *Ninik Mamak* with full knowledge of the village heads, as follows:

- GMP Estate (PT. GMP): Agreement letter for releasing of Customary Right “Hak Tanah Ulayat Nagari Lingkuang Aur” dated 5 November 1991.
- PHP-1 Estate (PT. PHP): Record of Agreement letter for releasing of Customary Right “Hak Tanah Ulayat Nagari Sasak and Nagari Kapar” dated 6 February 1997.
- PHP-2 Estate (PT. PHP): Record of Agreement letter for releasing of Customary Right “Hak Tanah Ulayat Nagari Sungai Aur” dated 16 July 1992

Status: Comply

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.

4.5.1, 4.5.2, 4.5.3, 4.5.4, 4.5.5, 4.5.6, 4.5.7 & 4.5.8

Until ASA 1.1, there has been no new planting in the area of PT GMP and PT PHP. There are only replanting activities on the area that previously had the land use right (HGU certificate).

Status: Comply

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.

4.6.1

The PT GMP and PT PHP have procedures to identify legality and compensation as a guidance for Land Acquisition (No. SOP 29 /BM / (0) 0409, valid since 13 April 2009. Interviews with several landowners (previous land owners) and historical land acquisition actors in the previous of operation PT GMP and PT PHP plantations has been done by Auditor. Based on the results of the interview was known that the process of land giving of the *Customary Land (Tanah Ulayat)* in the past had been carried out by the customary leaders and Ninik Mamak to the West Pasaman District Government to be granted Cultivation Rights to company of palm oil plantation. There was no forced hand over of customary land (*tanah ulayat*).

4.6.2

Evaluation of existing procedures has been carried out based on the development of the situation that occurred. For example, in the case of land conflict between PT PHP I and the Cooperative Village Unit (KUD) Kapar Plasma Farmer Group and the KUD Maligi had met the agreement point on 20 February 2020. Based on interviews with the Kapar and Maligi Customary Leaders, was informed that the agreement had been obtained after both parties agreed to appoint the Impartial Mediator Network (IMN)) as an agent or mediator in resolving the land dispute . The Agreement document has been signed by both parties and is still awaiting signing by the Head of West Pasaman District.

4.6.3

Based on interviews with several landowners (*previous land owners*) of land acquisition in the previous period of the PT GMP and PT PHP operation, was informed that the handover of the Customary Land (*Tanah Ulayat*) in the past had been carried out by customary leaders and Ninik Mamak to the Pasaman District Government West to be granted Cultivation Rights to the company of palm oil plantation. There has been considered to be in accordance with local customary norms and there is no forced hand over. The process of land hand over to the Regional Government has been carried out in accordance with customary rights in Minangkabau.

4.6.4

There have been shown the examples of documentation of previous land compensation process These documents are archived by the Unit’s legal staff of Head Office, which can be accessed based on the Information Services Procedure for the Community (PRO-BNM-006-Revision 2).

Based on the results of stakeholder consultations with the West Pasaman District Land Office and several of traditional leaders, among others: Ninik Mamak-Tanjung Pangkal, Ninik Mamak Nagari Sasak, Ninik Mamak Kenagarian Kapar, was informed that

the acquisition of Customary Land (*Tanah Ulayat*) had been carried out by the customary leaders and the Ninik Mamak (*Head of clan group*) to the West Pasaman District Government to be granted Cultivation Rights to the company of oil plantation has been deemed to be operating according to local customary norms and there is no forced handover.

Status: Comply

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.

4.7.1 & 4.7.2

The PT GMP and PT PHP have procedures to identify legality and compensation as a guidance for Land Acquisition (No. SOP 29 /BM / (O) 0409, valid since 13 April 2009. Interviews with several landowners (previous land owners) and historical land acquisition actors in the previous of operation PT GMP and PT PHP plantations has been done by Auditor. Based on the results of the interview was known that the process of land giving of the *Customary Land (Tanah Ulayat)* in the past had been carried out by the customary leaders and Ninik Mamak to the West Pasaman District Government to be granted Cultivation Rights to company of palm oil plantation. There was no forced hand over of customary land (*tanah ulayat*).

4.7.3

Based on the results of consultations with several of Head of Clan group (Ninik Mamak) and Customary Leaders around the plantation areas of PT GMP and PT PHP, for example from Ninik Mamak-Tanjung Pangkal, Ninik Mamak Nagari Sasak, Ninik Mamak Kenagarian Kapar, they were informed that several community member has worked in the plantation and mill unit. The company has also carried out the development of smallholders program (plasma). There was any Cooperation Agreement between the company and the parties for the implementation of the smallholders program. There was shown the agreement between the company and the related parties, for examples:

- Collaborative Agreement Between West Sumatra Regional Development Bank and Cooperative Village Unit (KUD Lingkung AUR II, Pasaman Regency and PT Gersindo Minang Plantation (Number: 158 / DIR / UM / 1094, 32 / P / KUD / LA-II / 94 & 33 / GMP / SW / X-94, 14 October 1994.
- Cooperation Agreement between Permata Hijau Pasaman and the Permata Sawit Maligi Cooperative Village Unit (KUD) in the Development, Management and Marketing of Palm Oil Plantation Products.
- Cooperation Agreement between Permata Hijau Pasaman and Mutiara Bosa Sikilang Cooperation (KSU MBS) in Development and Management of Palm Oil Plantation.

Status: Comply

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.

4.8.1 & 4.8.2

Based on the results of interviews with the Head of Customary Community Kapar (H. Alman Gampo Ali) was informed that the resolution related to the land conflict between PT PHP I and the Cooperative Village Unit (KUD) Kapar Plasma Farmer Group and the KUD Maligi had met the agreement point on 20 February 2020 which had an agreement was reached that the operations of PT PHP's plantations would continue and were supported by the local adat community by consistently carrying out a plan to compensate farmers (*indigenous peoples*). Based on the results of interviews with the Traditional Head of Kapar and Maligi (Pucuk Adat), was informed that the agreement had been obtained after the two parties agreed to appoint the Impartial Mediator Network (IMN) as an agent in resolving the dispute. The Agreement document has been signed by both parties and is still awaiting signing by the Head of West Pasaman District.

4.8.3 & 4.8.4

Based on interviews with several landowners (*previous land owners*) of land acquisition in the previous period of the PT GMP and PT PHP operation, was informed that the hand over of the Customary Land (*Tanah Ulayat*) in the past had been carried out by customary leaders and Ninik Mamak to the Pasaman District Government West to be granted Cultivation Rights to the company of palm oil plantation. There has been considered to be in accordance with local customary norms and there is no forced hand over. The process of land hand over to the Regional Government has been carried out in accordance with customary rights in Minangkabau and there was no forced process.

Based on the field visit observation in plantation area PT Gersindo Minang Plantation was claimed by the community, related to this case the company has shown several documents on the completion process, consist of: Official Report, Decree of Head

of West Pasaman District and the decision of the West Pasaman District Court which stated that the case had been decided in 2010 which won the PT GMP. Settlement related to the case of land issues between PHP I Estate with the KUD Kapar Smallholders Group and PHP II Estate with the Maligi Cooperation Village Unit (KUD), has an agreement point on 20 February 2020 where an agreement was reached that PT PHP's plantation operations would continue and were supported by local customary communities by consistently carrying out plans to provide compensation to smallholder group. The Agreement document has been signed by both parties and is still awaiting signing by the West Pasaman District. The compensation process is in progress and become opportunity for improvement (OFI).

Status: Comply

PRINCIPLE #5 SUPPORT SMALLHOLDER INCLUSION

5.1

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

5.1.1; 5.1.2; 5.1.3

Based on the results of the document review, it is known that the price of FFB in the company follows the price determination set by the West Sumatra Provincial Plantation Office involving stakeholders such as companies, Apkasindo, Gapki and farmers. FFB prices set by the plantation service are publicly available and accessible to farmers. In addition, the price set by Disbun is provided by companies in Mill.

The company already has FFB price documents in accordance with the price determination by the Plantation Office for the period December 2019, January 2020 and February 2020. For example, the following FFB prices for the January 2020 period:

Plant Age	The price of FFB
3 years	Rp 1,456.65
4 years	Rp 1,651.00
5 years	Rp 1,748.62
6 years	Rp 1,768.13
7 years	Rp 1,780.83
8 years	Rp 1,931.99
9 years	Rp 1,957.82
10 s.d 20 years	Rp 1,960.31
21 years	Rp 1,898.28
22 years	Rp 1,891.61
23 years	Rp 1,866.07
24 years	Rp 1,770.72

The company also conducts joint grading with plasma farmers so that plasma farmers understand the quality standard of FFB criteria that can be accepted by the company.

5.1.4 & 5.1.5

Plasma farmers who have partnered with companies have formed cooperatives, namely Village Unit Cooperatives (KUD) and Multipurpose Cooperatives (KSU). The company has a cooperation agreement with partnering farmers, while farmers cooperating with the company are KUD Lingkur Aur II, KSU Bina Tani Sejahtera, KUD Permata Sawit Maligi, KUD Rantau Pasaman, KUD KAPAR and KSU Mutiara Bosa Sekilang. This cooperation agreement is in the framework of the development and management of oil palm plantations with a partnership pattern. This agreement is made fairly, in accordance with applicable law and is transparent. There is an agreement period in the contract that has been agreed by each party.

For example, company can show a cooperation agreement between PT. GMP with KUD Lingkur Aur II with agreement number 33 / GMP / SW / X-94 on October 14, 1994 with a validity period if all loans have been paid in full. This agreement has been agreed by each party and is known by the Regent of Pasaman Regency. Then the letter of cooperation agreement between PT. PHP with KUD Rantau Pasaman with agreement number 919 / PHP-DIR / PK-III / 97 on March 15, 1997 with a validity period if all loans have been paid in full and / or the cycle of planting of oil palm plantations has expired, which is approximately 25 years . This agreement has been agreed by each party and is known by the Regent of Pasaman Regency.

5.1.6

Payment of the FFB farmers' plasma FFB yields has been paid by the company in accordance with the price set by the Plantation Office through transfers. The company shows proof of payment of FFB to smallholders through transfers that are made twice a month. For example, the Company shows proof of payment in the form of an invoice for the payment of FFB to KSU Bina Tani Sejahtera farmers, paid through a transfer on December 16, 2019 with a nominal value of Rp. 67,019,113, and proof of payment in the form of an invoice for payment of FFB yields to farmers of Rantau Pasaman KUD, which was paid by transfer on December 16, 2019 with a nominal value of Rp. 66,851,565.

5.1.7

The company has calibrated the electronic bridge scales with serial number SN 123150474 with a capacity of 50,000 Kg and the electronic scales with serial number SN 110350115 with a capacity of 50,000 Kg. This is evidenced by a certificate of test results with number 510.3 / 0535 / UPTD-ML / SKHP / VIII / 2019 (for SN 123150474 with a capacity of 50,000 kg) and number 510.3 / 0534 / UPTD-ML / SKHP / VIII / 2019 (SN 110350115 with a capacity of 50,000 kg). The examination was carried out on August 20, 2019 with the results of the examination fulfilling the 2019 requirements being passed according to Indonesian Republic Law No. 2 of 1981 concerning legal metrology with a validity period until August 20, 2020. This certificate of inspection results has been approved by the trading office of the Padang City Legal Metrology on August 21, 2019.

5.1.8

The company has provided training to farmers such as:

- Assistance and coaching of plasma cooperatives to be honest and transparent
- Increased plasma productivity.
- Increased income of smallholders.
- Information dissemination, guidance and training on the quality of FFB harvested and sent to Mill.
- Joint Grading at Mill.

This activity is carried out so that the farmers can follow the FFB standards set by the company and improve organizational skills so that they can increase the income of the farmers and the company has consulted with plasma cooperatives to be able to follow RSPO certification. Based on the results of the Consultation with Plasma Farmers (Lingkung Aur II), it is known that plasma farmers are willing to participate in the RSPO certification, only for the readiness of plasma management and funding to take RSPO certification. At present the cooperation agreement between the company and Plasma farmers does not cover RSPO certification for Plasma Farmers because the work agreement that was mutually agreed upon was made in 1994.

5.1.9

The company has a Procedure for Receiving Complaints and Settlement No. Document: PRO-BNM-007 Revision 01, effective 1 December 2015. In resolving conflicts that arise the company always prioritizes respect for human rights by not using violence and intimidation that is contrary to applicable laws and regulations. Based on interviews with farmers and company complaints documents, it was found that there were no complaints from farmers during 2019.

Status: Comply

5.2

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

5.2.1; 5.2.2; 5.2.3; 5.2.5

The company has provided training and training to farmers such as:

- Assistance and coaching of plasma cooperatives to be honest and transparent
- Increased plasma productivity.
- Increased income of smallholders.
- Information dissemination, guidance and training on the quality of FFB harvested and sent to Mill.
- Joint Grading at Mill.

This activity is carried out so that the farmers can follow the FFB standards set by the company and improve organizational skills so that they can increase the income of the farmers and the company has consulted with plasma cooperatives to be able to follow RSPO certification including the legality of FFB production.

The company has conducted a support program for farmers by managing and monitoring SIA for plasma. The management and monitoring of plasma is included in the report on the implementation and management of PT. GMP 2019.

5.2.4

The company shows evidence of minutes of the training to handle pesticides to smallholders, for example:

- Spraying training which was held on 19 November 2019 to farmers and Sasak Plasma workers attended by 15 participants.
- Spraying training which was held on 29 August 2019 to farmers and Rimbo Jandung Plasma workers attended by 26 participants.

Status: Comply

PRINCIPLE #6 RESPECT WORKERS' RIGHTS AND CONDITIONS

6.1

Any form of discrimination is prohibited.

6.1.1, 6.1.2.

The company has a policy on equal opportunities to get job opportunities, September 2010 signed by Goup Plantation Head and Group CSR Head. Specifically, this policy aims not to discriminate against gender, race or ethnicity, disability, sexual orientation, age or creed; but to develop a global workforce that has the ability based on objective assessment. Based on field observation and interview with spraying female worker, it is known that there is no issue or complain from worker regarding discrimination. Also, information from board of bipartite stated that there is no issue related discrimination. The workers that has been interviewed is came from various social origin, race, and religion. Based on interview with workers, it is known that they are aware about nondiscrimination policy. There is no migrant worker in PT GMP PHP.

Based on interviews with management representatives and review of employee registration documents, it is known that there are no migrant workers. Based on interviews with representatives of surrounding villages and women workers in the company, there was no discrimination issue in each unit. The company gives equal rights to all workers, starting from wages, facilities obtained.

6.1.3

Company has a Performance Appraisal Procedure no. PRO-HRD-003 on 2 September 2019. The mechanism explains employee performance appraisals are carried out 4 times a year, and for employees with class 2A and below, the appraisal is carried out according to company needs.

The company shows examples of employee performance appraisal in documentation, for example as follows.

- Application letter for harvester on May 2019 with initials UA.
- Probation period agreement between PT GMP with APP for 3 months No. 11/TK-BHT/VII/2019 on 8 July 2019
- Health certificate from the doctor of polyclinic PT PHP on 8 July 2019
- Result of performance appraisal
- Appointment letter to permanent worker No. 53/SK-PGA/Int-X/2019 on 29 October 2019.

6.1.4

There is no pregnancy test. From the results of the review of employee recruitment documents, there is no pregnancy test. Also pregnancy test is not listed in recruitment. Based on interview with woman worker, they are okay if company offered the alternative equivalent employment for pregnant women. As long as the work offered is not harm the pregnant woman.

6.1.5

Company has formed gender committee for handling the harassment issue around female workers. Complaint can be submitted to board of bipartite cooperation, gender committee, or their foreman. Based on interview with the board of gender committee, company provides the female worker with menstrual leave, pregnant and nursing leave for about 3 months. Pregnant and nursing female worker is prohibited to work related to chemical. And also, PT GMP PHP give special breast feeding time for female worker, but prohibit the worker from working with chemical material.

6.1.6

Company give the equal wages for the same scope of work. For example:

- Salary slip for January 2020 of sterilizer operator with ID GA/PGMP/1116/142 get basic wage Rp2,484,050 and overtime payment Rp387,684
- Salary slip for January 2020 of sterilizer operator with ID GA/PGMP/1116/143 get basic wage Rp2,484,050 and overtime payment Rp57,435

Based on interview with worker in estate and mill, there is no complaint about wages. Basic wage is according to applicable regulation.

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, 6.2.3

The company has a collective labor agreement (CLA) that regulates the rights and obligations of workers and companies, industrial relations, wages and *BPJS*, working days, leave and permits, company rules, OHS, provisions for layoffs. The agreement has registered in Manpower Agency of Pasaman Barat Regency with decree No. KEP.003/PP-PKB/DISNAKER/2019 on 17 June 2019. Based on interview with the workers in estate and mill, it is known that they are understand about the contents in the collective labour agreement. They are aware about their rights and obligation as workers.

The company has a copy of Sumatera Barat Governor's decision No. 562-827-2019 concerning the Sumatera Barat Province minimum wage for 2020 issued on 29 October 2019. The document explains that the minimum wage for Sumatera Barat Province for 2020 is Rp2,484,041. Following the governor's decision, the company issued an internal memorandum No. 001/WIP-HRR/ Int-XII/2019 dated December 17, 2019 regarding the Sumatera Barat Province minimum wage in 2020. Based on the document, the minimum wage for employees is Rp 2,484,050 per month or Rp 99,362 per day. In addition, provisions for piece rates, operators, vehicle drivers, FFB loading and unloading worker, are specifically regulated and determined by the leadership and HRD department

Company also showed example of payment documentation that informed the detail of income and deduction, among others:

- Salary slip for January 2020 of GMP Estate worker (harvester) with ID GA/GMP/0619/2870, wages received by worker is Rp3,595,639.
- Salary slip for January 2020 of PHP Estate worker (empty bunch application worker) with ID PF/1PHP/0505/110 , wages received by worker is Rp2,549,384
- Salary slip for January 2020 of GMP Mill Worker (sterilizer operator) with ID GA/PGMP/1116/142, wages received by worker is Rp2,484,050 and overtime payment Rp387,684.

Based on interview with worker in estate and mill, there is no complaint about wages. Basic wage and overtime paid is according to applicable regulation. Workers also understand about the wage scale in company and about calculation of overtime payment. There is no complaint about overtime payment. If company paid the overtime less than it should be, workers can make a complaint and it will be paid in the next month salary.

Based on interview with some harvesting worker in PT GMP and PHP, they will get a deduction if they harvest unripe fruit. It has been explained to the worker and labour union and agreed by the worker. The deduction is not deduct the basic wage. However, the harvester interviewed is not harvest the unripe fruit yet.

Company also use local contractor for some operational activities. Number of local contractor that listed in stakeholder list is 11 contractors. Wages for contractor worker is paid by the contractor based on the result of their work that day.

Based on the Collective Labor Agreement, it is known that the provisions regarding working hours, working days, overtime pay, leave, and termination of employment are regulated in accordance with the provisions of Law 13 of 2003 or other applicable labor regulations. For example, based on document review of salary slip it is known that basic wage is in accordance with minimum wage, overtime payment is paid in accordance with applicable regulation. Interview with worker also informed that they get annual leave every year.

6.2.4, 6.2.5

Based on field visit to worker housing complex, it is known that the company has provided facilities and infrastructure for the welfare of employees, such as housing, water facilities, educational facilities, sports facilities, religious facilities, health facilities such as providing treatment centers and *BPJS*. Based on observation visit about facilities provided by the company, the facilities provided by the company is in good condition, including the children's school transportation facilities.

Based on interviews with housing complex residents, it was found that there were no complaints regarding housing facilities. If there is damage to the house, the employee can report to the employer and the company will immediately repair the damage. And also it is known that one house is occupied by one family and the condition of housing is still in good shape. Adequate food supply can be accessed by the worker from monthly market whenever payday. Moreover, there are some kiosk in housing complex. Personnel can get the staple food with reasonable price.

6.2.6

The company has calculated the applicable wages and benefits in the form of goods when calculated in rupiah. The calculation takes into account several components such as basic salary referring to the applicable minimum wage, rice that is cashed, and facilities in the form of goods such as electricity, houses, water, schools, polyclinic facilities & services, and child care centers. Based on calculations that have been made, the company has given wages above the minimum wage, if benefits in the form of goods are synchronized in rupiah.

6.2.7

Based on interview with worker in estate and mill, it is known that core work is done by permanent worker. For example, harvesting, manual and chemical up keep, and processing activity in mill is done by permanent worker.

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, 6.3.3

The policy related to form and join worker union is written on collective labor agreement period 2019 - 2021. The policy is written in Bahasa Indonesia. Based on interview with representative of worker union, it is informed that company is giving freedom for worker to express their opinion. And also, company did not give any intervention related to worker union activity. Worker union has registered to Manpower Agency of Pasaman Barat Regency with registration number 560/01/SP-SB/DSTK-TRANS/XI/2012 on 1 November 2012 for PT PHP worker union and 560/002/DISNAKER/XII/2017 on 22 December 2017 for PT GMP Serbundo.

Based on interviews with representative from worker union, it is known that the company did not intervene in the activities carried out by the union. Likewise, the election of worker union officials is carried out based on consultation with all worker union members.

6.3.2

Worker union conducted internal meeting periodically or where there is an issue with company. Company shows documentation of meetings between worker unions and management representatives, for example as follows.

- Meeting on 14 December 2019 on evaluating SPSI work, discussing the 2020 SPSI work program, and preparation for the RSPO / ISPO 2020 external audit in 2020, which was attended by 18 participants from PHP I and PHP II.
- A meeting on March 21, 2019 between Serbundo PT GMP and PT GMP discussed the rejection of employee mutations. The meeting was attended by 8 participants and the minutes and the results of the meeting were available.

Workers' attendance lists and activity photos are available. The documentation is available in office unit and available for member if they were asking.

Status: Comply

6.4

Children are not employed or exploited.

6.4.1, 6.4.2, 6.4.3

Company demonstrated the Child Protection Policy, November 2017 which was signed by Wilmar International's Chief Sustainability Officer, which explained that Company does not tolerate child labor, child exploitation in any form and violence against children. 18 years old is the minimum age to become an employee. Based on document review of list of worker and field observation, there are no workers under 18 years old. Based on public consultation with Manpower Agency of Pasaman Barat Regency and field observation in estate and mill, there is no issue regarding child labor. Based on interview with worker in estate and POM, they know the minimum age to work in PT GMP – PHP. Based on field observation in estate, auditors did not sighted any harvester accompanied by their wife or children.

6.4.4

Based on the agreement with the contractor Dian RP, there is a clause that states that the contractor does not employ children under the age of 18, forced labor, or trafficking. Then, based on field visits on harvesting, spraying activity in GMP, PHP I, and PHP II Estate, it was found that there were no employees under the age of 18. Based on the review of worker documents, there were no employees under the age of 18.

Status: Comply

6.5

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

6.5.1, 6.5.2

Policy about prevention of harassment or abuse in work place is listed on Sexual Harassment Policy was endorsed by the Plantation Head group and the CSR Head group. Based on interview with female worker in GMP and PHP Estate, it is known that they understand the policy. It is also known that they understand the mechanism of complaint submission. Also, interview with committee of Gender Committee, it is known that there is no issue or complaint related to sexual harassment on the workplace.

Other policy regarding reproductive rights for worker is listed on:

- Internal Memorandum No. 026/WIP-HRD/Int-VIII/2009 approved by HRD Head on August 12, 2009. The memorandum explains that all employees are required to maintain decency and safety while at work and prohibit the element of sexual harassment and oppression of women. The Internal Memorandum also stated that it is prohibited to employ pregnant women based on information from doctors. Protection related to reproductive rights is also contained in the Company's CLA regarding H1 and H2 leave.
- Collective Labor Agreement states that:
 - Menstruation leave (H1), for female employees 2 days / month (first and second day) with a doctor's examination.
 - Maternity Leave (H2) for 3 months with details of 1.5 months before giving birth and 1.5 months after giving birth by a doctor's examination
- Procedure for worker complaints No. PRO-HRD-005 Revised 02 dated 9 September 2019. The procedure explains that if requested, the company guarantees the confidentiality of the whistleblower's identity and the whistleblower's disclosure.

All of these policies have socialized to worker, for example on 18 December 2019 and 28 October 2019 to estate workers. Based on interview with woman worker in estate, it is known that they know the condition of the policy.

6.5.3

The company has identified the presence of new mothers. It can be seen from monitoring of menstrual leave, pregnant and maternity leave, and breastfeeding data. Then, company has arrange the action to fulfill the need for new mothers and also all woman worker, for example provided Integrated Healthcare Center for toddlers, provide a special room for breastfeeding and a work location close to the facility.

6.5.4

Procedure for worker complaints No. PRO-HRD-005 Revised 02 dated 9 September 2019. The procedure explains that if requested, the company guarantees the confidentiality of the whistleblower's identity and the whistleblower's disclosure. Based on interview with committee of Gender Committee and worker in GMP and PHP Estate, it is known that there is no issue or complaint related to sexual harassment on the workplace.

Status: Comply

6.6
No forms of forced or trafficked labour are used.
6.6.1, 6.6.2

Based on interviews with the company and review of employee registration documents, there are no migrant workers. All workers are from Indonesia. In addition, interviews with workers in the estates and mill, it was found that there were no forced labor cases. Workers work according to work instructions and work agreements. For overtime, employees will be asked in advance whether they are willing to work overtime.

The workers is come from various places, such as from North Sumatera, Java, and also from West Sumatera. The procedure to recruit worker from outside West Sumatera as same as worker from West Sumatera. The general provisions for recruitment include not differentiating between race, caste, nationality, religion, disability, sex, not accepting prospective workers under the age of 18, and other provisions.

Status: Comply

6.7
The unit of certification ensures that the working environment under its control is safe and without undue risk to health.
6.7.1

The company already has persons that responsible for the OHS program within the organizational structure of Committee of Occupational Health and Safety (*P2K3*) established in each management unit. The organization routinely conducts monthly meetings on OHS issues in the workplace. The documentation of the meeting were recorded and stored well. There is OFI regarding approval of PT PHP's Guiding Committee of Occupational Safety & Health structure by the Manpower Office in Recertification. Based on verification result in ASA-1.1, it is known that PT PHP's Guiding Committee of Occupational Safety & Health structure has been approved by the Manpower Office at West Sumatera Province on 29 January 2019.

The company routinely send *P2K3* quarterly reports to the Office of Manpower and Transmigration Agency, for example, indicated by minutes of PT GMP *P2K3* Quarterly IV Report on 16 January 2020 and PT PHP reported on 21 January 2020. Example of record of *P2K3* PT GMP monthly regular meeting on 27 December 2019, which discusses cleaning work areas and evaluating compliance with PPE usage. Based on interviews to workers who are members of the *P2K3* organization it is known that monthly meetings are always routinely conducted to discuss about OHS such as consistency of PPE usage, work accident report, fire simulation, checking of emergency response equipment, OHS sign board, cleanliness of work area, etc.

6.7.2

The company has made efforts to prevent emergencies and accidents. The company has procedures related to the handling of emergencies and accident investigation, the procedure is still the same as the previous assessment. The procedures also explained that records of all accidents shall be kept and periodically reviewed. The company has emergency facilities and infrastructure such as fire extinguisher, first aid kit, hydrant, water tank, and other supporting equipment. Simulation was performed to know the preparedness of emergency response equipment in the POM. The simulation was performed on hydrants located in the mill and the result of the experiment was concluded that the hydrant tool is ready for use. As well as fire extinguishers in the estate, from the results of simulations carried out, it was concluded that fire extinguishers was ready for use. Based on interviews with operators at GMP POM, it was generally concluded that they understood emergency procedures and if an emergency occurred, they knew where the muster point was. There is OFI regarding evaluation of land fire emergency response equipment at PT PHP in Recertification. Based on verification result in ASA-1.1, it is known that company has adequate fire fighting equipment and based on the simulation results of the fire fighting team at PT GMP and PT PHP, it was concluded that the fire fighting equipment could function properly.

PT GMP and PT PHP has already licensed first aid officers and there was first aid internal training conducted on 11 December 2019 which was attended by 52 participants. Auditor conduct interview with first aid officer and the result of interview to first aid officer is they understand about first aid and they have received training in first aid in accidents. However, based on field observations and document reviews, the following evidence was found:

- The results of visits to 3 locations in GMP Estate (temporary storage of hazardous and toxic waste, fuel station and chemical warehouse) as well as at 1 location in GMP POM (first aid room), it was found that one of the contents of the first aid box namely Povidone Iodine had expired in February 2020.
- The results of a visit to the GMP Estate Workshop, Povidone Iodine not found in the first aid box.
- First aid training documentation was shown to first aid officers of PT GMP on 26 October 2019 where it was explained that the contents of first aid boxes were 21 items and conduct monitoring the contents of first aid boxes every month.

Based on this evidence, the monitoring of the contents of the first aid kit and its validity period has not been effective. This has been **Non-conformity No. 2020. 01 with the non critical category.**

6.7.3

Based on field visits and interviews with workers, the company has provided PPE and it is known that all workers received socialization about PPE every morning before go to work. PPE provided adequate and appropriate based on the results of identification of sources of hazard and risk control. All PPE can be replaced immediately if damaged. This is evidenced by shown the recording of PPE distribution documents to the workers and the workers recognition from interviews also confirmed it.

There is OFI regarding evaluate the type of PPE for activities in the chemical warehouse in Recertification. Based on interview and verification result in ASA-1.1, it is known that PPE for activities in the chemical warehouse are appropriate such as helmets, shoes, masks and rubber gloves.

From the results of observations to rinse houses in GMP Estate, PHP 1 Estate and PHP 2 Estate, it is known that sanitation facilities for spray workers are available such as bathing places, changing clothes and others. Wastewater from the rinse is collected in a place that has been permanent to prevent pollution from water sources or soil bodies.

6.7.4

The company has provide medical care for all workers. Medical care is covered by worker and health insurance (*BPJS*). The payment for BPJS is conducted every month according to the available rule. Besides, the company also provide medical facilities for workers if work accident is occurred. Work accident will be reported to the *BPJS* Agency and claim for it will be done if the medical process has been completed. Based on document verification, every worker has been registered to health insurance and accident insurance (*BPJS Kesehatan dan Ketenagakerjaan*). Based on interviews with workers at POM and workers in the Estates (spray workers, fertilizer workers, harvest workers), it was concluded that all of the employees were aware of medical service procedures in the event of a work accident or illness. All employees interviewed also claimed to have a *BPJS* card and if they went to the company's clinic there was no fee at all.

There is OFI regarding monitoring Social Security payments for contractor workers in Recertification. Based on verification result in ASA-1.1, it is known that the accident insurance and health insurance for contractor workers is covered by the head of contractor itself and the company monitors the payments made by the contractor.

6.7.5

The company has calculated the Lost Time Accident every month for monitoring the recording of occupational accidents. It shown the Lost Time Accident calculation per February 2020. This document informs the number of worker, number of working days, the number of non effective working days, overtime, hours of work in total, the number of accidents, the number of working days lost, hours of work a year, the number of accidents a year, lost days a year. Calculation of SR and FR is reviewed regularly and will be evaluated at monthly meeting of OHS Committee.

6.7.2	Status: Non-conformity No. 2020. 01 with the non critical category.
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PRINCIPLE #7 PROTECT, CONSERVE AND ENHANCE ECOSYSTEMS AND THE ENVIRONMENT

7.1

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

7.1.1

Procedure of Observation and Control of Disease set in the Agriculture Manual & Standard Operating Procedure For Palm Oil Plant, Chapter 8 Plant protection - Pest and Disease Management. In the procedure explained about the types of pests and diseases, the detection period (1 or 2 months), threshold control of pests and diseases, methods for sampling at the time of detection or the census, as well as the control recommendations. In this procedure was explained that the pest detection activities are conducted every one or two months.

Also available Procedures of Detection and census of Pests and Diseases for Palm Oil which aimed to ensure the pest and disease control program can be performed regularly and sustainable. In the procedure explained the description of activities, namely Detection of Pests and Diseases; Census of Pests And Diseases, planting the beneficial plants, reporting and documentation. IPM programs are conducted by the company, among others Pest Detection Program carried out periodically

every two months and in case of attack symptom is held every month and Beneficial plant maintenance activities performed every month.

The company shows a record of pest monitoring and control for the period 2019. For example, rat attack in block 34 GMP Estate with an attack rate of 5.81% (above the 5% threshold) in 1 October 2019, then controlling using chemicals (*Coumatetralyl*) in 25 October 2019 until level of *Coumatetralyl* application is below 20% (in 30 October 2019 or 5 days after application), the control is stopped. GMP Estate only controls pests with chemicals after the census results show results above the threshold.

The company has a good commitment to improve the use of pest natural predator as part of integrated pest control. One of natural predator development is the reproduction and the construction of barn owl box as a mechanism to control rat. The company monitoring barn owl box occupation at least once a month. The monitored parameter are the existing of barn owl in the boxes, left food, and sign of reproduction such as egg or owl. Currently, there are total 36 barn owl boxes in GMP Estate and 6 barn owl boxes in PHP 1 Estate. Auditor has made an observation to the owl nest box in block 127 Division 1 GMP Estate and block 02D PHP 1 Estate where the condition of the nest box was in good condition but there are no signs that the nest is inhabited.

The company has records of the training implementation for workers who are involved in the implementation of integrated pest management, for example, Integrated Pest Management training on 1 October 2019 with the number of participants are 7 employees consisting of census operators, supervisors, and field assistants. Based on interview with the worker revealed that the worker understands the method of plant pest and diseases census or detection.

7.1.2

Based on document review and interviews with relevant management, it is known that the company does not use the species mentioned in the Global Invasive Species Database and CABI.org in integrated pest control.

7.1.3

Based on the study of pest control documents, pest control procedures owned by the company, as well as interviews with related management, it is known that the company does not use fire in controlling pests.

Status: Comply

7.2

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

7.2.1

The company has SOP and work instruction on weeds management, the guidance covering about chosen, storage, application, contaminated handling, known about signs and symptoms of pesticides poison and first aid for poison case. To ensure pesticide used are in accordance with the target, company conducted identification the type of weed found in operational area.

Based on field visits and interviews with pesticide applicators in GMP Estate, PHP 1 Estate and PHP 2 Estate, it was concluded that workers knew about the function of the chemical used and selective when doing the spraying activity, as for example for glyphosate material used to spray the circle and harvesting path only while the weeds in inter row not sprayed. The company used *Isopropil amina glyphosate* and *Metil metsulfuron* which have received permission from the government. Based on document verification and observation to pesticide storage, there is no prohibited chemicals use.

7.2.2

The company has documented records of pesticide toxicity in the document of Monthly Pesticide Toxicity Data. The document is recorded product name, active ingredients, LD₅₀, area treated, amount of active ingredients applied per Ha, and total application. This document is constantly recorded and updated by Estate Sustainability Officer each month.

7.2.3 and 7.2.4

PT GMP and PT PHP has program to reduce the pesticide usage by replacing pesticides with biological controls such as using natural predators to control rat and planting the beneficial plant. Based on document review and field observation, several IPM program with biological approach that has been implemented such as rat control by *Tyto alba*, and leaf eater caterpillar by planting beneficial plant such as *Turnera subulata* and *Casia cobanensis*. Moreover, it has also conducted early detection routinely listed in the monthly report of early warning system. Based on document review, there is no prophylactic use because

the use of chemicals is only intended to control pests that are known to be above the threshold.

7.2.5

Based on Willmar Policy that released on 5 December 2013 stated that "Pesticides that are categorized as World Health Organization Class 1A or 1B, or that listed by the Stockholm or Rotterdam Conventions, are prohibited except in emergency situation. Paraquat usage is prohibited."

Based on document verification and field visit to pesticide storage, GMP Estate, PHP 1 Estate and PHP 2 Estate no longer use paraquat and in the last 3 years do not use pesticide with WHO 1A or 1B class.

7.2.6

The results of interview with pesticide applicator in GMP Estate, PHP 1 Estate and PHP 2 Estate, it is known that the employees have been given regular training in safe work practices. This was evidenced by the employee can demonstrate the correct way to work in accordance with the procedures including how use and handling the risks in accordance with material safety sheets. There have been sheets of safety work (MSDS) and the symbols of hazardous and toxic materials are properly installed on the walls and doors of warehouse. The pesticide applicator also using personal protective equipment in accordance with specified hazard identification and material safety such as respirator mask, gloves, safety shoes, apron and goggles.

In addition, the workers are also informed about the steps of secure work in each roll call in the morning before work. Meanwhile, the spraying workers interviewed also claimed that after spraying they will be washing up and drying up the PPE and spraying tools (sprayer tank, jerry, etc), and taking shower/changing clothes in special place near pesticide store of the division office. Therefore, based on field observation to rinse house in GMP Estate, PHP 1 Estate and PHP 2 Estate, that known there are storage for keeping all PPE's and spraying tools after use.

7.2.7

The company has a material and chemical management procedure (PRO-EST-006) which explains the inspection of materials and characteristics including hazardous chemicals. Officers who control are warehouse officers. Officers periodically monitor the condition of stored materials to find out damage and expiration.

Based on the results of field visits in the pesticide (chemical) storage warehouse at GMP Estate, PHP 1 Estate and PHP 2 Estate it is known that the storage of all pesticides is in accordance with the procedure and does not mix with other materials.

7.2.8

The company has procedures for handling pesticide waste including:

- SOP Circle and Path Spraying (SOP-EST-002) dated October 1, 2011 which regulates mixing of pesticides in the space provided and is prohibited from mixing in the field.
- SOP-EHS-016 dated October 1, 2011, regarding washing of used poison and fertilizer packaging as well as management of wastewater washing, which aims to be used again for packaging of poison and used fertilizer so that the amount of waste due to activities can be minimized while minimizing the occurrence of pollution in land and water.
- SOP on Control of Hazardous and Toxic Waste (Document number SOP-EHS-006) effective date 01 October 2011, SOP refers to PP 101 of 2014 concerning hazardous and toxic Waste Management, the purpose of this SOP is to prevent and overcome pollution or environmental damage caused by hazardous and toxic waste and carry out management as determined according to the provisions of the environmental law. In this procedure it is explained that all hazardous and toxic waste generated will be stored in a temporary storage area for hazardous and toxic waste.
- Pesticide Use Procedure (PRO-EST-006) dated October 1, 2011, among others, regulates the disposal of used pesticide containers in the Temporary Storage Facility of Licensed hazardous and Toxic waste, washing spraying equipment and PPE in a special room, and stored in a special storage warehouse.

Based on field observations at GMP Estate and PHP estate, it is known that the waste from pesticide packaging is stored in the Temporary Storage Facility of hazardous and Toxic waste and then handed over to authorized collectors. Some of the used pesticide packaging is reused to transport the same waste and after it is no longer in use will be returned and collected at the Temporary Storage Facility for Dangerous and toxic waste. The company has a special place for mixing chemicals and washing spray equipment to reduce / avoid pollution. While the used washing water will be reused as a chemical mixing. All agrochemical

packaging waste and used fertilizer packaging are washed clean at the washing place in each estate, monitored in quantity, sent to the Temporary and Toxic and Hazardous Waste Temporary Storage for later transported by hazardous and toxic waste authorized collection contractors periodically (PT Shali Riau Lestari).

7.2.9

The results of the document review, interviews with management and employees, and field observations revealed that the company did not apply pesticides by air.

7.2.10

The company has list of pesticide operator based on latest data of February 2020 as many as 71 workers in GMP Estate, 13 workers in PHP 1 Estate and 12 workers in PHP 2 Estate. Medical examination (cholinesterase) has been conducted on 9-11 September 2019 to all pesticides workers. The result of medical examination is informed to the workers and all pesticide operators are in a healthy condition (normal result). And also, based on interview with the workers, it is known that they are never get experience of occupational injury which caused by chemical such as irritation.

7.2.11

The company has an intern memorandum (007/Mem-GEM/Int/I/2017, date 9 January 2017) that prohibits pregnant and breastfeeding personnel working with chemical material. Based on interview with female spraying personnel, it is known that there was neither pregnant nor lactating female personnel who work with pesticide. Moreover, the company conducts pregnancy test and examination every 2 month. Audit team also got information that the personnel have understood that female personnel cannot work with chemical material if they are pregnant or lactating.

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

The company has the result of identifying waste or pollution resulting from factory and plantation activities. For example factory effluents are managed at WWTP before being distributed as land applications, hazardous waste is stored in temporary hazardous waste storage sites, empty fruit bunches are reduced and reused as nutrient cycles on plantations. Fiber and shell are used as boiler fuel. In addition, the company has used pome as biogas in a methane capture plant. All chemical and hazardous wastes and their containers are disposed of responsibly based on the EHS-006 SOP procedure. The company has identified hazardous and chemical waste. Based on the results of field visits to GMP Estate, PHP I Estate and PHP II Estate, the company has provided trash bins in the form of organic, inorganic, hazardous and toxic. The company can improve waste management and hazardous and toxic waste so that workers are not wrong in placing the type of waste according to the type of trash that has been provided (OFI).

All hazardous and chemical wastes are stored in temporary storage of hazardous and chemical waste. The company has a license for temporary storage of chemical and hazardous waste for GMP-POM, GMP-Estate, PHP-1 Estate and PHP-1 Estate. Based on document verification, the company cooperates with third-party toxic and hazardous waste managers who already have permits in the collection, transportation, utilization and destruction of toxic and hazardous waste. PT Shali Riau Lestari is a third party that has licensing and cooperation with further management of toxic and hazardous waste.

The company has procedures for managing all waste produced due to POM activities and plantations. POM effluent is managed by WWTP and is channeled to licensed land applications; Empty Fruit Bunch waste is used as fertilizer on plantations, shell and fiber waste is used as boiler fuel. While domestic waste is managed by providing final landfills in each division and sorting out organic / organic-waste. Observations also found that this landfill was located far (> 1 km) from housing and located in a flood-free area

Document of hazardous waste transporting is in form of official report of handover and manifest. The latest handover of hazardous waste was on 27th February 2020, among others:

GMP Estate:

- AAO 0015618 for TL Lamps as much as 0.0007 ton
- AAO 0015621 for used oil as much as 0.3600 ton

- AAO 0015617 for contaminated used packaging as much as 0.46887 ton
- AAO 0015622 for used batteries as much as 0.165 ton
- AAO 0015620 for used filters as much as 0.032 ton
- AAO 0015619 for medical waste as much as 0.0039 ton.

GMP Mill

- AAO 0015732 for TL Lamps as much as 0.001 ton
- AAO 0015733 for used oil as much as 0.116 ton
- AAO 0015729 for contaminated used packaging as much as 0.6883 ton
- AAO 0015731 for used batteries as much as 0.02 ton
- AAO 0015730 for used filters as much as 0.0004 ton
- AAO 0015728 for used gloves as much as 0.018 ton

PHP 1 Estate

- AAO 0015646 for used oil as much as 0.180 ton
- AAO 0015649 for contaminated used packaging as much as 0.057 ton
- AAO 0015642 for medical waste as much as 0.0003 ton
- AAO 0015650 for used filters as much as 0.042 ton
- AAO 0015645 for used gloves as much as 0.012 ton

PHP 1 Estate

- AAO 0015741 for used oil as much as 400 liters
- AAO 0015737 for contaminated used packaging as much as 0.016 ton
- AAO 0015744 for used batteries as much as 0.003 ton
- AAO 0015739 for used filters as much as 0.001 ton
- AAO 0015743 for used gloves as much as 0.006 ton

Based on field observation in housing complex in GMP and PHP, there is no hazardous waste that is reused. The in and out wastes is recorded in hazardous waste balance sheet that updated every month. Based on interview with worker in chemical storage in GMP estate and PHP estate, ex-chemical container is re-used for pesticide mixing, other than that everything is collected at hazardous waste warehouse. Domestic solid waste in the form of household and office waste which is divided into organic and inorganic in residential locations, offices, workshops and clinics. Organic waste in the form of leaves, food scraps and others are thrown and piled in the waste bins or managed by making organic fertilizer / compost. Inorganic waste is collected in the garbage bin / container that has been provided for later transported to the final landfill.

The company has promoted waste management to workers at GMP Estate and PHP Estate such as:

- Socialization of handling toxic and hazardous waste on August 22, 2019 to the employees of PT. PHP 1 and PHP 2. (photos and attendance list attached).
- Socialization of handling toxic and hazardous waste on October 2019 to the employees of PT. GMP. (photos and attendance list attached).
- The socialization of waste management is conducted every morning at the company.

7.3.3

The company did not burn to dispose of waste, this is evidenced by the results of field visits in the GMP estate, PHP I estate, and PHP II Estate. Domestic waste is collected in the bins provided by the company which consists of organic and inorganic waste and then transported to the final waste collection site in the area for landfill. For Toxic and hazardous waste collected in Temporary Storage, which will then be handed over to the authorized transporter for further management.

Status: Comply	
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7.4

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

7.4.1

The company has a fertilization procedure (SOP-EST-001 dated 9 September 2019) which explains good practices for providing nutrients for plants to optimize yields and utilize organic nutrient sources such as empty fruit bunch, application of effluent and recycling of organic materials when replanting to minimize the impact on the environment. Based on field observations on the replanting area in block 01B PHP 1 Estate, it is known that replanting activities are carried out by chop up the stems of palm tree as a nutrient recycling and also utilizing empty fruit bunch in immature plants as a source of organic nutrition.

7.4.2

The company has routinely monitored the changes on the nutrient status based on the regular soil sampling unit (SSU) and leaf sampling unit analysis (LSU) to determine fertilizers recommendation. The sampling spot has been determined in each division and block routinely by Ecological Management Unit (EMU) and it is supported by well-trained census officer in each division. SSU is conducted every 5 year, meanwhile LSU is conducted annually. The last LSU result in PT GMP and PT PHP was issued on March 2019 and the last SSU result was issued on October 2015 in PT PHP and September 2018 in PT GMP. Visual observations performed every year at the time of leaf analysis activities. Visual observation is a consideration in determining the fertilizer recommendations, deficiency of nutrients and analyze the potential of disease which is likely to become endemic of a particular disease.

Result of soil and leaf analysis published recommendation on fertilizer doses to produce an optimal production of palm fruit. Principles of fertilization are giving treatment on the ground to produce the nutrients required by palm and generating optimal results.

7.4.3

The company has a strategy of recycling nutrients, such as the use of the frond (pruning), recycling of organic materials when replanting, application of effluent and EFB Mulching. The company shown a recording of the realization of EFB applications in 2019 on GMP Estate and PHP 1 Estate. Based on field observations on the replanting area in block 01B PHP 1 Estate, it is known that replanting activities are carried out by chop up the stems of palm tree as a nutrient recycling.

7.4.4

The company shows the results of fertilizer recommendations in 2019. The types of fertilizers used are NPK Super, Kieserite, Urea, Borate, Rock Phosphate and Muriate of Potash. The verification of fertilization activities documents for the period until December 2019 in each estate were in accordance with the recommended dosage. Fertilization activity records are recorded well by the company that explains the type of fertilizer, the number of workers, work performance, and the dosage used. For example in the GMP Estate for urea fertilizer has a program in 2019 totaling 282.85 tons and as of December 2019 it has been realized 282.85 tons and in the PHP 1 Estate for urea fertilizer has a program in 2019 totaling 75.15 tons and as of December 2019 it has been realized 75.15 tons; in the PHP 2 Estate, for urea fertilizer has a program in 2019 totaling 24 tons and as of December 2019 it has been realized 24 tons.

From the verification results of the realization of the fertilizer application documents for GMP Estate, PHP 1 Estate and PHP 2 Estate, it was concluded that the fertilization realization was appropriate and for the 1 year program had been completed by the company based on the fertilizer recommendations set.

Status: Comply	
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7.5

Practices minimise and control erosion and degradation of soils.

7.5.1; 7.5.2 and 7.5.3

The company has maps that identify marginal and fragile areas, topographic maps that explain land slopes and maps of peat areas. The map is used to identify areas that are inappropriate for planting. Based on general field observations, it is known that the area in PT GMP and PT PHP is entirely flat. There is no steep area planted with palm oil. At the time of the audit activity, there were no new planting activities in the area of the company's management.

Status: Comply	
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7.6

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

7.6.1; 7.6.2; and 7.6.3

The company has maps that identify marginal and fragile areas, topographic maps that explain land slopes and maps of peat areas. The map is used to identify areas that are inappropriate for planting. Based on general field observations, it is known that the area in PT GMP and PT PHP is entirely flat. There is no steep area planted with palm oil. At the time of the audit activity, there were no new planting activities in the area of the company's management.

The company can show topographic maps and land surveys in the management of planting areas. This information has been used by the company in the development of oil palm plantations which are now underway such as the establishment of road, bridge, water gate, trench and other infrastructure.

Status: Comply	
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7.7

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

7.7.1

The management area of PT GMP and PT PHP consists of peat and mineral areas. Peat area was peat below 3 meters deep. From the statement area data shown it is known that PT GMP and PT PHP's oil palm plants have entered the second cycle. No new plantings were carried out on peatlands after 15 November 2018.

7.7.2

The company has reported the existing peat areas within the managed area to RSPO on 5 November 2019 via email with the aim of the GHG Unit (ghg@rspo.org). The company can show proof of sending the e-mail. However, based on peat area inventory data reported to the RSPO, it is known that the areas in PT GMP and PT PHP do not have any type of peat soil. That is because the company (Wilmar Group) uses peat area data based on the Indicative Map of Delays in the Granting of New Permits (*Peta Indikatif Penundaan Pemberian Izin Baru*) version XV issued by the Indonesian Ministry of Environment and Forestry which states that the operational areas of PT GMP and PT PHP do not include peat areas. But actually, PT GMP and PT PHP implemented peat management in areas declared peat based on land classification from the Param Agricultural Soil Survey.

7.7.3

The company has a subsidence monitoring standard of 17 compliance points with details: GMP Estate 7 compliance points; PHP 1 Estate 15 compliance points; and PHP 2 Estate 8 compliance points. Monitoring of subsidized stakes is conducted every 6 month. From the results of this monitoring, various results were obtained. The company shows the results of monitoring subsidized stakes, for example in block 019 GMP Estate from April 2015 to October 2019 there was a decrease in land surface of 6.5 cm; in block 05 PHP 1 Estate from December 2012 to December 2019 there was a decrease in land surface of 12.0 cm and in block 024 PHP 2 Estate from February 2017 to June 2019 there was a decrease in land surface of 1.0 cm. In general, the results of monitoring subsidence stakes concluded that there was no significant land subsidence.

The results of the field observations in the block 021 GMP Estate, block 011A PHP 1 Estate and block 026 PHP 2 Estate, it is known that the company has installed subsidence stakes and is in a well maintained condition.

7.7.4 and 7.7.6

The company has a program for water management and ground cover. The realization of the program is that the company regularly observes water level conditions in the trenches every week and has installed a bund as a water barrier so that the water conditions in the trench are maintained. The company can show water level monitoring documents for the period January to December 2019 which are carried out routinely every week at all compliance points. The results of monitoring water levels vary from week to week. For example in the third week of December 2019 showed an average height of water level of 56.65 cm from the ground surface and in the fourth week of December 2019 showed an average level of water level of 55.40 cm from the ground surface. The company also conducts routine daily rainfall monitoring as supporting data in the water management system in the peat area.

From the results of field observations in block 021 GMP Estate, the water level at the point of compliance is 42 cm from the ground surface and in block 011A PHP 1 Estate shows the water level is 70 cm from the ground surface and in block 026 PHP 2 Estate shows the water level is 50 cm from the ground surface. Based on field observations in PT GMP and PT PHP peat areas in general, there are ground cover crops such as legumes and nephrolepis in the field.

However, the company in observing ground water level has not implemented it by installing a piezometer. Therefore, the company has the opportunity to improve the groundwater level observation system with a piezometer in accordance with the RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2018). **OFI**

7.7.5

The calculation of Drainability Assessment conducted by the company is based on the RSPO method, namely:

- Drainability Assessment at PT GMP was conducted in October 2019 with the results of Not Applicable in the entire peat area to be replanted.
- Drainability Assessment at PHP 1 Estate was conducted in September 2019 with the results of Not Applicable in the entire peat area to be replanted.
- Drainability Assessment at PHP 2 Estate was conducted in October 2019 with the results of Not Applicable in the entire peat area to be replanted.

7.7.7

Based on the hectares of PT GMP and PT PHP statements shown, from the entire area of the company's management, there are areas that are not planted with oil palm. The area consists of roads, buildings, factories, lake borders, reserved areas, occupations and conservation areas. Of the areas not planted with palm oil, there is a peat area that is a conservation area and the company has managed the area to become HCV. Based on field observations to the company's HCV area, it appears that the area is naturally protected and overgrown by its natural vegetation.

Status: Comply

7.8

Practices maintain the quality and availability of surface and groundwater

7.8.1

Companies that have water management documents include: AMDAL documents, HCV Management Documents, and Water Management Documents every year. The documents contain: identification of water sources, efficiency of water use budget, monitoring of water quality and protection of water source areas. The company has a water management report contained in a report on the implementation of environmental documents, a report on water use, a report on monitoring water quality (surface water and wastewater), and a report on the protection of water source areas.

The company has a SOP for River-Riparian Belt Management with Document Number SOP-EHS-018, which explains that spraying is not carried out in river border areas and does not spray for the manufacture of harvest roads, harvest roads are made manually. River border area is given a sign or symbol that is attached to mark the river border area in the form of a live plant peg with yellow paint, with a distance of 5 palm oil from the river's edge. Based on a field visit to Batang Alin Block 023 PHP 2 Estate, it was found that the river border area has been given a yellow paint marker on the palm oil base, but in the river border area there are traces of chemical use. Based on that, the company has not implemented management of river banks in accordance with the procedures that it has. **NCR No. 2020.02 with non critical category.**

7.8.2

The company has identified catchment areas (including riparian) contained in HCV identification documents. The document has identified secondary swamp forests and several river basins in the GMP & PHP areas such as the Batang alin and Batang Pasaman rivers. the company has designated secondary swamp forest as HCV. Based on field observations at GMP Estate, the company has managed the riparian river, Batang Pasaman by making 50 m wide boundary markers, planting forest plants and bamboo, placing restrictions on spraying activities on the river banks. Based on the results of the field visit of the Batang Pasaman River border and the replanting location in 2015. PT GMP maintains 5 palm oil stems (not replanting) and installation of embankments to avoid erosion due to runoff of Pasaman river water flow. River border restoration was carried out by planting bamboo in 2015

7.8.3

Palm oil mill effluent is processed at the wastewater treatment plant (IPAL) according to SOP-MILL-014 procedure, until it meets the standards before being used in GMP plantations as land application based on the Decree of the Head of the Investment and Integrated Services Office at one door in West Pasaman Regency Number: 503 / 02 / LA / DPMPTSP / XII-2019 concerning Permits for the Utilization of Wastewater Oil Palm Oil Industry on Land in Oil Palm Plantations of PT. Gersindo Minang Plantation (extension), dated December 3, 2019 with a validity period of 5 years.

Based on the results of wastewater quality testing for July - December 2019, the parameters of pH and BOD are still below the quality standard Kep.Men LH No. 29 of 2009. Reports The results of monitoring have been reported to the relevant institutions every 3 months. Field observations at WWTP have no indications of leakage. Then, the Company conducts groundwater quality testing on community wells and application land wells based on the RKL / RPL matrix. The results of the second semester of 2019 showed that the test results still met the quality standards of Permenkes No. 416 in 1990. Based on the results of the field visit to the WWTP Pond it is known that the waste management tools are functioning properly such as mixer ponds and flow meters, there is no leakage and wastewater discharge. The results of interviews and field inspections with WWTP officers revealed that there had never been a leakage of WWTP pools so far. Based on the results of interviews with LA officers and field visits to the Land Application area of the 129 GMP Estate block there were 9 LA ponds and the last 2 ponds were emptied to anticipate the overflow in the rainy season and there was no overflow of liquid waste in the LA pool. The LA application area complies with the LA permission.

7.8.4

The company has periodic water usage monitoring reports based on Procedures for Factory water use and monitoring (SOP-MILL-027). in 2019 the average water use for processing is 0.66 m³ / ton FFB, still below the standard threshold of 1.10 m³ / ton FFB. The company has a Water Resources Utilization / Utilization Permit based on the Decree of the Governor of West Sumatra Number 611-393-2016 dated April 11, 2016, (valid for 10 years) amounting to 35,501 m³ / month. The use of factory water in 2019 is an average of 10,160 m³ / month (still below the threshold).

7.8.1	Status: Non-conformity No. 2020.02 with non critical category
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7.9

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

7.9.1

The company has regularly monitored the use of fossil fuel energy in POM and Estates activities. The company shows a commitment to reduce fossil fuels with the use of renewable energy. The use of shells and fiber and the realization of the use of fossil fuels have been monitored per month and POM GMP also has a Capture Methane plant with a total capacity of 500KW. The use of fiber and shells for boilers produces an average energy efficiency for diesel fuel is 0.1 liters / ton FFB, for electricity (including the methane capture plant) is 5 kWh / ton FFB.

	Status: Comply
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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 also has conducted GHG emission calculations period 2019 use of Calculator Palm GHG version 4.0. Accurate data has been input to the RSPO Palm GHG Calculator (Palm GHG version 4.0) and has been verified. Summary of net GHG emissions from Palm GHG calculator of the audit report which calculation option is applied "Apply full Version".

Summary Emission:

Emission per product	tCO ₂ e/tProduct
CPO	0.06
PK	0.06
Extraction	
OER	18.00
KER	4.78
Land use	
	Ha
Planted area on mineral soil	4232.48
Planted on peat	0.00
Total oil palm planted area	4232.48
Conservation Area (Forested)	6.19
Conservation Area (Non Forested)	49.85

FFB Production per hectare 48.14 t/ha

Estate/Plantation field emission and Sinks

Description	Own		Group		3 rd Party		Total
Emissions Sources	tCO ₂ e	tCO ₂ e/ tFFB	tCO ₂ e	tCO ₂ e/ tFFB	tCO ₂ e	tCO ₂ e/ tFFB	
Land conversion	40586.20	0.70	0.00	0.00	0.00	0.00	67980.68
CO ₂ emissions from fertilizer	3031.38	0.05	0.00	0.00	0.00	0.00	12323.87
N ₂ O emissions from peat	0.00	0.00	0.00	0.00	0.00	0.00	45532.51
N ₂ O from Fertilizer	2035.22	0.04	0.00	0.00	0.00	0.00	7548.98
Fuel consumption	1349.77	0.02	0.00	0.00	0.00	0.00	1621.63
Peat oxidation	0.00	0.00	0.00	0.00	0.00	0.00	332107.23
Sinks							
Crop sequestration	-384070.34	-0.67	0.00	0.00	0.00	0.00	-64436.68
Sequestration in Conservation area	-56.76	0.00	0.00	0.00	0.00	0.00	0.00
Total	8475.46	0.15	0.00	0.00	24794.24	0.00	33269.70

Mill Emissions and Credits

Description	tCO ₂	tCO ₂ e/t FFB
Emissionssources		
POME	2448.34	0.01
Fuel consumption	326.15	0.00
Grid electricity	0.00	0.00
Credits		
Export of grid electricity	0.00	0.00
Sales of PKS	-38845.29	-0.19
Sales of EFB	0.00	0.00
Total	-36070.79	0.018

Emissions from Palm Kernel Crusher

Emission Source	tCO ₂ e
PK from own mill	0.00
PK from other source	0.00
Fuel Consumption	0.00
Total Crusher Emissions	0.00

Palm Oil Mill Effluent (POME) Treatment

Divert to compost	0 %
Divert to anaerobic digestion	100 %

POME Diverted to Anaerobic Digestion:

Divert to anaerobic pond	0 %
Divert to methane capture (flaring)	61 %
Divert to methane capture (electricity generation)	39 %

Based on Palm GHG Calculator data, it is known that there are no plants in the peat area. The company has reported the existing peat areas within the managed area to RSPO on 5 November 2019 via email with the aim of the GHG Unit (ghg@rspo.org). The company can show proof of sending the e-mail. However, based on peat area inventory data reported to the RSPO, it is known that the areas in PT GMP and PT PHP do not have any type of peat soil. That is because the company (Wilmar Group) uses peat area data based on the Indicative Map of Delays in the Granting of New Permits (*Peta Indikatif*

Penundaan Pemberian Izin Baru) version XV issued by the Indonesian Ministry of Environment and Forestry which states that the operational areas of PT GMP and PT PHP do not include peat areas. But actually, PT GMP and PT PHP implemented peat management in areas declared peat based on land classification from the Param Agricultural Soil Survey. In the Palm GHG calculator data it is known that FFB production per hectare is 48,14 ton FFB/ year. This production is high because the company calculates FFB production from third parties.

7.10.2

There has been no new development since 2014 in the area of PT. Gersindo Minang Plantation

7.10.3

To reduce pollution and emissions, companies have identified sources of pollution and emissions as well as management steps described in the GHG Mitigation SOP (FRM-GRN-033). In addition, the company also identified GHG sources including management plans to reduce them. Emission and pollutant monitoring (air emissions, ambient air, odor, noise, and vibration) from plantations and mills is conducted regularly every semester, included in the RKL / RPL implementation report and reported to the environmental agency regularly. The results of Semester 2 2019 testing show all parameters related to emissions still meet quality standards.

All waste including sources of emissions and pollution from factories and plantations are identified and recorded in the 2019 GHG emission source identification document. Reduction of fossil fuels has been applied by the use of fiber and shells. The realization of renewable energy has been monitored in monthly reports for the use of fiber and leather. Wastewater has been monitored every month and the monitoring period July - December 2019 saw that all wastewater testing parameters met quality standards. Based on site visits at the boiler station every fiber and skin are used as fuel. The rest of the fiber shell is placed so that it does not cause pollution and potential fire. Based on field trips in landfills, GMP Estate, PHP I Estate and PHP II Estate, landfill areas are known to be divided into two types, namely organic and inorganic waste.

Status: Comply

7.11

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

7.11.1

The company has a zero burning policy as stated in the Wilmar Environmental Policy approved in September 2010 which states a zero burning policy in all plantation development activities. In addition, this is also included in the SOP for Land Clearing without Combustion with the number: PRO-EST-002 dated October 15, 2012. Based on the results of field visits and interviews with management, it is known that in 2019 the company carried out replanting with the process using the method without burning. In addition, there are planting legumes of *Mucuna bracteata*.

The results of interviews with the surrounding community and related offices (Department of Plantation and Department of Environment) there were no issues of land fires. The company has socialized zero burning policy routinely in the morning briefing and by installing signboard about prohibiting using fire for disposal waste. based on interview with workers and field observations The workers understood that there is prohibited for using fire for waste disposal and replanting.

7.11.2 & 7.11.3

The company has a fire emergency response SOP with no. SOP-EHS-011 document dated 09 September 2019 governing procedures: Warnings, communications and countermeasures, situation assessment and evacuation and anticipation. Then the company also has a SOP on Land and Forest Fire with no. SOP-EHS-014 document dated October 1, 2011. The scope of this SOP is when land and forest fires occur on company land. This SOP regulates the procedure:

- Preparedness and contact
- Fire Fighting
- Emergency response team
- Evacuation.

In addition, the company has adequate firefighting equipment and carries out monthly land fire monitoring. From the monitoring results it is known that during 2019 there were no land and forest fires in the company's area. The company also conducted training and fire simulations and dissemination of forest and land fires conducted on November 25, 2019 (PHP I), December 19, 2019 (PHP II) and September 11, 2019 (GMP Estate) to the fire emergency response team and the community around the

company. The company conducts socialization aiming that the community around the village understands the danger of land fires and how to deal with land fires if they occur. In addition, the public can find out which areas / lands are prone to fire and how to prevent them.

Status: Comply

7.12

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

7.12.1 & 7.12.2

There is no new land clearing in the company area but replanting. PT GMP and PT PHP conducted HCV assessments for all operational areas carried out by the RSPO Approve Assessor in 2012. The HCV identification process was carried out using HCV identification guidelines in Indonesia in June 2008. HCS is not applicable because PT GMP PHP is already operating and there is no new land clearing after November 2018. Verification of OFI in the Recertification assessment from the results of the HCV assessment it was found that the HCV area in PT. PHP of 1.92 Ha. while for PT. GMP of 54.63 Ha. On March 15, 2019 the company conducted a field assessment and checking of the HCV area of PT. GMP. The area within PT. GMP experienced a natural change due to a shift in the Batang Pasaman river flow. The area is BLOK 153 which has changed from the Not Planted zone to the HCV zone of 1.40 Ha. From the survey results and actual conditions in the field, the GMP HCV area has changed as much as 1.4 hectares. Therefore, the HCV area of PT. GMP after addition was 56.04 Ha. Available maps of HCV areas that have been added to a scale of 1: 50000 were made in June 2019.

7.12.3

The Indonesian Sumatra region is further in West Sumatera province, excluding the HFCL region.

7.12.4

The company has a HCV area management plan for 2019 for each plantation. The company's current management plan includes the management of buffer zones, for example related to the management of river banks that also function as wildlife habitat. Legal requirements related to species protection have been met through periodic monitoring and strict sanctions for hunters / custodians of protected animals. The current management plan of the company includes the management of buffer zones, for example related to the management of river banks that also function as wildlife habitat by planting trees in riparian river areas. Monitoring activities on the management of HCV areas and the presence of wild animals are carried out routinely every month by the company's HCV staff. Monitoring is carried out covering the condition of the river border / trench, and the presence of wild animals in the company, hunting activities / destruction of conservation areas around the plantation. Interviews with employees are known to have never occurred conflicts with wildlife until now. The company already has a 2020 HCV management plan based on the results of the previous year's management plan which consisted of:

PT. GMP:

- Maintain the existence of a population of species that have been identified.
- Defend swamp forest habitat.
- Sustain freshwater swamp forest ecosystems.
- Avoid damage to water quality, especially in the downstream.
- Avoiding erosion.

PT. PHP

- Planting river riparian trees
- Monitoring natural vegetation
- Monitoring HCV areas and animals
- Signboard care (prohibited signs)
- HCV socialization.

The company has reviewed the management plan that was made. This is evidenced by the 2018-2019 HCV management plan review report conducted in January 2020. The HCV management plan is reviewed every 2 years and the management plan is reviewed jointly with the surrounding community, community leaders and the company.

7.12.5

Based on the HCV identification document (2012), there is no indication of the presence of HCV 5 or HCV 6. Based on field

observations there are indications of HCV areas utilized by the community, namely the Batang Pasaman river border (GMP) and the Batang Alin river border (PHP). The existence of the community on the border of the river had existed before the plantation. The company continues to provide guidance to the community to suppress activities in the river border.

7.12.6

The company has a species protection procedure (RTE SOP-EHS-20) which states that all workers including contractors are not allowed to hunt, maintain and kill all RTE species. Worker training and outreach is available on the protection of RTE species. The results of the field visit did not find RTE / wild species maintained by workers.

Monitoring activities on HCV area management and the presence of wild animals are carried out routinely every month by HCV company staff. The monitoring carried out includes the condition of the river border / ditch, and the presence of wild animals in the company, hunting / destruction of conservation areas around the plantations. The company has conducted socialization on flora, fauna and HCV areas to employees. PT. GMP conducted socialization on 3 October 2019 and 1 December 2019. While for PT PHP it was conducted on 19 December 2019 and was attended by 26 employees. As a result of the interview with the spraying team, workers are aware of the existence and function of the HCV area. Workers also have a deep understanding of species RTE, a prohibition on hunting protected species. To provide protection for these RTE species, the management unit has created a ban on hunting, patrolling, riparian rehabilitation as habitat and reporting to relevant agencies (Nature Conservation Agency). GMP-PHP also conducts routine inspections for the protection of HCV / RTE species, the last inspection carried out on 13 December 2019 showed no poaching and no wild animal traps in the HCV area. In addition the company also carried out a socialization of HCV to employees which was carried out on December 19, 2019.

7.12.7

The company has a 2019 HCV management plan listed in the 2019 HCV management plan fulfillment program document consisting of:

PT. GMP

- Management of the presence of HCV with wildlife species so that integrity is maintained
- Refugium is a safe place for wildlife
- Wildlife is safe to move, especially in river border corridors
- Water conditions are in accordance with the aquatic ecosystem
- Handling hunting of key species
- Handling land encroachment and tree cutting

PT. PHP

- Planting river riparian trees
- Monitoring natural vegetation
- Monitoring Wildlife and HCV areas
- Signboard care (prohibited signs)
- Socialization of HCV areas

HCV monitoring results in 2019 include:

- Workers are aware of the existence and function of HCV areas.
- Workers also have a deep understanding of protected species, prohibitions on hunting protected species.
- To provide protection for these RTE species, the management unit has created a prohibition on hunting, patrolling, riparian rehabilitation as habitat and reporting to relevant institutions (Natural Resources Conservation Agency)
- The company conducts routine inspections for the protection of HCV / RTE species, the last inspection being carried out on 13 December 2019 showed no poaching and no wild animal traps in the HCV area.

HCV monitoring results have been evaluated by the company as evidenced by the 2018-2019 HCV management plan review report conducted in January 2020. The company has conducted a review of the management of the HCV 2019 management plan program for PT. GMP and PHP. For the year 2019, it will be carried out in January 2020. Based on the results of the Review, the company has set 2020 HCV management plan, namely:

PT. GMP

- Maintain the existence of a population of species that have been identified.

- Defend swamp forest habitat.
- Sustain freshwater swamp forest ecosystems.
- Avoid damage to water quality, especially in the downstream
- Avoiding erosion

PT. PHP

- Planting river riparian trees
- Monitoring natural vegetation
- Monitoring Wildlife and HCV areas
- Signboard care (prohibited signs)
- Socialization of HCV areas

7.12.8

This indicator does not apply to PT. GMP-PHP because there is no new land clearing by the company.

	Status: Comply	
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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-1.1	GMP POM and its supply bases did not use trademark in the product or any of its activity	✓
	Status: Comply	
2.	Implementation of certificate and trademark used by Client comply with size and type (shape) against Guideline of Logo Use	X or ✓
ASA-1.1	GMP POM and its supply bases did not use trademark in the product or any of its activity	✓
	Status: Comply	
3.	Implementation of Certificate and Trademark is not used on product	X or ✓
ASA-1.1	GMP POM and its supply bases did not use trademark in the product or any of its activity	✓
	Status:	
4.	Controlling of Certificate and Trademark, including withdrawing inappropriate logo.	X or ✓
ASA-1.1	GMP POM and its supply bases did not use trademark in the product or any of its activity	✓
	Status: Comply	

3.3 Summary of RSPO Partial Certification.

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

Wilmar International Ltd Time Bound Plan (TBP) is explained in point 1.10. Wilmar International Ltd has informed the TBP progress, MUTU has considered that Wilmar International Ltd is complied with the RSPO requirement for TBP. The Time Bound Plan was revised and declared by Wilmar International Ltd on March 2020.

MUTU has verified partial certification for un-certified unit's subsidiary of Wilmar International Ltd based on their Time Bound Plan. There are seven (7) uncertified mills and sixteen (16) uncertified estates of Wilmar International Ltd. MUTU Auditor verified positive assurance against the company internal audit and supporting evidence as well as any information from others sources.

MUTU Auditor has verified company partial certification and concludes that:

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

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
2.1.1	Did the company conduct an internal audit? If so, has a positive assurance statement been produced?	<p>Yes, and positive assurance is produced for these units.</p> <p>Auditor verification Internal audit conducted on 17 & 24 January 2020 for:</p> <ul style="list-style-type: none"> - PT Agronusa Investama Pahauman - PT Agro Palindo Sakti 2 - PT Musi Banyuasin Indah - PT Sinarsiak Dianpermai - PT Agroindo Indah Perkasa 2 - PT Buluh Cawang Plantation <p>There is some non-conformance find in internal audit and the company has produced the positive assurance for these units.</p>
2.1.2	<p>No replacement after dates defined in Nis Criterion 7.3 of:</p> <ul style="list-style-type: none"> • Primary forest. • Any area identified as containing High Conservation Values (HCVs). • Any area required to maintain or enhance HCVs in accordance with RSPO criterion 7.3. 	<p>Uncertified management units has conducted HCV assessment such as :</p> <ul style="list-style-type: none"> • PT Sarana Titian Permata in June 2008, • 4 unit scheme smallholders under PT Kerry Sawit Indonesia in year 2008, • PT Agronusa Investama - Sambas and their scheme smallholders in year 2011, • PT Agronusa Investama - Landak/Pahauman in year 2011 (re-assessment in year 2014),

		<ul style="list-style-type: none"> • PT Buluh Cawang Plantation-West Kalimantan in year 2016, • PT Agro Palindo Sakti 2 in July 2009, • PT Indoresin Putra Mandiri in March 2009, • PT Daya Landak Plantation in July 2009, • PT Putra Indotropical in November 2008, • PT Putra Procentindo in December 2008, • PT Permata Hijau Plantation (block 22) in year 2012, • PT Kencana Sawit Indonesia in year 2010, • PT Murini Samsam in year 2014, • PT Musi Banyuasin Indah in year 2013, • PT Sinarsiak Dianpermai in year 2014, • PT Agro Indah Persada in year 2011 and • Biase Plantation Limited in year 2011 & September 2014 (Calaro extension) <p>Some management units has carried out land clearing activities since November 2005 without preceded by HCV identification/assessment. Based on RaCP tracker (per November 2019) in RSPO website and the result of correspondence with RSPO compensation panel that the management units under Wilmar International Limited have :</p> <ul style="list-style-type: none"> • 24 management units with potential liability consist of 11 uncertified management units (2 uncertified management units still processing recertificatio) and 13 certified management units • RSPO member has submitted LUCA amount of 24 Management Units • LUCA of 20 management units has passed and 4 management units has reviewed and requiring clarification from RSPO member. • The 11 of 20 Management Units need/required Concept Note (CN). There are the 3 additional Management Units need Concept Note if compared with information of RaCP tracker per January 2019 (8 Management Units need Concept Note (3 uncertified management unit and 5 certified management unit)). Auditor has carried out clarification to the RSPO members and the RSPO secretariat. RSPO member do not know the name of the 3 additional management units because LUCA has been reviewed by RSPO but it is yet incomplete. Whereas, the result of clarification with the RSPO Secretariat that the compensation team is still updating the database so that the addition can occur due to duplicate. RSPO
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		<p>Secretariat will be informing to auditor again after updating finish.</p> <ul style="list-style-type: none"> 1 Management Units has submitted Concept Note (CN). Based on information from RSPO member that they has submitted Concept Note amount of 2 Management Units but the last of submit is January 2020 so that it not covered on RaCP tracker per November 2019. <p>Following up one of resolution from 35th BHCVWG meeting year 2017 are pushing certified management unit to submit annex 7 & 8 (compensation concept note & compensation plan) to RSPO compensation panel in annual surveillance audit by each certification body according time frame which has decided in meeting. The progress of the concept note approval can be saw in indicator of 7.12</p> <p>Information of LUCA for some uncertified management units as follow as :</p> <ol style="list-style-type: none"> 1. PT Agronusa Investama (Landak/Pahauman) : LUCA and disclosure of non-compliant land clearing was available and it has submit to RSPO secretariat year 2015 and LUCA has passed with the result of liability assessment is presence liability (per 27 February 2017 and total of liability areas is 53.50 ha). The concept note has developing by internal team so it has not been submitted to RSPO secretariat. 2. PT Buluh Cawang Plantation in West Kalimantan : LUCA and disclosure of non-compliant land clearing was available and it has submit to RSPO secretariat year 2015 and LUCA has passed with the result of liability assessment is presence liability (per 13 March 2017 and total of liability areas is 46.62 ha). The concept note has been developing by internal team so that it has not been submitted to RSPO secretariat. 3. PT Agro Palindo Sakti 2 : LUCA and disclosure of non-compliant land clearing was available and it has submit to RSPO secretariat year 2016 and LUCA has passed with the result of liability assessment is zero conservation liability. 4. PT Indonesia Putra Mandiri & PT Daya Landak Plantation : LUCA and disclosure of non-compliant land clearing was available and it has submit to RSPO secretariat year 2015 and LUCA has passed with the result of liability assessment is zero conservation liability.
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		<p>5. PT Putra Indotropical & PT Pratama Procentindo : LUCA and disclosure of non-compliant land clearing was available and it has submit to RSPO secretariat year 2015 and LUCA has passed (date on 13 March 2017) with the result of liability assessment is zero conservation liability.</p> <p>6. PT Sarana Titian Permata : LUCA and disclosure of non-compliant land clearing was available and LUCA has passed with the result of liability assessment is zero conservation liability.</p> <p>7. Based on the result of communication with RSPO that LUCA on behalf remaining uncertified management units has submitted and passed with the result of liability assessment is zero liability (2 uncertified management units) so not concept note required and presence liability (1 uncertified management unit) so concept note required. It has submitted concept note before November 2019.</p> <p>8. PT Musi Banyuasin Indah, PT Sinarsiak Dianpermai, PT Murini Samsam (466 ha) & PT Permata Hijau Plantation (block 22) : There are no planting after 1 November 2005 so RaCP status is not applicable.</p> <p>Auditor verification Auditor has verified the supporting evidence of above the company statement. The above statement in accordance with the supporting evidence provided.</p>
2.1.3	Any new plantings since January 1 st 2010 must comply with the RSPO New Plantings Procedure.	<p>There are some newly developed plantation areas under Wilmar International and have undergone the New Planting Procedure (NPP). It has announced on RSPO website during 30 days with complete status such as in Jambi Province (PT Agrindo Indah Persada 2) & West Kalimantan Province (PT Agro Nusa Investama (Sambas)) - Indonesia and Nigeria (Biase Plantation Limited & Biase Plantation Limited (Calaro extension).</p> <p>Auditor verification Auditor has verified the supporting evidence of above the company statement. The above statement in accordance with the supporting evidence provided.</p>
2.1.4	Any Land conflicts are being resolved through a mutually agreed process, e.g. RSPO Grievance procedure or Dispute Settlement Facility, in accordance with RSPO criteria 6.4, 7.5 and 7.6.	<p>Uncertified management unit have technical procedure/guidance for land acquisition (SOP 001/WIP-KB/(0)/0610) and procedure of calculation & compensation payments (SOP 01/WIP-KB/(1)/1215). The records and documents of land compensation was available</p>

	<p>such as list of recapitulation of land compensation/acquisition, minute of measurement and their maps, profile/identity of land ownership and minute of agreement/negotiation between company and land ownership regarding handover/release of land. Based on self assessment report that some uncertified management units (PT Daya Landak Plantation, PT Agronusa Investama – Pahuman, PT Putra Indotropical, PT Pratama Prosentindo, PT Agrindo Indah Persada 2 & PT Sarana Titian Permata – POM 2) has carried out some activities in order land acquisition process such as socialization to stakeholder and land owner, verification of land owner identity, measuring land/area in field together land owner, negotiating and agreeing on the price of land compensation and their plants, paying land compensation appropriate with the result of agreeing together. Community who lose access and land right for plantation areas has given the opportunity to benefit (direct and indirect) from plantation development as sample in form of scheme smallholder areas, as employee, as contractor (transportation, supplier for daily food, etc), as FFB supplier, using infrastructure/road as access from village to town or vice versa, as trader while employee has got wage, etc.</p> <p>Refer to case tracker or status of complaints under Wilmar International Limited period of February 2011 to conducting audit that the object of complaint has dominated by certified management unit and the majority of cases has closed. There are 2 case of complaints still in investigation process (PT Permata Hijau Pasaman and PT AMP Plantation). Further details on this case are available here: http://www.rspo.org/members/complaints/status-of-complaints/view/26</p> <p>Based on self assessment that no land conflict in the location of uncertified management units</p> <p>Auditor verification</p> <p>There is no information from public source and RSPO website on any land conflict for uncertified unit of the group subsidiaries.</p> <p>Based on the company record there is documentation on land compensation recapitulation updated on 1 October 2007, participatory mapping, agreement letter on compensation between company and land</p>
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		owner, land owner identity and procedure on compensation technical guidance SOP 001/WIP-KB/(0)/0610 dated June 2010.
2.1.5	Any Labour disputes are being resolved through a mutually agreed process, in accordance with RSPO criterion 6.3.	<p>There is a grievance and complaint form/procedure used by the company to collect and collate all complaints from communities and employee as sample in Indonesian is SOP 004/WIP-KB/(0)/0610, SOP 003/WIP-KB/(1)/0911, PRO-PGA-001 and Whistleblowing Policy (effective date on 5 August 2015). Procedure of grievance & complaint from employee has not been dissemination to employee in PT ANI-Pahuman, Cooperative of Tuah Jubata (scheme smallholder), PT Daya Landak Plantation, PT Indoresins Putra Mandiri & PT Putra Indotropical. It will be doing by auditee based on correction action plan.</p> <p>Based on self-assessment that uncertified management units has provided documentation of both the process which a dispute was resolved and the outcome and log book about handling grievance & complaint from internal (employee) & external. Based on log book that there are grievance & complaint from employee but there is no identified labor disputes ongoing at subsidiary companies of Wilmar International Limited..</p> <p>Auditor verification There is no information from public source and RSPO website on any labour conflict for uncertified unit of the group subsidiaries.</p> <p>The company has mechanism to handle employee complaint and grievance that is stated in SOP 005/WIP-KB/(0)/0610 for communication and consultation with community and SOP 004/WIP-KB/(0)/ 0610 on complaint and grivance mechanism and solving any dispute out off court.</p> <p>There is no list of employee and stakeholder complaint and grievance.</p>
2.1.6	Any Legal non-compliance is being resolved in accordance with the legal requirements, with reference to RSPO criteria 2.1 and 2.2.	<p>Uncertified management units have the list of laws & regulations or law register relate of plantation, environment, man power and OSH issue. The result of evaluation law and regulation with implementation by company.</p> <p>The evidence of compliance to laws and regulations such as land use right or land title (except uncertified management units as below), location permit for the location of uncertified management units in Indonesia, environment document has approved by local government</p>

	<p>(especially in Indonesia), minimum wage, minimum age as employee, etc. Whereas, Eyop Industries Limited and Biase Plantation Limited have deed grant, Deed of conveyance, Certificate of Occupancy and MoU with communities.</p> <p>Based on self-assessment report that there are not changing significantly if compare with previous condition i.e some of Wilmar's uncertified management units have not complied with certain legal requirements, i.e. :</p> <ul style="list-style-type: none"> • Land use right (HGU) : PT Sarana Titian Permai (1 & 2), PT Agro Nusa Investama (Landak/Pahauman), PT Sinarsiak Dianpermai, PT Permata Hijau Pasaman (block 22), PT Murini Samsam (466 ha), PT Pratama Prosentido, PT Putra Indotropical, PT Indoresin Putra Mandiri, PT Buluh Cawang Plantation in West Kalimantan, PT Agroindo Indah Persada 2, and PT Daya Landak Plantation, where the land use right (HGU) are still under process. At time of this audit, the company was still making efforts to close these legal non-compliances. • Forest areas release permit : part of PT Musi Banyuasin Indah areas and two estates under Eyop Industries Limited <p>Uncertified management units has carried out monitor of pillar boundary regularly except PT Agroindo Indah Persada 2 because has not been carried out cadastral measurement.</p> <p>Auditor verification PT Agroindo Indah Perkasa 2</p> <ul style="list-style-type: none"> - There is HGU on propose. <p>PT. Buluh Cawang Plantation</p> <ul style="list-style-type: none"> - HGU on process <p>PT Agronusa Investama Pahauman</p> <ul style="list-style-type: none"> - The continues changing on PIPB map. In accordance to PIPB 10 there is no area of the company (based on location permit) that is in the moratorium area. When PIPB 11 released, some area of the company is in the updated peat moratorium map. <p>PT Agro Palindo Sakti 2</p> <ul style="list-style-type: none"> - There is an obstacle on processing HGU is before continuing the HGU process, the company has to complete the requirement for 20% area allocation for smallholder. Based on BupatiSanggau Decree No. 137
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		<p>year 2011 dated 25 March 2011 for 623 ha of smallholder scheme for 2 koperasi of Batu Ceramin and and Maju Bersama. Later, koperasi Maju Bersama split into Koperasi Maju Bersama and Koperasi Harapan Baru. And Koperasi Harapan Baru wants to take about 136 ha within company proposed HGU area. The company needs to resolve this issue first before be able to continue HGU process.</p> <p>PT Musi Banyuasin Indah</p> <ul style="list-style-type: none"> - Overlay the map of land use with attachments Ministerial Decree No. SK.822/Menhut-II/2013 PT MBI entered in production forest area. - Planting outside HGU Kebun Sei Selabu (block 010, 024 and 027). - Explanation management unit following the legal department still perform continuous coordination with the government while waiting for a change of government decisions regarding the status of the area. <p>PT Sinarsiak Dianpermai</p> <ul style="list-style-type: none"> - HGU 1,002 Ha on process - Status of Other Use Areas based on Appendix SK 878 / Menhut-II / 2014 dated September 29, 2014 and letter no. S.160 / BPKH.XIX-3/2016 dated March 31, 2016 <p>Explanation management unit as follows:</p> <ul style="list-style-type: none"> - Disagreement between the ministry of forestry by the Riau provincial government on the status of land PT SSDP (between the status of forest and APL), which led to the process of making the concession inhibited. - There are some estate areas around the Mill that does not have permission locations. The process of acquiring a location permit was hampered due to the reasons in point 1 as well. - The legal department is still doing continuous coordination with the government while waiting for a change of government decisions. <p>Based on website date on 13 & 21 June 2019 and 27 July 2019 that PT Putra Indotropical, PT Indoresin Putra Mandiri and PT Pratama Prosentindo have not been land use right (Hak Guna Usaha). The result of clarification from auditee that they are still in the process of completing the requirements in other ministries.</p>
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		This is one of requirements to apply for land use right at National Land Agency.
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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 Re-Certification Assessment

NCR No.	:	2019.01	Issued by	:	Radytio Puspanjana
Date Issued	:	02 March 2019	Time Limit	:	ASA 1.1
NC Grade	:	Minor	Date of Closing	:	6 March 2020
Standard Ref. & Requirement	:	5.1.2 An environmental management plan document must be available to prevent negative impacts and implementation reports and revisions, if identifiable impacts should change the activities of the company in progress. The management of the company must appoint the person responsible for the implementation of the environmental management plan.			
Evidence observed (filled by auditor): PT GMP has been replanting since 2017 and the company has an internal replanting study but the company has not been able to show the recording document of the implementation of environmental management related to replanting activities.					
Non-Conformance Description (filled by auditor): Not able to show a record of the implementation of environmental management related to replanting activities to evaluate the management that has been carried out.					
Root Cause Analysis (filled by organization audited) <ul style="list-style-type: none">- The reporting of the implementation of environmental management activities has not yet been carried out related to the company's replanting activities.- he environmental management matrix related to replanting has not yet been disseminated to the RKL-RPL report compiler PIC.					
Correction (filled by organization audited): <ul style="list-style-type: none">- Conduct an environmental management report related to replanting activities that have been carried out in accordance with the matrix that has been prepared.- Added a discussion on environmental management related to replanting activities in accordance with the matrix prepared in the RKL-RPL implementation report.					
Corrective Action (filled by organization audited): <ul style="list-style-type: none">- Monitoring the implementation and reporting of environmental management related to replanting.- Conduct information dissemination to PIC responsible for preparing RKL-RPL reports related to the replanting environmental management matrix.					
Assessor Evaluation and Conclusion (filled by auditor): The company shows a management and monitoring plan related to the impact of replanting conducted in 2019. The replanting management and monitoring plan: <ul style="list-style-type: none">• Decreased surface water quality due to accumulation or spread of plants that have been chopped near surface water.• Decreased air quality due to oil palm felling activities.• Impairment of soil physical and chemical quality• Changes in biodiversity (Flora –Fauna).• Changes in Biodiversity (disturbance of Aquatic Biota). In this regard, non-conformities with this indicator have been fulfilled					
Verified by	:	Leonada			

NCR No.	: 2019.02	Issued by	: Radytio Puspanjana			
Date Issued	: 02 March 2019	Time Limit	: ASA 1.1			
NC Grade	: Minor	Date of Closing	: 6 March 2020			
Standard Ref. & Requirement	5.1.3 An environmental monitoring plan document and its implementation report and an improvement plan for such monitoring results if nonconformity is found. This plan is reviewed at least 2 years.					
Evidence observed (filled by auditor): PT GMP has been replanting since 2017 and the company has an internal replanting study but the company has not been able to show the recording document of the implementation of environmental monitoring related to replanting activities.						
Non-Conformance Description (filled by auditor): Not able to show a record of the implementation of environmental monitoring related to replanting activities to evaluate monitoring that has been carried out.						
Root Cause Analysis (filled by organization audited): <ul style="list-style-type: none"> - The reporting of the implementation of environmental monitoring activities has not yet been carried out related to the company's replanting activities. - The environmental monitoring matrix related to replanting has not yet been disseminated to the RKL-RPL report compiler PIC. 						
Correction (filled by organization audited): <ul style="list-style-type: none"> - Conduct an environmental monitoring report related to replanting activities that have been carried out in accordance with the matrix that has been prepared. - added a discussion on environmental management related to replanting activities in accordance with the matrix prepared in the RKL-RPL implementation report.. 						
Corrective Action (filled by organization audited): <ul style="list-style-type: none"> - Reviewing the implementation and reporting of environmental monitoring related to replanting - Conduct information dissemination to PIC responsible for preparing RKL-RPL reports related to the replanting environmental monitoring matrix. 						
Assessor Evaluation and Conclusion (filled by auditor): The company shows a management and monitoring plan related to the impact of replanting conducted in 2019. The replanting management and monitoring plan: <ul style="list-style-type: none"> • Decreased surface water quality due to accumulation or spread of plants that have been chopped near surface water. • Decreased air quality due to oil palm felling activities. • Impairment of soil physical and chemical quality • Changes in biodiversity (Flora –Fauna). • Changes in Biodiversity (disturbance of Aquatic Biota). In this regard, non-conformities with this indicator have been fulfilled.						
Verified by	: Leonada					

NCR No.	: 2019.03	Issued by	: Moh Arif Yusni
Date Issued	: 02 March 2019	Time Limit	: 01 June 2019
NC Grade	: Major	Date of Closing	: 18 May 2019
Standard Ref. & Requirement	: 8.1 Growers and millers regularly monitor and review their activities and develop and implement action plans that allow demonstrable continuous improvement in key operations.		
Evidence observed (filled by auditor): <p>based on a summary of nonconformities that were identified during the first cycle of the RSPO assessment (Stage 2 to ASA 4), its known if there is a commitment to continuous improvement that has been implemented in almost all major activities, such as OSH aspects, environment, employment, and best practices in cultivation and processing.</p> <p>Related to social management, the results of document verification, interviews with management and stakeholders (internal and external) are known that the company has implemented a social management and monitoring plan, which is carried out partially by the relevant departments, so that reports on activities carried out are not comprehensive and integrated into several developing issues for example:</p> <ul style="list-style-type: none"> - Attention to the company's operational disturbances and attempts to minimize them. - Potential conflicts with communities around the plantation. - Attention is specifically related to the dynamics of plasma cooperatives that have an impact on the company's operational activities. - Attention related to labor issues (Changes in the number of workers, terms of employment, income of workers and the existence of unions) 			
Non-Conformance Description (filled by auditor): <p>The company could not show further plans related to the management of social impact, involving all relevant departments.</p>			
Root Cause Analysis (filled by organization audited): <p>Inadequate understanding of the importance of involvement of all departments for review, evaluation and preparation of social management plans</p>			
Correction (filled by organization audited): <ul style="list-style-type: none"> • Conduct socialization regarding the importance of the involvement of all relevant departments in the management and monitoring of social impacts • Reviewing the evaluation of SIA management activities in 2018 and the preparation of further social management plans for the 2019 to 2021 period involving the relevant departments 			
Corrective Action (filled by organization audited): <p>Create a team structure plan of the report's authors manage and monitor the social impact that involves several related departments.</p>			
Assessor Evaluation and Conclusion (filled by auditor): <p>Verification May 18, 2019 the company can be presented the corrective evidence as follows:</p> <ul style="list-style-type: none"> - Minute of Meeting for the preparation of the Management Plant Plan - SIA 2019 to 2021 PT GMP and PT PHP on March 8, 2019 involving all relevant departments and dissemination to all departments regarding joint collaboration with the social management plant - Minute of Meeting in the preparation of the Management Plant Plan - SIA 2019 / until 2021 PT GMP and PT PHP on 			

March 15, 2019

- Minute of Meeting preparation of Management Plant Plans - SIA 2019 / until 2021 PT GMP on March 18, 2019
- Minute of Meeting preparation of Management Plant Plan - SIA 2019 / until 2021 PT PHP on March 19, 2019
- News of the review and evaluation of Management Plant - SIA 2018 involving all related PICs at PT GMP and PT PHP and support departments
- Review of SIA Management and evaluation in 2016 -2018 PT GMP and PT PHP which explain Impacts, Objectives, Indicators, Target baselines (2019, 2020 and 2021) Management Measures, Monitor Measures and PIC. The MP has been adjusted according to each department or department covering
 PT GMP
 1. Management plan regarding employment
 2. Management Plan regarding OHS and Environment
 3. Manage plans regarding MCC
 4. Manage plans for health / clinics
 5. Management Plan on Social / Partner Development
 6. Management Plan regarding smallholders
 PT PHP
 1. Management Plan regarding Estate
 2. Plan to Manage the Social / Partnership Section
 3. Management plan regarding employment
 4. Management Plan regarding OHS and Environment
 5. Management Plan regarding Health / Clinic
 6. Management Plan regarding smallholders

The evidences had been verified and accepted to be closed out and complied. and will be verified again in relation to the implementation of social management as stipulated in Criterion 6.1.

Verified by	:	Moh Arif Yusni
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3.4.2. Identification of Findings, Corrective Actions and Observations at ASA-1.1 Assessment

NCR No.	: 2020.01	Issued by	: Hasiholan Sihombing
Date Issued	: 6 March 2020	Time Limit	: ASA-1.2
NC Grade	: Non Critical	Date of Closing	:
Standard Ref. & Requirement	6.7.2 Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in the appropriate language of the workforce. Assigned operatives trained in first aid are present in both field and other operations, and first aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed		
Evidence observed (filled by auditor): Based on field observations and document reviews, the following evidence was found: <ul style="list-style-type: none"> - The results of visits to 3 locations in GMP Estate (temporary storage of hazardous and toxic waste, fuel station and chemical warehouse) as well as at 1 location in GMP POM (first aid room), it was found that one of the contents of the first aid box namely Povidone Iodine had expired in February 2020. - The results of a visit to the GMP Estate Workshop, Povidone Iodine not found in the first aid box. - First aid training documentation was shown to first aid officers of PT GMP on 26 October 2019 where it was explained that the contents of first aid boxes were 21 items and conduct monitoring the contents of first aid boxes every month. 			
Non-Conformance Description (filled by auditor): Based on this evidence, the monitoring of the contents of the first aid kit and its validity period has not effective.			
Root Cause Analysis (filled by organization audited): Monitoring of first aid box by person in charge limit for completeness only.			
Correction (filled by organization audited): Replacing the expired of Povidone Iodine			
Corrective Action (filled by organization audited): 1. Improve the monitoring of first aid kit 2. Replacing the expired kit 3. Ensure the monitoring on schedule			
Assessor Evaluation and Conclusion (filled by auditor): 			
Verified by	:		

NCR No.	: 2020.02	Issued by	: Leonada
Date Issued	: 6 March 2020	Time Limit	: ASA-1.2
NC Grade	: Non Critical	Date of Closing	:

Standard Ref. & Requirement	:	7.8.1 A water management plan is in place and implemented to promote more efficient use and continued availability of water sources and to avoid negative impacts on other users in the catchment. The plan addresses the following: a) The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities b) Workers have adequate access to clean water
Evidence observed (filled by auditor): The company has a SOP for River-Riparian Belt Management with Document Number SOP-EHS-018, which explains that spraying is not carried out in river border areas and does not spray for the manufacture of harvest roads, harvest roads are made manually. River border area is given a sign or symbol that is attached to mark the river border area in the form of a live plant peg with yellow paint, with a distance of 5 palm oil from the river's edge. Based on a field visit to Batang Alin Block 023 PHP 2 Estate, it was found that the river border area has been given a yellow paint marker on the palm oil base, but in the river border area there are traces of chemical use.		
Non-Conformance Description (filled by auditor): Based on that, the company has not implemented management of river banks in accordance with the procedures.		
Root Cause Analysis (filled by organization audited): <ul style="list-style-type: none"> • Socialization of chemical procedure on riparian are not optimized • The sign of bufferzone (yellowline) was faded 		
Correction (filled by organization audited): <ul style="list-style-type: none"> • Registering area that have been spray and the sign of bufferzone • Improve the socialization of chemical procedure and bufferzone 		
Corrective Action (filled by organization audited): <ul style="list-style-type: none"> • Socializing the procedure to the person in charge phasely • Improve the supervising • Discipline to the workers • Remarking the sign of bufferzone • Planting a bamboo on HCV area 		
Assessor Evaluation and Conclusion (filled by auditor):		
Verified by	:	

3.4.3. Opportunity for Improvement

No	Ref. Std.	Description
1	2.1.1	Ensure the permit process changes in the coordinates of GMP Estate's temporary and hazardous waste storage
2	2.1.3	Improve monitoring of <i>HGU</i> stakes
3	2.3.1	Spruce up information on geolocation, land legality and operational of FFB suppliers.
4	4.8.4	Consistency in the implementation of the agreements agreed with the Kapa and Maligi indigenous groups
5	7.3.1	Improve the management of hazardous and toxic waste
6	7.7.6	The company has the opportunity to improve the groundwater level observation system with a piezometer in accordance with the RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2018)

3.4.4. Noteworthy Positive Components


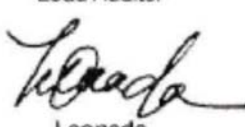
No	Description
1	Has obtained ISCC and ISPO certificates
2	The same treatment policy for HIV sufferers to get employment opportunities
3	GHG mitigation efforts in the form of methane capture development.
4	Construction of drinking water depots for employees.
5	No longer use pesticides made from paraquat

3.5 Summary of Arising Issues from Public and Auditor Verification

Public Issues (Institution/ NGO/Community)	Auditor Verification
Land Office of West Pasaman District <ul style="list-style-type: none"> • The company has reported the land use right report 2019 • There was no reports of abandoned land • In the PT GMP area there is a 2019 land case was reported to West Pasaman Land Office • There were no reports of fires in the PT GMP & PHP area in 2019 	<p>Has been verification on Indicator 4.8.3 & 4.8.4</p> <p>Has shown several documents on the completion process, consist of: Official Report, Decree of Head of West Pasaman District and the decision of the West Pasaman District Court which stated that the case had been decided in 2010 which won the PT GMP.</p>
Plantation Agency of West Pasaman District <ul style="list-style-type: none"> • The company has reported the Plantation Business Development Report (LPUP) regularly • Plantation Grade/Class Assessment has been carried out and the results are PT GMP (Class I) and PT PHP (Class II) • There was no reports of fires in the PT GMP & PHP area in 2019 • Solution to prevent the emergence of cases of land claims, it is better to replanting the oil palm in the area of the smallholders' plantation 	<ul style="list-style-type: none"> • The company has had all plantation permit and has been complied all obligation reports. • Based on hydrant simulation dan landfires simulation in PHP-1 Estate, known that company has adequate facilities and infrastructure of fire and functioning properly. • Company has realized the assistance to local communities based on needs of society that explained.
Environmental Agency of West Pasaman District <ul style="list-style-type: none"> • The company has reported RKL & RPL reports regularly • There was no issues and objections from the related parties regarding the negative impact on the surrounding environment due to the operations of PT GMP & PT PHP's plantations • There was no reports of fires in the PT GMP & PHP area in 2019 • Management Unit of PT GMP and PHP have obtained <i>PROPER BIRU</i> by the Ministry of Environment of Indonesia related to environmental management. 	<p>Auditor has verified the compliance towards manpower aspect, such as:</p> <ul style="list-style-type: none"> - Company has reported RKL & RPL regularly - Company has carried out environmental management according to procedures. - Based on document review, it is known that there was no land fire in 2019 and the company has adequate fire fighting equipment.
Manpower Agency of West Pasaman District <ul style="list-style-type: none"> • The company has regularly reported mandatory reports related to employment • There was no reports from the related parties regarding labor disputes between the company and workers • The company has paid the health and workers insurance (<i>BPJS</i>) contributions to the workers 	<p>Auditor has verified the compliance towards manpower aspect, such as:</p> <ul style="list-style-type: none"> - Company has reported the Manpower Report regularly - Company pays the basic wage according to applicable minimum wage and also the overtime payment has paid according to regulation - Company has registered the workers to health and work insurance
Head of Cooperation Village Unit of Lingkuang Aur II <ul style="list-style-type: none"> • Collaboration on smallholders plantation management with PT GMP has been going well since 1992 • The FFB prices of smallholders have followed the Provincial Plantation Service price standards • The smallholders credit is now paid off 	<p>This matters have been verified and explained in the report related to the FFB price (criteria 5.1)</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<ul style="list-style-type: none"> • The company continues to provide technical guidance related to maintenance and harvesting processes • There was no cases of fire in the PT GMP & PHP area in 2019 • The Cooperation of Lingkung Aur II routinely holds Annual Member Meetings 	
Jorong Tanjung Pangkal (Ninik Mamak Kenagarian Lingkung Aur) <ul style="list-style-type: none"> • The process of granting customary lands to the company through the local government has been carried out by consultation without coercion or forced. • The impact of the existence of the company is the access of employment opportunities for the surrounding community • Open opportunities for the surrounding community to cooperation with the company (FFB's supplier, FFB transported, etc) 	Has been verification on Indicator 4.8.3 & 4.8.4
The Head of Kapa Customary Community <ul style="list-style-type: none"> • Settlement related to the case of land issues between PHP I Estate with the KUD Kapar Smallholders Group and PHP II Estate with the Maligi Cooperation Village Unit (KUD), has an agreement point on 20 February 2020 where an agreement was reached that PT PHP's plantation operations would continue and were supported by local customary communities by consistently carrying out plans to provide compensation to smallholder group. The Agreement document has been signed by both parties and is still awaiting signing by the West Pasaman District. • The value of the initial land owner compensation has been agreed both of parties. • Social interaction between the company and community was well established • Settlement of land cases between PT PHP and Kenagarian Kapa will be used as a pilot project to resolve cases in the West Pasaman District • If there are demands from posterity (young generation) related to land claim, it must be resolved through customary mechanisms (Ninik Mamak). 	Has been verification on Indicator 4.8.1 & 4.8.2
The Head of Clan Group (Ninik Mamak Kenagarian Sasak) <ul style="list-style-type: none"> • The process of granting customary lands to the company through the local government has been carried out by consultation without coercion or forced. • If there are demands from posterity (young generation) related to land claim, it must be resolved through customary mechanisms (Ninik Mamak). 	Has been verification on Indicator 4.8.3 & 4.8.4

Public Issues (Institution/ NGO/Community)	Auditor Verification
Worker union of PT GMP PHP <ul style="list-style-type: none"> • All worker is permanent worker. • Basic wages is in accordance with minimum wage of Sumatera Barat Province for 2020. • There are no complaints related to payment of wages or overtime. All have been paid in accordance with applicable regulations. • There are no complaints from workers that cannot be resolved at the bipartite level. 	<p>Auditor has verified to all employment aspect regarding minimum wage, salary payment, minimum age, anti discrimination, and complaint.</p>
Serbundo of PT GMP PHP <ul style="list-style-type: none"> • All worker is permanent worker. • Basic wages is in accordance with minimum wage of Sumatera Barat Province for 2020. • There are no complaints related to payment of wages or overtime. All have been paid in accordance with applicable regulations. • There are no complaints from workers that cannot be resolved at the bipartite level. 	<p>Auditor has verified to all employment aspect regarding minimum wage, salary payment, minimum age, anti discrimination, and complaint.</p>
Gender Committee of PT GMP PHP <ul style="list-style-type: none"> • There are no complaints regarding immoral acts in the company. • The company provides menstrual leave and maternity leave for all female workers. • The routine activity of the gender committee is to participate in implementing posyandu. • The company gives special permission to breastfeed for workers who are breastfeeding. 	<p>Auditor has verified to all employment aspect regarding minimum wage, salary payment, minimum age, anti discrimination, and complaint.</p>
FFB Supplier of third party <ul style="list-style-type: none"> • The price of FFB is determined based on the mill adjusting to market prices. • Every price change will be informed via whatsapp service. • There are no complaints related to the payment of buying and selling FFB. 	<p>Company participated in community development by make an agreement with FFB supplier.</p>

4.0	CERTIFIED ORGANISATION'S ACKNOWLEDGEMENT OF INTERNAL RESPONSIBILITY
4.1	Formal Sign-off of Assessment Findings
	<p>Hereunder sign by management representative from inspected company to acknowledge a field assessment and agree for all content explained in this assessment report, included of non-compliance findings.</p> <p>Signed on behalf of:</p> <div style="display: flex; justify-content: space-around; align-items: flex-end;"> <div style="text-align: center;"> <p>PT Gersindo Minang Plantation Group Estate Manager</p>  <p><u>Indra Arman</u> Friday, 06 March 2020</p> </div> <div style="text-align: center;"> <p>PT Mutuagung Lestari Lead Auditor</p>  <p><u>Leonada</u> Friday, 06 March 2020</p> </div> </div>

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

No	Institution/NGO/Community	Address	Phone/Email	Form of Communication	Date of Contact	Response	
						Yes	No
1	Environmental Agency	West Pasaman District	-	Visit and Interview	3 March 2020	✓	
2	Land Office	West Pasaman District	-	Visit and Interview	3 March 2020	✓	
3	Plantation Agency	West Pasaman District	-	Visit and Interview	3 March 2020	✓	
4	Manpower Agency	West Pasaman District	-	Visit and Interview	3 March 2020	✓	
5	Head of Cooperation Village Unit of Lingkung Aur II	West Pasaman District	-	Visit and Interview	4 March 2020	✓	
6	Jorong Tanjung Pangkal (Ninik Mamak Kenagarian Lingkung Aur)	West Pasaman District	-	Visit and Interview	4 March 2020	✓	
7	The Head of Kapa Customary Community	West Pasaman District	-	Visit and Interview	4 March 2020	✓	
8	The Head of Clan Group (Ninik Mamak Kenagarian Sasak)	West Pasaman District	-	Visit and Interview	4 March 2020	✓	
9	Worker union of PT GMP PHP	PT GMP – PT PHP	-	Interview	3 March 2020	✓	
10	Serbundo of PT GMP PHP	PT GMP – PT PHP	-	Interview	3 March 2020	✓	
11	Gender Committee of PT GMP PHP	PT GMP – PT PHP	-	Interview	3 March 2020	✓	
12	FFB Supplier of third party	PT GMP – PT PHP	-	Interview	5 March 2020	✓	
13	<ul style="list-style-type: none"> - Spraying: 7 workers - Manuring: 6 workers - EFB Application: 6 workers - Harvesting: 3 workers - Hazardous waste storage: 1 worker - Daycare: 2 workers - Clinic: 1 worker 	GMP Estate	-	Visit and Interview	3 March 2020	✓	
14	<ul style="list-style-type: none"> - Spraying: 9 workers - Manuring: 6 workers - EFB Application: 3 workers - Harvesting: 3 workers - Hazardous waste storage: 1 worker - Daycare: 1 worker - Clinic: 2 workers 	PHP 1 Estate	-	Visit and Interview	4 March 2020	✓	
15	<ul style="list-style-type: none"> - Manual weeding: 6 workers - Harvesting: 6 workers - Hazardous waste storage: 1 worker - Clinic: 1 worker 	PHP 2 Estate	-	Visit and Interview	5 March 2020	✓	
16	<ul style="list-style-type: none"> - Security: 2 Security - Loading ramp: 2 workers - Sterillizer station: 1 worker - Clarification station: 1 	GMP POM	-	Visit and Interview	3 March 2020	✓	

	worker - Press station: 1 worker - Boiler station: 2 worker - Engine room: 1 worker - Kernel station: 1 worker - WWTP: 1 worker - WTP: 1 worker - Workshop: 1 workers - LA: 1 workers						
17	Sawit Watch	Bogor, Indonesia	info@sawitwatch.or.id	Email	26 February 2020		✓
18	WWF	Jakarta, Indonesia	wwf-indonesia@wwf.or.id	Email	26 February 2020		✓
19	WALHI	Jakarta, Indonesia	informasi@walhi.or.id	Email	26 February 2020		✓
20	AMAN	Jakarta, Indonesia	rumahaman@cbn.net.id	Email	26 February 2020		✓

Appendix 2. Assessment Program

DATE	2 – 7 March 2020	
PLANNED TIME	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
Monday, 2 March 2020		
06.10 – 08.05	Jakarta – Padang	All Auditor
08.05 – 14.00	Padang – SITE (PT. GMP)	
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)	
15.00 – 17.00	Documents Review <ul style="list-style-type: none">Review of previous assessment findingsVerification of Basic Information Mill and EstateConfirmation of Time Bound PlanReview of Partial CertificationVerification of P n C documents	
Tuesday, 3 March 2020		
08.00 – 12.00	Stakeholders consultation to related agencies in Belitung Regency Field Observation to GMP Estate Aspect to be verified : <ul style="list-style-type: none">Implementation of Legal Aspect (Land Ownership, Legal Boundaries, HCV area.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 AspectImplementation 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).	LEO / OTR LEO / OTR HSS RAB / AAS
12.00 – 14.00	Break	
14.00 – 17.00	Field observation to GMP POM : <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 Interview with Gender Committee, Worker's Union, , Worker's Cooperative (if	LEO/ RAB HSS LEO/ RAB

DATE	2 – 7 March 2020	
PLANNED TIME	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
	any), Local Contractor (for Mill and Estate), Smallholders, Third Party Supplier (if any), local NGO (if any)	AAS / OTR
Wednesday, 4 March 2020		
08.00 – 12.00	Stakeholder consultation to affected communities surrounding the plantations, indigenous peoples, local communities and previous land owners. Field Observation to PHP 1 Estate Aspect to be verified : <ul style="list-style-type: none"> - Implementation of Legal Aspect (Land Ownership, Legal Boundaries, HCV area. - 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). 	LEO / OTR LEO / OTR HSS / RAB AAS
12.00 – 14.00	Break Continue Field Observation and field observation clarification	All Auditor
14.00 – 17.00	Documents Review <ul style="list-style-type: none"> - Review of previous assessment findings - Verification of Basic Information Mill and Estate - Confirmation of Time Bound Plan - Review of Partial Certification - Verification of P n C documents 	All Auditor
Thursday, 5 March 2020		
08.00 – 12.00	Field Observation to PHP 2 Estate Aspect to be verified : <ul style="list-style-type: none"> - Implementation of Legal Aspect (Land Ownership, Legal Boundaries, HCV area. - 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). 	LEO HSS / OTR RAB / AAS
12.00 – 14.00	Break	
14.00 – 17.00	<ul style="list-style-type: none"> • Continue Field Observation and field observation clarification 	All Auditor

DATE	2 – 7 March 2020	
PLANNED TIME	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
	<ul style="list-style-type: none">• Verification of documents and completing checklist	
Friday, 6 March 2020		
08.00 – 10.00	<ul style="list-style-type: none">• Continue Field Observation and field observation clarification• Verification of documents and completing checklist	All Auditor
10.00 – 12.00	Interim Meeting (closing meeting preparation)	
12.00 – 14.00	Break	
14.00 – 15.00	Interim Meeting (closing meeting preparation)	
15.00 – 17.00	Closing Meeting	
17.00 – 23.00	Travel to Padang	
Saturday, 7 March 2020		
11.50 – 13.45	Padang – Jakarta	All Auditor