

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

Name of Management Organisation : Leidong West Mill, PT Maskapai Perkebunan Leidong West Indonesia subsidiary of Golden Agri Resources Ltd

Plantation Name : PT Maskapai Perkebunan Leidong West Indonesia (Leidong West Selatan Estate and Leidong West Utara Estate) & PT Bumi Permai Lestari (Bukit Intan Estate and Bukit Mas Estate)

Location : Village of Terentang, Sub District of Kelapa, District of Bangka Barat, Province of Bangka Belitung, Indonesia

Certificate Code : MUTU-RSPO/041

Date of Certificate Issue : 16 May 2019 Date of License Issue : 16 May 2020

Date of Certificate Expiry : 15 May 2024 Date of License Expiry : 15 May 2021

Assessment	Assessment Date	PT. Mutuagung Lestari Auditor	Reviewed by	Approved by
ASA 1.1	24 to 29 February 2020	Arif Faisal Simatupang (Lead Auditor), Muhamad Rinaldi, Dwi Haryati, Johannes Pandiangan (Observer)	Ardiansyah	Octo H.P.N. Nainggolan

Assessment	Approved by MUTUAGUNG LESTARI on:
ASA 1.1	28 March 2020

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Figure 1. Location Map of PT Maskapai Perkebunan Leidong West Indonesia and PT. Bumi Permai Lestari

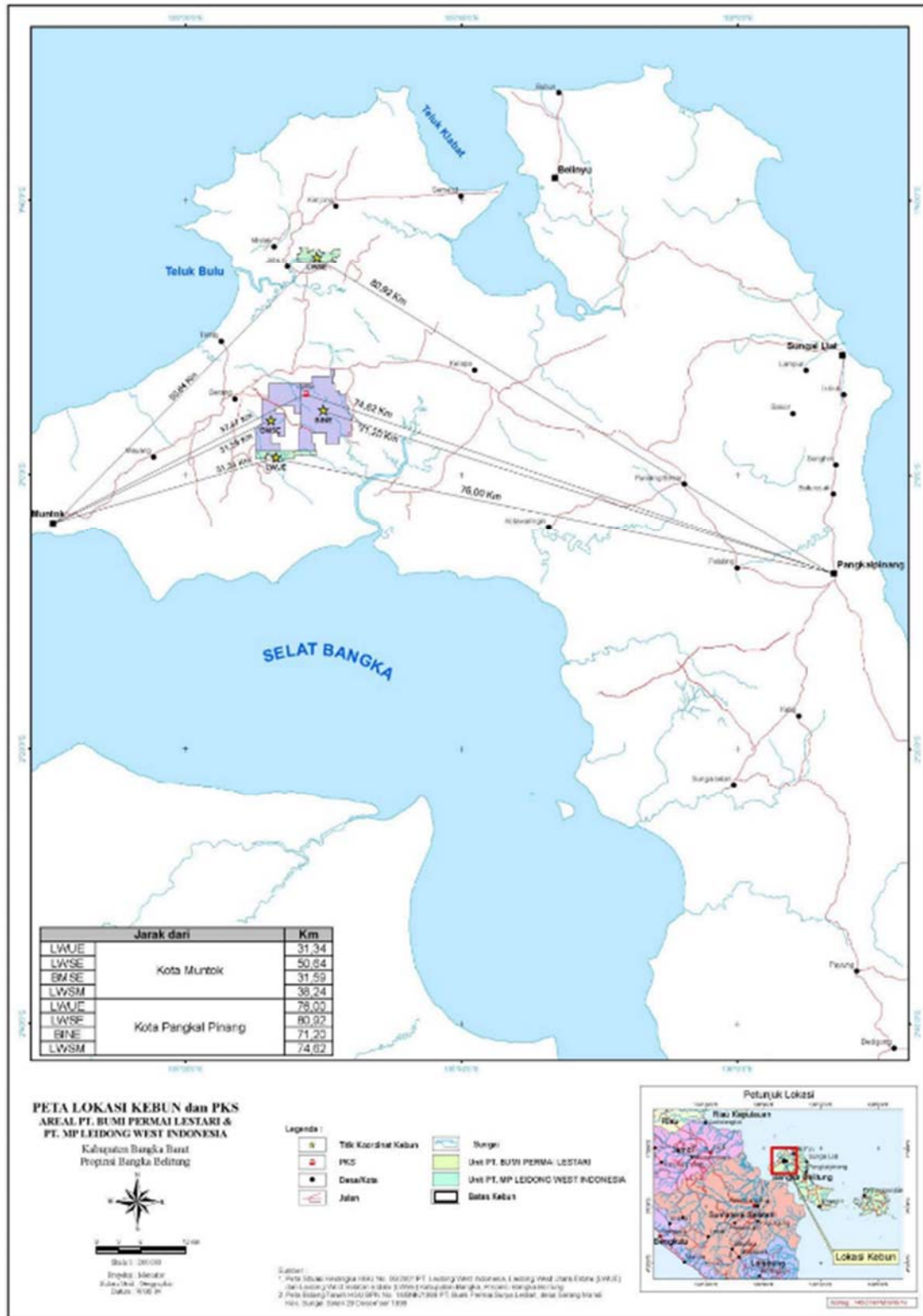


Figure 2. Operational Map of PT Maskapai Perkebunan Leidong West Indonesia - Leidong West Selatan Estate (LWSE)

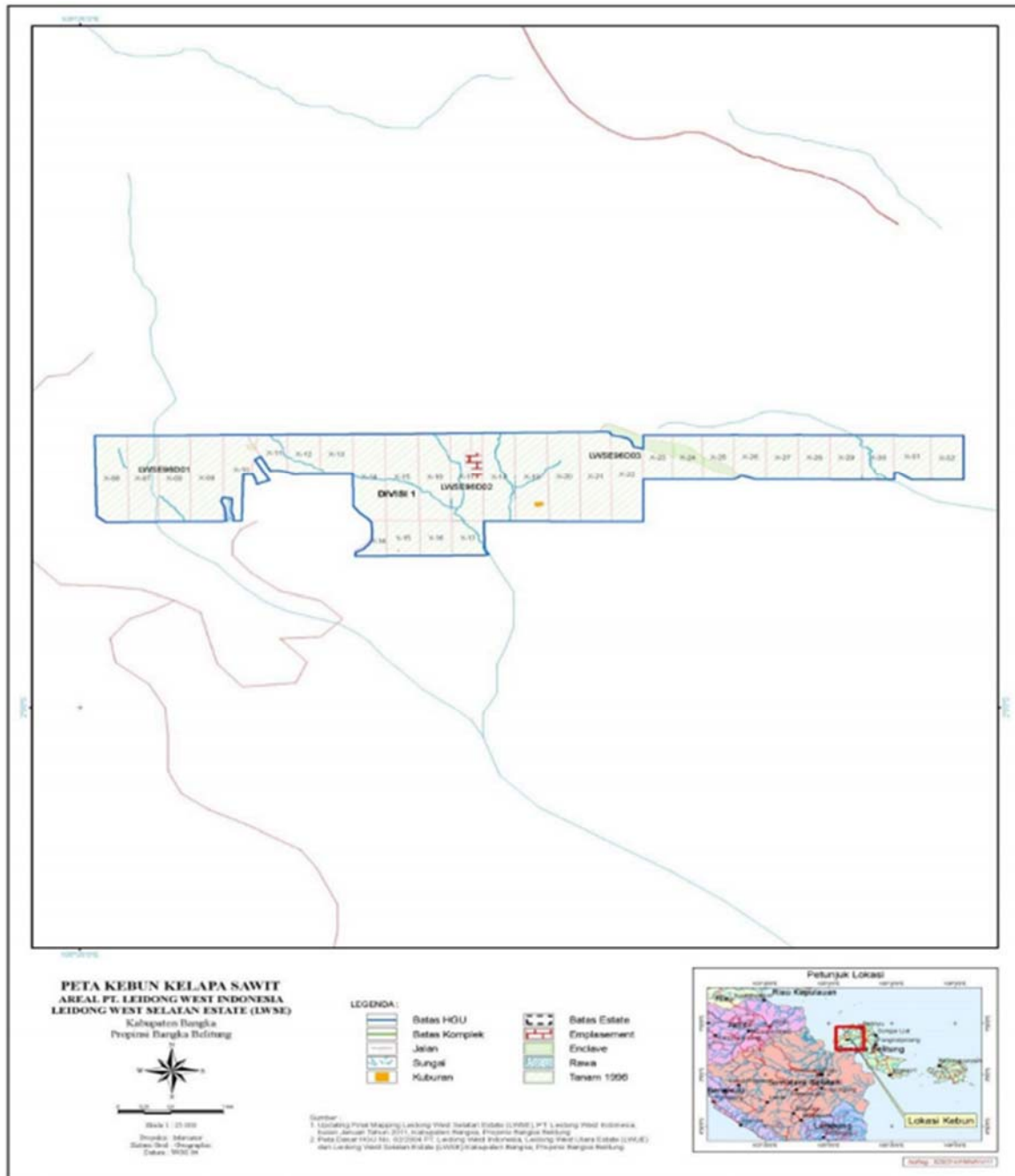


Figure 3. Operational Map of PT Maskapai Perkebunan Leidong West Indonesia - Leidong West Utara Estate (LWUE)

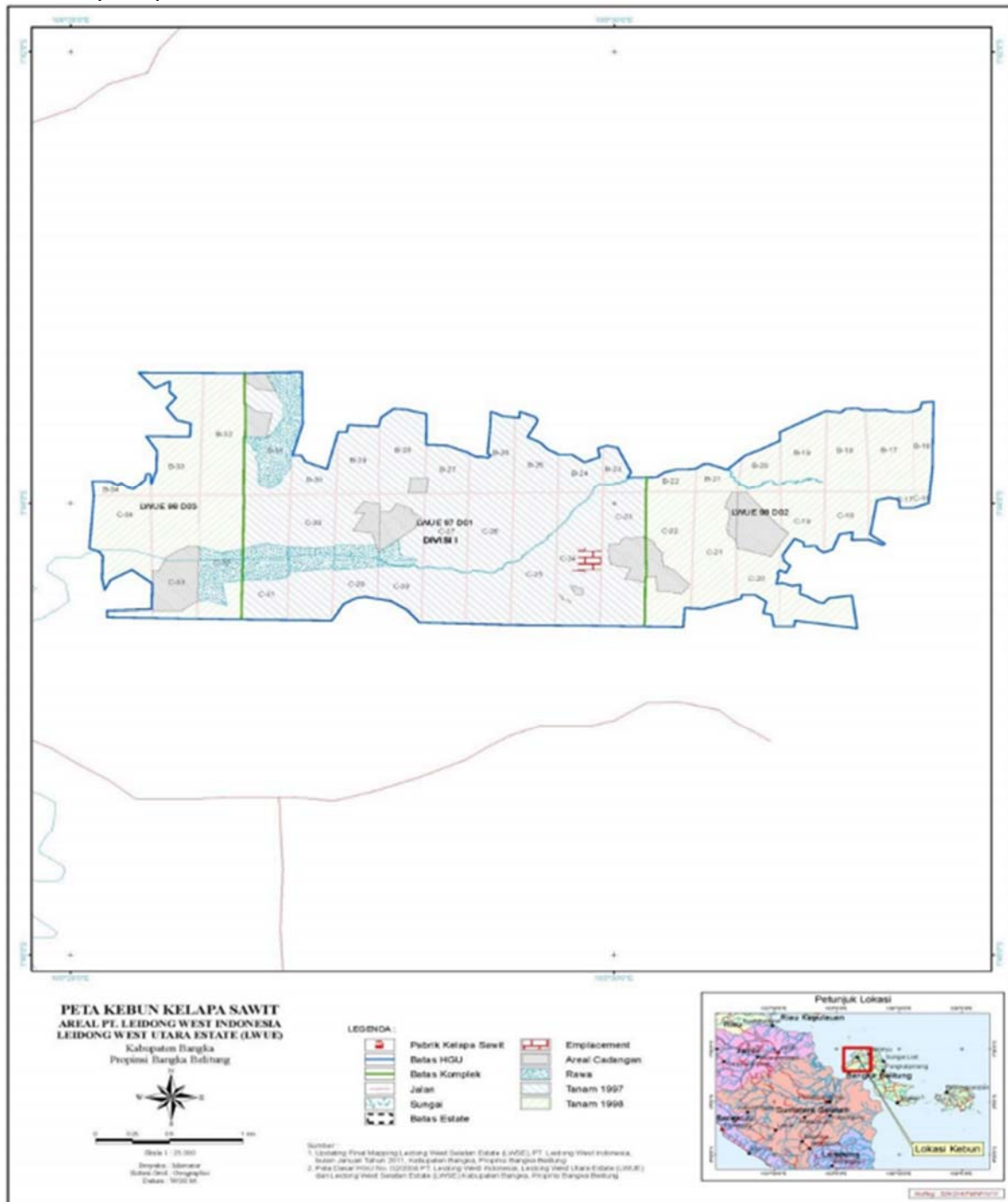


Figure 4. Operational Map of PT Bumi Permai Lestari - Bukit Intan Estate (BINE)

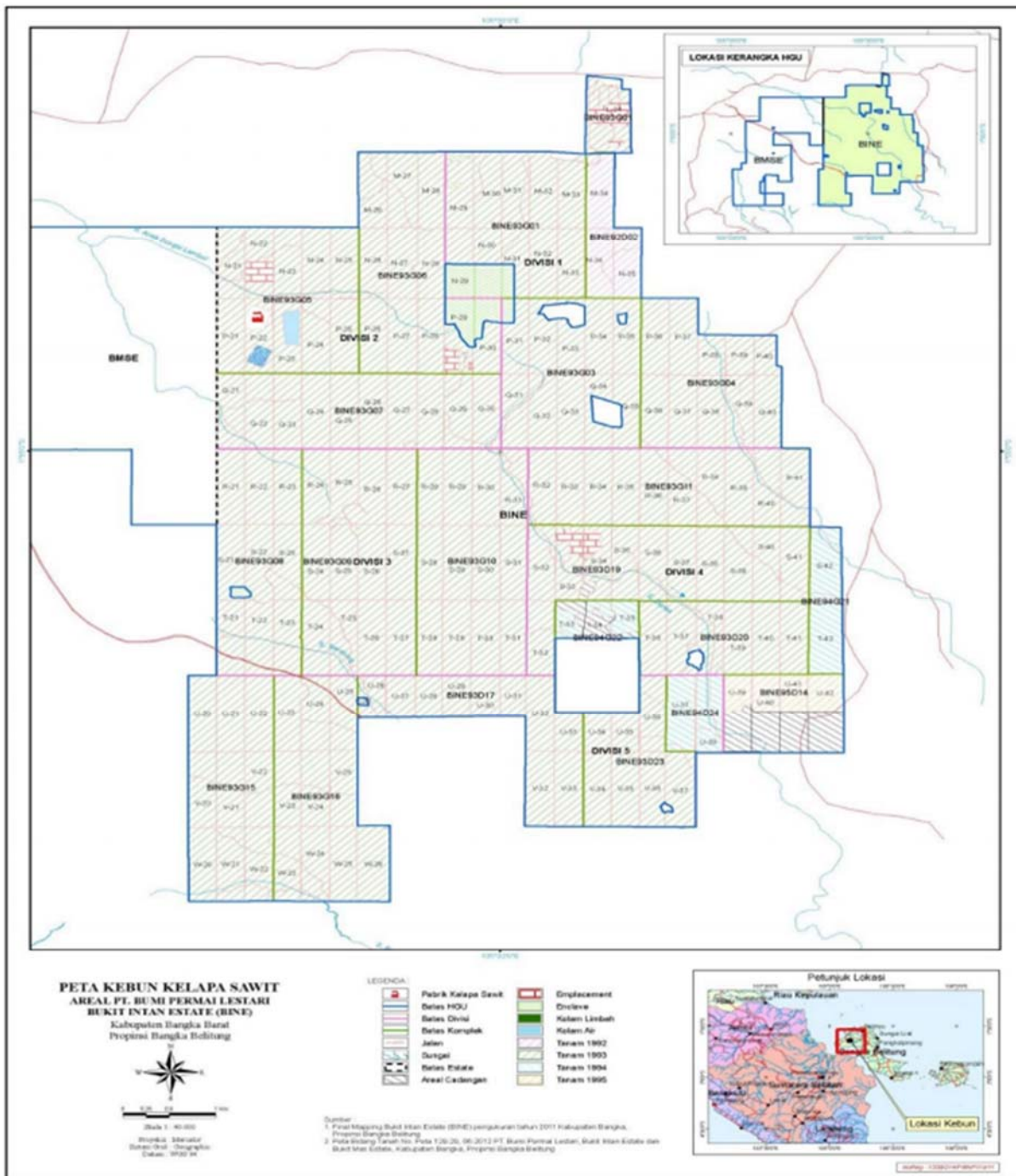
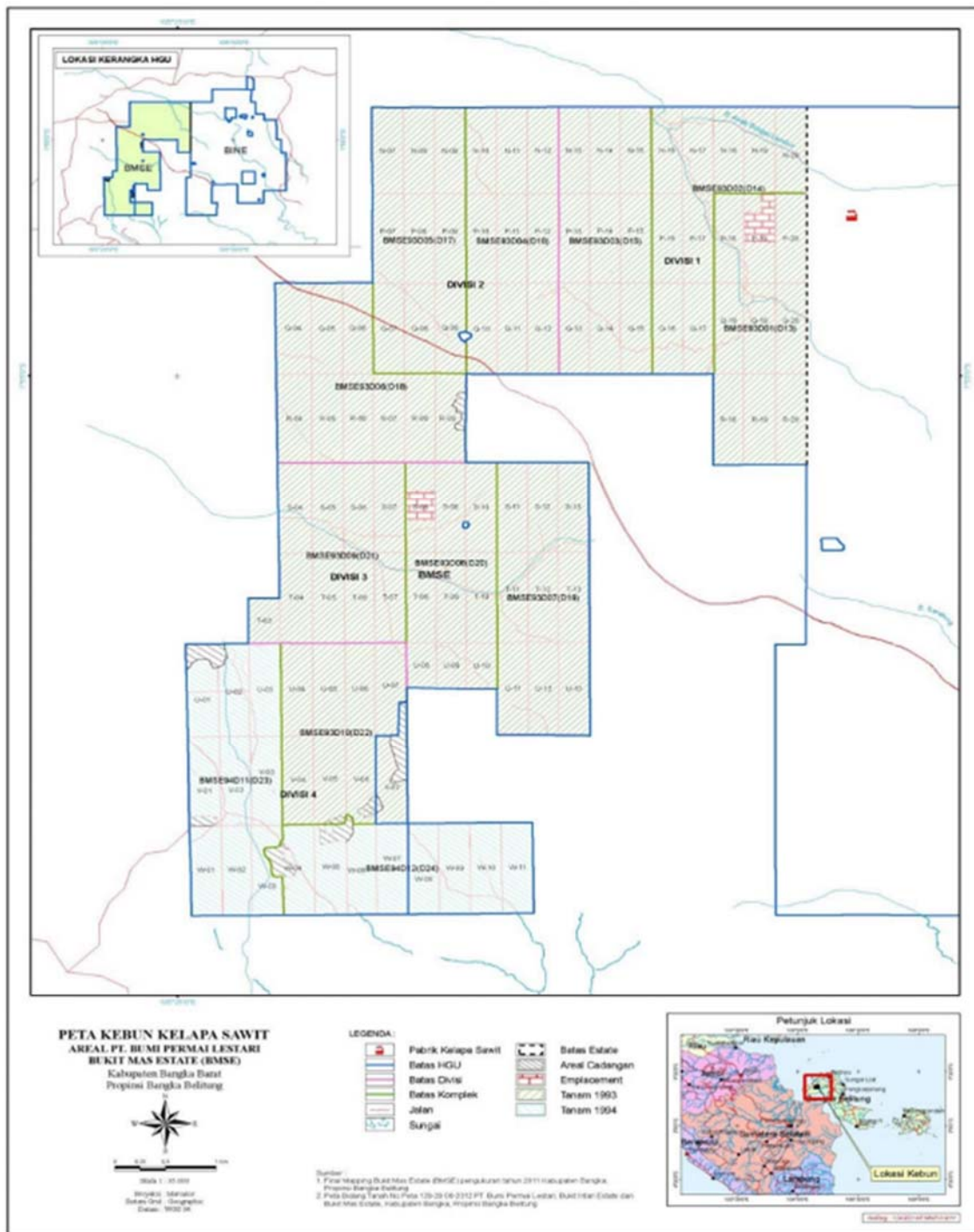


Figure 5. Operational Map of PT Bumi Permai Lestari – Bukit Mas Estate (BMSE)



Abbreviations Used

ASA	:	Annual Surveillance Assessment
BPJS	:	<i>Badan Penyelenggara Jaminan Sosial</i> (Insurance)
BMSE	:	Bukit Mas Estate
BINE	:	Bukit Intan Estate
BKPM	:	<i>Badan Koordinasi Penanaman Modal</i> (Investment Agency)
BOD	:	Biochemical Oxygen Demand
BPL	:	Bumi Permai Lestari
CEO	:	Chief Executive Officer
CFO	:	Chief Financial Office
CH	:	Certificate Holder
CLA	:	Collective Labour Agreements
CPO	:	Crude Palm Oil
CSPK	:	Certified Sustainable Palm Kernel
CSPO	:	Certified Sustainable Palm Oil
CSR	:	Corporate Sosial Responsibility
DPLH	:	<i>Dokumen Pengelolaan Lingkungan Hidup</i> / Environmental Management Document
EBS	:	Empty Bunch Spreader
EFB	:	Empty Fruit Bunch
EHS	:	Environmental Health and Safety
EIA	:	Environmental Impact Assessment
FFB	:	Fresh Fruit Bunch
FPIC	:	Free Prior Inform and Consent
GAR	:	Golden Agri Resource
GHG	:	Green House Gas
GSEP	:	GAR Social and Environment Policy
HCV	:	High Conservation Value
HGU	:	<i>Hak Guna Usaha</i> (Land Use Title/Right)
HIRAC	:	Hazard Identification Risk Assessment and Control
ID	:	Identity
IPM	:	Integrated Pest Management
ILO	:	International Labour Organization
ISCC	:	International Sustainability and Carbon Certification
ISO	:	International Standard Organization
ISPO	:	Indonesia Sustainable Palm Oil
IUCN	:	International Union for Conservation of Nature
IUP	:	Plantation Permit/Licenses
KAN	:	Indonesian Accreditation Body
KER	:	Kernel Extraction Rate
LA	:	Land Application
LD	:	Lethal Dosage
LKUP	:	<i>Laporan Kegiatan Usaha Perkebunan</i> (Plantation Activity Report)
LSU	:	Leaf Sampling Unit

LWI	:	Leidong West Indonesia
LWSM	:	Leidong West Mill
LWUE	:	Leidong West Utara Estate
LWSE	:	Leidong West Selatan Estate
MCMD	:	Management Committee for Mill Development
MCU	:	Medical Check Up
MoU	:	Memorandum of Understanding
MSDS	:	Material Safety Data Sheet
MUTU	:	Mutuagung Lestari
MTQ	:	Musabaqah Tilawatil Quran
NGO	:	Non Government Organization
NPWP	:	<i>Nomor Pokok Wajib Pajak</i> (Tax Identity Number)
OER	:	Oil Extraction Rate
OFI	:	Oportunity for Improvement
OHS	:	Occupational Health and Safety
OSH	:	Occupational Safety and Health
OIA	:	Operational Internal Audit
PK	:	Palm Kernel
POM	:	Palm Oil Mill
POME	:	Palm Oil Mill Effluent
PSM	:	Perkebunan Sinar Mas
PT BPL	:	PT Bumi Permai Lestari
PT MP LWI	:	PT Maskapai Perkebunan Leidong West Indonesia
P2K3	:	<i>Panitia Pembina Keselamatan dan Kesehatan Kerja</i>
PPE	:	Personal Protective Equipment
RC/PC	:	Regional Controller / Production Controller
RKL- RPL	:	Environmental Management and Monitoring Report
RSPO	:	Roundtable Sustainable Palm Oil
SCCS	:	Supply Chain Certification System
SIA	:	Social Impact Assessment
SMARTRI	:	SMART Research Institute
SMD Ops	:	Senior Managing Directors Operation
SOP	:	Standard Operating Procedure
SPO	:	Sustainable Palm Oil
SPSI	:	<i>Serikat Pekerja Seluruh Indonesia</i>
SPUP	:	<i>Surat Pendaftaran Usaha Perkebunan</i> (Plantation Business Permit)
SSU	:	Soil Sampling Unit
STNK	:	<i>Surat Tanda Nomor Kendaraan</i> /Vehicle identity number
UKL-UPL	:	<i>Upaya Pengelolaan & Pemantauan Lingkungan Hidup</i> / Environmental Management & Monitoring Effort
UPDKS	:	<i>Ulat Pemakan Daun Kelapa Sawit</i>
VPA	:	Vice President Agronomi
VPA /VPM	:	Vice President Agronomy / Vice President Manufacture
WHO	:	World Health Organization
WLTk	:	<i>Wajib Laport Tenaga Kerja</i>

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"><i>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.</i><i>RSPO Certification System for Principles and Criteria, 14 June 2017</i>	
1.2	Organisation Information		
1.2.1	Organisation name listed in the certificate	PT Maskapai Perkebunan Leidong West Indonesia subsidiary of Golden Agri Resources	
1.2.2	Contact person	Yahya Mustakim	
1.2.3	Organisation address and site address	RSPO register company: 108 Pasir Panjang Road, #06-00 Golden Agri Plaza, Singapore 118535 Liaison Office : Sinarmas Land Tower 2, 30th Floor JL. MH Thamrin No 51 Kav 22 Jakarta 10350 Indonesia	
1.2.4	Telephone	+6221 50338899 ext 1184	
1.2.5	Fax	+6221 50389999	
1.2.6	E-mail	Yahya-mustakim@sinarmas-agri.com	
1.2.7	Web page address	www.goldenagri.com.sg	
1.2.8	Management Representative who completed the application for certification	Yahya Mustakim (<i>Head of SPO Certification& Low GHG Emissions Strategy</i>)	
1.2.9	Registered as RSPO member	1-0096-11-000-00 – 31 March 2011	
1.3	Type of Assessment		
1.3.1	Scope of Assessment and Number of Management Unit	Palm Oil Mill and supply base <ul style="list-style-type: none">Leidong West Mill, Leidong West Selatan Estate, Leidong West Utara Estate, Bukit Intan Estate and Bukit Mas Estate	
1.3.2	Type of certificate	Single	
1.4	Locations of Mill and Plantation		
1.4.1	Location of Mill		
	Name of Mill	Location	Coordinate
			LatitudeLongitude
	Leidong West Mill	Terentang Village, Kelapa Sub District, Bangka Barat District, Bangka Belitung Province, Indonesia	S 01° 54' 05"E 105° 28' 35"
1.4.2	Location of Certification Scope of Supply Base		
	Name of Supply Base	Location	Coordinate
			LatitudeLongitude
	Leidong West Selatan Estate (LWSE)	Berang Village, Simpang Teritip Sub District, Bangka Barat District, Bangka Belitung Province, Indonesia	S 01° 58' 24"E 105° 26' 59"

	Leidong West Utara Estate (LWUE)	Mislak, Tumbak Petar, Jebus and Ranggi Asam Village; Jebus Sub District; Bangka Barat District, Bangka Belitung Province, Indonesia	S 01° 44' 17"	E 105° 29' 53"		
	Bukit Intan Estate (BINE) – PT Bumipermai Lestari	Terentang and Kacung Village, Kelapa Sub District; Bangka Barat District, Bangka Belitung Province, Indonesia	S 01° 52' 33"	E 105° 30' 35"		
	Bukit Mas Estate (BMSE) - PT Bumipermai Lestari	Ibul Villages; Kelapa Sub District; Bangka Barat District, Bangka Belitung Province, Indonesia	S 01° 54' 03"	E 105° 28' 05"		
1.5	Description of Area Statement					
1.5.1	Tenure					
	• State		9,627.77 Ha			
	• Community		- Ha			
1.5.2	Area Statement					
	• Total area		9,627.77 Ha			
	• Total planted area		8,931.32 Ha			
	- Mature area		7,474.45 Ha			
	- Immature area		1,456.87 Ha			
	• Nursery		31.07 Ha			
	• Mill and building		83.27 Ha			
	• Road		399.07 Ha			
	• Reserve area		129.44 Ha			
	• River/drain/swamp		53.60 Ha			
	• HCV		311.31** Ha			
	* Mill are located in BINE (land lease agreement)					
	** HCV area are consists of planted area (175.17 Ha) and not planted area (136.14 Ha). HCV in not planted consist of in HGU and outside the HGU.					
1.6	Planting Year and Cycles					
1.6.1	Age profile of planting year					
	Planting Year	Hectarage (Ha)				
		LWSE	LWUE	BINE	BMSE	Total
	1992	-	-	85.28	-	85.28
	1993	-	-	2,866.08	2,534.01	5,400.09
	1994	-	-	156.68	482.76	639.44
	1995	-	-	60.89		60.89
	1996	627.12	-	-	-	627.12
	1997	-	341.45	-	-	341.45
	1998	-	320.18	-	-	320.18
	Sub Total of Mature	627.12	661.63	3,168.93	3,016.77	7,474.45

	2019	-	-	1,359.57	-	1,359.57	
	2020	-	-	97.30	-	97.30	
	Sub Total of Immature	-	-	1,456.87	-	1,456.87	
	TOTAL	627.12	661.63	4,625.80	3,016.77	8,931.32	
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 (Certified and Non-Certified)						
	Name of Mill	Capacity (tonnes/ hour)	FFB Processed (tonnes/year)	CPO		Palm Kernel	
				Out put (tonnes)	Extraction (%)	Out put (tonnes)	Extraction (%)
	Leidong West Mill	60	223,760.23	46,405.47	20.74	13,777.99	6.16
*Production data source from 12 months before assessment (February 2019 – January 2020)							
1.7.2	Description of Certification Scope of Supply Base (Certified)						
	Name of Estate	Total Area (Ha)	Planted Area (Ha)	FFB (tonnes/year)	Yield (tonnes/ ha/year)	Supplied to Mill	
						FFB (tonnes/year)	%
	Leidong West Selatan Estate	642.73	627.12	14,806.76	23.61	14,806.76	100
	Leidong West Utara Estate	746.52	661.63	14,021.44	21.19	14,021.44	100
	Bukit Intan Estate	5,055.02	4,625.80	87,839.34	18.99	87,839.34	100
	Bukit Mas Estate	3,183.50	3,016.77	65,666.38	21.77	65,666.38	100
	TOTAL	9,627.77	8,931.32	182,333.92	20.42	182,333.92	100
*Production data source from 12 months before assessment (February 2019 – January 2020)							
1.7.3	FFB description from other source (Certified and Non-Certified)						
	Name of sources/Organisation	Type of Organisation	number of smallholders	Production Area (Ha)	Supplied to Mill		
					FFB (tonnes/year)		
	Bukit Permata Estate (RSPO Certified)	PT Bumi Permai Lestari - GAR	-	-	33,713.63		
	Bukit Perak Estate (RSPO Certified)	PT Bumi Permai Lestari - GAR	-	-	1,212.57		
	CV Multi Nusa Pratama (RSPO Non Certified)	Third Party Supplier	-	-	3,729.46		
	CV Hijau Barokah (RSPO Non Certified)	Third Party Supplier	-	-	1,739.81		
	CV Karya Sejati Utama (RSPO Non Certified)	Third Party Supplier	-	-	1,030.84		
	TOTAL					41,426.31	
*Production data source from 12 months before assessment (February 2019 – January 2020)							
1.7.4	Product categories			FFB, CPO, PK			

1.8	Tonnage of Certified Product							
1.8.1	Past Annual Claim Certified Product			Last Year Projected Certified Volume – period of 16 May 2019 to 15 May 2020 (MT)	Last Year Actual Certified Volume, period of 1 February 2019 to 31 January 2020 (MT)			
	FFB Processed			241,936	217,260.12			
	CSPO Production			49,938	45,098.76			
	Certified Palm Kernel (PK) Production			14,266	13,375.66			
1.8.2	Certified Product Selling							
	Type of selling of certified product			Actual selling of certified product for last year (1 February 2019 to 31 January 2020) (MT)				
	CSPO sold as RSPO certified product			24,185.94				
	CSPK sold as RSPO certified product			13,155.00				
	CSPO sold under other scheme			19,824.27				
	CSPK sold under other scheme			-				
	CSPO sold as conventional			-				
	CSPK sold as conventional			-				
1.8.3	Estimate of Certified FFB Claim							
	Name of Estates		Total Area (Ha)	Planted Area (Ha)	FFB (tonnes/year)	Yield (tonnes/ha/year)		
	Leidong West Selatan Estate		642.73	627.12	14,000	22.32		
	Leidong West Utara Estate		746.52	661.63	13,000	19.65		
	Bukit Intan Estate		5,055.02	4,625.80	92,000	19.89		
	Bukit Mas Estate		3,183.50	3,016.77	69,000	22.87		
	TOTAL		9,627.77	8,931.32	188,000	21.05		
	*Projected FFB production for 12 months of certificate (16 May 2020 to 15 May 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 (%)	
	Leidong West Mill	60	188,000	41,400	22	11,600	6.2	MB
*Projected CSPO and CSPK production for 12 months of certificate (16 May 2020 to 15 May 2021)								
1.9	Other Certifications							
	ISCC			ISCC EU assessment by GutCert No. EU-ISCC-Cert-DE104-07781527				
	ISPO			ISPO certificate by Mutuagung Lestari No. MUTU-ISPO/049 valid from 5 February 2016 until 4 February 2021				
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						
	Pangkalan Panji	2013	Sawit Mas Estate		2013	Sumatera Selatan	Certified	

(PT Sawit Mas Sejahtera)		Sawit Mas Estate (HGU on progress)	2022	Province	-
Bumi Sawit Mill (PT Bumi Sawit Permai)	2013	Bumi Sawit Estate	2013	Sumatera Selatan Province	Certified
		Bumi Sawit Estate (HGU on progress)	2022		-
Muara Kandis Mill (PT Djuanda Sawit Lestari)	2013	Muara Tawas Estate	2013	Sumatera Selatan Province	Certified
		Muara Kandis Estate	2013		Certified
		Muara Kandis Estate (HGU on progress – 418.49 Ha)	2022		-
		Muara Tawas Estate (HGU on progress – 57.7 Ha)	2022		-
		Smallholder (KKPA Pandawa)	2021		-
Sungai Rungau Mill (PT Sumber Indah Perkasa)	2013	Sungai Rungau Estate	2013	Kalimantan Tengah Province	Certified
		Sungai Seruyan Estate	2013		Certified
		Terawan Estate	2013		Certified
		Tangar Estate	2013		Certified
		Bukit Tiga Estate	2013		Certified
Bukit Perak Mill (PT Bumi Permai Lestari)	2013	Bukit Perak Estate	2013	Bangka Belitung Province	Certified
		Bukit Permata Estate	2013		Certified
		Bukit Lestari Estate (PT Bumi Bangka Lestari)	2023		-
		Bukit Permai Estate (PT Bumi Permai Surya Lestari)	2023		-
Tanjung Kembiri Mill (PT Forestaletari Dwikarya)	2013	Tanjung Kembiri Estate	2013	Bangka Belitung Province	Certified
		Tanjung Rusa Estate	2013		Certified
		Tanjung Rusa Estate (HGU on process 48.81 Ha)	2022		-
		Tanjung Sawit Estate (PT Palmino Biliton Berjaya)	2023		-
		Tanjung Sawit Plasma (PT Palmino Biliton Berjaya)	2023		-
		Tanjung Rusa KKPA	2021		-
Sungai Buaya Mill	2014	Sungai Buaya	2014	Lampung Province	Certified

(PT Sumber Indah Perkasa)		Estate			
		Sungai Buaya Estate (HGU on process)	2022		-
		Smallholder (KKPA Gedung Aji Lama)	2014		Certified
		Smallholder (KKPA Mesuji)	2014		Certified
Sungai Merah Mill (PT Sumber Indah Perkasa)	2014	Sungai Merah Estate (HGU on process)	2014	Lampung Province	Certified
		Sungai Merah Estate	2022		-
		Smallholder (KKPA Gedung Aji Baru)	2014		Certified
Kasuari Mill (PT Sinar Kencana Inti Perkasa)	2021	Cendrawasih Estate	2021	Papua Province	ST-1
		Nuri Estate	2021		ST-1
		Rajawali Estate	2021		ST-1
		Mambruk Estate (PT Sumber Indah Perkasa)	2021		ST-1
Pekawai Mill (PT Agrolestari Mandiri)	2020	Kayung Estate	2020	Kalimantan Barat Province	ST-1
		Pekawai Estate	2020		ST-1
		Sungai Kelik Estate	2020		ST-1
		Nanga Tayap Estate	2020		ST-1
		Smallholder (Kayung Plasma)	2022		ST-1
Kenanga Mill (PT Kencana Graha Permai)	2014	Kencana Estate	2015	Kalimantan Barat Province	Certified
		Cendana Estate	2015		Certified
		Kenanga Estate (PT Cahaya Nusa Gemilang)	2018		Certified
		Delima Estate (PT Kencana Graha Permai)	2020		-
		Smallholder (Kencana Plasma)	2022		-
		Smallholder (Kenanga Plasma)	2022		-
Perdana Mill (PT Binawit Abadi Pratama)	2023	Perdana Estate	2023	Kalimantan Tengah Province	ST-1
		Lenggana Estate	2023		ST-1
		Semandau Estate	2023		ST-1
		Muara Dua Estate	2023		ST-1
Kuayan Mill (PT Agrokarya Prima Lestari)	2023	Bukit Santuhai Estate	2023	Kalimantan Tengah Province	ST-1
		Tajur Beras Estate	2023		ST-1
		Seranau Estate	2023		ST-1
		Sungai Sambon	2023		ST-1

		Estate			
		Sungai Sambon Plasma	2023		-
		Sapiri Estate (PT Buana Adhitama)	2023		ST-1
		Sapiri Plasma	2023		-
		Bukit Dua Estate (PT Buana Adhitama)	2023		-
		Bukit Tunggal Estate (PT Buana Adhitama)	2023		-
Belian Mill (PT Paramitra Internusa Pratama)	2020	Belian Estate	2020	Kalimantan Barat Province	ST-1
		Tengkawang Estate	2020		ST-1
		Muara Tawang Estate (PT Kartika Prima Cipta)	2020		ST-1
		Kapuas Hulu Estate (PT Persada Graha Mandiri)	2020		ST-1
		Sungai Beran Estate (PT Persada Graha Mandiri)	2020		ST-1
		Smallholder (Belian KKPA)	2021		-
		Smallholder (Muara Tawang KKPA)	2021		-
		Smallholders (Kapuas Hulu KKPA)	2021		-
Sungai Kupang Mill (PT Sinar Kencana Inti Perkasa)	2020	Sungai Kupang Estate	2020	Kalimantan Selatan Province	IC
		Sungai Kupang KKPA	2022		-
Sungai Kikim Mill (PT Sawit Mas Sejahtera)	2021	Sungai Kikim Estate	2021	Sumatera Selatan Province	-
		Sungai Pangi Estate	2021		-
		Sungai Musi Estate	2021		-
		Sungai Saling Estate	2021		-
		Sungai Enim Estate (PT Bumi Sawit Permai)	2021		-
		Sungai Lematang Estate (PT Bumi Sawit Permai)	2021		-
		Sungai Bungur Estate (PT Prima Cipta Mandiri)	2021		-
		Sungai Lingsing Estate (PT Prima	2021		-

		Cipta Mandiri)			
Tangar Mill (PT Mitra Karya Agroindo)	2023	Sulin Estate	2023	Kalimantan Tengah Province	-
		Sulin Plasma	2023		-
		Nahiyang Estate	2023		-
		Katayang Estate	2023		-
		Sungai Nusa Estate	2023		-
		Sungai Ayawan Estate (PT Aditunggal Mahajaya)	2023		-
Sungai Magalau Mill (PT Sinar Kencana Inti Perkasa)	2021	Sungai Magalau Estate	2021	Kalimantan Selatan Province	-
		Senakin Estate	2021		-
Jalemo Mill (PT Agro Lestari Sentosa)	2023	Balasang Estate	2023	Kalimantan Tengah Province	-
		Jalemo Estate	2023		-
		Kajui Estate (PT Agro Lestari Sentosa)	2023		-
		Manuhing Estate (PT Agro Lestari Sentosa)	2023		-
Sako Mill (PT Adi Tunggal Mahajaya)	2023	Mentaya Estate	2023	Kalimantan Tengah Province	ST-1
		Kuayan Estate	2023		ST-1
		Sako Plasma	2023		-
Padang Halaban Mill (PT SMART Tbk)	2011	Padang Halaban Estate	2011	Sumatera Utara Province	Certified
		Penantian Estate	2011		Certified
		Adipati Estate	2011		Certified
		Kanopan Ulu Estate	2011		Certified
Batu Ampar Mill (PT SMART Tbk)	2012	Batu Ampar Estate	2012	Kalimantan Selatan Province	Certified
		Batu Mulla Estate	2012		Certified
		Sungai Panci Estate	2012		Certified
		Sungai Panci KKPA	2012		Certified
Tanah Laut Mill (PT SMART Tbk)	2012	Tanah Laut Estate	2012	Kalimantan Selatan Province	Certified
		Kinta Pura Estate	2012		Certified
Langga Payung Mill (PT Tapisan Nadenggan)	2012	Langga Payung Estate	2012	Sumatera Utara Province	Certified
		Paya Baung Estate	2012		Certified
		Normark Estate	2012		Certified
Hanau Mill (PT Tapisan Nadenggan)	2012	Hanau Estate	2012	Kalimantan Tengah Province	Certified
		Tasik Mas Estate	2012		Certified
		Tanjung Paring Estate	2012		Certified
		Langadang Estate	2012		Certified
		Medang Sari Estate (PT Satya Kisma Usaha)	2022		-
Semilar Mill (PT Tapisan Nadenggan)	2013	Semilar Estate	2013	Kalimantan Tengah Province	Certified
		Sei Rindu Estate	2013		Certified

Jak Luay Mill (PT Tampilan Nadenggan)	2015	Mandang Estate	2013	Kalimantan Timur Province	Certified
		Puri Estate	2013		Certified
		Pantun Mas Estate	2015		Certified
		Jak Luay Estate	2015		Certified
		Jak Luay KKPA	2022		-
		Long Buluh Estate	2015		Certified
		Bukit Subur Estate	2015		Certified
		Bukit Subur KKPA	2022		-
Leidong West Mill (PT MP Leidong West Indonesia)	2014	Leidong West Utara Estate	2014	Bangka Belitung Province	Certified
		Leidong West Selatan Estate	2014		Certified
Muara Wahau Mill (PT Kresna Duta Agroindo)	2014	Muara Wahau Estate	2014	Kalimantan Timur Province	Certified
		Gunung Kombeng	2014		Certified
Gunung Kombeng Mill (PT Kresna Duta Agroindo)	2021	Gunung Kombeng KKPA	2021	Kalimantan Timur Province	-
Rantau Panjang (PT Kresna Duta Agroindo)	2022	Rantau Panjang Estate	2022	Kalimantan Timur Province	-
		Rantau Panjang KKPA	2022		-
Jelatang Mill (PT Kresna Duta Agroindo)	2014	Bangko Estate	2014	Jambi Province	Certified
Pelakar Mill (PT Kresna Duta Agroindo)	2020	Pelakar Estate	2020	Jambi Province	IC
		Batang Merangin Estate	2020		IC
		Tiga Serumpun KKPA	2022		-
Langling Mill (PT Kresna Duta Agroindo)	2014	Bangko Estate	2014	Jambi Province	Certified
		Batang Gading Estate	2021		-
		Batang Gading KKPA (PT Satya Kisma Usaha)	2022		-
Sungai Bengkal Mill (PT Satya Kisma Usaha)	2015	Sungai Bengkal Estate	2015	Jambi Province	Certified
		Sungai Bengkal KKPA	2015		Certified
		Muara Kilis Estate	2015		Certified
		Muara Kilis KKPA	2022		-
Bukit Kapur Mill (PT SMART Tbk)	2022	Bukit Kapur Estate	2022	Kalimantan Selatan Province	ST-1
		Sungai Cantung Estate	2022		ST-1
Samsam Mill (PT Ivomas Tunggal)	2009	Samsam Estate	2009	Riau Province	Certified
		Samsam Estate (HGU on progress - 29.09 Ha)	2022		-
		Kandista Estate	2009		Certified
		Kandista Estate (HGU on progress - 158.46 Ha)	2022		-
		Palapa Estate	2009		Certified

Libo Mill (PT Ivomas Tunggal)	2009	Libo Estate	2009	Riau Province	Certified
		Nenggala Estate	2009		Certified
		Nenggala Estate (HGU on progress 419.9 Ha)	2022		-
		Sei Rokan Estate	2009		Certified
		Sei Rokan Estate (HGU on progress - 102.7 Ha)	2022		-
Ujung Tanjung (PT Ivomas Tunggal)	2009	Ujung Tanjung Estate	2009	Riau Province	Certified
		Ujung Tanjung Estate (HGU on progress - 557.3 Ha)	2022		-
Naga Sakti Mill (PT Buana Wiralestari Mas)	2010	Naga Mas Estate	2010	Riau Province	Certified
		Naga Mas Estate (HGU on process - 253.39 Ha)	2022		-
		Naga Sakti Estate	2010		Certified
		Naga Sakti Estate (HGU on process - 59.79 Ha)	2022		-
		Rama Bakti Estate	2010		Certified
Kijang Mill (PT Buana Wiralestari Mas)	2010	Kijang Mas Estate	2010	Riau Province	Certified
		Kijang Mas Estate (HGU on process - 56.07 Ha)	2022		-
		Kijang Kencana Plasma	2010		Certified
Ramarama Mill (PT Ramajaya Pramukti)	2010	Ramarama Estate	2010	Riau Province	Certified
		Ramarama Estate (HGU on process - 318.76 Ha)	2022		-
		Amartajaya Plasma	2010		Certified
		Smallholder (Ramarama KKPA)	2021		-
Indrasakti Mill (PT Meganusa Inti Sawit)	2011	Indralestari Estate	2011	Riau Province	Certified
		Indrasakti Estate	2011		Certified
		Indragiri Plasma	2011		Certified
		Indrasakti Plasma	2011		Certified
Bumipalma Mill (PT Bumipalma Lestari Persada)	2012	Bumi Lestari Estate	2012	Riau Province	Certified
		Bumi Palma Estate	2012		Certified
		Bumi Sentosa Estate	2012		Certified
		Bumi Palma Estate (HGU on process - 39.21 Ha)	2022		-
Sawita Mill (PT Sawitakarya Manunggal)	2021	Sawita Estate	2021	Kalimantan Selatan Province	ST-1
		Pamukan Estate	2021		ST-1
		Sawita KKPA	2021		ST-1
Kenari Mill	2023	Gaharu Estate (PT	2023	Kalimantan Barat	-

(PT Bangun Nusa Mandiri)		Bangun Nusa Mandiri)		Province	
		Kenari Estate (PT Bangun Nusa Mandiri)	2023		ST-1
		Keranji Estate (PT Bangun Nusa Mandiri)	2023	Kalimantan Barat Province	ST-1
		Smallholder (Gaharu Plasma)	2023		-
		Smallholder (Kenari Plasma)	2023		-
Sungai Air Jernih Mill (PT Bahana Karya Semesta)	2022	Sungai Air Jernih Estate	2022	Jambi Province	-
		Sungai Mentawak Estate	2022		-
		Sungai Merak Estate	2022		-
		Sungai Badak Estate	2022		-
There is revision of time bound plan on 02 January 2020 made by Head of Sustainability Policy & Compliance. There are 14 mills which postpone and 2 new mills. There are justification for mills that postpone, with explanation: <ul style="list-style-type: none">- Kasuari Mill and supply bases still in process of EIA (AMDAL) revision and permit for hazardous waste warehouse.- Perdana Mill and supply bases are still in process for HGU and RaCP (LUCA review).- Kuayan Mill and supply bases are still in process for HGU and RaCP (LUCA review).- Tangar Mill and supply bases are still in process for HGU and RaCP (LUCA review).- Sungai Kikim Mill and supply bases are still in process of EIA (AMDAL) revision.- Sungai Magalau Mill and supply bases are still in process for RaCP (LUCA review).- Jalemo Mill and supply bases are still in process for HGU and RaCP (LUCA review).- Sako Mill and supply bases are still in process for HGU and RaCP (LUCA review).- Bukit Kapur Mill and supply bases are still in process for HGU and RaCP (LUCA review).- Rantau Panjang Mill and supply bases are still in process for RaCP (LUCA review).- Sawita Mill and supply bases are still in process for RaCP (LUCA review).- Gunung Kombeng Mill and supply bases are still in process for land rights.- Kenari Mill and supply bases are still in process for HGU.					
There are some companies that are not fully certified, due to some area still on process to get land title (HGU), consist of: <ul style="list-style-type: none">1. PT Ivomas Tunggal (Samsam Estate, Kandista Estate, Nenggala Estate, Sei Rokan Estate, Ujung Tanjung Estate);2. PT Rama Jaya Pramukti (Ramarama Estate);3. PT Buana Wira Lestari (Nagasakti Estate; Nagamas Estate and Kijang Estate);4. PT Forestalestari Dwikarya (Tanjung Rusa Estate);5. PT Djuanda Sawit Lestari (Muara Kandis Estate & Muara Tawas Estate).6. PT Sumber Indah Perkasa (Sungai Merah Estate and Sungai Buaya Estate).					
1.10.2	Progress of Associated Smallholders and Outgrowers for Certifiable Standard				
	There is no scheme smallholder under PT MP LWI and PT BPL.				

2.0	ASSESSMENT PROCESS
2.1	Assessment Team
	<p>1. Arif Faisal Simatupang (Lead Auditor). Bachelor of Agriculture, from Department of Agriculture Agronomy, Faculty of Agriculture, University of Gadjah Mada. He has successfully completed an RSPO endorsed P&C Lead Auditor Training, RSPO SCCS endorsed Lead Auditor Training, Indonesian Sustainable Palm Oil (ISPO) Lead Auditor Training, Management System Certification ISO 9001-2008 Lead Auditor Training, Environmental Management System ISO 14001 Lead Auditor Training, ISO 17021 and ISO 17065 Awareness Training, Management of High Conservation Value (HCV) Training, Social Accountability SA 8000 Training. He has four years of working experience as a Field Assistant on oil palm plantation company in Indonesia. Since 2014, he works as an auditor of RSPO and ISPO in the aspects of legal, social, best management practices of mill and estate, OHS, employment, and environmental. In this audit, he was assessing the aspects of legality, SCCS, TBP, Partial Certification, and best management practices of agriculture and processing.</p> <p>2. Muhammad Rinaldi. Indonesian citizen, Diploma of Oil Palm Plantation. He has experience 4 years working as Assistant Agronomy since 2009. He has attended training RSPO Lead Auditor, training of Auditor ISPO, training of Lead Auditor ISO 9001-2008, and training of ISO 14000, training of HCV identification, training of OHS management system, training of potential and conflict resolution, ISCC training, ISO 14060 training, CORSIA training. Experienced in auditing in relevant scheme (ISPO) since 2014 with the aspects of land legality, environmental, social, occupational health and safety, Best Management Practices, conservation and worker welfare. At this audit he assess the aspect of environment, HCV, GHG, and social.</p> <p>3. Dwi Haryati. Indonesian citizens. Bachelor of Agriculture Department of Agriculture – Program study: Agronomy. She has experienced on Palm Oil Plantation as Sustainability staff. Training have been followed include: Training Auditor ISPO, Quality Management ISO 9001-2008, ISO 14001 Environmental Management, ISO 17021 & 17065, HCV, General Health Safety Expert, Health Safety Management System, GHG Workshop by the ISPO Commission, IHT Palm Oil Mill Processing, Awareness RSPO, IHT Best Practice in Peat Management, Mapping Potential and Conflict Resolution in Production Forest, and Social Accountability SA 8000 Training. RSPO audit experience since March 2015 and ISPO since May 2014. During this audit, she assigned the aspect of Transparencies, Occupational Health and Safety, and Worker Welfare.</p> <p>4. Johanes Pandiangan (Observer). Bachelor of Agriculture Department of Social Economics of Agriculture, Faculty of Agriculture. He has 7 years experience working as operational staff of one of the leading private oil palm plantation companies in Indonesia.</p>
2.2	Assessment Methodology, Assessment Process and Locations of Assessment
2.2.1	Figure of person days to implement assessment
	<p>Number of auditors: 3 Auditors</p> <p>Number of days for ASA 1.1 at site: 6 days.</p> <p>Number of working days for ASA 1.1 at site: 18 Working days.</p>
2.2.2	Assessment Process
	<p>The assessment was conducted by measuring the sufficiency of implementation with the consistency done by PT Maskapai Perkebunan Leidong West Indonesia and PT Bumi Permai Lestari to the requirements of Principles and Criteria for the Production of Sustainable Palm Oil 2018, endorsed by the RSPO Board of Governors and adopted at the 15th Annual General Assembly by RSPO Member on 15 November 2018 and RSPO Certification System for Principles and Criteria, 14 June 2017.</p> <p>The assessment was conducted in three methods: (1) document review, aiming to observe the sufficiency of types or substances from required documents; (2) <i>interview</i>, aiming to obtain more detailed information and cross check the information; and (3) field observation, aiming to observe directly the sufficiency of implementation on site.</p> <p>During the audit, the company was cooperative in supporting the audit activities starting from the presentation of documents, facilitation of field observations and stakeholder interviews, and there was no any tendency of pressing</p>

	<p>and intervening the auditors. The opening meeting and closing meeting were involved by Company's Top Management to the Staff.</p> <p>Some opportunities for improvement of the results ASA 1.1 delivered by the MUTU auditor to the management unit and the results are the subject will be verified at the next assessment phase (ASA-1.2).</p> <p>The assessment program can be seen in Appendix 2.</p>
2.2.3	<p>Locations of Assessment</p> <p>The number of management units of this activity consists of one Mill (Leidong West Mill) and four Estates (Leidong West Utara Estate, Leidong West Selatan Estate, Bukit Intan Estate, and Bukit Mas Estate). Therefore, in accordance with the certification system, all Estates shall become audit sample.</p> <p>Leidong West Mill</p> <ul style="list-style-type: none"> - Security Post. Observation related to the acceptance of FFB and employment aspect of securities. - Weighbridge Station. Observation and interview related of supply chain implementation, and weighbridge calibration. - Grading Station. Observations and interviews related to the process and criteria for sorting, sampling techniques, handling of FFB that did not pass the selection, adamination of the results of sorting the K3 aspects and employment - FFB processing stations (sterilizer, thresher, digester, press, kernel). Observations and interviews related to the processing of FFB, yield quality, losses, OSH aspects and employment. - Boiler Station. Observations and interviews related to operations, understanding of emergency response, OSH aspects and employment. - Engine room. Observations and interviews related to operations, understanding of emergency response, OSH aspects and employment. - Hydrant simulation. Observation related emergency response, readiness of fire fighting equipment. - Chemical warehouse. Field observations and interview related chemical management, OHS, and environmental aspect. - Sparepart Warehouse. Field observations and interview related sparepart management, OHS, and environmental aspect. - Hazardous Waste Temporary Warehouse. Field observations and interview related hazardous waste management, OHS and environmental aspect. - Workshop. Field observations and interview related workshop activity, OHS, environmental and worker welfare aspect. - Waste Water Treatment Plant. Field observations and interviews with WWTP operators regarding waste water management. - Water intake. Observation for POM water intake condition - Solid waste area. Observation related to waste management and observation of leachate drainage. - Water treatment plant. Observation for water usage monitoring and interview with operator related workers welfare and OHS. <p>Leidong West Utara Estate</p> <ul style="list-style-type: none"> - FFB harvest, Block C28. Observations and interviews with harvesters related to FFB harvest activities, fruit quality, OSH aspects and employment. - Lose fruit collection, Block C28. Observations and interviews with workers regarding the activities of berondolan quotation, the quality of the disk after the lose fruit quotation, OSH aspects and employment. - Barn Owl Box, Block C28. Integrated observations of rat pest control by installing and monitoring owl cages. - Woody growth spraying, Block C18. Observation and interview of workers regarding herbicide spraying activities starts with technical work, employment, OSH and the impact on the environment. - Betung River riparian conservation area, Block X18. Observation of conservation area management in the form of river border, and boundary area boundary layout.

- **Conservation of swamp area, Block C31.** Observation of conservation management in the form of swamps.
- **Fertilizer storage.** Observations related to the management of chemical fertilizers, OSH aspects and the environment.
- **Pesticide storage.** Observations related to pesticide management, OSH aspects and the environment.
- **Genset house.** Observations related to work procedures, employment, OSH, and the environment.
- **Hazardous waste storage.** Observations related to work procedures, employment, OSH, and the environment.
- **Land fire facility storage.** Observation of land fire infrastructure readiness.
- **Cleaning house, PPE warehouses and spraying equipment.** Observations related to the technical work of spray preparation and post-spray preparation, OSH aspects and the environment.
- **Employee housing complex.** Observations and interviews with housing residents regarding the availability of workers' welfare facilities, sports facilities, ibadan facilities, emergency response facilities, electricity, water, and domestic waste management.
- **Land demarcation and HGU Poles No. BPN 02, BPN 58.** Observation of land boundary boundaries and Benchmark HGUs, as well as potential land disputes.

Leidong West Selatan Estate

- **FFB Harvesting, Block X14.** Observation and interview with foreman and harvester related FFB quality, harvesting round, OHS, and employment.
- **Barn Owl Box, Block X14.** Observation of IPM, related to suppress rat infestation by installing and monitoring barn owl boxes.
- **Spraying Circle & Path, Block X20.** Interviews of working procedure, OHS, employment, and environmental.
- **HCV of Pelur River Riparian Area, Block X18.** Observation the implementation of HCV management of riparian area, and boundary marking.
- **Fire fighting facilities storage.** Observation and simulation the emergencies response facilities.
- **Hazardous Waste Warehouse.** Field observations related to the fulfillment of the attribute's health and safety, recording, and the implementation of compliance requirements of hazardous waste temporary warehouse.
- **Fertilizer and agrochemical storage.** Observation related to management of agrochemical material and waste, MSDS, emergency response facilities and the types of agrochemical used.
- **Generator House.** Interviews of working procedure, OHS, employment, and environmental (hazardous waste management).
- **Cleaning house and PPE/tools storage of spraying workers.** Observation related to management of agrochemical material and waste, cleaning and emergency response facilities, and PPE storage.
- **Housing Complex.** Observation and interview with residents about housing, sports, worship, clean water and electricity facilities, domestic waste management, and complaint mechanism.
- **Land demarcation aspect and HGU poles No. BPN 01, BPN 02, BPN 03, BPN 04, BPN 33.** Observation of land demarcation aspect and maintenance of HGU pole, as well as land dispute potency.

Bukit Intan Estate

- **FFB Harvesting, Block N27.** Observation and interview with foreman and harvester related FFB quality, harvesting round, OHS, and employment.
- **Barn Owl Box, Block N27.** Observation of IPM, related to suppress rat infestation by installing and monitoring barn owl boxes.
- **Spraying Circle & Path, Block P27.** Interviews of working procedure, OHS, employment, and environmental.
- **HCV of forest area of Bukit Selam, Block N29 and P29.** Observation the implementation of HCV management and monitoring of forest area, and boundary marking.
- **HCV Duren River Riparian Area, Block Q32.** Observation the implementation of management in HCV of riparian area, and boundary marking.
- **POME Land Application, Block P25.** Observation for POME management as nutrient cycle by land application, as well as environmental and OHS aspects.
- **Replanting area of 2019, planting year of 2020, Block R31.** Observations related to replanting mechanism, Zero burning method, cover crop, and nutrient cycle.
- **Replanting on riparian area of Duren River, Block R31.** Observations related to replanting on riparian area. The

- riparian area was demarcated and restored by not felled the oil palm.
- **HCV of Duren River Riparian Area, Block R31.** Observation the implementation of HCV management of riparian area, and boundary marking.
- **Nursery.** Observation and interview with workers related oil palm nursery, preparation of replanting, OHS and employment, on continuous improvement by drip and automatization irrigation.
- **Fire monitoring tower, Block R26.** Observation of fire preventive action by building fire monitoring tower.
- **Land demarcation aspect and HGU poles No. BPN 280, BPN 281, BPN 282, BPN 283, BPN 284, BPN 285.** Observation of land demarcation aspect and maintenance of HGU pole, as well as land dispute potency.
- **Reserve area, Block M33.** Observation on HGU area that still owned by community since the beginning, because the land owner not want to release the land to the company.
- **Agrochemical storage.** Observation related to management of agrochemical material and waste, MSDS, emergency response facilities and the types of agrochemical used.
- **Generator House.** Interviews of working procedure, OHS, employment, and environmental (hazardous waste management).
- **Cleaning house and PPE/tools storage of spraying workers.** Observation related to management of agrochemical material and waste, cleaning and emergency response facilities, and PPE storage.
- **Housing Complex.** Observation and interview with residents about housing, sports, worship, clean water and electricity facilities, domestic waste management, and complaint mechanism.
- **Domestic Waste Landfill, Block M 28/29.** Observation related domestic waste management.
- **Fire Fighting Facilities.** Observation and simulation the emergencies response facilities.
- **Daycare.** Observation and interview with worker related labor aspect and OHS.
- **Spare part and PPE warehouse.** Observation minimum stock of PPE's.
- **Diesel Tank.** Observation of OHS, environment aspect, emergency response and fire facilities.
- **Oil and Agrochemicals Warehouse.** Observation related to management of oil and agrochemical material and waste, MSDS, emergency response facilities and the types of pesticides used.
- **Hazardous Waste Warehouse (Temporary).** Field observations related to the fulfillment of the attributes health and safety, recording, and the implementation of compliance requirements hazardous waste temporary warehouse, wages and complaint mechanism.
- **Workshop.** Observations and interviews related to wages and overtime, waste management activities, OHS implementations and health inspections.
- **Fertilizer warehouse.** Observation related to management of agrochemical material and waste, MSDS, emergency response facilities and the types of fertilizer used.

Bukit Mas Estate

- **FFB harvesting, Block Q17.** Observations and interviews with harvesters related to FFB harvest activities, fruit quality, OSH aspects and employment.
- **Woody growth spraying, Block P14.** Observation and interview of workers regarding herbicide spraying activities starts with technical work, employment, K3 and the impact on the environment.
- **Barn Owl Box, Block P9.** Integrated observations of rat pest control by installing and monitoring owl cages.
- **Circle scratch, Block R8.** Observations and interviews with workers regarding circle scratching activities, quality after circle scratching, OSH aspects and employment.
- **HCV Seralung River Riparian Area, Block T6/7.** Observation the implementation of management in HCV of riparian area, and boundary marking.
- **Fire fighting facilities storage.** Observation and simulation the emergencies response facilities.
- **Hazardous Waste Storage.** Field observations related to the fulfillment of the attributes health and safety, recording, and the implementation of compliance requirements of hazardous waste temporary warehouse.
- **Fertilizer and agrochemical storage.** Observation related to management of agrochemical material and waste, MSDS, emergency response facilities and the types of agrochemical used
- **Land demarcation aspect and HGU poles No. 246, 247, 248.** Observation of land demarcation aspect and maintenance of HGU pole, as well as land dispute potency.
- **Material storage.** Observation of material storage including PPE
- **HCV area of cemetery and indigenous forest, Block Q9.** Observation the implementation of HCV management

	<ul style="list-style-type: none"> - Workshop. Observations and interviews related to wages and overtime, waste management activities, OHS implementations and health inspections. - Cleaning house and PPE/tools storage of spraying workers. Observation related to management of agrochemical material and waste, cleaning and emergency response facilities, and PPE storage. <p>Consulted Stakeholder</p> <ul style="list-style-type: none"> - FFB Supplier / local contractor of CV Multi Nusa Pratama - Gender Committee of PT LWI and PT BPL - Worker Cooperative of PT LWI and PT BPL - Labor Union of PT LWI and BPL - Labor Agency of Bangka Barat Agency - Environmental Agency of Bangka Barat Regency - Plantation Agency of Bangka Barat - Village Official of Ibul - Village Official of Terentang - Elders of Dusun Ibul (Land Previous Owner) - Gender Committee of Leidong West Mill
2.3	Stakeholder Consultation and Stakeholders Contacted
2.3.1	Summary of stakeholder consultation process.
	<p>Consultation of stakeholders for the assessment was held by:</p> <ul style="list-style-type: none"> • Public announcement at web website MUTU (www.mutucertification.com) on 3rd February 2020 • Public consultation meeting with local stakeholder conducted by visits (Village Head and previous landowner in Terentang and Ibul Village) on 26th February 2020. • Public consultation meeting with Gender Committee, local contractors and Worker Union on 25th February 2020. • Public consultation with government agency of Bangka Barat Regency (Environmental Agency, Agriculture Agency, Labor Agency) via telephone on 26th February 2020. • Public consultation by email with NGO (Sawit Watch, Walhi, WWF) by email on 18th February 2020 <p>Numbers of input from stakeholders were clarified by PT Maskapai Perkebunan Leidong West Indonesia.</p>
2.3.2	Stakeholder contacted
	<i>Please find appendix 1</i>
2.4	Determining Next Assessment
	The next visit (ASA-1.2) will be determined 8-12 months after date of certificate license.

3.0 ASSESSMENT FINDINGS

3.1 Summary of Assessment Report of the RSPO Certification

MUTUAGUNG LESTARI has conducted an assessment of Leidong West Palm Oil Mill – PT. Maskapai Perkebunan Leidong West Indonesia and PT Bumi Permai Lestari, Golden Agri Resources Group operation consisting of one (1) mill and four (4) oil palm estates.

During the assessment, no (0) nonconformity identified; and five (5) opportunities for improvement were identified.

MUTUAGUNG LESTARI found that PT. Maskapai Perkebunan Leidong West Indonesia and PT Bumi Permai Lestari, Golden Agri Resources Group 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	<p>The company has a list of stakeholders, it renewal is carried out once a year or if there is a change in the structure or contact of the stakeholder persons. PT LWI and PT BPL have identified stakeholders who have an interest with operational unit. The updated list of stakeholders in 2020 which informs the name of the institution, name of the contact person and the number that can be contacted. The list of stakeholders includes 12 government agencies, 9 target villages, 5 community leaders, 6 workers' organizations (SPSI and gender committees), 4 local contractors and 3 NGOs. The stakeholder list updated at January 16, 2020.</p> <p>The company provides types of documents that can be accessed and given to stakeholders. This is in the list of information for stakeholders, such as employee list, NPWP, local tax payment, environmental documents, company establishment deed and amendments, production area data and fertilizer application, evidence land ownership and HGU certificates, HCV reports, SIA reports, social activity documents, work accident reports, P2K3 reports, improvement program documents, RSPO audit report documents, human rights policy documents. If the information requested is not included in the list of information, then top management consideration is needed first.</p> <p>The company has a Consultation and Communication SOP (SOP-SMART-GENERAL-SADP-I-004, which was passed on July 1, 2014). This document explains and regulates it's in communicating and consulting. It regarding common interests and existing problems so that dialogue, discussion and deliberation can be achieved that are acceptable to all parties. In the SOP, it is explained the period of submitting suggestions / requests for information no later than 1 week after the letter is received (from the Unit Head to the relevant Department). Responses no later than 3 weeks after the letter is received.</p> <p>Based on interviews with community leaders in the Terentang and Ibul Village on February 26, 2020 it was found that the village could send a letter containing requests for information and complaints if any through the communication officer. They already know the procedure for requesting information and personal that can be contacted.</p> <p>Sighted the evidence of report submission to agencies, for e.g.:</p> <ul style="list-style-type: none"> - Reports of P2K3 of estates and mill are sent to the Provincial Office of the Department of Labor in January 2020.

- PT BPL and PT MP LWI 2019/2020 WLTk reports are sent on January 31, 2020.

1.1.3 ; 1.1.4 ; 1.1.5

The company keeps a list of stakeholders under the Sustainability department which is updated annually. Likewise, the recording of requests for information and complaints from stakeholders. The latest evaluation update January 2020.

Based on interview with villagers they have understood mechanism of communication and consultation. Normally, head of the village or communities will send a letter as a form of communication. For example:

- Letter from Simpang Teritip Subdistrict No.451.14 / 82 / 4.1 regarding the request for MTQ funds at the sub-district level on January 28, 2020. This was responded to by the company with the approval of assistance.
- Letter No.B / 7386/122019 dated December 3, 2019 regarding requests for information on salary / wages of Pangkal Pinang workers and this has been responded to by the company.

The results of interviews with community leaders such as Terentang and Ibul Village in February 26, 2020. It is known that they know the mechanism of communication and consultation with the community. The company have a Personnel in Charge which is appointed to communicate with stakeholders, who is appointed to respond the stakeholders. The position of that PIC is made officially to communicate with stakeholders. Based on interview with villagers, they have known the personnel which is appointed to communicate with them.

Status: Comply

1.2

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

1.2.1 ; 1.2.2

The company has code of integrity and ethical behavior that contained in document The Code of Integrity and Ethical Behavior of Employees is also explained in the Social and Environmental Policy (GEP) signed by the Head of Up-stream September 2015. It is explains upholding integrity for employees, companies, business partners, shareholders and the community. The code of ethics has been explained and socialized to employees routinely every morning roll-call and displayed on the notice boards. For external, can accessed through the company website and also has been listed in the document of agreements. That document which is available in Bahasa, explains fair conduct of business, prohibits any employee for corruption, and bribery and provide information in accordance with applicable laws.

To monitor the implementation of compliance and implementation of company policies, both internally and externally, the company already has an SOP to respond to stakeholders properly contained in the SOP of communication and consultation with no. document. SOP/SMART/UMUM/SAD VI/004. Procedure for Handling Complaints and Dissatisfaction with document No. SOP / SMART / GIMS-SCMD / USDV / I / 001.

This aims to provide space for all stakeholders to make complaints or reports if there are practices that are not in accordance with the ethical practices policy.

During interviews with workers, contractors, suppliers of FFB, unions, gender committees can explain the understanding of company policy. The certification unit is committed to carrying out ethical behavior in all operations and business transaction.

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 shown compliance toward applicable laws and regulations in several aspects as follows :

Land Legality

In legal aspect, the company has comply to the agrarian act no.: 5/1960, shown by the company has the land title for the total cultivated area, namely: Decree of Head of BPN No: 49/HGU/BPN/2004, on 11 August 2004 (PT MP LWI) and decree of BPN RI No. 1/R1t/HGU/BPN RI/2013 on 9 September 2013 (PT BPL). Compliance against Plantation Act No.: 39/2014 Shown by owned IUT from the Head of the Central BKPM through the Decree of BKPM No: 610 / T / PERTANIAN /

INDUSTRI / 2009 (PT MP LWI) and SPUP document No. HK.350/183/BUN.5/III/2001 dated 16 March 2001 (PT BPL).

Environmental

- The Certification unit has hazardous waste store facilities based on PP 101/2014
- The Certification unit has environmental impact assessment based on PP 27/2012\
- Leidong West palm oil mill has land application permit based on decree on decree of Bangka Barat regent No. 188.45/256/2.12.1.1/2019 dated 10 June 2019 valid until 10 June 2021. However, based on the Land Application Permit, it was explained that the mill effluent was flowed to the PT MP Leidong West Indonesia plantation. This is different from the previous permit and the situation in the field where the mill effluent was flowed at PT BPL, but the block and total area have not changed. The company has also sent a Request for Clarification of the Difference with the Letter No. 010 / Mgr-LWSM / II / 2020 dated 28 February 2020 to the Regent of West Bangka Regency cq. Head of Investment Office, One Stop Integrated Licensing Service of West Bangka Regency. **This becomes an observation to be confirmed to the relevant agencies in the next assessment. OFI.**

OHS and Manpower Regulation

- Labor Report for PT LWI and PT BPL in 2020 to the Manpower and Transmigration Agency of Bangka Belitung Province on January 31, 2020.
- The application of the minimum wage in 2020 is in accordance with the Minimum Wage Decree of the Bangka Belitung Province established by the Governor of Bangka Belitung in October 2019.
- Payment of overtime wages to workers in accordance with Decree of the Minister of Manpower No. 102 of 2004.
- Application of the structure and scale of wages for all levels of workers in accordance with Minister of Manpower Regulation No. 01 of 2017.
- The establishment of the P2K3 (OHS Committee) for PT Leidong West Indonesia (LWUE) which were registered / approved by the Manpower and Transmigration Agency of Bangka Belitung Province in July 2018 (SK No. 188.4/017/P2K3/DISNAKER/2018 dated July , 31 2018).
- The establishment of the P2K3 (OHS Committee) for PT Leidong West Indonesia (LWSE) which were processed by the Manpower and Transmigration Agency of Bangka Belitung Province in Februari 2020 (SK No. 580/025/DISNAKER/2020 dated Februari, 24 2020).
- The establishment of the P2K3 (OHS Committee) for PT Leidong West Indonesia (LWSM) which were registered / approved by the Manpower and Transmigration Agency of Bangka Belitung Province in October 2018 (SK No. 005/MGR/SMK3/LWSM/010/2018 dated October , 22 2018).
- Provision of PPE for free to all workers and arrange the use of PPE according to the type of work based on the free predetermined HIRAC.
- Have permits for all mill operating machines such as boiler and sterilizer machines that have been tested for eligibility according to applicable regulations (the last feasibility test was in September 2019).
- Has a license / competency for some special jobs that require more expertise such as OSH experts, hyperkes, boiler operators, diesel engine operators, welder, wheel loader operators and others in accordance with the requirements contained in the legislation.
- Has carried out a general health check (Medical Check Up) every year for all workers and special checks (cholinesterase, spirometry and audiometry) according to the level of risk / danger for certain jobs.

2.1.2

To ensure the laws and legal compliance, the company has had a mechanism to assess compliance with the laws and regulations set in the SOP of Rules and Other Requirements (No. SOP/SPO/SMART/LH-03). Starting with inventorying and make a list of the rules applicable in regional, national, and international. The list updated semesterly by Assistant, Document Controller and assisted by the relevant department in accordance with the procedure. The company have shown list of regulation related to the field of employment, environment, HCV, OHS, and legality of land use. Those list were include of regional, national, and ratified international regulations. The compliance of regulation conducted regularly, lattest on 20 February 2020.

2.1.3

Legal (HGU) boundaries are clearly demarcated and maintained based HGU Map issued by National Land Agency. Based on field observation on HGU poles and land demarcation in all Estates, known that HGU poles sampled were available in the field, and other boundaries such as boundary drain and road were maintained. There is no planting exceed the HGU boundary.

Other than that, the company has had SOP of HGU Poles Installation and Maintenance (No. SOP/SMART/CERS-EHSD/SADV/II/004), set that the poles maintenance will be conducted semesterly. Based on document of HGU Maintenance and Monitoring - Semester II of 2019, known that all HGU poles were installed and well maintained.

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

FFB Suppliers

Based on review production data of and information from management unit, it was known that Leidong West Mill has only received fresh fruit bunches (FFB) from main estate as main supply base and PT Bumi Permai Lestari which is still a company in one group.

List of FFB supplier is presented in the following Table.

FFB Supplier	Status
PT LWI PT BPL	Main Supplier (one scoope certification) : Leidong West Utara Estate Leidong West Selatan Estate Bukit Intan Estate Bukit Mas Estate
PT BPL	Other source in one group : Bukit Perak Estate Bukit Permata Estate
External FFB Supplier	CV Multi Nusa Pratama (MNPX)
	CV Hijau Barokah (CHBX)
	CV Karya Sejati Utama (KHSX)

CPO and FFB Transportation

Mill management shows list of 1 Contractors which mostly appointed for CPO and FFB transportation. The list informed document reference of work agreement, PIC of contractor, contact number, email address, identity card, etc.

In monitoring the use of contractors for plantation and factory activities, the certification unit has well documented the list of contractors, the number of workers they have, contact persons, work agreements, and ensuring other matters related to compliance with laws and regulations in Indonesia. At present the certification unit has 2 contractors with 48 workers. These contractors collaborate in the activities of transport FFB, CPO and PK.

In managing the contractor, the certification unit has a copy of the cooperation agreement in each unit. For example for agreement between two parties such as:

- Work Agreement No. 001/BPL/LWSM/01/2020-PK dated 2 December 2019 for the transportation of PK from Leidong West Mill to the Port which is valid for one year.
- Work Agreement No.022/LWI/JKTO-II/XII/2019-ATBS dated 2 December 2019 for the transportation of FFB and CPO which is valid for one year.

The explanation above can be concluded that the certification unit has managed and documented the list of contractors along with supporting documents.

2.2.2

The commitment and compliance contractors of PT LWI and PT BPL to regulations in Indonesia, for example, are presented in Work Agreement No.001 / BPL / LWSM / 01/2020-PK and No. 022 / LWI / JKTO-II / XII / 2019-ATBS respectively on December 2, 2020. For the FFB contractor or CPO transporter, regulatory clauses seeking / compliance with contractors, especially for the rights of employees are presented at several points of the work agreement , as follows:

- Health assurance and tax is mentioned in Article 4
- Compliance with fulfilling minimum age, prohibiting child labor, forced labor and workers from trafficking in persons as well as fulfilling company business ethics and following all the requirements in the certification standard.
- The contractor must carry out its own assessment of compliance with OHS standards using the inspection form determined by the contractor to then be verified and approved by the company (the first party).
- In carrying out its work, the contractor must guarantee the safety and health of the workforce of all second party workers (contractors) and equip their workforce with PPE in accordance with applicable regulations and follow labor, environmental and OHS regulations.
- Attachment to the letter that states legal compliance with the minimum age for work, personal protective equipment, vehicle exhaust emissions control.

Cross check mechanism by unit of certification towards regulation compliance is conducted through periodic update on contractors' employees' data which included ID number, BPJS Number, wages/salary. Furthermore for PPE compliance, monitoring has conducted by Foreman or Assistant during muster morning and working hours.

In each work agreement between the certification unit and the contractor, there are several separate clauses related to fulfilling legal obligations in force in Indonesia as one of the obligations that must be fulfilled by the contractor. Some of these obligations are related to the registration of workers' BPJS (Government Insurance Scheme), the provision of minimum wages, the obligation to use PPE, other permits such as tax payment (NPWP), vehicle licenses (STNK), and others. To ensure compliance with these clauses, the certification unit always requests the requirements for the completeness before the contractor does / starts work.

The results of field visits and interviews with contractor revealed that workers had received wages above the minimum wage, were registered in the BPJS program, have a vehicle license (STNK), driving license (SIM) and the worker understood about his status as a permanent worker. This result is in line with the results of the document review which proves that the wages of contractor workers are above the minimum wage, have vehicle / driver license, fulfilling tax payments, BPJS payments and other requirements.

The certification unit has proven that all contracts have their own clauses regarding the fulfillment of applicable legal obligations, and are shown by the relevant third party.

2.2.3

In each work agreement between the certification unit and the contractor, there are clauses related to fulfilling legal obligations in force in Indonesia as one of the obligations that must be fulfilled by the contractor. Some of these obligations are related to disallowing child, forced and trafficked labor to be employed by the third party, and where young workers are employed, the contracts include a clause for their protection. To ensure compliance with these clauses, the certification unit always requests the requirements for the completeness before the contractor does / starts work.

The results of the document review of the list of contractor workers revealed that there were no workers under the age of 18 and the work provided was in accordance with the agreement when the initial worker worked. This is in line with the results of interviews stating that no child laborers have worked up until now, there are no forced laborers / workers resulting from trafficking because all workers have understood the work agreement at the start of work and payment for the work is always equal.

The certification unit has proven that all contracts have clauses disallowing child, forced and trafficked labor to be employed by the third party, and where young workers are employed, the contracts include a clause for their protection.

Clause of disallowing child, forced and trafficked labour in contract agreement is not available, due to there is no employees' contractor ages under 18 years old.

Status: Comply

2.3

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

2.3.1, 2.3.2

The Mill has no directly sourced FFB from outsider, but received FFB through indirectly source i.e third party FFB suppliers (agency) since November 2019, that were CV Multi Nusa Pratama, CV Hijau Barokah, and CV Karya Sejati Utama.

To identify the FFB legality, the company was in cooperation with PT Koltiva – an IT vendor, has been conducted identification by computerized application, of smallholders who supplied th FFB to the Mill through agents (FFB suppliers). At this moment, identified 37 smallholders, covers 642 ha area. The progress of smallholders identification is about 50 %. In the application, variable of identification covers of smallholders ID, name, age, telephone number, smallholders address and geolocation, ha area, annual production, number of oil palm, land title status, average tree age, etc.

Based on interview with CV Multi Nusa Pratama, known that both the CV and the company still in progress to identify the informations of sourced smallholders, includes address, geolocation, land title, etc. The CV also committed to received FFB from legal sources.

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 has management plan that contained in the document of Economic Feasibility Analysis in the period 2020-2024 which describes the production of FFB, CPO Production, Production Kernel, OER, KER, operating costs, the financial indicators (income vs. costs), etc.

3.1.2

The company has a replanting program as follows:

UNIT	Total Area	Year					
		2019	2020	2021	2022	2023	2024
BINE	4,656.88	1,564.61	1,599.68	1,492.59			
BMSE	3,016.77				1,570.27	1,446.50	
LWSE	627.12						627.12
LWUE	661.63						661.63

Based on the results of interviews with the company's management, it is known that there was a change in the replanting program in the LWSE which was originally planned for 2020 to 2024. The change was based on tonnes / ha production which was still quite high with the document showing the achievement of 2019 LWSE production which still reached 23.8 tons / ha.

3.1.3

The company has shown management reviews through an operational internal audit for each plantation and mill. In addition, the company also has an annual management review such as the 2019 LWI-BPL Management Review, which explains annual management review schedules, meeting invitations, minutes of meetings, and minutes of management review meetings with number F / SMART / GENERAL / SSSE / 010/001 date December 20, 2019 concerning the discussion of the certification internal audit findings and the monthly meeting which consisted of 3 agendas namely the results of the internal audit, customer feedback, and process performance & product compatibility.

Status: Comply

3.2

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

3.2.1

The certification unit has conducted an internal audit, describing the following:

PT MP LWI's RSPO and ISPO internal audit reports for the LWSM units (LWUE, LWSE, BINE, BMSE) conducted on 28 October 2018 - 2 November 2019. All non-conformities were fulfilled and discussed in management review on 20 December 2019. Descriptions and analyzes of the root causes and corrective actions are available in the non-confirmation and internal audit observation reports.

The company regularly monitors continuous improvement, covering economic aspects / best practices, social, and environment for each unit (Mills and Plantations).

Legality

The company was in cooperation with PT Koltiva – an IT vendor, has been conducted identification by computerized application, of smallholders who supplied the FFB to the Mill through agents (FFB suppliers). At this moment, identified 37 smallholders, covers 642 ha area. The progress of smallholders identification is about 50 %.

Social aspects

Most of the employees of the contractor are residents of the surrounding community. It has been verified to the community (based on interviews) that the company's policy significantly increases the positive perception of the surrounding community towards the company.

Worker Welfare

- The certification unit has set minimum wage regulations for all workers based on the determination of the minimum wage by the Governor of the Pacific Islands for 2020.
- Unit certification facilitates workers with adequate housing, electricity facilities, and the availability of clean water in every publicly available housing.
- Unit certification is also committed to avoiding acts of discrimination, sexual harassment, child labor or acts of human rights violations in the work environment.

BMP

The company has shown documents on the use of pesticides for the past 3 years, based on these documents it is known that the company no longer uses pesticides class 1A and 1B both in pest control and weed control. This has been based on the commitment of the company's top management. Besides that the company has also made several innovations in the implementation of BMP such as the Smart Nursery project and the use of digital SPBs.

3.2.2

Based on interviews with company management, it is known that the company has not made an annual report to the RSPO Secretariat for continuous monitoring and improvement because the RSPO metric template has not been published, but the company has reported the RSPO Annual Communication of Progress 2019. The latest ACOP for period of 2018 has been submitted on May 2019.

Status: Comply	
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3.3

Operating procedures are appropriately documented, consistently implemented and monitored.

3.3.1

The company has procedures for oil palm cultivation and palm oil processing which are available in Indonesian. Oil palm cultivation procedures include land clearing, water and soil conservation, integrated pest management, plant upkeep, harvesting and transportation whereas for palm oil processing procedures include FFB receipts, FFB grading, FFB processing, and CPO quality sampling.

The results of the verification of the Technical Procedure for Palm Oil Cultivation and Palm Oil Processing are known that

the procedure is available in Indonesian, further through interviews with management, it was obtained information that each field operational staff (plantation assistant and factory assistant) had 1 SOP bundle as a reference in carrying out work in the field. SOPs are also available at each plantation office.

The results of field observations and interviews with employees in the estate and mill revealed that each employee understood their respective working procedures, for example for harvester in LWUE, LWSE, BINE and BMSE can explain the criteria for fresh fruit bunches, cutting and arranging fronds, preparation of FFB at the fruit collecting point. While for mill employees in the engine room section can explain monitoring and checking tools and functions of generators and turbines, employees can also explain the time of use between turbines and generators.

3.3.2 and 3.3.3

The company has demonstrated a system that ensures consistency in the implementation of SOPs through internal operational audits for each plantation and mill. In addition, the company also has an annual management review such as the 2019 LWI-BPL Management Review, which explains the annual management review schedule, meeting invitations, minutes of meetings, and minutes of the management review meeting number F / SMART / GENERAL / SSSE / 010/001 December 20, 2019 concerning the discussion of internal audit certification findings and monthly meetings consisting of 3 agendas namely internal audit results, customer feedback, and process performance & product compatibility.

The company also monitors the work of contractors related to compliance with company procedures, this is evidenced by routine inspections conducted by the company on a weekly basis. An example of an inspection by a company is contained in a contractor inspection form against a FFB transport contractor (PT. Satrindo Jaya Agropalma) on December 31, 2019 at LWSE. The things that are inspected are compliance with the work environment, PPE, emergency response and work equipment.

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

There is no change Social and Environmental Impact Assessment from previous assessment, contain on:

1. Environmental Impact Assessment

PT LWI-estate, LWSM, and PT BPL has established EIA that consist of repsectively UKL/UPL for LWUE/LWSE, *Dokumen Pengelolaan Lingkungan Hidup* for LWSM, and AMDAL for BMSE/BINE (PT BPL). Certification unit also shown evidence that the document has been conducted participially, for example for *Dokumen Pengelolaan Lingkungan Hidup (DPLH)* for LWSM has a letter of recommendation for the DPLH of the Palm Oil Processing Plant Activity on September 21, 2011 letter no. 660/590 / 1.08.02 / 2011, it has been explained that in the preparation of the document, the technical evaluation was carried out.

EIA for LWI mill and estate covered activites for 9000 ha estates, 60 tonne/hour mill capacity, Meanwhile PT BPL (BINE and BMSE) also provides ANDAL documents approved by Agricultural Miniseter based on decree No. 046/ANDAL/RKL-RPL/BA/II/1996 covered 14000 ha estate activities.

There is an observation from previous assessment regarding to addendum of *AMDAL* of PT BPL. During ASA-1.1, certification unit has shown the progress of making addendum of *AMDAL* of PT BPL, consist of:

- Letter from the Regional Secretariat No. 056.50 / 1345 / 1.3.1.1 / 2019 dated December 13, 2019 concerning the Conformity of PT BPL Spatial which explains that the area of PT BPL is in the plantations area.
- Minutes of Meeting of TKPRD (*Tim Koordinasi Penataan Ruang Daerah*) Discussion in West Bangka Regency No. 056.50 / ./ 1.3.1.1/2020 dated January 28, 2020 which explains that there is a data lack of map of PT BPL land use title that has been approve by National Land Agency and the map will be used for spatial recommendations.

Based on interviews with the Environment Agency, it was explained that certification unit has been actively for completing of process the EIA addendum. However, EIA addendum progress still having a problem at National Land

Agency because until now they cannot provide the digitization maps which is needed for spatial recommendation data.

2. Social Impact Assessment

There is no changes to SIA documents. The company has conducted Social Impact Assessments such as :

- **PT BPL:** The initial social impact assessment carried out in 2014 by PT SMART was conducted by interview and FGD methods. The study areas in 5 villages were: Dendang Village, Air Bulin Village, Kacung Village, Tugang Village, and Pangkal Beras Village.
- **PT LWI:** The initial social impact assessment carried out in 2012 by PT SMART was conducted by interview and FGD methods. The study areas in 7 villages were: Berang Village, Ibul Village, Jebus Village, Mislak Village, Ranggal Asam Village, Terentang Village and Tumbak Petar Village.

Based on interview with Ibul and Terentang Village, it is known there is no new social. Issued raised by village representative is only related to recruitment of workers through Labor Union and this issued has been covered on Social Impact Assessment.

3.4.2

The certification unit has a Social Environment Impact Assessment management and monitoring plan, including:

- Environmental impacts have been included in the Environmental Management and Monitoring Plan Matrix listed in each Environmental Document
- Social Impact Management Monitoring Report of 2019-2020 has been revise to add 2 issued that are the demand for the realization of partnership in plasma and the clarity of HGU boundaries.

3.4.3

Environmental Impact Assessment Document

A. Implementation of Environmental Documents

The Certification Unit has implemented environmental management and monitoring activities listed in the Implementation of Environmental Document Report which is prepared every semester. Based on the document review of the Semester II of 2019 of Implementation Report, it is known that all parameters in the environmental management and monitoring plan matrix have been implemented, but there is some evidence of monitoring that is not listed in the report for example related to the implementation of public health. This will be observed in the next assessment. **OFI**

Based on the monitoring results, there are environmental test parameters that exceed the quality standards, that is the results of noise level and pH test of the Air Pulur river and the well on Terentang Village. In the Report on the Implementation of environmental documents there has been an evaluation of this matter, with details as follows:

- Noise area has been determined as mandatory PPE (Ear Muff) area to reduce the impact of noise.
- It is a normal value pH below in this area. This is shown from the results of the Initial Environmental Baseline test with pH 5.9 for Pulur River and pH 5.4 & 5.8 for community wells. In addition, the results of soil analysis at PT MP LWI also showed that soil pH has acidity properties with pH 5.98 and 5.16.

B. Review of Environmental Documents

The Certification Unit has demonstrated the Conformity Evaluation of the Environmental Document Plan (UKL-UPL, DPLH and AMDAL) conducted on 28 October 2019 with the result that the management and monitoring parameters did not change from the environmental document plan.

Social Impact Assessment Document

A. Implementation of Social Documents

PT MP LWI and PT BPL has shown Report of Monitoring and Management on Social Impacts of Oil Palm Plantations on 2019 describing social impact management and monitoring activities to reduce negative impacts and increase positive impacts in accordance with the plan.

In addition, there is evidence of social impact monitoring activities, for example Minutes of Interview with employees of PT BPL conducted on 3-4 December 2019, Minutes of interview with Ibul Village on December 4, 2019, Minutes of Interview with Mislak Village until the Social Impact Monitoring Implementation Form that has been conducted throughout the

affected villages.

B. Social Document Review

The certification unit has conducted a review of the management and monitoring of social impacts in 2018 and will be re-conducted on 2020 (conducted every 2 years).

Non-Conformity No. 2019.01:

Based on interviews with representatives of Terentang Village, Kacung Village, and Ranggi Asam Village there were social issues or negative perceptions from the community such as: Lack of local workers recruited by companies, CSR realization that was considered lacking, there was no realization of partnership cooperation in the form of plasma, and clarity about the boundaries of the HGU. This was also added from the results of interviews with the West Bangka Regency Agriculture Office regarding social issues in the communities. Regarding this, the company has reviewed the management and monitoring of social impacts carried out in 2018.

The results of the document verification of the Review Report on the Management and Monitoring of Social Impact Plans have included the results of minutes with affected parties regarding issues / negative perceptions related to the above matters. Based on the results of the review, improvements to the management and monitoring plans prepared for the 2019 period has been including negative impacts / perceptions as follows:

PT LWI

- Public unrest related to poor communication relations, and
- Community expectation related to increase assistance from the company

PT BPL

- Social jealousy related to the recruitment of labor by the local community
- Perceptions about communication between the company and the community
- Perceptions about CSR assistance given by the company is felt to be not optimal
- Community's assumption that the company's operations enable pollution due to liquid waste on the Lagok River.

Based on the explanation above, it was concluded that the results of the review of the management and monitoring plan did not cover all the issues or negative perceptions of the communities, namely the demand for realization of partnership cooperation in the form of plasma and clarity on the boundaries of the HGU.

Evaluation of Non-Conformity No. 2019.01:

The Certification Unit already has a Social Impact Management and Monitoring Plan listed in the Palm Oil Plantation Social Impact Management & Monitoring Report for 2019, for example:

PT MP LWI

Type of Impact	Management of Impact	Monitoring Parameter	Monitoring Method
Public unrest related to poor communication relations	Application of SOP of communication and consultation	Communication and consultation book recap	Secondary data checking and interview
Disruption of the company's operational activities as a result of community demonstrations	<ul style="list-style-type: none"> • Establish communication related to the regulation of plasma formation • Realizing CSR activities • Provide job information 	<ul style="list-style-type: none"> • Documentation of socialization activities • CSR realization documents • Employee data 	Secondary data checking and interview

PT BPL

Type of Impact	Management of Impact	Monitoring Parameter	Monitoring Method
Social jealousy related to hiring	Provision of written labor information to the Village Officials	<ul style="list-style-type: none"> • Documentation of employment socialization 	Secondary data checking and interview

		<ul style="list-style-type: none"> PT BPL workforce data 	
The emergence of community demands regarding clarity of HGU, plasma land, CSR programs and workforce recruitment	Provision of workforce information, CSR realization, plasma socialization	CSR documentation, proof of plasma socialization	Secondary data checking and interview

Based on the explanation above, that in the issue or negative perception of the community related to the demand for the realization of partnership in plasma and the clarity of HGU boundaries has been included in the Social Management and Monitoring Plan and there has been an implementation of the social impact.

Based on interviews with Ibul and Terentang Village, it was found that there were no more issues related to the demands for the realization of partnership in plasma and the clarity of the boundaries of the HGU. **Based on this explanation, the non-conformity No 2019.01 can be declared Fulfilled.**

	Status: Comply	
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3.5

A system for managing human resources is in place.

3.5.1

The certification unit has procedures related to recruitment, selection, employment, promotion, retirement and termination of employment which are generally described in the Collective Labour Agreements period of 2018-2020 written in Bahasa. In general these procedures describe:

- Recruitment of workers is based on needs and adjusted to the ability of the company.
- The age of the prospective worker is a minimum of 18 years at the time of recruitment of workers.
- Recruitment of workers is based on the ability, expertise and assessment of prospective workers.
- The company is authorized to carry out the placement, transfer and promotion of workers in accordance with applicable regulations.
- Termination of employment can occur when a worker retires, dies, resigns, and terminates an employment agreement due to a serious violation and others.

In addition to being publicly listed in CLA, the certification unit has other procedures in the form of Policies, SOPs, Internal Memorandums and others related to recruitment, promotion, retirement, termination of employment and others. These procedures have been documented to all workers and their representatives. For example some procedures that are owned by the company include Procedure No. SDM D-010-00 concerning Promotion, CLA article 5 about recruitment.

The results of interviews with workers (harvesting, manuring, spraying and mill operators) in Leidong West Mill note that workers have a sufficient understanding of the procedures related to recruitment, promotion, retirement and factors causing termination of employment. Workers explain that in the acceptance process carried out in accordance with the terms / conditions according to ability / expertise, promotion is based on an assessment of the performance of each employee each year, and one of the causes of termination of employment can occur if the worker has committed a serious violation.

From this explanation it can be concluded that the certification unit have procedures for recruitment, selection, employment, promotion, retirement and termination of employment must be documented / available to workers and their representatives.

3.5.2

The certification unit always documented all labor procedures that have been carried out properly such as recruitment, promotion, performance assessment and others. The following are some sample labor procedures that have been implemented and are well documented by certification unit, such as worker at LWUE who have work agreement document No. 001/LWUE-EM/SK/JAN/2018-SKU-H NIK 02004 dated 02 January 2018 along with the complete recruitment requirements such as employee identity (KTP), family card (KK), job application letter, and other supporting documents. The worker has received a performance evaluation in the orientation period of 3 months and is eligible to be appointed as permanent workers. After obtaining an assessment, the worker is appointed as permanent worker.

The explanation above proves that the certification unit has implemented labor procedures properly and is documented for each employee.

Status: Comply

3.6

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

3.6.1

The company has had a policy of occupational safety and health were written in Bahasa. The policy has been legalized on 01 November 2013. 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 (P2K3) 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 regular meetings to assess effectiveness.

The company have document of hazard identification, risk assessment and risk control (HIRAC) 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 boiler and engine room in LWSM, 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, MCU and OHS signboard are available in workplace.

Interviews with estate workers (harvester, workshop) and mill workers (mill operators). 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. For example mill employees exposed to high noise such as boiler employees and engine rooms who have used a complete hearing protection device according to risk analysis, namely ear muff and ear plug. There is no complaints from employees exposed to high noise exposure. To ensure that every workers are in good health then certification unit do the medical check up. The results of each employee's health examination have been properly stored. Last medical checkups conducted in February 2020. The result of medical test showed that workers were in good health and fit to work.

3.6.2

Realization of the program of work will be monitored through regular meetings Guiding Committee of Occupational Safety & Health (P2K3) 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 regular meetings to assess effectiveness. The following are examples of the realization by the certification unit in 2019, including:

- Dissemination of the dangers of drugs to workers and residents of housing by installing drug hazard warnings in every employee's housing, office, and other areas.
- Identification of areas with potential for emergency hazards such as areas prone to fire, explosion, soil / water pollution, and workplace accidents as well as the results of monitoring conducted every 3 months. The last inspection was in January 2020.
- Check availability and condition of first aid kits for 2020 was conducted in January 2020 with the results of all first aid kits carried by each field foreman, first aid kits in offices and in warehousing areas are still in good condition and available in 21 types of goods in accordance with the law and applicable regulations.
- P2K3 meeting on 6 December 2019 which discussed the evaluation of OSH implementation in December, annual evaluation of OHS implementation, preparation of OSH work program in 2020.
- Monthly safety inspections of all contractors.

Based on field observations and interviews with workers it can be seen that the company has provided adequate and appropriate protective equipment. It is available to all workers in the workplace to cover all potentially dangerous operations such as pesticide applicators using PPE such as face shield helmet, waterproof aprons, masks, double rubber, cloth gloves, and complete boots.

Status: Comply

3.7
All staff, workers, Scheme Smallholders, outgrowers, and contract workers are appropriately trained.
3.7.1 and 3.7.2

The company has a training program that is organized annually based on identifying employee training needs. The 2019/2020 training program prepared by the SPO in each unit for example: Simulations of fire and riot land, fertilization, IPM, Chemical use, LSU-SSU, First Aid, Socialization of HCV areas and protected animals, , Work Environment and Industrial Relations, RSPO, ISPO, ISCC, Environmental Management, MSDS, OHS Control, Contractors.

Identification of the needs of the Farm and Factory Training has been made based on the organization's position and type of competency, for example heavy equipment operators need training types such as: lift operator license, OSH policy, SOP / IK, PPE, risk analysis, prohibited from burning waste, socialization of business ethics, hazardous and toxic waste Control , working age limit, GSEP, Industrial Relations, SOP for Grievance and Dissatisfaction, Communication and Consultation SOP, Understanding ISPO RSPO ISCC.

The company has stored training records / documentation in each unit or in the SPO office. At the time of the audit activity, the company can show documentation, materials and attendance list of trainees.

Training records also include the attendance of workers who received training, for example:

- LSU-SSU training on February 20, 2020 at BINE long house with LWUE, LWSE, BMSE, LWUE participants. 75 people.
- P3K training on February 15, 2020 at BINE long house with 54 participants from LWUE, LWSE, BINE, BMSE, LWSE.
- IPM training on February 20, 2020 at BINE Long House with 63 LWSE, BMSE, BINE participants.
- Fertilization Training on February 20, 2020 at BINE Long House with LWSE, BMSE, BINE participants, as many as 83 people.
- Emergency Response Simulation on February 6, 2020 at BINE with LWSE, LWUE, BMSE, BINE participants, as many as 65 people.
- SOP / IK socialization / training, and safety equipment at the sterilizer station on December 16, 2019 followed by 5 employees.
- Emergency stop boiler socialization / training on December 14, 2019 followed by 7 employees.
- The training/socialization to FFB Transport Contractor on 13 February 2020 related to SOP Loading and Transporting FFB, Reducing Driving Speed, OHS and worker welfare, Environmental Management, HCV / HCV, Social and Environmental Policy, ISPO, RSPO, ISCC, attended by 8 people (contractors and company / SPO Officer).
- The fire alert community Training (MSA) was held on 20-21 February 2020 at the BPPE long house and yard for PT LWI and PT BPL delivered by the Fire Department of West Bangka Regency. The training was attended by 58 MSAs (fire alert community) from surrounding villages such as Kacung, Terentang, Bujang, Tugang, Berang, Simpín Bulín and villages around the company. Also attended by 58 employees of PT BPL and PT LWI.
- Spray Training on Chemical Use and Weed Control on February 20, 2020 at BINE long House to 69 LWUE, LWSE, BINE, BMSE employees by the SMARTRI coordinator.
- Integrated Pest Management (IPM) and Fertilization Training on 20 February 2020 at BINE long House to 63 LWUE, LWSE, BINE, BMSE (census officer, maintenance, foreman) employees by the SMARTRI coordinator.
- Fire and Riot Simulation on 6 February 2020.

The results of interviews with plantation and factory workers revealed that the company had provided training to workers in accordance with their duties and responsibilities.

3.7.3

The training of SCCS has been conducted for SCCS related workers on 3 January 2020. Based on interview to the workers involved in SCCS operations, such as security (for FFB receiving verification), weighbridge operator (for deviding amount of certified and uncertified sourced), and Administration Head (for recording and monitoring the MB data), known that the workers understood the SCCS mechanism, and the MB record has conducted and monitored well.

Status: Comply

3.8
Supply Chain Requirements for Mills
3.8.1 and 3.8.2

Based on document verification and interview with the weighbridge operator, during the period of October 2019 and previously, the Mill implement the IP Module, that is only received FFB from certified source. However, in the period of November 2019 onward, the Mill implements the MB Module, which is received both FFB from certified and uncertified sources. Verification of Mass Balance record, the Mill has been recorded well the FFB and products (CPO and PK) from certified and uncertified sources. The Mill only claims certified products from certified sources.

3.8.3

Estimated certified product recorded in the last assessment report and certificate, as well as in the RSPO IT Platform. Actual certified produced has been verified during this assessment, and not exceed the estimate. The estimates of certified production for the next license period also have been set, in reasonable amount taking into account the last year's production. The data are shown in the following table:

Product	Estimate Production of 12 month (MT) 16 May 2019 to 15 May 2020	Actual Production of 12 months (MT) previous audit 1 February 2019 to 31 January 2020	Estimate Production of 12 month (MT) further 16 May 2020 to 15 May 2021
FFB	241,936	217,260.12	188,000
CSPO	49,938	45,098.76	41,400
CSPK	14,266	13,375.66	11,600

3.8.4

Leidong West Mill has registered as RSPO member under GAR (No. 1-0096-11-000-00) and also registered in palm trace as PT. MP Leidong West Indonesia - Leidong West Palm Oil Mill with License ID CB84789, and Member ID RSPO_PO1000001372.

The reporting requirements has been conducted by the Mill through RSPO IT Platform, such as CSPO and CSPK sales announcement and confirmation from the buyer.

Other than that, the CSPO and CSPK sold in another certified scheme, or sold as non-certified, has been removed.

3.8.5

The Mill has had procedures related supply chain, such as SOP of RSPO Supply Chain Model of Mass Balance (No. PT.MP.LWI.LWSM/SOP/26 dated 16 January 2020), SOP of FFB Processing (No. SOP/SMART/MCMD/I/TM-PKS), SOP of Reporting of Certified Product (No. SOP/SMART/CERS-EHSD/SADV/003), and SOP of Document and Record Controlling (No. SOP/SMART/UMUM/SADV/I/001).

The dissemination of procedures has been conducted on 18 November 2019.

These procedures have referred to the RSPO Supply Chain System and Standard of 2014, revised in June 2017. The procedure has covered all aspects in SCCS MB model, such as receiving and recording that identify the traceability of RSPO certified and uncertified source and products, FFB processing, the announcement in RSPO Palmtrace, key persons such as security, weight bridge clerk, dispatch/kernel officer, production clerk, Administration Head, as well as the training.

Based on field observation, obtained information that key persons for SSCS implementation (such as weighbridge operators, security, and Head of Administration) understood the supply chain implementation. FFB from certified and uncertified sources were received and verified by the software program to classified and separate RSPO certified and uncertified source.

3.8.6

Internal audit of RSPO SCCS conducted on 28 October to 2 November 2019. All of SCCS indicators has been assessed and complied. Management Review of RSPO SCCS implementation conducted on 18 December 2019. The management review discussion has covered the input from internal audit result, correction and corrective action, customer feedback, process performance and product compliance, follow up of previous management review, and recommendation for

improvement.

3.8.7

The Mill has maintain the record of Mass Balance data, that informed amount and sources of FFB certified and uncertified received, as well as the certified products (CSPO and CSPK), shown as follows :

Month	FFB (MT)		
	RSPO Certified	Non Certified	Total
February 2019	16,978.34	-	16,978.34
March 2019	17,840.31	-	17,840.31
April '2019	16,043.02	-	16,043.02
May 2019	17,679.39	-	17,679.39
June 2019	17,648.15	-	17,648.15
July 2019	21,601.93	-	21,601.93
August 2019	20,390.15	-	20,390.15
September '2019	19,610.73	-	19,610.73
October '2019	19,967.32	-	19,967.32
November '2019	16,563.59	2,143.39	18,706.98
December 2019	16,899.13	2,390.87	19,290.00
January '2020	16,038.06	1,965.85	18,003.91
Total	217,260.12	6,500.11	223,760.23

In early of January 2020, the Mill saw projected overproduction, and informed the CB to request volume extension on 15th January 2020, amount of 46,724 MT of FFB, 8,943 MT of CSPO, and 2,554 MT of CSPK.

Product	Estimate Production of 12 month (MT)	Actual Production of 12 months (MT) previous audit
	16 May 2019 to 15 May 2020	1 February 2019 to 31 January 2020
FFB	241,936	217,260.12
CSPO	49,938	45,098.76
CSPK	14,266	13,375.66

Based on the table above, know that there is no FFB overproduction of against credit given during one year of license.

Related for handling non-conforming oil palm products, has been set in the SOP of Complaints and Grievance Handling (NoSOP/SMART/SIGS-CSRD/SADV/II/003, dated on 1 July 2014). This procedure is generally applied to all complaints aspects, including complaints and non-conforming products from customers/buyers. During the audit, there is no written complaint from stakeholders related to nonconforming products.

3.8.8

The CSPO and CSPK from the Mill were sold has met the requirements of certified product information. The selling documentations shown were contract agreement, delivery order, delivery ticket, report of loading, weighing minutes, weighing card, and delivery note. Those documents cover information of delivery date, description of product and supply chain model, product quantity, identification number (unique code), certificate number, sender's name and address of the seller.

3.8.9

The Mill outsources its products transportation to the third parties and has contractual agreements. CSPO transporter handled by PT Satrindo Jaya Agropalma (Agreement No. 001/LWI/LWSM/01/2020-CPO dated 2 December 2019, valid

thru 31 December 2022), and CSPK transportation handled by PT EMKL Tiga Berdikari (Agreement No. 001/BPL/LWSM/01/2020-PK dated 2 December 2019, valid thru 31 December 2020).

To ensure the contractors complies with the RSPO Supply Chain, in the agreement, there were clauses that set obligations of the contractor to comply with the supply chain rules. For instance, the responsibility to deliver products only from Leidong West Mill, as well as the willingness to observe by Certification Body in order to verify the compliance. Other than that, the Mill has had SOP of Contractor Control (No. SOP/SMART/UMUM/SADV/I/006 dated 1 July 2014).

One of the mechanisms to ensure that the products delivered only from Leidong West Mill, in the vehicle is mounted on a seal that can only be opened at the buyer's location.

3.8.10 and 3.8.11

The Mill has the record of details of the contractors, covers the contractor's company profile, address, contact person, email and phone number, contract agreement and period, and list of vehicles. There is no new contractors and transporter since Re-Certification until this ASA 1.1.

3.8.12

The Mill has maintained accurate, complete, and up to date records related RSPO Supply Chain implementation that kept at least 2 years in accordance with Mill's procedure, such as mass balance data, announcement and remove of stock. The records cover FFB received from certified and uncertified sources, production of CPO and PK (certified, noncertified, total), products dispatch (as RSPO certified, sold in another certified scheme, sold as noncertified, total sold), as well as balance/stock of certified products.

The Mill balancing the certified products and dispatch on a three-monthly basis. Based on the Mass Balance record, the Mill only sells certified products from a positive stock in three monthly periods.

The summary of Mass Balance data 12 months previous the audit can be seen on the table below:

Mass Balance record of CPO

Period	All CPO Production (MT)			CSPO Dispatch (MT)			
	CSPO	Non Cert CPO	Total	RSPO	Other Scheme (ISCC)	As Non Certified (conventional)	Total CSPO Dispatch
Feb 2019 – Jan 2020	45,098.76	1,306.71	46,405.47	24,185.94	19,824.27	-	44,010.21

Mass Balance Record of PK

Period	All PK Production (MT)			CSPK Dispatch (MT)			
	CSPK	Non Cert PK	Total	As RSPO	As another Scheme (ISCC)	As Non Certified (conventional)	Total
Feb 2019 – Jan 2020	13,375.66	402.33	13,777.99	13,155.00	-	-	13,155.00

3.8.13 and 3.8.14

The conversion rate of production of CPO (OER) and PK (KER) were based on actual daily, monthly, and yearly production. Then the Mill set the target of OER and KER, even though the actual may vary. Based on production data 12 months previous audit (February 2019 to January 2020) the average OER is 20.74 %, while KER is 6.16 %. The target of OER and KER reviewed annually based on Management Review Meeting.

3.8.15

The Mill only applying RSPO SCC Module of Mass Balance.

3.8.16

Based on delivery and transaction document review, it was known that announcement is carried out less than three months after delivery date. The removing stock of RSPO certified product which sold under other scheme (ISCC) and/or conventional are properly conducted by the Mill. For instance, the selling of 100 MT CSPK to PT Sumber Indah Perkasa (buyer ref. DIC/1250/070819/0001), final shipping on 26 September 2019, has been announced and confirmed in RSPO Palm Trace on 15 October 2019 (transaction id TR-2a45b369-0325).

3.8.17

The products are claims as mass balance and conventional. The Mill does not use RSPO logo on product or off product.

Status: Comply

PRINCIPLE #4 RESPECT COMMUNITY AND HUMAN RIGHTS AND DELIVER BENEFITS

4.1

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

4.1.1

The company has a commitment to respecting human rights and explained in the Social and Community Engagement Policy established on November 10, 2011. The commitment of the company in respecting human rights has been quite well implemented in the absence of issues and incidents of human rights violations that occurred in the operational area of plantations and mill.

The policy / declaration has been well documented and has been socialized to the workers at the time of the morning ceremony and by using warnings placed in several locations to make it easier for workers to find out. Based on the results of interviews with workers, it is known that the company has respected and facilitated workers related to human rights policies such as leave rights, benefits rights, the right to associate and others.

Workers also know their rights such as those related to minimum wages, H1 and H2 leave (for female workers), overtime , etc. The results of interviews with contractors also conveyed that the company routinely conveyed socialization related to company policies.

Based on the explanation above, during the past year there were no issues / incidents of human rights violations that occurred in the vicinity or the operational area of the certification unit so that there were no acts of intimidation / violence carried out by the certification unit.

4.1.2

During the past year, the certification unit did not have records related to the use of violence / mercenaries or paramilitaries in resolving conflicts / problems that existed between the certification unit and related stakeholders (surrounding communities, workers, or others).

This has been stated in GAR's social and environmental policy was published on September 8, 2015. Point 2.1.2 regarding Achieving conflict resolution which is responsible for explaining that the Policy concerns Free, Prior and Informed Consent (FPIC) from indigenous peoples and local communities, complaint handling, conflict resolution, and respect for human rights. The company always maintains peace and order of plantation and mill operational activities by not using violence / paramilitary use in resolve existing conflicts / problems.

The results of interviews with the surrounding community and company workers revealed that up to now if there was a conflict / problem with the company, the resolution action taken was deliberation without resorting to violence. Resolution of conflicts / problems using these deliberations has been quite effective and during the past year there have never been any conflicts / problems with the company.

Status: ComplyComply

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 ; 4.2.3 ; 4.2.4 ; 4.2.4

Unit certification can demonstrate the existence of standard communication and consultation procedures as indicated by SOP-SMART-UMUM-SADP-I-004 regarding Communication and Consultation. The deadline for responses to requests for information or conflicts is 3 weeks. The SOP contains an explanation of communication procedures in terms of requests for information.

The SOP explained that the Social Officer / KTU received letters of complaint and dissatisfaction directly from the complainant or indirectly through the suggestion box. The information and data entered are recorded in the Complaint and Dissatisfaction Record form. The solution contained in the SOP on Complaints and Dissatisfaction Handling explains that if there is no resolution in the grievance mechanism, it can be brought to the RSPO Complaint System.

In addition, the certification unit has conducted policy socialization, code of ethics, complaints handling procedures, consultation with FPIC principles and providing information to relevant stakeholders (sub-district / village / village officials, community leaders, partners, contractors and others) on 13th February 2020 which was attended by surrounding community and stakeholder.

Based on interview with workers in LWSM, LWSE and LWUE as well as information from Labor Union and Gender Committee of those units, it was known that every complaints and grievances has satisfactory responded by management unit directly, and there were no significant issues that needs to be follow up by the management.

The results of interviews with representatives of surrounding communities, the village community has known about the communication procedures and to people who served as communicators between the company and the community so that people who cannot read / write can be informed by the related communicators. In addition, during the past year there were no complaints or conflicts that occurred between the company and the surrounding community.

Status: Comply

4.3

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

4.3.1

The Certification Unit already has CSR Activity Plan of 2020 explaining plan for contributes to local communities covers the fields of education, social, health, infrastructure, economy and environment. The program was made based on proposals / letters from the communities in 2019.

In addition, the certification unit shows evidence of communication for the creation of CSR program in the form of vegetable cultivation in Kacung Village conducted in February 2018. However, the program has been rejected by community with evidence of letter from head of village No. 140.01/87/19.05.04.2006/II/2018 on 17 February 2018. The certification unit has also shown plans to conduct a review of CSR activities around PT MP LWI and PT BPL which will be conducted in April 2020. **This will be an observation in the next assessment (OFI).**

The certification unit has presented the CSR Implementation Report for 2019 informing implementation of CSR program on 2019 including infrastructure development (road improvement and assistance to places of worship), customary event in surrounding villages, funding assistance for schools, etc.

The results of interviews with representatives of the Terentang Village and Ibul Village revealed that the certification unit had realized a number of assistances such as assistance for basic needs during Eid, places of worship assistance, road repairs, religious assistance, assistance for village customary activities, etc.

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 total cultivated area based on the latest statement area is 9,627.77 ha, consist of 1,389.24 ha of PT Maskapai Perkebunan Leidong West Indonesia (PT MP LWI), and 8,238.53 ha of PT Bumi Permai Lestari (PT BPL).

Detail of land title and plantation permit of PT MP LWI as follows:

- Certificate of HGU of PT MP LWI No. 15 dated September 25, 2004 with an area of 746.52 Ha, valid until September 21, 2039.
- Certificate of HGU of PT MP LWI No. 16, September 25, 2004 with an area of 642.72 Ha valid until September 21, 2039.

Detail of land title of PT BPL as follows:

- Revised HGU Certificate of PT BPL No. 01 dated August 8, 1996 with an area of 8,234.13 ha (previously 6,907.6 ha), valid until August 8, 2031.
- HGB Certificate of PT BPL No. 01 dated 5 August 2005. Letter of Measure No: 01 / Terentang / 2005, dated 4 August 2005. Area of 44,000 m2.

Leidong West Mill (LWSM) are located within PT BPL's HGU, documents of lease land between PT Bumi Palma Lestari and PT MP Leidong West Indonesia are sighted, determined on October 17, 2001, over an area of 28.2 hectares used by PT MP LWI for Leidong West Mill. There was an addendum to the agreement on January 17, 2011 which added the period of the agreement until October 17, 2021.

4.4.2, 4.4.3, 4.4.4, 4.4.5, 4.4.6

Based on the verification of HGU Decree, the HGU is sourced from State Land, included community lands that had been compensated by the company. The entire compensation has been completed in 1996 (PT BPL) and 2004 (PT MP LWI). Also, there was no customary rights and/or traditional rights, informed in HGU Decree. It has been verified based on an interview with Village Heads of Ibul and Terentang. Until this ASA 1.1, the company didn't develop new areas/land acquisition.

In land acquisition process during the period of 1996 or 2004, the company has no FPIC procedure yet, thus the FPIC process also still incompletely and unspecifically, such as no participation mapping of land owner that entitled to compensation. However, based on land acquisition documents, interviews with ex-landowners in Sub-Village of Ibul, and Village Heads of Ibul and Terentang, can be concluded that the land acquisition processes had been conducted in FPIC manner. For instance, the documentations shown had been made in Indonesian language and available for both parties, based on the agreed price and no coercion, involved and signed by community representatives such as Village Heads and Sub-District Heads.

Also evidenced in some cases, there are some areas within HGU amount of 89 ha in BINE and 20.88 ha in BMSE that are still owned by communities. This is due to the landowners still not willing to release their land to be compensated by the company. The company stated this kind of land as reserve area, that might be compensated in the future. A field observation on a sample of that land (Block M33 of BINE), sighted that the land has been well-demarcated and there is no dispute or conflict between the company and the landowner.

However, the company has been set the FPIC related procedure in the SOP of Application of free, prior and informed consent (No. SOP/SMART/SENS-CSR/SADV/II/003, dated 1 July 2014), that covers detailed FPIC process if there any plan of land acquisition and development onward.

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 to 4.5.8

Based on the verification of HGU Decree, the entire land compensation has been completed in 1996 (PT BPL) and 2004 (PT MP LWI). Until this ASA 1.1, the company didn't develop new areas/land acquisition. It has been verified based on an

interview with Village Heads of Ibul and Terentang. However, the company has opportunity for improvement to re-ensure identification of enclave and reserve areas inside the HGU, as well as synchronization between HGU maps and operational maps. OFI.

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.

4.6.3, 4.6.4

Based on the verification of HGU Decree, the entire land compensation has been completed in 1996 (PT BPL) and 2004 (PT MP LWI). Until this ASA 1.1, the company didn't develop new areas/land acquisition. It has been verified based on an interview with Village Heads of Ibul and Terentang.

In land acquisition process during the period of 1996 or 2004, the company has no FPIC procedure yet, thus the FPIC process also still incompletely and unspecifically, such as no participation mapping of land owner that entitled to compensation. However, based on land acquisition documents, interviews with ex-landowners in Sub-Village of Ibul, and Village Heads of Ibul and Terentang, can be concluded that the land acquisition processes had been conducted in FPIC manner. For instance, the documentations shown had been made in Indonesian language and available for both parties, based on the agreed price and no coercion, involved and signed by community representatives such as Village Heads and Sub-District Heads.

4.6.1, 4.6.2

However, if in the future there is a plan for land acquisition/development, the company has been set the FPIC related procedure in the SOP of Application of free, prior and informed consent (No. SOP/SMART/SENS-CSRD/SADV/II/003, dated 1 July 2014), and procedure for calculating and distributing fair compensation in SOP of Land Compensation (No. SOP/NP/SMART/VII/D&L.002 dated 01 July 2010). Those procedures has covers the detail of FPIC process, such as identifying legal, customary or user rights and mechanism of people entitled to compensation identification.

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

In line with Criteria 4.4, 4.5 and 4.6, described that the entire compensation has been completed in 1996 (PT BPL) and 2004 (PT MP LWI). In land acquisition process during the period of 1996 or 2004, the company has no FPIC procedure yet, thus the FPIC process also still incompletely and unspecifically, such as no participation mapping of land owner that entitled to compensation.

However, based on land acquisition documents, interviews with ex-landowners in Sub-Village of Ibul, and Village Heads of Ibul and Terentang, can be concluded that the land acquisition processes had been conducted in FPIC manner. For instance, the documentations shown had been made in Indonesian language and available for both parties, based on the agreed price and no coercion, involved and signed by community representatives such as Village Heads and Sub-District Heads.

However, if in the future there is a plan for land acquisition/development, the company has been set the FPIC related procedure in the SOP of Application of free, prior and informed consent (No. SOP/SMART/SENS-CSRD/SADV/II/003, dated 1 July 2014), and procedure for calculating and distributing fair compensation in SOP of Land Compensation (No. SOP/NP/SMART/VII/D&L.002 dated 01 July 2010). Those procedures has covers the detail of FPIC process, such as identifying legal, customary or user rights and mechanism of people entitled to compensation identification.

4.7.3

In land acquisition process during the period of 1996 or 2004, there was no such written agreement that allows previous landowners to have opportunities of benefit from plantation development. However, the company has several policies, as

well as SIA management and monitoring plan that has some purposes to improve livelihoods quality of surrounding communities, includes the previous landowner/ For instance the acceptance (buying) of communities FFB, acceptance of local workers and contractors if needed, economic development program, and any other CSR programs. Those things have been verified through document review, and interview with previous land owner, as well as Village Heads of Ibul and Terentang.

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 to 4.8.4

Based on a review of the HGU Decree document, there are no customary rights or traditional rights in the HGU, and has been verified based on interviews with Village Heads of Ibul and Terentang. There were community lands that had been compensated by the company. The entire compensation process was completed in 1996 (PT BPL) and 2004 (PT MP LWI).

Based on interviews with Village Heads of Ibul and Terentang, as well as Plantation Agency, obtained information that until this ASA 1.1, there was no significant land dispute, and currently there is no land dispute. However, in HGU area there are 89 ha lands in BINE and 20.88 ha in BMSE that still owned by the communities. This matter due to the land owners still not want to release their lands to the company.

Based on field observation on land that still owned by the community in BINE Block M33, known that land has been well demarcated and there is no conflict between the company and the land owner.

Status: Comply

PRINCIPLE #5 SUPPORT SMALLHOLDER INCLUSION

5.1

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

5.1.1, 5.1.2, 5.1.3, 5.1.4

Based on interviews with weighbridge operator and document review in Mill, the outsider FFB received through three third party FFB supplier (agents), that were CV Multi Nusa Pratama, CV Hijau Barokah, and CV Karya Sejati Utama. There was no FFB received directly from independent or scheme smallholder. Based on interview with one of those FFB supplier, that is CV Multi Nusa Pratama, known that the FFB pricing has been mutually agreed, that is by Mill's mechanism considering the Plantation Agency pricing and market trend. The FFB set and provided daily by phone or SMS.

5.1.5, 5.1.6

Based on interviews with CV Multi Nusa Pratama (FFB Supplier), known that the supplier did not want any agreement, due to did not want to be contractually bound related FFB supplying. However, the payment time is reasonable and acceptable, i.e. does not exceed the 20th of the following month.

5.1.7

The Mill's weighbridge has been calibrated annually. The latest calibration conducted on 14 October 2019 by Industrial Agency of Bangka Barat Regency, based on Certificate of Calibration No. 6/SKHP-SMBP/DKUP.BABAR/X/BM/2019.

5.1.8

Based on interviews with workers and document review, third party FFBs that enter LWSM come from FFB collectors and not from independent smallholders.

Based on interviews with FFB Suppliers (CV Multi Nusa Pratama), it is known that the supplier is a FFB collector from independent smallholders and does not want any agreement including participating in certification with LWSM.

5.1.9

The complaints mechanism for farmers is the same as the general complaints mechanism listed in SOP on Complaints

and Dissatisfaction Handling No. SOP / SMART / GIMS-SCMD / USDV / I / 001 Rev. 2.0 April 11, 2017 which explains that the handling of complaints is no later than 1 month after the problem is verified by the unit.

Status: Comply

5.2

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

5.2.1, 5.2.2, 5.2.3, 5.2.4 and 5.2.5

Based on interviews with workers and document review, third party FFBs that enter LWSM come from FFB collectors and not from independent smallholders. Certification unit also not have any scheme smallholders.

Based on interviews with FFB Suppliers (CV Multi Nusa Pratama), it is known that the supplier is a FFB collector from independent smallholders and does not want any agreement including participating in certification with LWSM.

Status: Comply

PRINCIPLE #6 RESPECT WORKERS' RIGHTS AND CONDITIONS

6.1

Any form of discrimination is prohibited.

6.1.1 ; 6.1.2 ; 6.1.3

The company has a GAR Social and Environmental Policy signed by Head of Upstream, CEO-Downstream & Commercial, Executive Director & CFO; Managing Director of Sustainability & Strategic Stakeholder Engagement. In point 3 the Work Environment and Industrial Relations states: The company provides equal opportunities for all workers, and embraces diversity regardless of ethnicity, religion, disability, gender, political affiliation, sexual orientation, or union membership.

The company ensures that workers are protected from acts of discrimination in all stages of labor relations, there is no forced labor system that can cause human rights violations and inconvenience of employees / prospective employees in the work or recruitment process.

The results of a review of labor documents prove that the certification unit does not discriminate and treat all workers fairly, the following is evidence that can be shown by companies:

- The composition of workers consisting of various ethnic groups, religions, sexes, and workers' origins.
- Recruitment of workers based on the results of selection, performance appraisal, ability and expertise of workers.
- Worker placement and training is carried out according to their expertise / type of work, such as prospective harvest workers being placed as harvest workers and receiving routine harvest training.
- Women workers are given equal rights, wages and opportunities to get promotions with male workers of the same type of work, for example there are several maintenance foremen who are female workers.

Based on the employee registration document, unit certification has provided equal opportunities and treatment in employment opportunities. This is evidenced by the diversity of ethnic accepted to work. The results of interviews with workers during field visits and interviews with labor unions and representatives of the Gender Committee also obtained information that there was no indication of acts of discrimination based on religion, ethnicity, gender and regional origin in the process of accepting work.

These explanations can conclude that the company has treated all workers equally without discrimination based on gender, ethnicity, religion, health conditions or others.

6.1.4

A pregnancy test for workers is carried out every month just to ensure that pregnant workers are not allowed to do work with chemicals, not as a basis for discriminating against these workers. If declared pregnant, the worker will be transferred to a safer job but still equal in terms of wages and other benefits, so that there is no discriminatory action. This is made clear by the results of interviews with women workers in the Bumi Intan Estate maintenance activities stating that female workers are required to have monthly pregnancy testing at the clinic to ensure that no female workers working with

chemicals are pregnant / breastfeeding and testing the pregnancy is not a discriminatory measure given by the company.

6.1.5

Gender committees have been formed and are still active today in the certification unit which is chaired by the committee chairperson along with coordinators in several sections and there are representatives in each unit. The main objective of forming a gender committee is to provide a forum that can accommodate the aspirations / complaints of workers (especially women), as company partners in carrying out the activities of socialization related to gender and other policies related to workers' reproductive rights. In carrying out its activities this gender committee always collaborates with the labor union so that the socialization of matters related to women's rights can be conveyed properly and there is no discrimination in terms of gender. The workers also knew of the existence of the gender committee because it had been routinely socialized by its management.

The results of interviews with women workers and representatives of the gender committee revealed that until now there were no reports / issues / complaints related to gender reported by the workers and at the moment the activities carried out were gender meetings during children healthcare (posyandu), women recitation weekly and others.

6.1.6

Equal payment of wages has been made by certification unit properly, taking into account the ability, performance, expertise, length of work and other factors as a basis for remuneration. So that the payment of wages provided is in accordance with the burden / duties / types of work respectively. For example, upkeep workers with initials RML (female with 5 years of work) and DDI (male with 10 years of work) who get wages in December 2019 whose value is above the minimum wage, but with different amounts based on years of service, ability, attendance and job performance.

Status: Comply

6.2

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

6.2.1

The company has a Collective Labor Agreement for the period 2018-2020 in accordance with Decree No. 560/001 / PKB / 2.12.1.1 / 2019 22 February 2019. It has been ratified by the Head of the Investment Office, One Stop Integrated Licensing Service, Manpower and Transmigration, West Bangka Regency No.560 / 001 / PKB / 2.12.1.1 / 2019 concerning Registration of CLA Extension of PT BLP and PT MP LWI of West Bangka Regency, in April 2019 and valid from October 20, 2018 to October 20, 2020.

It is made in Indonesian language which explains the working conditions and rights / obligations of workers such as, recruitment, selection, transfer, promotion, performance appraisal, remuneration, discipline, overtime, and other provisions.

During the last year the certification unit did not have workers with contract status (PKWT / BHL), the current employee status is permanent workers who have Orientation Worker status (3 or 12 month orientation period). The review of the February 2020 wage document for harvest workers, pesticides, sprayers and mill operators proves that the wages received are above the minimum wage and in accordance with the wage scale structure determined by the certification unit for 2020. Based on the above explanation it can be concluded that the workers have understood the work requirements that have been socialized by the certification unit in an understandable language.

The results of interviews with workers (harvesters, sprayers, fertilizers, mill operators), contractor worker (Satrindo Transport) and union representatives know that workers have a sufficient understanding of their rights (wages, overtime, incentives, fines, etc.) listed in the Company Regulations and in accordance with routine socialization provided by the certification unit. Workers' wages in 2019 have been above the minimum wage set by the government and there are no late payments every month.

6.2.2; 6.2.3

The company has Collective Labor Agreements are made in Language than explains the working conditions and rights / obligations of workers such as recruitment, selection, transfer, promotion, performance appraisal, remuneration, discipline,

deduction, overtime, sick leaves, holiday entitlement, maternity leave and other provisions. In addition to being generally stated in CLA, the certification unit also has a decree, policy, memorandum and work contract for workers in orientation period that specifically explain these matters. An example is:

- Decree No. 213 / CEOLAMBABEL / HRPSMSUMSEL-LAMBABEL / 12/2019, set on January 27, 2020 by the director regarding the stipulation of the structure and scale of wages for permanent workers of PT MP LWI Babel Region in 2020 and used from January 1, 2020 in the amount of Rp. 3,230,524.
- Employment contract No. 076 / SK-PT / LWUE / 01/2019, which describes working hours, wages, BPJS, leave, overtime, and others.
- January 2020 salary slips, for example workers' wages (boiler operators) Number employee 01071 who have a breakdown of wages in the form of basic wages, benefits, overtime, incentives, fines, and others. Overtime payment in December 2019 that has been accordance with applicable laws. This has been verified by the auditor.
- List of women worker that has been given maternity leave and pregnant workers in 2019.

The results of interviews with workers (harvesters, sprayers, fertilizers and mill operators) and union representatives know what workers have a sufficient understanding of their rights (wages, overtime, incentives, deductive, fines, etc.) listed in the Company Regulations and in accordance with routine socialization provided by the certification unit. Workers' wages in 2020 have been above the minimum wage set by the government and there are no late payments every month, working hours is seven (7) hour a day with 6 days in a week and for the overtime has been paid in accordance with applicable regulations. A review of the January 2020 wage document for harvest workers, pesticides operator and mill operators proves that the wages received are above the minimum wage and in accordance with the wage scale structure determined by the certification unit for 2020. For example workers wages with employee number 01071 earned IDR 3,286,024.

Based on these explanations, it can be concluded that the certification unit has carried out work requirements in accordance with applicable laws and regulations in Indonesia.

6.2.4

The company unit has provided welfare facilities to occupants in the form of housing, clinics, water supply, electricity, education, transportation and other facilities. The results of the field visit in the housing area revealed that workers were provided with adequate housing facilities with 2 bedrooms, 1 bathroom and there were daycare for children. The house is inhabited by 1 family and specifically for workers who are not married then 1 house will be filled by 2 workers. This is in line with the results of interviews with housing residents stating that the facilities provided by the certification unit are houses, electricity, availability of clean water, transportation of school, elementary & middle school (for high schools located in located outside the estate with an affordable distance), child daycare with nursing room places of worship (mosque & church), sport facilities and others. In general, the facilities provided by the company are good / suitable for use by workers and their families.

6.2.5

The company unit has made it easier for workers and their families to obtain food sources by providing employee cooperatives that sell the daily needs of workers and provide access to vegetable traders to sell in the workers' housing area. In addition there are also workers who open small business stalls to sell daily necessities in each housing.

Based on interviews with workers (harvesters, sprayers, maintenance and mill operators), housing residents, labor unions and gender committees, it is known that workers have no difficulty in getting food sources because the company has provided cooperatives that sell daily necessities and the existence of vegetable sellers given access to sell at home. In addition, workers can buy these needs into markets around the area of the company with easy access.

6.2.6

In Indonesia no living wage standard is established, so certification unit still implemented the national minimum wages for all workers. In addition to the payment of minimum wages, certification unit has been conduct an assessment of the prevailing wages and in-kind benefits provided to workers in the certification unit aligned with the RSPO Guidance for Implementing a Decent Living Wage.

The company has the determination of assessment prevailing wage and all kind of benefits for DLW simulation in 2020

has been included in the calculation of food costs, housing facility costs, non food costs, non housing costs, and other costs. The results of these calculations are known that the standard of DLW simulated by the company is above the stipulation of the minimum wage (IDR 3,230,023.66) of IDR 3,588,097. Implementation of the simulation will be carried out in stages in 2020 while awaiting the adoption of the RSPO DLW benchmark for Indonesia.

6.2.7

During the last year the certification unit did not have workers with contract status (PKWT / BHL), the current employee status is permanent workers. The number of workers currently owned by the certification unit is 1,511 Regular Workers (LWSM, LWUE, LWSE, BINE and BMSE).

The results of interviews with spray workers, fertilizer, harvester and mill operators' found that workers understood the recruitment system, the status of workers and the orientation period that had to be passed before the worker was appointed as a permanent worker. These processes are stated to be fair enough and provide equal opportunities to work according to the abilities, expertise and achievements of the workers during the orientation period.

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

The company has a policy related to trade unions contained in Circular No.094 / CEO2-SE / 12/2010 dated December 14, 2010 there is a statement of recognition of freedom of association. The document is published in Bahasa which can be understood by all employees. The establishment of the union is in accordance with the applicable laws and regulations and has been recorded at the Manpower Office.

Based on interviews with labor union representatives who explained that the company had given freedom of association and at present a trade union was formed, in the form of the Agricultural and Plantation Workers Union of All Indonesia Workers (SPPP SPSI) which had been registered at the Department of Manpower with no. recording: 045.2 / 07 / III.10 / 2009 dated 9 January 2009. As for the management of the Agriculture and Plantation Workers' Work Unit (PUK SPSI-PP. PT BPL / LWI period 2018-2022 based on Decree No. 152 / PC-FSPSI / BB / I / 2018 dated January 1, 2018.

The union management consists of the chairman, deputy chairman, secretary, treasurer and other fields.

The Workers Union and the company have also agreed on the Collective Labor Agreement (PKB) document that has been ratified by the Head of the Investment Office, One Stop Integrated Licensing Service, Manpower and Transmigration, West Bangka Regency No.560 / 001 / PKB / 2.12.1.1 / 2019 concerning Registration of PKB Extension of PT BLP and PT MP LWI of West Bangka Regency, in April 2019 and valid from 20 October 2018 to 20 October 2020.

The results of interviews with workers such as workshop staff, warehouses, foremen, factory process operators and union representatives stated that employees are free to become union members and there is no intervention from the company regarding the election of union leaders or management.

6.3.2

The certification unit has a list of workers who have joined the union and the last update was carried out in February, 2020 totaling 254 workers for PT MP LWI and 742 workers for PT BPL. In addition to properly documenting the list of members, the certification unit also has records of meetings between trade unions and management representatives as well as with internal unions. The following are examples of records of meetings conducted by trade unions in 2019, namely:

- The meeting between the union and company management (PT LWI) on 6th December 2019 discussion about the use of PPE provided by the company to all employees.
- The meeting between the union and company management (PT BPL) on 8th November 2019 to discuss the nursery employees in the unit or BPPE and BINE to always maintain security and keep compulsory use of PPE at work.

6.3.3

The absence of company interference in the selection or operation of labor union activities, this is evidenced by the results of interviews with workers and union representatives stating that in the process of selecting / making decisions and planning activities, members provide input / aspirations to their representatives each to make an election / decision-making and no management has a position as staff / managerial (assistant and above).

The employee who currently serves as the Chairman of the PT BPL – PT MP LWI Union is non managerial employee. The explanation has reinforced the fact that management did not interfere directly with the taking decisions and activities carried out by labor unions.

Status: Comply

6.4

Children are not employed or exploited.

6.4.1 ; 6.4.2 ; 6.4.3; 6.4.4

The company has a policy regarding the age requirements of workers is contained in Circular from HR Director to all Unit Head number 002 / SE-HRDV / 03/09 dated March 31, 2009 regarding the minimum age limit. Also in the process of hiring employees this is evidenced by the Identity Card (KTP) at the time of employee recruitment. Document verification results reveal that there are no workers under the age of 18. In addition to having a policy governing the minimum age of workers for workers, the certification unit also includes a clause on child protection and a prohibition on employing workers under the age of 18 in any agreement with the contractor.

Based on field visits and interviews with workers in the fields of LWSE, LWUE, BINE, BMSE (Estate) and LWSM (Mill) it is known that the minimum age for work is 18 years, and no workers found below the minimum age specified. This is supported by the results of a review of company and contractor workers' document which proves that there are no workers under the age of 18.

Status: Comply

6.5

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

6.5.1 ; 6.5.2

The company have a policy to protect reproductive rights and prevent all forms of sexual harassment and violence. The policy contained in Circular from CEO 2 No. 003 / CEO2-SE / 01/2011 dated January 10, 2011. It explains that every worker is entitled to receive protection against sexual harassment in the workplace and Sexual harassment is an offense and if convicted of sexual abuse offenders will be penalized in accordance with applicable regulations. The committee gender has socialized to the employees and the representatives of the committee gender are available in each division. Based on interview with workers and committee gender, the policy had disseminated to workers through gender committee meetings with workers and in the last year period, that hasn't any issue/incident related to sexual harassment, violence at work/reproductive rights.

6.5.3

The company has Work Environment and Industrial Relations Policy No. KHI-smart / 005-00 date is set for August 1, 2017 concerning Pregnant and Breastfeeding Women Workers. The memo explains about giving mothers special time to breastfeed their children, providing light work / which does not endanger the mother / obstetric / child, and providing a special room for breastfeeding her child. For now the company has recorded employees who have experienced pregnancy conditions in each unit by recapitulating the total number of female workers who were pregnant in 2019 as many as 24 workers and all of them were confirmed not to work in chemical-related work.

The company is assisted by a gender committee to support the assessment the needs of new mother. Based on auditor observations, the company has provided sufficient space and arranged breaks have been provided to allow mothers with babies 24 months or less to breastfeed and store breast milk by maintaining privacy.

Interviews with women workers and gender committee representatives, it is known that the company has provided a special place for breastfeeding at daycare / office and has given of special time to breastfeed. There is no prohibition from supervisors in the field related to this matter and specifically workers in the field who do not bring a vehicle will be delivered

/ picked up by the foreman at these times.

The company unit has specifically provided the need for new mother or breastfeeding workers to breastfeed by setting a special time for breastfeeding at work, the availability of a special room for breastfeeding and other supporting facilities.

6.5.4

Complaint mechanism of workers was contained in Procedure no. (No. SOP/SMART/GIMS-SCMD/USDV/II/001), valid date 1 Juli 2014 (last revision at 11 April 2017). The SOP aims to accommodate complaints and grievance from employees. In the procedure described that if requested, the company guarantees the confidentiality of the reporting identity and the disclosure of disgrace or incident (whistleblower).

The results of interviews workers for example spraying teams, warehouse officers, and weighbridge are known to be aware of the grievance mechanism. Related complaints of sexual harassment (women's issues) can be submitted to the gender committee. In the last year period, that hasn't any complaint related to sexual harassment, violence at work/reproductive rights.

Status: Comply

6.6

No forms of forced or trafficked labour are used.

6.6.1 ; 6.6.2

The company have policy related prohibits forced or bonded labor or debt bondage and take steps to prevent it. The procedures related to human resources management shows that every worker has a work agreement that describe specific job description. Based on employee list in 2020 and observation in field known that there is no migrant workers, forced labor. Every worker has a work agreement that describe specific job description, there is no substitution of contract without prior consultation and agreement from the worker.

Based on employee data and interview with workers, most of the workers came from local communities. They have the recruitment process in the company and is in accordance with applicable employee acceptance procedures.

There is no significant obstacles related to employment or violations of company regulations. For example for the harvesters works daily based in 7 working hours. Certification unit provides output targets that can be obtained in less than 7 hours of work. If the harvester obtains more output within or more than 7 working hours, then the harvester will get the harvest premium payment. No penalty is given to the harvester if it does not get output due to natural factors such as rain. Based on payment list, the harvesters have earned above the minimum wage.

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 have 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 P2K3 team has received approval from the Head of Manpower and Transmigration of the Kepulauan Bangka Belitung and the P2K3 secretary is a certified occupational health and safety expert.

OHS committee routinely conducts monthly meetings on OHS issues in the workplace. The documentation of the meeting were recorded and stored well. 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 analysis, report, fire simulation, checking of emergency response equipment, OHS sign board, safety patrol, etc. The last meeting has been held in January 2020.

At the time of the assessment, the General OSH Expert license for the Leidong West Mill (LWSM) unit was in the extension period because it had expired on September 8, 2019. At this time the process of extension had been carried out by the PJK3 appointed by the company that the license was still awaiting the issuance process from the Ministry of RI. Ensuring

the progress of the Leidong West Mill unit's General Expert OSH license. OFI.

6.7.2

SOP for Accident and Disease Management Due to Work No. SOP / SMART / HESS - EHSD / SADV / I / 005 and Emergency Response No. SOP / SMART / GENERAL / SADV / I / 005 has been ratified by certification unit. In that procedure has explained the handling of accidents from reporting to coordination. Simulation was performed regularly to ensure the preparedness of emergency response equipment in the certification unit. The simulation was performed on hydrants located in the mill and water pump in Estate, the result of the simulation was concluded that the emergency tool that certification unit have is ready for use. The routinely emergency simulation that has been conducted by certification unit in 3 February 2020 and have 65 participants.

The last first aid training has been conducted in 15 February 2020 and certification unit has licensed first aid officers. Certification unit also has a first aid box in each unit and based on observations, it's concluded that the contents in the first aid box are sufficient (21 items). There is also a checklist of observations of the contents of first aid boxes routinely performed every month by first aid officers.

The company has documented every work accident that occurred in the one-year recapitulation period 2019-2020. There were 3 work accidents at the Bukit Intan Estate (BINE) unit.. All work accidents have been reported to *BPJS* and the labor agency.

Based on field visits and interviews, it was found that all the supervisor in each of activities were equipped with first aid kit and had been trained on the use of first aid boxes and the supervisor explained the usefulness of each first aid kit. In addition there are evacuation routes in the operational area that are clearly visible through the signboards.

6.7.3

Based on documents verification and interviews, it is known that all operators at PT BPL and PT LWI already have license/certificate for boiler operators, lift carrier operators, welders and electrical technician. The management unit has had the training plan for every worker that has been exposed high danger level work such as all mill process operators. For example engine room operators that has been exposed to high noise levels such as training of procedure, socialization of HIRAC and safety briefing before work. Beside that, the certification unit has provided PPE to every workers. PPE for type of glove, ear plug, ear muff, helmet, apron, goggles and safety shoes 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. For examples provided PPE for pesticide operators such as apron, boots, goggles, glove, respirator and others.

When field observations are found PPE that is used by employees is in accordance with the risk identification, for example Boiler operators at mill using PPE kinds of helmets, ear muff, gloves, mask, and safety shoes it is in accordance with hazard identification and instructions on the product or packaging.

6.7.4

The workers have the right to receive medical care and be protected by the accident insurance company. The management unit show proof of payment of *BPJS*. Payments are made every month by percentage according to the regulation. The last payment that has been paid by certification unit is on 7 February 2020 for *BPJS* periode of January 2020.

Based on the interview with Estate and Mill workers, concluded that all employees were aware of the medical service procedures in the event of an accident or illness. All employees interviewed also claimed to have a health *BPJS* card, if they went to a company clinic there was no fee at all. Based on interview with contractor representative, it is known that the accident insurance for contractor's workers is covered by the head of contractor it self.

Based on interviews with the contractor of FFB transport – PT Satrindo Jaya Agropalma has been paid it's workers insurance. Based on interview with some personnel, it is known that the entire personnel have been registered in manpower medical insurance/ *BPJS*.

6.7.5

The company is still consistent in monitoring the recording of occupational accidents by calculating the lost time accident (LTA). Recapitulation of work accidents with a formula to find the level of severity and frequency of accidents. This document informs the time period, the 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 Severity Rate and Frequency Rate is reviewed regularly and monitoring will be evaluated at the monthly meeting of Committee of Occupational Health and Safety. For examples in period of 2019 certification unit have 3 incidents, 25 lost time, Severity Rate is 53 and Frequency Rate is 1.

Status: Comply

PRINCIPLE #7 PROTECT, CONSERVE AND ENHANCE ECOSYSTEMS AND THE ENVIRONMENT
7.1

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

7.1.1

The company has shown an integrated pest control plan as stipulated in SOP / SMART / MCAR / VII / TA-HPT) which aims as a guide in Integrated Pest Control activities as one of the activities in the process of caring for oil palm plants. In the work description, the work stages of Pest and Disease Control are explained briefly as follows. The EWS stage consists of Detection and Census. Detection aims to determine as early as possible the occurrence of pest attacks (EWS) including insects, and vertebrates, if pests or diseases are found, a census is conducted. Detection activities are carried out regularly every 2 months.

Based on the census results that have been shown there are no pest attacks that exceed the economic threshold value. Likewise during the field visit, the auditor did not find any signs of pest attacks, both leaf-eating pests and rats.

7.1.2

Based on document review and field observation, the company implement some biological control practices to suppress pest and diseases infestation such as white buttercup flower (*Turnera subulata*), *Antigonon leptopus* and barn owl (*Tyto alba*). Verification result on website of cabi.org known that those species stated as not invasive in Indonesia.

7.1.3

Based on document review, field observation, as well as interview with the workers and external stakeholders, known that the company did not use fire for pest control.

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 shown a list of pesticides used in each estate. Based on these documents it is known that the pesticides used are based on needs and in accordance with the weeds or pests of diseases that are targeted.

The results of field observations and interviews with pesticide applicators in Block P14 Division I BMSE and Block C18 LWUE are known that all pesticide applicators have understood good procedures regarding spraying and using spray equipment, target weed targets, prohibition of spraying in river border areas and actions taken when poisoning occurs at work.

7.2.2

The company has a record of the use of pesticides during the 2019 period for each estate which explains trademarks, active ingredients, registration numbers, class of pesticides, LD 50, the number of uses and application areas for a year, and the use of pesticides per hectare. As an example of the use of pesticides in 2019 on BINE: roll Up 480 SL, the active ingredient Isopropyl Amine Glyphosate 480 g / l, RI Registration Number. 01030120042133, WHO class III pesticides based on WHO, with LD 50 mouth and skin 5000, total annual usage 3,682.01 liters, total application area 14,728.04 Ha, with usage per hectare 0.25 L / ha

7.2.3

The company has an integrated pest control and monitoring program listed in the 2019 budget. The budget is in accordance with the procedures contained in the integrated pest control SOP, which is for the UPDKS census once a month, Oryctes beetle every two weeks, rat pests done once a month and monitoring owl nests once a month. The census is carried out routinely by research employees and reported to the Estate Manager.

The integrated pest control plan is monitored through an early warning system in the form of sampling attack monitoring. So far there has not been an attack rate that has exceeded the economic threshold, so there is no use of pesticides for pests.

Memorandum No: 032 / PD / VIII / 2016 dated August 13, 2016 by President Director Daud Darsono, regarding a ban on the use of paraquate. The letter explains that since the beginning of 2016, it is no longer permissible to use an herbicide made from paraquat (Rolixone trademark) to combat weeds.

The company has shown documents on the use of pesticides for the past three years. Based on this document, the auditor has verified that the company no longer uses paraquat anymore to control weeds and there is no use of pesticides for pest control because there is no pest attack that exceeds economic limits.

7.2.4

The company does not use pesticides prophylactically. The use of pesticides is always based on needs and field conditions. Based on the results of the field visit on the spray work, the worker explained that the spraying was done selectively.

7.2.5

At the time of the audit activity, the certificate holder can show documentary evidence related to efforts to reduce the use of herbicides with active paraquat ingredients, namely:

- Memorandum No. 044 / PD / IX / 2014 dated 21 November 2014 from the President Director to MD01, CO and VPA which states that: In the minutes of the MCAR meeting No.1-2014 point II.4, it was decided that the use of quota was limited, that is only to eradicate noxious fern weeds, have committed to reduce the use of paraquaters by + 30% starting in 2015 and in 2018 no longer use them, the Division Head of SMARTRI is expected to conduct garden staff training on how to conduct weed censuses and selection of appropriate herbicides.
- The above memorandum has been followed up through a letter from the SMARTRI Section Head Weeds Control dated 29 August 2015 concerning Data on Herbicide Use and Weed Census (until August 2015) and Stock Estimates to End of 2015 submitted to Staff / VPA / MDNO / PLANT and Research Assistant. The memorandum conveyed, among others, that starting in 2016 there was no more eradication of weeds using herbicides with active ingredients
- Memorandum No: 032 / PD / VIII / 2016 dated August 13, 2016 by President Director Daud Darsono, regarding the prohibition on the use of paraquate. The point of the letter is that since the beginning of 2016, it is no longer permissible to use an herbicide made from active paraquate (trademark Rolixone) to eradicate weeds

Based on the results of the 2019 pesticide use document review, it is known that there is no use of class 1A and 1B pesticides and based on the results of a field visit to the chemical warehouse there were no class 1A and 1B pesticides found.

7.2.6

The company has SOP related to handling pesticides, including:

- SOP for handling pesticides is regulated in Waste Management SOP (SOP / SMART / LEMS-EHSD / SADV / I / 002)
- Personal Protective Equipment Management SOP (SOP / SMART / HESS-EHSD / SADV / I / 010)
- Weed Control SOPs are General Guidelines on Safety at Work (PUKB) with Pesticides (PUKBP) (LAMP / VIII / TA-PGM / 03-PUKBP).

The company has also shown evidence related to training for employees, including:

- First aid training on February 15, 2020 at BINE long house with 54 participants from LWUE, LWSE, BINE, BMSE, LWSM.

- IPM training on February 20, 2020 at BINE Long House with 63 LWSE, BMSE, BINE participants.

Based on the results of a field visit to a chemical storage warehouse, it is known that MSDS is made in Indonesian so that it is easily understood by both workers and warehouse officers.

Based on field visits and interviews with workers, it is known that there is a mechanism for replacing PPE routinely every six months, however, if PPE is damaged outside the routine replacement schedule, the company continues to replace the damaged PPE after workers report. Besides that, workers have also understood the technicalities of spraying for work safety, that is, they must use appropriate PPE and pay attention to the direction of the wind when spraying. Spray workers can also explain handling in the event of a work accident, for example if the eye is exposed to toxic fluids when spraying, then the worker will immediately stop working and meet the foreman to report a work accident and get first aid by rinsing the eyes with clean running water.

7.2.7

Field observations in the chemical storage warehouse LWUE, LWSE, BINE, BMSE, known that pesticide storage activities have been carried out in accordance with the best practices, including available MSDS according to the type of pesticides, pesticide warehouses equipped with adequate ventilation, where pesticide mixing is completed with bunds, and warehouse officials have PPE is provided in the form of rubber gloves and masks, and warehouse personnel have also received special health checks

The results of field observations in the pesticide storage warehouse in LWUE, LWSE, BMSE showed that there were MSDS, First Aid boxes, fire extinguishers, spill kits, scattered traps, adequate ventilation. all used pesticide packaging is washed / rinsed in a special washing place, then recorded by the warehouse officer and then sent to the Temporary Storage Site of Hazardous and Toxic Material at the LWI palm oil mill and the Bukit Perak Palm oil mill. Based on the company's explanation, it is known that BINE and BMSE under PT. BPL so that the shipment of hazardous and toxic waste is sent to Bukit Perak POM

7.2.8

Certification unit has had procedure for Hazardous Waste including ex agrochemicals management presented on procedures SOP/SMART/LEMS-EHSD/SADV/002 and IK/SMART/LEMS-EHSD/SADV/002/001. These procedure stated that all ex chemicals containers were kept on temporary hazardous storage at mill/estates or ex chemicals containers that has been rinsed can reused for the same activity.

The Certification Unit has implemented hazardous waste management including ex agrochemical containers in accordance with its procedures and regulations, among others:

- Record of hazardous waste delivery from satellite storage to licensed storage
- Hazardous Waste Logbook and Balance Sheet at Hazardous Waste Storage
- Minutes of the handover of hazardous waste contaminated packaging dated February 17, 2020 from LWUE to LWSM
- Documentation of Hazardous Waste sending to licensed collectors and transporters in the form of hazardous waste manifests. Unit can show the last manifest of Hazardous waste deliver on 17 February 2020

Based on interviews with warehouse officers and spraying supervisor, it was explained that all ex chemicals containers that cannot be reused was collected at Satellite Hazardous Waste Storage (non-licensed) and periodically (every 6 months) will sent to the licensed Hazardous Waste Storage and periodically all ex chemicals containers send to licensed hazardous waste collectors and processors. Based on the documentation review, it is known that hazardous waste from Satellite Hazardous Waste Storage only keep for one day at licensed Hazardous Waste Storage then transferred to licensed collector.

7.2.9

Based on the results of a document review and interview with management, it is known that the company does not apply the application of air spraying.

7.2.10

The company regularly have a medical examination for pesticide operator. PT BPL and PT LWI has a list of the latest pesticide operator as many as 75 workers. All spraying workers has examined health through inspection types of medical check up, cholinesterase and spirometry, to ascertain the condition of workers in good health. This semester examination was conducted in 17 February 2020 for all units. Examination results stating that all workers spray are in a healthy condition. Auditor conduct interviews with spraying workers in blok C18 Leidong West Utara Estate and they admit that they have not been exposed to skin disease and itches because they always use PPE while working.

7.2.11

The company has policies that protect health specifically to prevent women workers who are pregnant or breastfeeding from handling pesticides. Based on the document review, the company has Memorandum VPA PSM 2 No. 001 / MEMO-VPA PSM2 / 04/2011 dated April 8, 2011 which states that the company does not allow pregnant and breastfeeding women workers to be employed as spray power.

In addition, the company has also presented a circular issued by the Regional Control-Region of Babel with Number: 02 / RC-BABEL / 01/2018 dated 15 January 2018 regarding health checks and spray-force pregnancy examinations which explain the cholinesterase and spirometry checks every semester, examinations pregnancy every month spray workers, mothers who are breastfeeding are not allowed to work spray, workers who do not want to do a pregnancy check are not allowed to work spray and spray workers who have not received special health examination results and women workers are prohibited from working spray until getting the results of the examination.

Based on the results of the document review, the company has shown a list of employees of the pesticide applicator, as follows:

1. BINE :
Men : 19 workers
Women : 7 workers
2. BMSE
Men: 34 workers
Women : 2 workers
3. LWSE
Men: 7 workers
Women : -
4. LWUE
Men: 6 workers
Women : -

The company has also shown the results of spray workers pregnancy examinations in 2020. For example, the results of pregnancy examinations of BINE and BMSE spray workers in semester I of 2020 on 7 and 2 female workers with non-pregnant and non-breastfeeding examination results and recommendations for working as a spray worker.

Status: Comply

7.3

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

7.3.1

There is no changed of waste management and utilization plan in SOP of Waste Management with document number SOP / SMART / LEMS-EHSD / SADV / I / 002 Rev 0.0 dated July 1, 2014 approved by the Head of Upstream. For Hazardous Waste, certification unit has additional procedure presented on document no. IK/SMART/LEMS-EHSD/SADV/002/001 regarding Work Instructions for Hazardous Waste Management and Ex Chemical Containers.

Management of Non-Hazardous Waste

The Certification Unit has realized the Management and Utilization of waste as well as an effort to reduce waste, for example through the application of the empty fruit bunch to the plantation area, the use of fiber and shells for boiler fuel, and the application of waste water to the plantation area. All documentation has shown in the form of Environment Report

and Land Application report 4th quarter of 2019.

For domestic waste, based on site visits to housing complex and landfills at BINE, it is known that inorganic domestic waste has been managed by collecting in sacks and collected at landfills every 1 week. At the final landfill, it is also known that the available waste is only inorganic domestic waste, far from housing complex and water bodies (\pm 2 km) and has been given a fence and warning sign.

Management of Hazardous Waste

The Certification Unit has implemented hazardous waste management in accordance with its procedures and regulations, among others:

- Record of hazardous waste delivery from satellite storage to licensed storage
- Hazardous Waste Logbook and Balance Sheet at Hazardous Waste Storage
- Minutes of the handover of hazardous waste contaminated packaging dated February 17, 2020 from LWUE to LWSM
- Documentation of Hazardous Waste sending to licensed collectors and transporters in the form of hazardous waste manifests. Unit can show the last manifest of Hazardous waste deliver on 17 February 2020.

Regarding the management of medical waste, the certification unit shows the minutes of the sending of solid medical waste, for example the period of January 28, 2020, from the PT BPL clinic to Bakti Timah Hospital with a total of 2 kg of medical waste. In addition, the certification unit also shows monitoring of medical waste stored in the PT BPL clinic for example during the January 2020 period the type of medical waste stored consists of 50 grams of medical waste.

7.3.2

The Certification Unit has shown evidence of training to workers related to environmental management, for example at LWUE socialization on February 12, 2020 included management of hazardous waste, management of domestic waste to GHG mitigation.

Based on interviews with manager, staff, warehouse officers and spraying supervisor, it was explained that all ex chemicals containers that cannot be reused was collected at Satellite Hazardous Waste Storage (non-licensed) and periodically (every 6 months) will sent to the licensed Hazardous Waste Storage and periodically all ex chemicals containers send to licensed hazardous waste collectors and processors.

7.3.3

Based on field visits and interviews with workers in the Estate and Mill, it is known that there is no waste management by burning in open fields.

	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 fertilizer procedure with the number SOP/SMART/MCAR/IX/TA-PPK. The procedure explains that fertilizer recommendations must be made based on the results of analysis of leaf and soil samples. Based on the company's Palm Oil Cultivation Guidelines, it is explained that leaf sampling and analysis are carried out once a year and soil sampling is carried out every five years.

7.4.2

The company has shown the results of soil analysis and leaf analysis for each estate. Even the parameters of the soil analysis are soil analysis including testing of texture, pH, C.Org, N Total, P, K, Mg Cad, Exchange Bases, P Bray, CEC, and H - Al Swap and testing parameters for soil analysis include content testing of elements N, P, K, Mg, Ca, B and Cl. The sample results of soil analysis and leaf analysis are as follows:

1. The company shows the results of the soil analysis of 12 samples issued by the SMARTRI Analytical Laboratory with document reference number 063 / TANAH / AL / ANLZ / 10/15 dated October 14, 2015.

2. The company shows the results of the leaf analysis of 18 samples issued by the SMARTRI Analytical Laboratory with document reference number 300DAUN / LAB-SMARTRI / V / 2019 dated May 15, 2019

7.4.3

The company has a nutrient recycling strategy such as the use of pruning, Palm Oil Mill Effluent (POME) and utilization of plant residues after replanting

- SOP / SMART / MCAR / XII / TA-PTM - Maintenance of Producing Plants, pruning fronds are arranged on interrow in the form of L-Shape (on a flat area) and parallel to the contour (on a bumpy area) and cut into 2 parts (on an area Land Application).
- SOP / SMART / MCAR / II / TA-PRP - Replanting planning, submission of replanting program refers to the following considerations: plant age > 25 years, average tree height > 13 meters, annual production < 14 tons / ha, number of stands < 100 trees / ha.
- SOP / SPO / SMART / LH-09 regarding waste management and IK.SMART/MCAR/IX/TA-PPK/14 about fertilizing using Palm Oil Mill Effluent (POME).

POME

Based on the realization of the application of Palm Oil Mill Effluent (POME) in the BINE-PT BPL plantation (in accordance with the permit) in 2019, it is known that the utilization of Palm Oil Mill Effluent (POME) by the company is as follows:

- October 2019 the total volume of application POME is 13,462 m³
- November 2019 the total volume of application POME is 25,086 m³
- December 2019 the total volume of application POME is 15,364 m

Empty Bunch

The company has shown a EFB application documents for each estate. As an example:

- The 2019 period for BMSE is 348.78 ha with a total application volume of 13,951.27 tons
- The 2019 period for the LWSE is 7.73 ha with a total application volume of 309.12 tons.

Replanting

Based on the results of a field visit in the replanting area of block R31, planting year 2020 in BINE, it is known that the company has recycled nutrition by utilizing oil palm residues that have been uprooted by being chopped.

7.4.4

The company has presented the 2019 fertilizer plan and realization in each estate in accordance with fertilizer recommendations. For example the plan and realization of fertilization in LWUE as follows:

1. Plans for fertilizing HGFB as much as 3764 kg with the realization of 3764 kg with the use of HGFB fertilizer as much as 0.273 kg / ton of FFB
2. The plan to fertilize Dolomite is 14000 kg with the realization of 14000 kg with the use of fertilizer as much as 1.015 kg / ton of FFB.
3. Urea fertilizing plan of 131950 kg with the realization of 131950 kg with the use of fertilizer of 9.567 kg / ton of FFB

Fertilization plan and realization at LWSE as follows:

1. Plans for fertilizing HGFB of 6250 kg with the realization of 6246.79 kg with the use of HGFB fertilizer of 0.422 kg / ton of FFB
2. MOP fertilizer application of 255550 kg with the realization of 255550 kg with the use of Dolomite fertilizer of 17,258 kg / ton of FFB
3. Urea fertilizing plan of 127800 kg with the realization of urea 127800 with the use of Ureas fertilizer as much as 8,630 kg / ton of FFB

Status: Comply	
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7.5

Practices minimise and control erosion and degradation of soils.

7.5.1

The company has a PT MP Leidong West Indonesia and PT Bumi Permai Lestari Soil Analysis Report with a scale of 1: 75,000 dated May 1, 2015. The document equipped with legend soil map units, roads, rivers, cities, estate boundary and division boundary.

The company has conducted land mapping based on land suitability classes conducted by the Plantation Monitoring and Planning Division in 2006 for each estate. An example is:

LWUE

Based on the 1: 25,000 scale semi detailed survey land map unit, in the 2005 land suitability class document, it is known that there is a marginal land (s3) typic hapludults with a complex land map unit 4 + 42 inclusions 77, with a slope of 8-15% with a gravitational limiting factor and effective depth, mixed with soil s2 (suitable medium) typic hapludults, slope 0-8% and 8-15% covering an area of 425.19 Ha. As well as marginal suitable complex (S3) complex 38 + 69, typic troporthods texture limiting factor, slope of 0-8% mixed with typic tropaquepts (N / non-conforming) area of 258.16 Ha. In the map the location of land inclusion in accordance with the marginal is illustrated. Whereas marginal soils or N (not suitable) enter into SPT Complex 38 + 69 with Tropaquept soil classification, slope 0-8%, drainage limiting factors mixed with typic troporthods, with a total area of 258.16 Ha or 34.6% of 746.52 Ha.

Mapped area is 642.73 Ha and has been mapped in the land map unit area of PT. MPLWI with a scale of 1: 50,000 (No. Reg: 527/214 / PMNP / V / 11).

7.5.2

Based on interviews with company management and on site visits in the replanting area of block R31, planting year 2020 in BINE, no re planting was found on steep sloped land.

7.5.3

Based on interviews with company management and on site visits, no new planting was found on steep sloped land.

Status: Compy

7.6

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

7.6.1, 7.6.2, 7.6.3

The management unit is not performed expanding and developing the plantations area after November 2005. The results of the document study and interviews with management showed that the planting has done last in 1998. The results of the document study and field visits showed the planting year in Bukit Intan Estate, Bukit Mas Estate, Leidong West Utara Estate, and Leidong West Selatan Estate it is known that the company did not clear new land for new plantings.

Status: Comply

7.7

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

7.7.1, 7.7.2, 7.7.3, 7.7.4, 7.7.5, 7.7.6, and 7.7.7

Based on the results of the document review, interviews, and field visits in each estate, no peat areas were found.

As for the type of soil contained in PT. MP LWI is as follows :

ESTATE	Type Of Soil
LWUE	typic Hapludults
	Typic Tropaquepts+Troporthods
LWSE	Typic Dystropepts + Aquic Dystropepts
	Typics Troposamments + Troporthods
	Typic Hapludults
	Typic Tropaquepts
BINE	Typic Dystropepts + Aquic Dystropepts
	Typic Dystropepts
	Typics Troposamments + Aquic Troposamments
	Typics Troposamments + Troporthods
	Typic Hapludults
	Typic Tropaquepts

BMSE	Typic Dystropepts + Aquic Dystropepts
	Typic Dystropepts
	Typics Troposamments + Aquic Troposamments
	Typics Troposamments + Troporthods
	Typic Hapludults
	Typic Tropaquepts

	Status: Comply	
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7.8
Practices maintain the quality and availability of surface and groundwater

7.8.1 & 7.8.2
The certification unit already has an identification of water course and wetlands which is equipped with a map listed on the HCV identification report with the following details:

Location	Unit	Total (Ha)
Betung River	LWUE	19.19
Block X08 River	LWSE	5.34
Pelur River	LWSE	5.6
Batu River	LWSE	3.37
Swamp area	LWUE	51.96
Swamp area	LWSE	2.17

Location	Unit	Total (Ha)
Lambur River	BMSE	24.26
Seralung River	BMSE	18.27
Lambur River	BINE	10.19
Anak Lambur River	BINE	14.87
Duren River	BINE	35.63
Seralung River	BINE	12.25
Batu River	BINE	7.55

Management plans of water course and wetland are listed in:

- SOP of Riparian River Protection (SOP / SPO / SMART / LH-06) dated July 1, 2010
- SOP of Management and Monitoring of water resources with document number SOP / SMART / BCOS-EHSD / SADV / I / 2004 rev 0.0 approved by the Head of Upstream effective July 1, 2014.
- HCV Annual Management Plan for 2020 for PT LWI and PT BPL

Based on field visits throughout the Estate and Mill of PT MP LWI and PT BPL as well as document review, it was found that the certification unit had carried out water source protection activities by:

- The results of the field visit to the Seralung River Block T6/7, Duren River block Q32 and Betung River Block X18, known there are marked the limit of chemical application activities with a distance of 5 plant from the riparian(± 50 meters) and has planting vetiver grass plants. There is no indication of maintenance activities using chemicals around the riparian
- No replanting activities on riparian areas, for example in BINE.
- Conduct rehabilitation of riparian areas, for example at BINE conducted in December 2019 on blocks S42, R40-41, Q21-22, and W22-24.
- Conduct river quality testing every 6 months.
- Test the quality of the well in the Terentang Village community and employee housing every 6 months

7.8.3
The Certification Unit has tested the quality of wastewater conducted by the Accredited Environmental Laboratory (LP 231-IDN) with the following results:

Parameter	Unit	Threshold	Test Result		
			Oct 19	Nov 19	Dec 19

BOD	mg/l	<5000	1,720	2,513	1,738
COD	mg/l	-	10,399	16,712	16,632
pH		6-9	7.42	7.56	7.23
Oil and fat	mg/l	-	16.9	16.8	10.3
Pb	mg/l	-	<0.047	<0.047	0.142
Cu	mg/l	-	0.1844	0.104	0.300
Cd	mg/l	-	<0.003	0.003	0.003
Zn	mg/l	-	0.613	0.228	0.150

7.8.4

LWSM has presented Water Use and Distribution Recapitulation data for 2019 informing:

Month	Water Process (m ³)	FFB Processed (ton)	m ³ /ton FFB
January	19,151	21,944	0.87
February	25,756	17,022	1.51
March	23,447	17,841	1.31
April	24,225	16,044	1.51
May	27,986	17,730	1.58
June	25,415	17,573	1.45
July	28,193	21,547	1.31
August	27,992	20,466	1.37
September	26,123	19,467	1.34
October	25,778	19,984	1.29
November	22,192	18,782	1.18
December	25,952	19,471	1.33
Total	302,210	227,870	1.33

Status: Comply

7.9

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

7.9.1

LWSM has monitor the use of fossil fuel and renewable energy, such as shells and fibers, and evaluates the efficiency of energy use for period of 2019, as follows:

CPO production: 47,170.97 mt

Shell use: 13,102.55 mt

Fiber use: 28,483.81 mt

KwH turbine: 4,477,980 KwH

Kwh Genset: 230,656 KwH

Diesel used for genset: 80,906 L

Diesel/ Kwh Genset: 0.35 L/KwH

Diesel savings from using turbine: 1,570,718 L

Diesel savings / ton CPO: 33.30 liters / ton CPO

Activity monitoring of renewable energy utilization has been reported in the Environmental Report every 3 months to the Environment Agency.

Status: Comply

7.10

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

7.10.1

There is no change of identification of GHG Emission Source and Mitigation of GHG emission, contained on:

- Document of sources inventory of Greenhouse Gas (GHG) emissions informing the origin of emissions from each plantation and mill activity
- SOP of Greenhouse Gas Mitigation approved by the Head of Upstream with document number SOP / SMART / CERS-

EHSD / SADV / I / 2015 rev 0.0 dated 1 July 2014 which aims to reduce and prevent the effects of GHG emissions identified in each operational area of the company

- GHG Emission Mitigation Program of 2020

The Certification Unit has done the GHG calculation using the Palm GHG calculator V.4.0, with details as follows:

Summary Emission

Product	tCO ₂ e / tProduct
CPO	0.90
PK	0.90
PKO	0.00
PKE	0.00

Description	Unit	Value
Oil palm planted on mineral soil	Ha	14395.31
Oil palm planted area on peat	Ha	0.00
Total oil palm planted area	Ha	14395.31
Conservation area (Forested)	Ha	138.30
Conservation area (Non-Forested)	Ha	289.38
FFB Production per hectare	t/ha	18.82
OER	%	20.70
KER	%	6.16

Mill Emissions and Credits

Description	tCO ₂	tCO ₂ e/t FFB
Emission Sources		
POME	44666.48	0.20
Fuel Consumption	338.67	0.00
Grid Electricity Utilisation	0.00	0.00
Credits		
Export of Excess Electricity to Housing & Grid	0.00	0.00
Sale of PKS	0.00	0.00
Sale of EFB	0.00	0.00
Total	45005.14	0.20

Estate/Plantation field emissions and sinks

	Own			Group			3rd Party			
Description	tCO2e	tCO2e/ha	tCO2e/t FFB	tCO2e	tCO2e/ha	tCO2e/t FFB	tCO2e	tCO2e/ha	tCO2e/t FFB	Total
Emission Source										
Land Conversion	8934.53	6.93	0.31	14868.75	1.13	0.08	0.00	0.00	0.00	23803.28
CO2 Emissions from Fertiliser	983.66	0.76	0.03	4432.48	0.34	0.02	0.00	0.00	0.00	5416.15
N2O Emissions from Peat	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
N2O Emissions from Fertiliser	735.89	0.57	0.03	4309.15	0.33	0.02	0.00	0.00	0.00	5045.04
Fuel Consumption	417.70	0.32	0.01	1732.41	0.13	0.01	0.00	0.00	0.00	2150.11
Peat Oxidation	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Sinks										
Crop Sequestration	-11751.31	-9.12	-0.41	-13678.41	-1.04	-0.07	0.00	0.00	0.00	-25429.72
Sequestration in Conservation Area	-627.96	-0.49	-0.02	-640.25	-0.05	-0.00	0.00	0.00	0.00	-1268.21
Total	-1307.48	-1.01	-0.05	11024.13	0.84	0.06	362.74	0.00	0.00	10079.40

FFB Supplier

No.	Supplier Name	FFB Production by Estate/Plantation (t)	FFB Supplied by Estate/Plantation (t)	Percentage of FFB supplied by Estate/Plantation (%)
1	Leidong West Utara Estate	13791.63	13791.63	100.00
2	Leidong West Selatan Estate	14808.14	14808.14	100.00
3	Bukit Intan Estate	91809.44	91809.44	100.00
4	Bukit Mas Estate	67231.37	67231.37	100.00
5	Third Party	4534.26	4534.26	100.00
6	Bukit Perak Estate	44074.12	1094.62	2.48
7	Bukit Permata Estate	34601.03	34601.03	100.00

Based on document review for examples: pesticides & fertilizer usages monitoring, diesel fuel monitoring, HCV identification and etc. found that accurate data has been put into the RSPO palm GHG Calculator. Unit certification using data period January – December 2019. GHG calculation on 2019 shown net emission of GHG are increasing compared to 2018 net GHG (0.90 tCO₂e/t Product vs 0.87 tCO₂e/t Product), because there are replanting activity at BINE that led to the use of pesticides and fertilizer materials increased.

7.10.2

Based on field visits to all Estate and document review of areal statement, it is known that there are no new land clearing was carried out above 2014.

7.10.3

Based on the results of field observations in the Estate and Mill as well as document review, the real efforts that have been made by the certification unit to mitigate GHG emissions include:

- Application of IPM principles as an effort to minimize the use of chemicals to overcome pest , such as the use of owls and the planting of beneficial plants.
- Fertilization is done based on analysis of leaves and soil, so that the manuring activity is conducted with the right dose.
- Utilization of empty fruit bunches and liquid waste from factory processing activity to the field.
- Testing of motor vehicles, factory machinery and others.
- Plant vetiver grass plants along riparian.
- Implement a ban on the use of chemicals along riparian.
- Perform preventive maintenance for factory equipment and vehicles
- Use shells and fiber as boiler fuel to produce electricity.

Status: Comply

7.11

Fire is not used for preparing land and is prevented in the managed area.
7.11.1 & 7.11.2

The Certification Unit has a zero-burning policy for land clearing or replanting activities in the form of Circular No. 071 / SMD OPS / IX / 2007 dated September 4, 2007 signed by Daud Dharsono (SMD Operations) which regulates, for example: Prohibition of opening land by burning.

In addition, the Certification Unit can also show procedures related to fire prevention and control, for example:

- The Fire Prevention and Management Procedure contained in the SOP of Emergency Response (SOP / SMK3 / SMART / LH-09) was approved by Div Head Env'd & Sustainability on July 1, 2010.
- The Land Fire Handling Procedure (SOP / NP / SMART / XI / LH002) was approved by the SMARTRI Div Head on July 1, 2010.

As for the activities carried out by the certification unit for fire prevention and control, for example:

- Has an emergency response organizational structure approved by Manpower Agency of Bangka-Belitung Province
- Having firefighting facilities and infrastructure, as well as monitoring the condition of the equipment every month.
- Regularly conduct firefighting training and simulation.
- Reporting of Fire Control Facility and Infrastructure System Preparedness Report Semester 2 of 2019 submitted on 19 February 2020 to relevant agencies.

Based on a field visit to the Replanting area in BINE, it was found that there was no indication of burning activity in preparation for replanting activity.

7.11.3

The certification unit has involved stakeholders for fire prevention and control with evidence of the Fire Concern Community Training conducted on 20-21 February 2020 attended by 58 participants from the villages of Tugang, Kacung, Rakai, Berang, stretched, Tumbak, Simp Bulin, Ibul, etc.

Status: Comply

7.12

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

7.12.1 & 7.12.8

Based on field visits, document review and interviews with management, it was found that there were no new land clearing activities after November 2005 and only carried out replanting activities in 2019 and 2020.

PT MP LWI and PT BPL are subsidiaries of GAR and have made disclosure of Liability to RSPO on August 29, 2014 with the statement of zero liability (no land use change after 2005). LUCA for PT MP LWI and PT BPL was submitted to the RSPO on 11 April 2016, and was approved by the RSPO on 7 December 2017. In addition, HCV identification activities has been completed on 2012.

7.12.2

PT LWI and PT BPL estates shown HCV assessment for the entire area of operations which done by the RSPO Approved Assessor. HCV identification has completed on 2012 and public consultation for making HCV document has been conducted on 11 May 2012. The results of the existence of HCV attributes, among others:

PT MP LWI

No	HCV Type	Location	Riparian Width	Unit	Total Area (Ha)
1	HCV 1.1; 4.1	Betung River	25 M	LWUE	19.19
		Blok X08 River	25 M	LWSE	5.34
		Pelur River	25 M	LWSE	5.6
		Batu River	25 M	LWSE	3.37
2	HCV 1.1; 1.3; 4.1	Swamp Area		LWUE	51.96
		Swamp area Block X10		LWSE	2.17

3	HCV 1.1; 1.3; 6	Bukit Asam Sacred Forest	LWSE	14.36
4	HCV 6	Cemetery Block C-24, C-25	LWUE	
		Cemetery Block Y-15, X-19	LWSE	
The total HCV area of PT MP LEIDONG WEST INDONESIA				101.99

Distribution of HCV LWUE area: 71.15 Ha is riparian area included in planted area and LWSE: 30.84 Ha with details of 14.31 Ha is riparian area including planted area and 16.53 Ha is forested area outside HGU.

PT BPL

No	HCV Type	Location	Riparian Width	Unit	Total Area (Ha)
1	HCV 1.1; 4.1	Lambur River	25 M	BMSE	24.26
		Seralung River	25 M	BMSE	18.27
		Lambur River	25 M	BINE	10.19
		Anak Lambur River	25 M	BINE	14.87
		Duren River	25 M	BINE	35.63
		Seralung River	25 M	BINE	12.25
		Batu River	25 M	BINE	7.55
2	HCV 1.1; 1.3; 5; 6	Bukit Selam Area		BINE	69.82
3	HCV 1.2	Lambur River		BMSE	-
		Bukit Selam Area		BINE	-
4	HCV 6	Blok S-10, Q-6, R-5, Q-4, Q-9, N-12, N-17, P-20, Q-13, Q-10, T-9 (Cemetery)		BMSE	-
		Blok P-30, U-26, Bukit Selam Area		BINE	-
Total HCV area of PT Bumi Permai Lestari (BMSE, BINE)					209.32

Distribution of HCV BMSE: 42.53 Ha is riparian area included in planted area and BINE: 166.79 Ha with details of 96.97 Ha is riparian area included in planted area and 69.82 Ha is forested area outside HGU

7.12.3

Based on the initial baseline of land cover that listed in UKL/UPL on 1995, it was found that the types of flora that existed around the location of the activity were production forests that could be converted, some of the people's plantations were pepper and rubber plantations.

The company can show information on land use conversion where the company's operational area was initially a secondary forest area, shrubs and pepper and rubber plantations.

7.12.4

Company has had Annual Work Plan for the HCV management plan of 2020 of PT LWI and PT BPL has been inform the plan for management on riparian area, management of wildlife habitat, management of local cultural identity areas, management of protected species and HCV monitoring.

Certification unit can show evidence that the HCV management plan based on consultation with surrounding communities, for example:

- Evidence of consultation of HCV management plan at PT BPL conducted on December 3, 2019 in Terentang Village
 - Evidence of consultation of HCV management plan at PT LWI conducted on December 3, 2019 in Berang Village
- Proof of consultation shown in the form of minutes, attendance lists and photos of activities. Based on the minutes, it is known that plans from consultation have been included in the HCV management plan for 2020.

Based on the High Conservation Value Areas (HCV) Implementation and Management Implementation Report on 2019, it is known that all management and monitoring activities in 2019 have been carried out in accordance with the HCV activity plan.

7.12.5

HCV identification results showed that there are community areas that contain HCV as a sacred area of Bukit Asam and Bukit Selam. Each unit has made an agreement with the villages representatives to protect HCV area, for example, a letter of agreement on February 24, 2016 between the managers of Leidong West Selatan Estate with Village Chief of Berang to protect the sacred areas of Bukit Asam. Field visit on bukit asam conservation areas block X21 shown that the Leidong West Selatan Estate has protected the sacred areas of Bukit Asam that crosses the area of the estate operational.

7.12.6

Company has had Annual Work Plan for the HCV management plan of 2020 of PT LWI and PT BPL informing the plan of HCV socialization to stakeholder.

PT MP LWI

- Minutes of socialization activities regarding HCV and Protected Animal Areas to all employees, for example LWUE has been held on February 13, 2020
- Minutes of the socialization activities of HCV and Protected Animal Areas to the community, for example in the villages of Tumbak, Mislak and Jebus conducted on February 6, 2020

PT BPL

- Minutes of the socialization activities of HCV and Protected Animal Areas to all employees, for example BINE has been held on 18 February 2020
- Minutes of the socialization activities of HCV and Wildlife Protected Areas to the community, for example in Terentang Village on February 13, 2020 and Ibul Village on January 16, 2020

Based on interviews with workers and communities, it known that they already knew related to HCV areas and protected animals. In the company area also has signboards related to protected animals and HCV areas.

7.12.7

Implementation of HCV Plan

PT MP LWI and PT BPL can show the High Conservation Value Areas (HCV) Implementation and Monitoring Implementation Report of 2019 which informs the recapitulation of all management and monitoring activities per each HCV type. In addition, there is documentation of every HCV management and monitoring activity.

Review of HCV plan

PT MP LWI and PT BPL showed the Minutes of the Management & Monitoring of HCV conducted on December 16, 2019 with results for example:

HCV Programs	Evaluation	Recommendation
Arrangement, installation and maintenance of HCV attributes and warnings	Each HCV area has area attributes and sign of attribute has installed	Maintenance is carried out routinely according to SOP
Direct and indirect socialization	Direct and indirect socialization has been carried out	Direct and indirect socialization must continue.

The results of the evaluation and recommendations have been taken into consideration for the development of HCV management and monitoring work plans for 2020 period.

Status: Comply

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 ✓
	The company do not use any RSPO logo. Trademark license No. 1-0096-11-100-00.	✓
	Status: Comply	
2.	Implementation of certificate and trademark used by Client comply with size and type (shape) against Guideline of trademark Use	X or ✓
	The company do not use any RSPO logo. Trademark license No. 1-0096-11-100-00.	✓
	Status: Comply	
3.	Implementation of Certificate and Trademark is not used on product	X or ✓
	The company do not use any RSPO logo. Trademark license No. 1-0096-11-100-00.	✓
	Status: Comply	
4.	Controlling of Certificate and Trademark, including withdrawing inappropriate trademark.	X or ✓
	The company do not use any RSPO logo. Trademark license No. 1-0096-11-100-00.	✓
	Status: Comply	

3.3 Summary of RSPO Partial Certification.

Compliance of the uncertified management units of Golden Agri Resources, 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

Golden Agri Resources, Ltd Time Bound Plan (TBP) is explained in table 1.10. Golden Agri Resources run forty two (42) mills and one hundred thirty six (136) estates (own and smallholders) in Indonesia and has achieved RSPO certified for twenty eight (28) mills and supply base in Indonesia. Golden Agri Resources, Ltd has informed the TBP progress, MUTU has considered that Golden Agri Resources, Ltd is comply with the RSPO requirement for TBP. The Time Bound Plan was revised and declared by Golden Agri Resources, Ltd on 2 January 2020 made by Head of Sustainability Policy & Compliance.

MUTU has verified partial certification for un-certified unit's subsidiary of Golden Agri Resources, Ltd based on their Time Bound Plan. There are sixteen (16) uncertified management unit of GAR. 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 is no labour disputes that are not being resolved through an agreed process
- All plantations established since 2005 have been done so in accordance with the applicable laws of the country and that there is no evidence of non-compliance with law in any of the non-certified holdings which has not been declared above

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
2.2.1	Did the company conduct an internal audit? If so, has a positive assurance statement been produced?	<p>Company Group/Holding Statement: Companies are already doing internal audits. There are internal audit reports for each company.</p> <p>Auditor Verification: Internal Audit report available for uncertified management unit:</p> <ol style="list-style-type: none"> 1. PT Sinar Kencana Inti Perkasa (Kasuari Mill and supply base) compliance audit on November 2019 2. PT Agrolestari Mandiri (Pekawai Mill and supply base) compliance audit on November 2019 3. PT Binasawit Abadi Pratama (Perdana Mill and supply base) compliance audit on December 2019 4. PT Agrokarya Prima Lestari (Kuayan Mill and supply base) compliance audit on November 2019 5. PT Mitra Karya Agroindo (Tangar Mill and supply base) compliance audit on December 2019 6. PT Paramitra Internusa Pratama (Belian Mill and supply base) compliance audit on August 2019 7. PT Sawit Mas Sejahtera (Sungai Kikim and supply base) compliance audit on October 2019 8. PT Sinar Kencana Inti Perkasa (Sungai Magalau Mill and supply base) compliance audit on January 2019

		<p>9. PT Agro Lestari Sentosa (Jalemo Mill and supply base) compliance audit on January 2019</p> <p>10. PT Adi Tunggal Mahajaya (Sako Mill) (under construction) compliance audit on December 2019</p> <p>11. PT SMART (Bukit Kapur Mill and supply base) compliance audit on January 2019</p> <p>12. PT Kresna Duta Agroindo (Rantau Panjang Mill and supply base) compliance audit on December 2019</p> <p>13. PT Kresna Duta Agroindo (Gunung Kombeng Mill and supply base) compliance audit on March 2019</p> <p>14. PT Sawitakarya Manunggal (Sawita Mill and supply base) compliance audit on October 2019</p> <p>There 2 companies which under system development. The companies are PT Bahana Karya Semesta and PT Bangun Nusa Mandiri. PT Bahan Karya Semesta is newly acquisition and PT Bangun Nusa Mandiri is on process to construct the mill.</p>
i.	<p>No replacement of primary forest or any area identified as containing High Conservation Values (HCVs) or required to maintain or enhance HCVs in accordance with RSPO criterion 7.3 (it has changed be Criterion 7.12 in P&C 2018)</p>	<p>Company Group/Holding Statement: Several companies under GAR were planted above November 2005, while the HCV assessment process was conducted in the period 2010 – 2013.</p> <p>GAR and its subsidiaries have been reporting disclosure and zero liability to RSPO by email dated August 29, 2014.</p> <p>26 companies have been developed after November 2005 and are currently following the RaCP process with progress as of January 12, 2019 as follows:</p> <p>a) 5 report are concept note review in RSPO:</p> <ol style="list-style-type: none"> 1. PT Buana Arta Sejahtera – Kalimantan Tengah 2. PT Kresna Duta Agroindo – Kalimantan Timur 3. PT Agrolestari Sentosa – Kalimantan Tengah 4. PT Sumber Indah Perkasa – Papua 5. PT Kencana Graha Permai – Kalimantan Barat <p>b) 20 report need more clarification on LUCA review</p> <ol style="list-style-type: none"> 1. PT Satya Kisma Usaha – Jambi 2. PT Bumi Sawit Permai – Sumatera Selatan 3. PT Sawit Mas Sejahtera (MMM) – Sumatera Selatan 2 4. PT Sawit Mas Sejahtera (PJP) – Sumatera Selatan 2 5. PT Sawit Karya Manunggal – Kalimantan Selatan 6. PT Sinar Kencana Inti Perkasa – Kalimantan Selatan 7. PT Tapian Nadenggan – Kalimantan Timur 8. PT Tapian Nadenggan – Kalimantan Tengah 1 9. PT Satya Kisma Usaha – Kalimantan Tengah 10. PT Mitra Karya Agroindo – Kalimantan Tengah

		<p>11. PT Binasawit Abadipratama – Kalimantan Tengah</p> <p>12. PT Aditunggal Mahajaya – Kalimantan Tengah</p> <p>13. PT Agrokarya Primalestari – Kalimantan Tengah</p> <p>14. PT Buana Adhitama – Kalimantan Tengah</p> <p>15. PT Agrolestari Mandiri – Kalimantan Barat</p> <p>16. PT Paramitra Internusa Pratama – Kalimantan Barat</p> <p>17. PT Persada Graha Mandiri – Kalimantan Barat</p> <p>18. PT Bangun Nusa Mandiri – Kalimantan Barat</p> <p>19. PT Kartika Pria Cipta – Kalimantan Barat</p> <p>20. PT Tapan Nadenggan – Kalimantan Tengah</p> <p>c) 1 report on LUCA review process (PT Cahaya Nusa Gemilang – Kalimantan Barat)</p> <p>HCV assessment for 26 companies was conducted in the period of 2010 - 2012, mostly carried out by external parties. HCV assessments are carried out by assessors who have been approved RSPO. reference to the HCV assessment using the Toolkit HCV 2008. peer review is carried out by an independent consultant who has also been approved by the RSPO.</p> <p>The company always takes action on the RaCP process, but only the RSPO for uncertified units can be realized immediately.</p> <p>Auditor Verification:</p> <p>Based on auditor verification, not all uncertified unit conduct new clearing after Nov 2005, but for uncertified unit with land clearing after Nov 2005 has follow RaCP. Detail information of uncertified unit are:</p> <ol style="list-style-type: none"> 1. PT Sinar Kencana Inti Perkasa (Kasuari Mill and supply base): no new land clearing after Nov 2005 and company already disclose to RSPO. 2. PT Agrolestari Mandiri (Pekawai Mill and supply base): LUCA review and the company on process to response the second review. 3. PT Binasawit Abadi Pratama (Perdana Mill and supply base): LUCA review and the company on process to response the second review. 4. PT Agrokarya Prima Lestari (Kuayan Mill and supply base): LUCA review and the company on process to response the second review. 5. PT Mitra Karya Agroindo (Tangar Mill and supply base): LUCA review and the company on process to response the second review. 6. PT Paramitra Internusa Pratama (Belian Mill and supply base): LUCA review and the company on process to response the second review.
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i.	Any new plantings since January 1 st 2010 must comply with the RSPO New Plantings Procedure.	<p>Company Group/Holding Statement: GAR and its subsidiaries planted oil palm plantation after January 2010. There were 18 companies that had conducted NPPs and had gone through a public consultation process in April 2014. The companies were:</p> <ol style="list-style-type: none"> 1. PT Satya Kisma Usaha – Jambi 2. PT Bumi Sawit Permai – Sumatera Selatan 3. PT Tapan Nadenggan – Kalimantan Timur 4. PT Kresna Duta Agroindo – Kalimantan Timur 5. PT Mitra Karya Agroindo – Kalimantan Tengah 6. PT Binasawit Abadipratama – Kalimantan Tengah 7. PT Aditunggal Mahajaya – Kalimantan Tengah 8. PT Agrolestari Sentosa – Kalimantan Tengah 9. PT Agrokarya Primalestari – Kalimantan Tengah 10. PT Buana Adhitama – Kalimantan Tengah 11. PT Buana Artha Sejahtera – Kalimantan Tengah 12. PT Agrolestari Mandiri – Kalimantan Barat 13. PT Paramitra Internusa Persada – Kalimantan Barat 14. PT Persada Graha Mandiri – Kalimantan Barat 15. PT Bangun Nusa Mandiri – Kalimantan Barat 16. PT Kartika Pria Cipta – Kalimantan Barat 17. PT Kencana Graha Mandiri – Kalimantan Barat 18. PT Cahaya Nusa Gemilang – Kalimantan Barat <p>Auditor Verification: Based on auditor verification, not all uncertified unit conduct new clearing after January 2010 but for all</p>

		<p>uncertified unit with land clearing after January 2010 has follow NPP. Detail information of uncertified unit are:</p> <ol style="list-style-type: none"> 1. PT Sinar Kencana Inti Perkasa (Kasuari Mill and supply base): there is no new land clearing after January 2010 2. PT Agrolestari Mandiri (Pekawai Mill and supply base): NPP on 26 April 2014 3. PT Binasawit Abadi Pratama (Perdana Mill and supply base): NPP on 8 July 2014 4. PT Agrokarya Prima Lestari (Kuayan Mill and supply base): NPP on 26 April 2014 and PT Buana Adhitama (supply base) conduct NPP on 4 June 2014. 5. PT Mitra Karya Agroindo (Tangar Mill and supply base): NPP on 26 April 2014 6. PT Paramitra Internusa Pratama (Belian Mill and supply base): NPP on 3 June 2014, PT Kartika Prima Cipta (supply base) conduct NPP on 8 July 2014 And PT Persada Graha Mandiri (Supply base) conduct NPP on 6 June 2014. 7. PT Sawit Mas Sejahtera (Sungai Kikim and supply base): there is new planting after January 2010 in Sungai Kikim Estate and Sungai Saling Estate, the company not conduct NPP. This is become subject of sanction. For PT Buana Sawit Mas (supply base) conduct NPP on 8 July 2014. 8. PT Sinar Kencana Inti Perkasa (Sungai Magalau Mill and supply base): there is no new land clearing after January 2010. 9. PT Agro Lestari Sentosa (Jalemo Mill and supply base): NPP on 26 April 2014 10. PT Adi Tunggal Mahajaya (Sako Mill) (under construction): NPP on 25 April 2014, PT Agrokarya Prima Lestari (supply base) conduct NPP on 26 April 2014 and PT Mitra Karya Agroindo (supply base) conduct NPP on 26 April 2014. 11. PT SMART (Bukit Kapur Mill and supply base): there is no new land clearing after January 2010. 12. PT Kresna Duta Agroindo (Rantau Panjang Mill and supply base): NPP on 8 July 2014 13. PT Kresna Duta Agroindo (Gunung Kombeng Mill and supply base): NPP on 8 July 2014 14. PT Sawitakarya Manunggal (Sawita Mill and supply base): there is new land clearing after January 2010 in Sawita KPPA and company not conduct NPP. This is become subject of sanction.
ii.	Land conflicts, if any, are being resolved through a mutually agreed process, such as the RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO criteria 2.2, 6.4, 7.5 and 7.6 (it has changed be Criterion 4.8, 4.7 and 4.5 in P&C 2018).	<p>Company Group/Holding Statement:</p> <p>There are no land conflicts. The Company has a land conflict resolution mechanism in accordance with the RSPO criteria 6.4; 7.5; and 7.6. This procedure is outlined in the <i>SOP Penanganan Konflik Sosial</i> (SOP/SMART/SENS-CSR/SADVI/02 Rev 1 on 18</p>

	<p>May 2016) and <i>SOP Penanganan Keluhan dan Ketidakpuasan</i> (SOP/ SMART/ GIMS-SCDM/ USDV/ I/ 001 Rev 2 on 11 April 2017). This procedure regulates social conflict settlement agreed. Conflict resolution can be done in a participatory manner and can also be done by a third party (mediator).</p> <p>The company also has procedures to deal with complaints before they become conflicts. The procedure is SOP/ SMART/ GIMS-SCDM/ USDV/ I/ 001 Rev 2 on 11 April 2017. The company handling complaints appropriately and quickly. GAR has been initiated to become a member of RSPO DSF as a category "growers".</p> <p>Here recap of complaint progress related to GAR which publish in RSPO Website:</p> <ol style="list-style-type: none"> 1. PT Kartika Prima Cipta (Muara Tawang Estate: complaint by FPP related to FPIC process and the latest information is waiting response from external review which appointed by RSPO and until 3 January 2020 there is no response from RSPO. 2. Kapuas Hulu Region (PT Kartika Prima Cipta, PT Persada Graha Mandiri and PT Paramitra Internusa Pratama) related to legality, GAR already reply RSPO email and until 3 January 2020 there is no response from RSPO. 3. PT Agrolestari Mandiri (Pekawai Mill), GAR already sent to RSPO related to Indonesian industrial court decisions and until 3 January 2020 there is no response from RSPO. 4. PT Kartika Prima Cipta (Muara Tawang Estate): complaint by LinkAr Borneo related to land claim. Update on 29 July 2019 RSPO inform that CP agree to allow withdrawals by LinkAr Borneo. 5. Compliance audit which conduct in uncertified unit period 2019 there is no land conflict and unit already socialize <i>SOP Penanganan Keluhan dan Ketidakpuasan</i>, Human Rights Policy and <i>SOP Penanganan Konflik Sosial</i> to internal and external. <p>Auditor Verification: Auditor has verified the supporting evidence of above the company statement. There are no land conflicts for</p> <ol style="list-style-type: none"> 1. PT Sinar Kencana Inti Perkasa (Kasuari Mill and supply base) 2. PT Binasawit Abadi Pratama (Perdana Mill and supply base) 3. PT Agrokarya Prima Lestari (Kuayan Mill and supply base) 4. PT Mitra Karya Agroindo (Tangar Mill and supply base)
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		<p>5. PT Sawit Mas Sejahtera (Sungai Kikim and supply base)</p> <p>6. PT Sinar Kencana Inti Perkasa (Sungai Magalau Mill and supply base)</p> <p>7. PT Agro Lestari Sentosa (Jalemo Mill and supply base)</p> <p>8. PT Adi Tunggal Mahajaya (Sako Mill and supply base)</p> <p>9. PT SMART (Bukit Kapur Mill and supply base)</p> <p>10. PT Kresna Duta Agroindo (Rantau Panjang Mill and supply base)</p> <p>11. PT Kresna Duta Agroindo (Gunung Kombeng Mill and supply base)</p> <p>12. PT Sawitakarya Manunggal (Sawita Mill and supply base)</p> <p>There are any land conflicts but was in the process of completion for:</p> <ul style="list-style-type: none"> - PT Paramitra Internusa Pratama (Belian Mill and supply base). The supply base of Belian mill are PT Kartika Prima Cipta and PT Persada Graha Mandiri. - PT Agrolestari Mandiri (Pekawai Mill and supply base).
iii.	Labour disputes, if any, are being resolved through a mutually agreed process, in accordance with RSPO criterion 6.3 (it has changed be Criterion 4.2 in P&C 2018).	<p>Company Group/Holding Statement:</p> <p>The company has procedures for handling workers complaints before it become conflict. The procedure is SOP/ SMART/ SIGS-CSR/ SADV/ I/ 003. Procedures related to workers problems are arranged in the internal flow chart because workers are categorized as internal stakeholder. The media of complaint used is an official letter submitted through a union or put into a suggestion box provided at a strategic location.</p> <p>Here recap of complaint progress related to GAR which publish in RSPO Website:</p> <ol style="list-style-type: none"> 1. PT Agrolestari Mandiri (Pekawai Mill), Kalimantan Barat, a complaint by the <i>Serikat Buruh Sejahtera Indonesia</i> in Ketapang District on 30 August 2018. The complaint submitted was that the company allegedly laid off workers with violations of Indonesian labor law. the current status is still in progress. 2. PT SMART, Sumatera Utara, complaints by 56 workers of PT SMART and local communities in Hamlet of Belongkut I, II and III on 18 October 2018 related to a) the company allegedly did not pay severance in accordance with labor law No. 13 of 2003 to 56 former workers, b) workers suspect that the company is not compliant with CSR related regulations, especially environmental differences. Current status, CP warning letter to the

		<p>representative of the people of hamlet I / II / III Belongkut.</p> <p>3. PT SMART Tbk, PT MPLWI Sumatra Utara, complaints from <i>Konsulat Cabang Federasi Serikat Pekerja Metal Indonesia</i> (KC-FSPMI) related to discrimination against workers and women workers who were not given safety equipment and did not get maternity leave and birth leave. The status is currently an internal progress review.</p> <p>Auditor Verification: There is information from public source and RSPO website on any labour conflict for uncertified unit of the group subsidiaries, consist of:</p> <ul style="list-style-type: none"> PT Agrolestari Mandiri (Pekawai Mill), company already sent to RSPO related to Indonesian industrial court decisions and until 3 January 2020 there is no response from RSPO. PT Mitrakarya Agroindo: https://www.mongabay.co.id/2018/08/22/potret-perburuhan-sawit-sinar-mas/. GAR has issued media release about Sinar Mas Agribusiness and Food continues efforts to improve worker experience in palm oil operation nationwide. This media release inform the progressively converting our daily workers to permanent status according to their skill and qualification. From late November 2017 until June 2018 company have converted more than 1,300 daily workers to permanent staff for our operations at PT Tapan Nadenggan and PT Mitra Karya Agroindo. PT Sawit Mas Sejahtera: https://pusaka.or.id/2019/01/surat-protas-tindakan-sewenang-wenang-perusahaan-pt-sawit-mas-sejahtera-terhadap-buruh-perkebunan-dan-aktifis-serikat-buruh-gsbi/. Bipartite on 11 April 2019, the parties agreed to terminate the work agreement as of 1 Feb 2019 and withdraw the claim. <p>There is no labor issue in other uncertified unit.</p>
iv.	Legal non-compliance, if any, is being addressed through measures consistent with the requirements of RSPO P&C criterion 2.1 (it has changed be Criterion 4.2 in P&C 2018).	<p>Company Group/Holding Statement: Companies comply with the regulations in accordance with the requirements of the RSPO 2.1 and 2.2 where there is no violation of the rules that are relevant to the plantation. The company has a mechanism to evaluate compliance with regulations, namely SOP/SMART/UMUM/SADV/II/002. In SOP describes procedures for compliance, completeness and groove sections which explain in detail to evaluate compliance with the legislation.</p>

	<p>Subsidiaries of GAR which still on going to process HGU consist of:</p> <ol style="list-style-type: none"> 1. PT Djuanda Sawit Lestari (Muara Kandis Estate / Muara Tawas Estate) 2. PT Sawit Mas Sejahtera (Sawit Mas Estate) 3. PT Bumi Sawit Permai (Bumi Sawit Estate) 4. PT Sumber Indah Perkasa (Sungai Buaya Estate, Sungai Merah Estate) 5. PT Ivo Mas Tunggal (Samsam Estate, Kandista Estate, Nenggala Estate, Sei Rokan Estate, Ujung Tanjung Estate) 6. PT Buana Wiralestari Mas (Nagasakti Estate; Nagamas Estate and Kijang Estate) 7. PT Ramajaya Pramukti (Ramarama Estate) 8. PT Binasawit Abadipratama (Perdana Estate, Lenggana Estate, Semandau Estate, Muara Dua Estate, Perdana Mill) 9. PT Agrokarya Prima Lestari (Mentaya Estate, Kuayan Estate, Bukit Santuhai Estate, Tajur Beras Estate, Seranau Estate, Sungai Sambon Estate, Kuayan Mill) 10. PT Buana Adhitama (Sapiri Estate, Bukit Dua Estate, Bukit Tunggal Estate) 11. PT Agrolestari Sentosa (Manuhing Estate, Kajui Estate, Balasang Estate, Jalemo Estate, Jalemo Mill) 12. PT Mitra Karya Agroindo (Sungai Nusa Estate, Tangar Mill) 13. PT Aditunggal Mahajaya (SAYE, Sako Mill) 14. PT Satya Kisma Usaha (Medang Sari Estate) 15. PT Agrokarya Prima Lestari (Sungai Sambon Estate) 16. PT SMART Tbk (Sungai Cantung Estate, Bukit Kapur Estate, Bukit Kapur Mill) 17. PT Bangun Nusa Mandiri (Gaharu Estate, Kenari Estate, Keranji Estate, Gaharu Plasma, Kenari Plasma) 18. PT FLD (Tanjung Rusa Estate) <p>Beside that, there are some unit still on process the land certificate (SHM) consist of:</p> <ol style="list-style-type: none"> 1. PT Kresna Duta Agroindo (Gunung Kombeng Mill, Gunung Kombeng KKPA) 2. PT Ramajaya Pramukti (Ramarama KKPA) 3. PT Kresna Duta Agroindo (Tiga Serumpun Estate) 4. PT Satya Kisma Usaha (Batang Gading KKPA, KILA) 5. PT Agrokarya Prima Lestari (Sungai Sambon Plasma) 6. PT Djuanda Lestari (Pandawa KKPA) 7. PT Forestra Lestari Dwikarya (Tanjung Rusa KKPA)
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	<p>8. PT Sinar Kencana Inti Perkasa (Sungai Kupang KKPA)</p> <p>9. PT Sawitakarya Manunggal (Sawita KKPA)</p> <p>10. PT Kresna Duta Agroindo (Jakluay KKPA, Bukit Subur KKPA)</p> <p>11. PT Kresna Duta Agroindo (Rantau Panjang KKPA)</p> <p>12. PT Kencana Graha Permai (Kayung Kemitraan, Kencana Kemitraan, Kenanga Kemitraan)</p> <p>13. PT Paramitra Internusa Pratama (Belian KKPA, Muara Tawang KKPA, Kapuas Hulu KKPA)</p> <p>14. PT Mitrakarya Agroindo (Sulin Plasma)</p> <p>15. PT Agrokarya Prima Lestari (Sapiri Plasma)</p> <p>16. PT Adi Tunggal Mahajaya (Sako Plasma)</p> <p>There are 4 companies which still on process to revise EIA document, consist of:</p> <ol style="list-style-type: none"> 1. PT Sinar Kencana Inti Perkasa 2. PT Sumber Indah Perkasa 3. PT Sawit Mas Sejahtera 4. PT Bumi Sawit Permai <p>Auditor Verification:</p> <p>Legal process is still going on and there is a detail update progress documented by the company for each year.</p> <ul style="list-style-type: none"> - PT Sinar Kencana Inti Perkasa (Kasuari Mill and supply base), there is a legal non-compliance. Supply base for Kasuari Mill are PT Sinar Kencana Inti Perkasa and PT Sumber Indah Perkasa. The legal non compliance which still on process is EIA revision in PT Sumber Indah Perkasa and Hazardous waste permit in PT Sinar Kencana Inti Perkasa. - PT Binasawit Abadi Pratama (Perdana Mill and supply base), doesn't have land use title (HGU), the HGU is still on process. - PT Agrokarya Prima Lestari (Kuayan Mill and supply base, doesn't have land use title (HGU), the HGU is still on process. Supply base for Kuayan Mill are PT Agrokarya Prima Lestari and PT Buana Adhitama. - PT Mitrakarya Agroindo (Tangar Mill and supply base, doesn't have land use title (HGU), the HGU is still on process. - PT Paramitra Internusa Pratama (Belian Mill and supply base), there is a legal non-compliance. Supply base for Belian Mill are PT Paramitra Internusa Pratama, PT Persada Graha Mandiri and PT Kartika Prima Cipta. For PT Kartika Prima Cipta doesn't have land use title (HGU), the HGU is still on process. - PT Sawit Mas Sejahtera (Sungai Kikim Mill and supply base), there is a legal non-compliance.
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		<p>Supply base for Sungai Kikim Mill are PT Sawit Mas Sejahtera and PT Bumi Sawit Permai. The legal non compliance which still on process is EIA revision.</p> <ul style="list-style-type: none"> - PT Agrolestari Sentosa (Jalemo Mill and supply base), doesn't have land use title (HGU), the HGU is still on process. - PT Adi Tunggal Mahajaya (Sako Mill and supply base), there is a legal non-compliance. Supply base for Sako Mill are PT Adi Tunggal Mahajaya, PT Mitra Karya Agroindo and PT Agrokarya Prima Lestari. The legal non compliance which still on process is Land Use Title (HGU). - PT SMART Tbk (Bukit Kapur Mill and supply base), doesn't have land use title (HGU), the HGU is still on process. - PT Kresna Duta Agroindo (Gunung Kombeng Mill and supply base, doesn't have land use title (SHM), the SHM is still on process. Supply base for Gunung Kombeng Mill is communities plantation. - PT Bangun Nusa Mandiri (Kenari Mill and supply base), doesn't have land use title (HGU), the HGU is still on process. - PT Djuanda Sawit Lestari: there is an area is still in process for HGU in Muara Kandis Estate (574.58 Ha) - PT Satya Kisma Usaha – Kalimantan Tengah: there is an area is still in process for HGU in Medang Sari Estate (2441 Ha) - PT Sawit Mas Sejahtera: there is an area is still in process for HGU in Sawit Mas Sejahtera Estate (2291 Ha) - PT Bumi Sawit Mas: there is an area is still in process for HGU in Bumi Sawit Mas Estate (773 Ha) - PT Sumber Indah Perkasa: there is an area is still in process for HGU in Sungai Buaya Estate (155.46 Ha) and Sungai Merah Estate (241.54 Ha) - PT Ivomas Tunggal: there is an area is still in process for HGU Samsam Estate (29.09 Ha), Kandista Estate (158.46 Ha), Nenggala Estate (419.9 Ha), Sei Rokan Estate (102.7 Ha), Ujung Tanjung Estate (557.3 Ha) - PT Buana Wiralestari Mas: there is an area is still in process for HGU Naga Mas Estate (253.39 Ha), Naga Sakti Estate (59.79 Ha), Kijang Mas Estate (56.07 Ha) - PT Ramajaya Pramukti: there is an area is still in process for HGU Rama Rama Estate (318.76 Ha) - PT Bumipalma Lestari persada: there is an area is still in process for HGU Bumi Palma Estate (39.21 Ha)
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		<p>There are companies that already comply with regulation, consist of:</p> <ul style="list-style-type: none">• PT Agrolestari Mandiri (Pekawai Mill and supply base).• PT Sinar Kencana Inti Perkasa (Sungai Magalau Mill and supply base).• PT Kresna Duta Agroindo (Rantau Panjang Mill and supply base).• PT Sawitakarya Manunggal (Sawita Mill and supply base).
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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	:	Rizliani Hasibuan
Date Issued	:	01 March 2019	Time Limit	:	ASA-1.1
NC Grade	:	Minor	Date of Closing	:	27 February 2020
Standard Ref. & Requirement	:	6.1.4 (3.4.3 on P&C 2018) The documented plan for management and monitoring of social impacts, shall be reviewed at least on two-yearly basis. If necessary, the plan should be updated. There shall be evidence that the review process includes participation of all affected parties			
Non-Conformance Description & Evidence observed (filled by auditor): Based on interviews with representatives of Terentang Village, Kacung Village, and Ranggi Asam Village there were social issues or negative perceptions from the community such as: Lack of local workers recruited by companies, CSR realization that was considered lacking, there was no realization of partnership cooperation in the form of plasma, and clarity about the boundaries of the HGU. This was also added from the results of interviews with the West Bangka Regency Agriculture Office regarding social issues in the communities. Regarding this, the company has reviewed the management and monitoring of social impacts carried out in 2018. The results of the document verification of the Review Report on the Management and Monitoring of Social Impact Plans have included the results of minutes with affected parties regarding issues / negative perceptions related to the above matters. Based on the results of the review, improvements to the management and monitoring plans prepared for the 2019 period has been including negative impacts / perceptions as follows: PT LWI <ul style="list-style-type: none">- Public unrest related to poor communication relations, and- Community expectation related to increase assistance from the company PT BPL <ul style="list-style-type: none">- Social jealousy related to the recruitment of labor by the local community- Perceptions about communication between the company and the community- Perceptions about CSR assistance given by the company is felt to be not optimal- Community's assumption that the company's operations enable pollution due to liquid waste on the Lagok River. Based on the explanation above, it was concluded that the results of the review of the management and monitoring plan did not cover all the issues or negative perceptions of the communities, namely the demand for realization of partnership cooperation in the form of plasma and clarity on the boundaries of the HGU.					
Root Cause Analysis (filled by organization audited): In the implementation of the SIA 2018 review conducted by the SBLD team, there had been issues regarding the discussion of partnerships with the company and the limits of the company's HGU, but the writing of the report had not been included in the management review document because the discussion was related to the legality of the company so the SBLD provided information to the team unit operations to be communicated and handled in the relevant section namely the Document and License (DnL) team					
Correction (filled by organization audited): The SBLD Officer will revise monitoring in the 2019 period to monitor the social impact of PT MP LWI and include					

discussions regarding partnerships and clarity on HGU boundaries.

Corrective Action *(filled by organization audited):*

In the monitoring of 2019 will be included the discussion regarding the partnership plan and clarity of HGU boundaries based on a follow-up plan from the relevant divisions synchronized into the PT MP LWI social impact monitoring document of 2019 .

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

The Certification Unit already has a Social Impact Management and Monitoring Plan listed in the Palm Oil Plantation Social Impact Management & Monitoring Report for 2019, for example:

PT MP LWI

Type of Impact	Management of Impact	Monitoring Parameter	Monitoring Method
Public unrest related to poor communication relations	Application of SOP of communication and consultation	Communication and consultation book recap	Secondary data checking and interview
Disruption of the company's operational activities as a result of community demonstrations	<ul style="list-style-type: none"> Establish communication related to the regulation of plasma formation Realizing CSR activities Provide job information 	<ul style="list-style-type: none"> Documentation of socialization activities CSR realization documents Employee data 	Secondary data checking and interview

PT BPL

Type of Impact	Management of Impact	Monitoring Parameter	Monitoring Method
Social jealousy related to hiring	Provision of written labor information to the Village Officials	<ul style="list-style-type: none"> Documentation of employment socialization PT BPL workforce data 	Secondary data checking and interview
The emergence of community demands regarding clarity of HGU, plasma land, CSR programs and workforce recruitment	Provision of workforce information, CSR realization, plasma socialization	CSR documentation, proof of plasma socialization	Secondary data checking and interview

Based on the explanation above, that in the issue or negative perception of the community related to the demand for the realization of partnership in plasma and the clarity of HGU boundaries has been included in the Social Management and Monitoring Plan and there has been an implementation of the social impact.

Based on interviews with Ibul and Terentang Village, it was found that there were no more issues related to the demands for the realization of partnership in plasma and the clarity of the boundaries of the HGU. **Based on this explanation, the non-conformity No 2019.01 can be declared Fulfilled.**

Verified by : **Muhammad Rinaldi**

3.4.2. Identification of Findings, Corrective Actions and Observations at ASA 1.1 Certification Assessment

There is no Non-conformity identified during ASA 1.1

3.4.3. Opportunity for Improvement



No	Ref. Std.	Description
1	2.1.1 C	Re-ensure the location of drainage of Liquid Waste in the Extension of Utilization of Liquid Waste on 2019
2	3.4.3 C	Re-ensure that the environmental management and monitoring evidence is included in the Environmental Document Implementation Report.
3	4.3.1	Re-ensure the implementation of plans for CSR program review activities that involve the community.
4	4.5.1 C	Re-ensure identification of enclave and reserve areas, as well as synchronization between HGU maps and operational maps.
5	6.7.1 C	Re-ensure the progress of the Leidong West Mill unit's OHS Expert license

3.5 Summary of Arising Issues from Public and Auditor Verification

Public Issues	Auditor Verification
Gender Committee of Leidong West Mill The company has had a policy to protect female workers from sexual harassment in the workplace as well as a grievance mechanism. Have implemented regulations related to reproductive rights such as menstruation leave and childbirth.	There are no negative issues that need further verification. Related no gender discrimination has been verified in Criteria 6.1
Gender Committee of Leidong West Estate and Bumi Mas Estate The Gender Committee are still active in the company until the audit are carried out. Gender Committee activities include socialization of sexual harassment, complaints, general health and so on. There are no issues related to sexual harassment. Female workers have the right to get menstruation leave (H1) and maternity leave (H2).	There are no negative issues that need further verification. Related no gender discrimination has been verified in Criteria 6.1
Environmental Agency of Bangka Barat Regency The CH complied with applicable regulations, among others has had license of hazardous temporary warehouse, license of POME Land Application, license of WWTP. All mandatory reports related environmental has been reported to agency. There is no complaints from stakeholder related environmental issue. The agency has not been able to process the AMDAL addendum of PT Bumi Permai Lestari because it is still waiting for spatial recommendations from the relevant agencies.	There is no negative issue that need further verification. Based on document review and field observations, the CH has demonstrated legal compliance related environmental, and no indications of environmental pollution. Described in detail in related indicators.
Agriculture Agency of Bangka Barat Regency <ul style="list-style-type: none"> • Plantation Business Assessment (PUP) will be carried out in the first semester of 2020. • The company has reported its business activities to the Plantation Office every semester. • There are no environmental issues related to the company's operational activities. • The company has adequate fire fighting facilities and infrastructure and is functioning properly. • There are no negative issues such as fire. • When there is a request for information from the department has received a good response from the 	There are no negative issues that need to be verified. The company has fulfilled obligations such as licensing and mandatory reporting that have been explained in related indicators.

Public Issues	Auditor Verification
company.	
Manpower Agency of Bangka Barat Regency <p>There are no negative issues related to labor and child labor. P2K3 reporting has been given regularly by the company on a periodic basis (3 months), besides that it has also carried out a mandatory report on labor reports.</p> <p>Payment of wages has followed the provisions of 3,230,023.66 IDR /month. At present the company has a Bipartite.</p>	<p>There are no negative issues that need further verification. The company has paid wages in accordance with the regulations. This is in accordance with related indicators.</p>
Labor Union of SPSI PT BPL/PT LWI <p>Labor Union have been registered in the labor Agency Bangka Barat District in 2009 and there has been no change in management until this audit. The last meeting between company and the labor union discussed the agenda of using PPE that is provided by the company to all employees. Salary implementation is in accordance with the provincial minimum wage in 2020 is equal to 3,230,023.66 IDR /month. In addition, payment of salaries has been in accordance with the specified time and through the transfer. There are no labor issues.</p>	<p>There are no negative issues that need further verification, the company has paid salaries in accordance with the regulations described in related indicators</p>
Elder of Ibul Village (Land Previous Owner) <p>The land compensation process has been carried out by involving various parties and carried out transparently and without coercion. The compensation agreement has been explained by the company. untill now, there were no land disputes in the company area.</p>	<p>The land compensation process has been carried out transparently and there is no coercion. All evidence of the land compensation process can be presented by the company. The land compensation process has been explained in criterion 4.4</p>
Village Official of Terentang <p>There is no land dispute issues or environmental pollution. The company has made efforts to develop the surrounding community through CSR programs, the use of local labor and local contractors.</p> <p>The relationship between the company and the community has run quite well and harmoniously. Communication between the company and the village is quite good.</p> <p>There are complaints from the community, including:</p> <ul style="list-style-type: none"> Recruitment of workers through Labor Union Salary deductions for temporary employees 	<p>The company has made efforts to develop the surrounding community through CSR programs and the use of local workers.</p> <p>The auditor has verified the complaints from the community, including:</p> <ul style="list-style-type: none"> Employee recruitment mechanism through Labor Union has been socialized to the surrounding villages, for example, on February 13, 2020, it has been socialized to Pangkal Beras Village and Terentang Village. This has also been stated on SIA document Based on employee data and field visits, it is known that all employees within the scope of certification are permanent workers and there are no more temporary employees.

Public Issues	Auditor Verification
<p>Village Official of Ibul</p> <p>There is no land dispute issues or environmental pollution. The company has made efforts to develop the surrounding community through CSR programs, the use of local labor and local contractors.</p> <p>The relationship between the company and the community has run quite well and harmoniously. Communication between the company and the village is quite good.</p> <p>There is a letter informing for the planting distance around the Rajek-Belar road requested to be given a distance of 15 meters from the right and left of the road.</p>	<p>The company has made efforts to develop the surrounding community through CSR programs and the use of local workers.</p> <p>Requests for planting distances on the Rajek-Belar road have been followed up by the company. Based on field visit at replanting area of BINE and documentation in the form of photographs, it was found that the planting had been given a distance of 15 meters from the roadside.</p>
<p>Employee Cooperative</p> <p>Employee cooperatives are engaged in providing basic commodities. There is a regular contribution of Rp 5,000. The Company has made The Annual Member meeting (RAT) and revenue sharing in 2018 which was held on March 24, 2019.</p>	<p>There are no negative issues that need further verification. The company has employee cooperatives in accordance with the regulations. Described in criteria 6.5.4</p>
<p>FFB Supplier of CV Multi Nusa Pratama</p> <p>The company receives FFB from third parties provided that FFB supplied is not the result of looting, theft or FFB produced by looting state forests. It is stated in the agreement based on the agreement between the two parties, further explained that the payment was made on time in accordance with the contents of the agreement and there had never been a problem in terms of payment.</p>	<p>There was no negative issue that need further verification. The company has demonstrated its commitment and mechanism so that FFB received is not from illegal activities. In addition documentation has been shown that the payment of the contractor's results has been paid according to the agreement and on time. Described in detail in related indicators</p>

4.0	CERTIFIED ORGANISATION'S ACKNOWLEDGEMENT OF INTERNAL RESPONSIBILITY
4.1	<p>Formal Sign-off of Assessment Findings</p> <p>Hereunder sign by management representative from inspected company to acknowledge a field assessment and agree for all content explained in this assessment report, included of non-compliance findings.</p> <p>Signed on behalf of:</p> <div style="display: flex; justify-content: space-between; align-items: flex-end;"> <div style="text-align: center;"> <p>PT Leidong West Indonesia Head of SPO Certification & Low GHG Emissions Strategy</p>  <p><u>Yahya Mustakim</u> 25th March 2020</p> </div> <div style="text-align: center;"> <p>Mutuagung Lestari Lead Auditor</p>  <p><u>Arif Faisal Simatupang</u> 25th 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 of Bangka Barat Regency	Bangka Barat Regency	-	By telephone	26 th February 2020	✓	
2	Agriculture agency of Bangka Barat Regency	Bangka Barat Regency	-	By telephone	26 th February 2020	✓	
3	Manpower agency of Bangka Barat Regency	Bangka Barat Regency	-	By telephone	26 th February 2020	✓	
4	FFB Supplier / local contractor of CV Multi Nusa Pratama	Bangka Barat Regency	-	Direct Interview	26 th February 2020	✓	
5	SPSI board of PT MP LWI and PT BPL	PT LWI and PT BPL	-	Direct Interview	25 th February 2020	✓	
6	Gender committee of PT MP LWI and PT BPL (Committee Gender of LWSE, BINE, BMSE, LWSM)	PT LWI and PT BPL	-	Direct Interview	25 th February 2020	✓	
7	Elder of Ibul Village (Land Previous Owner)	Bangka Barat Regency	-	Direct Interview	26 February 2020	✓	
8	Village Official of Terentang	Bangka Barat Regency	-	Direct Interview	26 February 2020	✓	
9	Village Official of Ibul	Bangka Barat Regency	-	Direct Interview	26 February 2020	✓	
10	Gender Committee of Leidong West Mill	PT LWI	-	Direct Interview	24 th February 2020	✓	
11	Sawit Watch	Jakarta	info@sawitwatch.or.id	Email	18 th February 2020		✓
12	WWF	Jakarta	supporter-service@wwf.or.id	Email	18 th February 2020		✓
13	Walhi	Jakarta	informasi@walhi.or.id	Email	18 th February 2020		✓
14	Leidong West Mill <ul style="list-style-type: none"> - 2 security - 1 weghbridge operator - 4 sorter and 1 foreman - 1 engine room operator - 2 Sterilizer operator - 2 boilerman - 1 warehouse officer - 1 hazardous waste warehouse officer - 1 welder - 1 WTP operator - 1 WWTP operators 	PT LWI	-	Field observation and direct interview	24 th February 2020	✓	
15	Leidong West Utara Estate <ul style="list-style-type: none"> - 2 harvesting workers - 3 picker - 1 foreman of harvesting - 2 spraying workers - 1 foreman of manuring - 1 warehouse officer and hazardous waste warehouse officer - 1 genset operator 	PT LWI	-	Field observation and direct interview	26 th February 2020	✓	

16	Leidong West Selatan Estate - 7 harvesting workers - 6 spraying workers - 2 workers in storage complex and genset.	PT LWI	-	Field observation and direct interview	27 th February 2020	✓	
17	Bukit Intan Estate - 5 harvesters - 6 spraying workers - 1 PIC of HCV monitoring - 1 PIC of HGU monitoring - 4 POME LA workers - 2 warehouse officer - 1 hazardous waste warehouse officer - 1 welder - 1 doctor - 2 paramedic	PT BPL	-	Field observation and direct interview	25 th February 2020	✓	
18	Bukti Mas Estate - 2 harvesting workers - 1 foreman of harvesting - 1 foreman of spraying - 3 spraying workers - 3 circle scratch worker - 2 warehouse and hazardous waste warehouse officer - 1 welder - 1 mechanic - 1 firefighter officer - 1 PIC of HCV monitoring - 1 PIC of HGU monitoring	PT BPL	-	Field observation and direct interview	25 th February 2020	✓	

Appendix 2. Assessment Program

Date	24 - 29 February 2020	
Program	Clauses To Be Audited	Auditor / PIC
Monday, 24 February 2020		
06.00 – 07.10 07.30 – 11.00	Flight from Jakarta to Pangkal Pinang Traveling from Pangkal Pinang to PT Leidong West Indonesia	All Auditor All Auditor
11.00 – 12.00	Opening Meeting <ul style="list-style-type: none"> Auditee speech (introduction of PIC, profile of Management Unit) Auditor Team speech (introduction, audit objective, audit scope, audit plan discussion, determine of audit sample, transparency and confidentiality clarification) 	Management Unit Faisal
12.00 – 14.00	Break	All Auditor
14.00 – 17.00	Field Observation of Leidong West Mill <ul style="list-style-type: none"> Observation of supply chain (FFB receiving, weighbridge) Observation of FFB grading, processing activity, product despatch Observation of chemical storage, hazardous waste storage, fire control simulation, etc Observation of WWTP, WTP, EBA 	Faisal/Johanes Faisal/Johanes Dwi Rinaldi
Tuesday, 25 February 2020		
08.00 – 12.00	Field Observation of Bukit Intan Estate Field observation and consultation with internal stakeholder in their respective work locations (Gender Committee, Worker Union, Worker Cooperative, etc) <ul style="list-style-type: none"> Observation of HGU poles, and land demarcation. Observation of agronomy aspect (harvesting & transportation, manuring, pesticides application, road maintenance, IPM, EFB application, etc) Observation of chemical storage, fertilizer storage, hazardous waste storage, fire control facilities, waste management, etc) Observation of workers facilities (housing, school, worship place, domestic waste management, etc). Observation of HCV area, POME Land Application. 	Faisal Faisal Dwi Dwi Dwi
08.00 – 12.00	Field Observation of Bukit Mas Estate Field observation and consultation with internal stakeholder in their respective work locations (Gender Committee, Worker Union, Worker Cooperative, etc) <ul style="list-style-type: none"> Observation of HGU poles, and land demarcation. Observation of agronomy aspect (harvesting & transportation, manuring, pesticides application, road maintenance, IPM, EFB application, etc) Observation of chemical storage, fertilizer storage, hazardous waste storage, fire control facilities, waste management, etc) 	Rinaldi/Johanes Rinaldi/Johanes Rinaldi/Johanes

	<ul style="list-style-type: none"> Observation of workers facilities (housing, school, worship place, domestic waste management, etc). Observation of HCV area, POME Land Application. 	Rinaldi/Johanes Rinaldi/Johanes
12.00 – 14.00	Break	All Auditor
14.00 – 17.00	Agency Consultation of Bangka Barat Regency (by telephone) Stakeholder consultation of Local Contractors, FFB suppliers, etc Continue internal stakeholder consultation if any outstanding (Gender Committee, Worker's Union, Worker's Cooperative, etc) / Document review	All Auditor All Auditor All Auditor All Auditor
Wednesday, 26 February 2020		
08.00 – 12.00	Stakeholder consultation to affected communities surrounding the Plantation (Villager, Smallholders, and previous land owner) Field Observation of Leidong West Utara Estate Field observation and consultation with internal stakeholder in their respective work locations (Gender Committee, Worker Union, Worker Cooperative, etc) <ul style="list-style-type: none"> Observation of HGU poles, and land demarcation. Observation of agronomy aspect (harvesting & transportation, manuring, pesticides application, road maintenance, IPM, EFB application, etc) Observation of chemical storage, fertilizer storage, hazardous waste storage, fire control facilities, waste management, etc) Observation of workers facilities (housing, school, worship place, domestic waste management, etc). Observation of HCV area, POME Land Application. 	Rinaldi Faisal/Johanes Faisal/Johanes Dwi Dwi Faisal/Johanes
12.00 – 14.00	Break	All Auditor
14.00 – 17.00	Continue internal stakeholder consultation if any outstanding Document review	All Auditor All Auditor
Thursday, 27 February 2020		
08.00 – 12.00	Field Observation of Leidong West Selatan Estate Field observation and consultation with internal stakeholder in their respective work locations (Gender Committee, Worker Union, Worker Cooperative, etc) <ul style="list-style-type: none"> Observation of HGU poles, and land demarcation. Observation of agronomy aspect (harvesting & transportation, manuring, pesticides application, road maintenance, IPM, EFB application, etc) Observation of chemical storage, fertilizer storage, hazardous waste storage, fire control facilities, waste management, etc) 	Faisal Faisal Dwi/Johanes Dwi/Johanes

	<ul style="list-style-type: none"> • Observation of workers facilities (housing, school, worship place, domestic waste management, etc). • Observation of HCV area, POME Land Application. 	Rinaldi
12.00 – 14.00	Break	All Auditor
14.00 – 17.00	Continue internal stakeholder consultation if any outstanding	All Auditor
	Document review	All Auditor
Friday, 28 February 2020 /		
08.00 – 12.00	Document review	All Auditor
12.00 – 14.00	Break	All Auditor
14.00 – 17.00	Auditor's internal discussion of closing meeting preparation	All Auditor
14.30	Deadline of audit evidences/documents submission	Management Unit
Saturday, 29 February 2020		
08.00 – 10.00	Closing Meeting <ul style="list-style-type: none"> • Presentation of audit findings (noteworthy positive component, non conformities, OFI, timeline of CAR's, conclusion) • Comments, responses and questions 	All Auditor
10.00 – 12.00	Traveling from PT Leidong West Indonesia to Pangkal Pinang	All Auditor
13.25 – 14.40	Flight from Pangkal Pinang to Jakarta	All Auditor