

Roundtable on Sustainable Palm Oil Certification
R S P O

[✓] Surveillance

Name of Management Organisation : **Bumi Permai Mill – PT Prima Mitrajaya Mandiri & PT Teguh Jayaprima Abadi Subsidiary of MP Evans Group PLC**

Plantation Name : PT Prima Mitrajaya Mandiri – Beringin Jaya Estate, Lembuswana Estate, Bumi Permai Estate, Prima Estate, Kahoi Estate; PT Teguh Jayaprima Abadi – Rahayu Estate, Mahakam Estate

Location : Benua Puhun Village, Muara Kaman Sub District, Kutai Kartanegara District, Kalimantan Timur, Indonesia

Certificate Code : **MUTU-RSPO/062**

Date of Certificate Issue : 17 September 2019 Date of License Issue : 01 March 2021

Date of Certificate Expiry : 25 June 2024 Date of License Expiry : 25 June 2021

Assessment	Assessment Date	PT. Mutuagung Lestari Auditor	Reviewed by	Approved by
ASA-1.1 remote audit	9 – 10 July 2020	Moh Arif Yusni (Lead Auditor), haikal Ramadhan K, Radityo Puspanjana, Asystasha Aishah S.	Ardiansyah	Octo H.P.N. Nainggolan
ASA-1.1	14 – 17 September 2020	Mohamad Amarullah (Lead Auditor), Hasiholan Sihombing, Sansan Suhendar and Putri Oktariani		

Assessment	Approved by MUTUAGUNG LESTARI on:
ASA-1.1	14 January 2021

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Figure 1. Location Map of PT Prima Mitrajaya Mandiri & Teguh Jayaprima Abadi in Kalimantan Timur Province



Figure 2. Operational Map of Beringin Jaya Estate - PT Prima Mitrajaya Mandiri

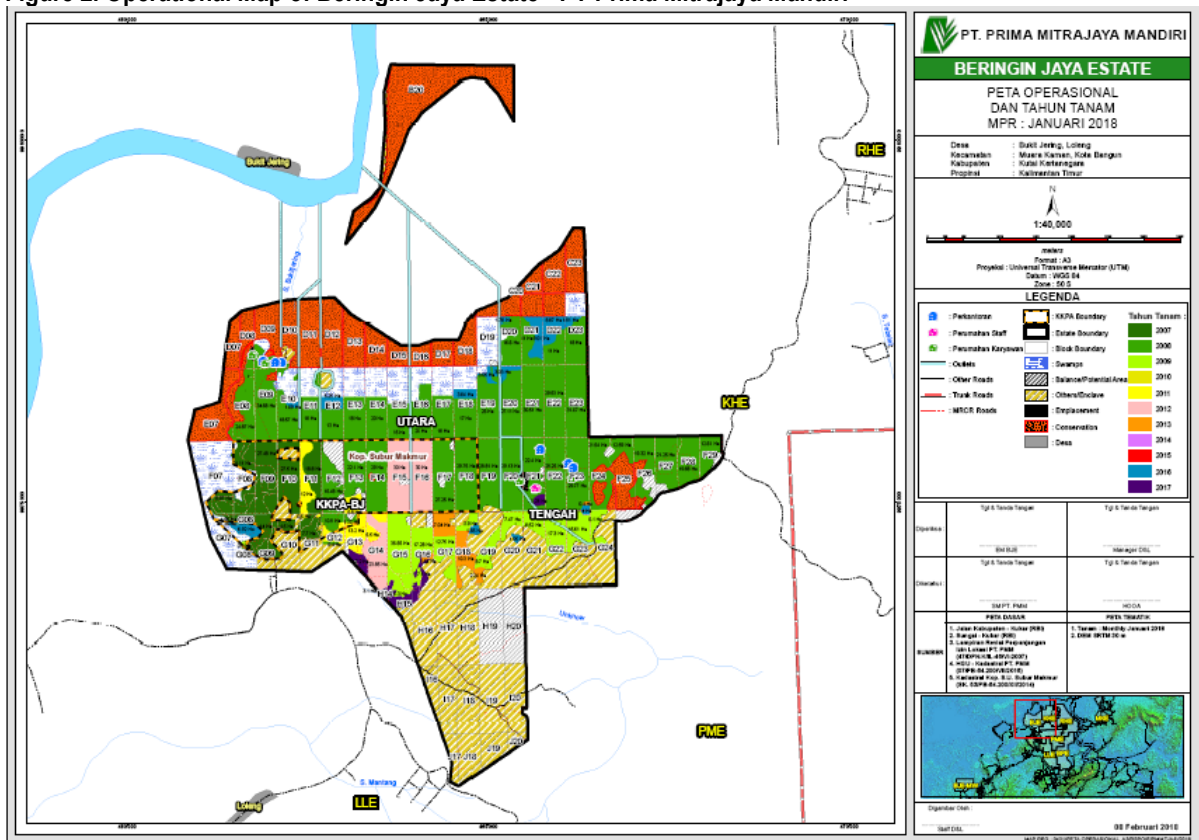


Figure 3. Operational Map of Beringin Jaya Estate, Mawar Division - PT Prima Mitrajaya Mandiri

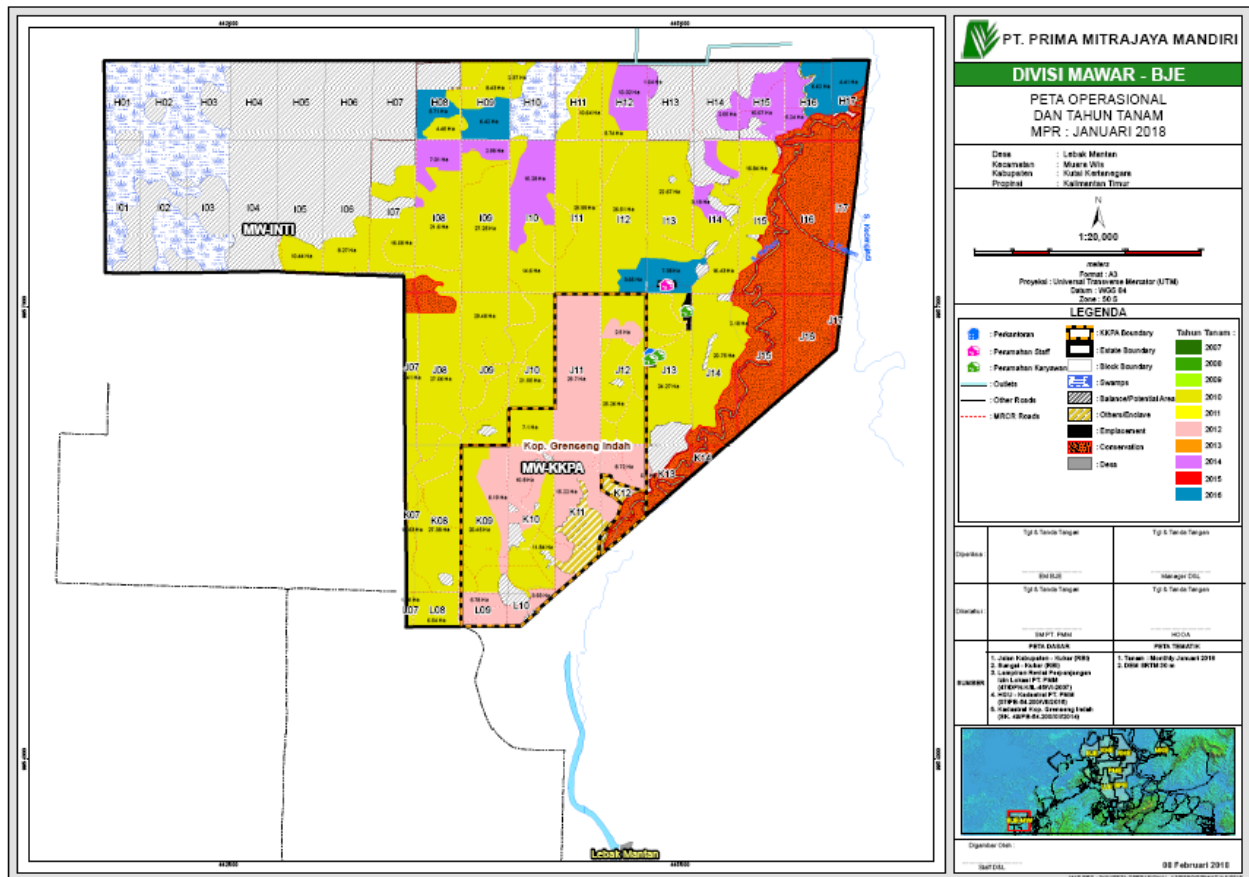


Figure 4. Operational Map of Bumi Permai Estate - PT Prima Mitrajaya Mandiri

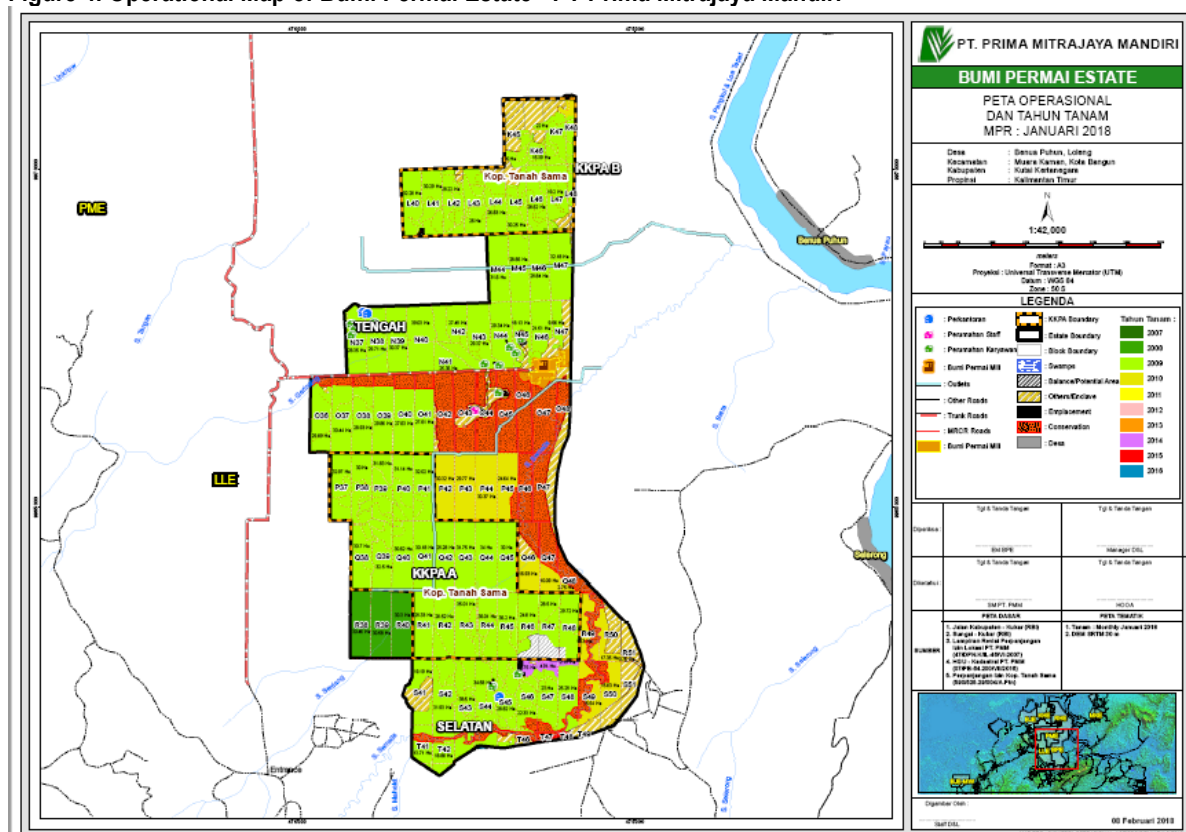


Figure 5. Operational Map of Kahoi Estate - PT Prima Mitrajaya Mandiri

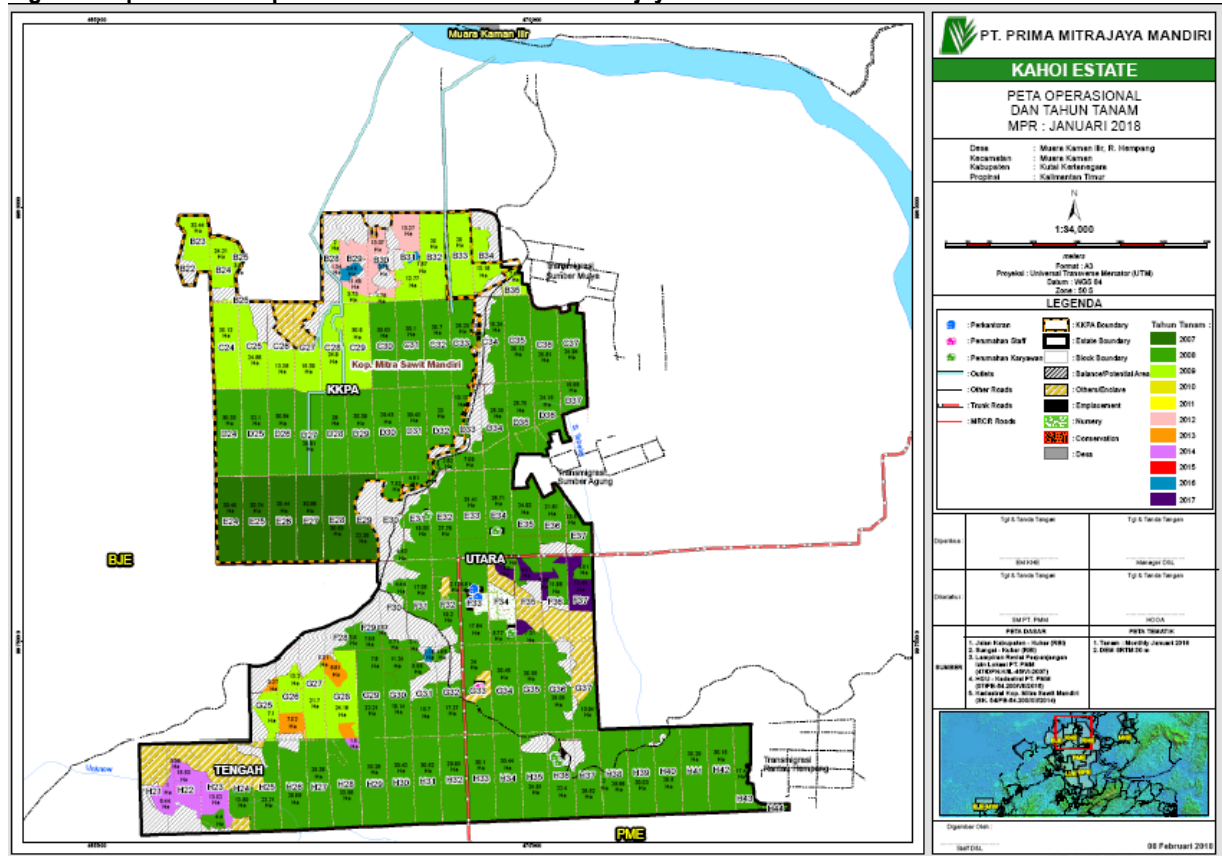


Figure 6. Operational Map of Lembuswana Estate - PT Prima Mitrajaya Mandiri

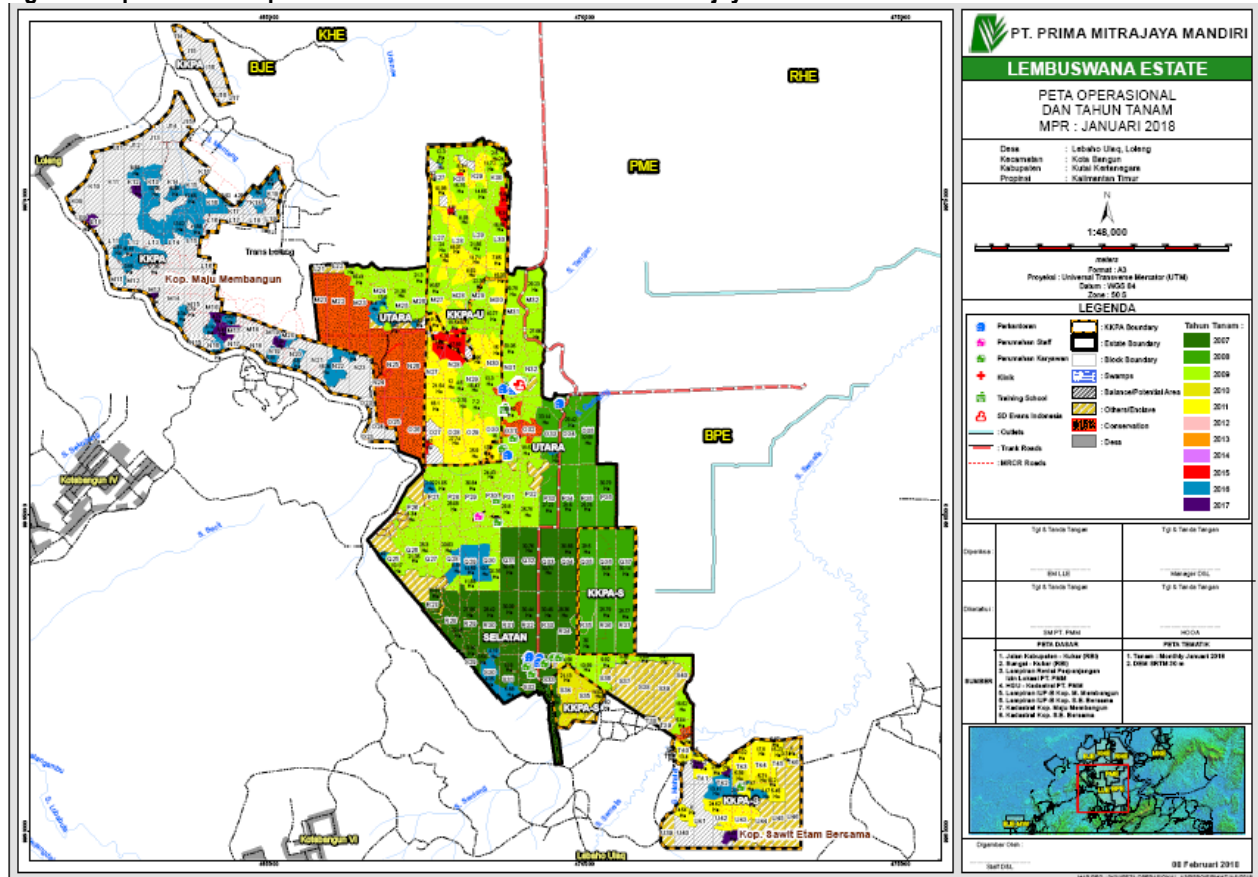


Figure 7. Operational Map of Prima Estate - PT Prima Mitrajaya Mandiri

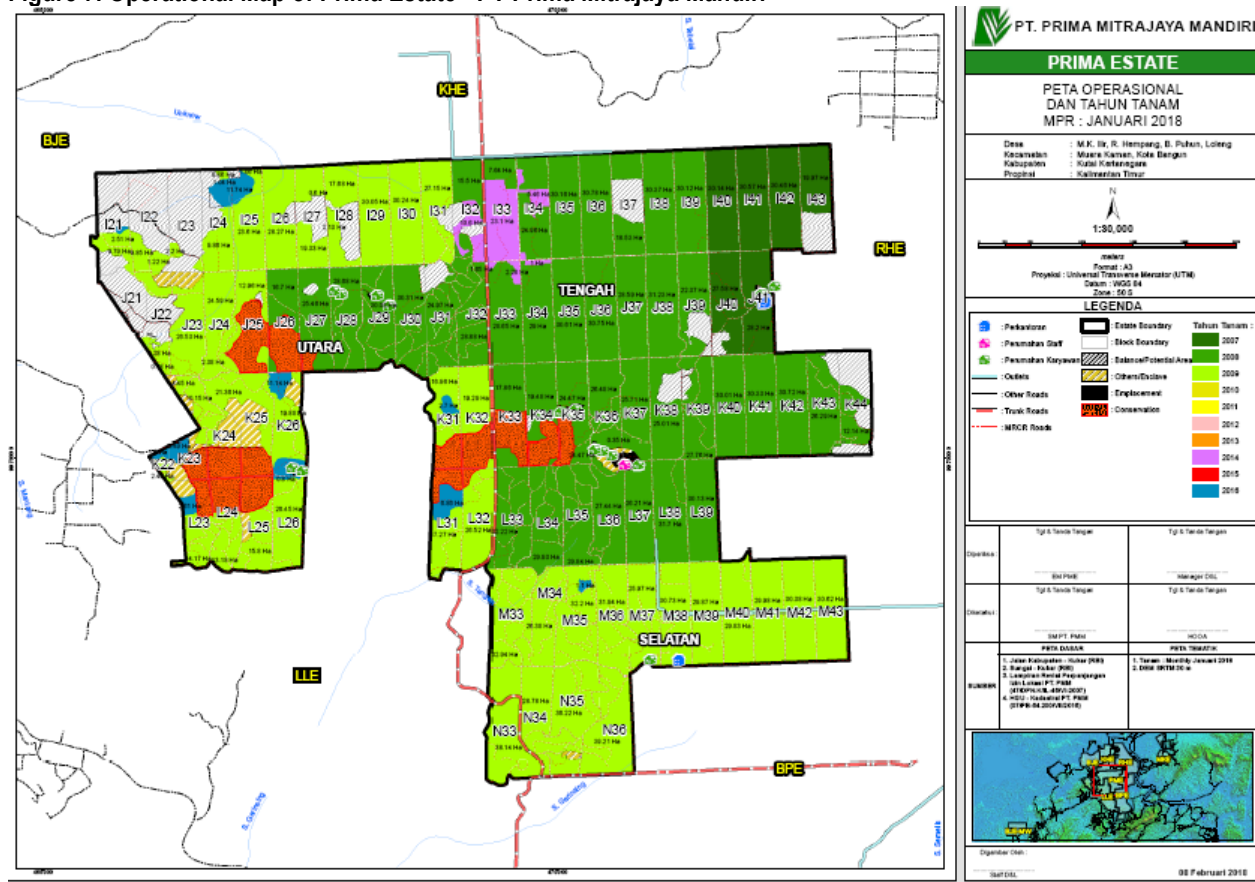


Figure 8. Operational Map of Rahayu Estate - PT Teguh Jayaprima Abadi

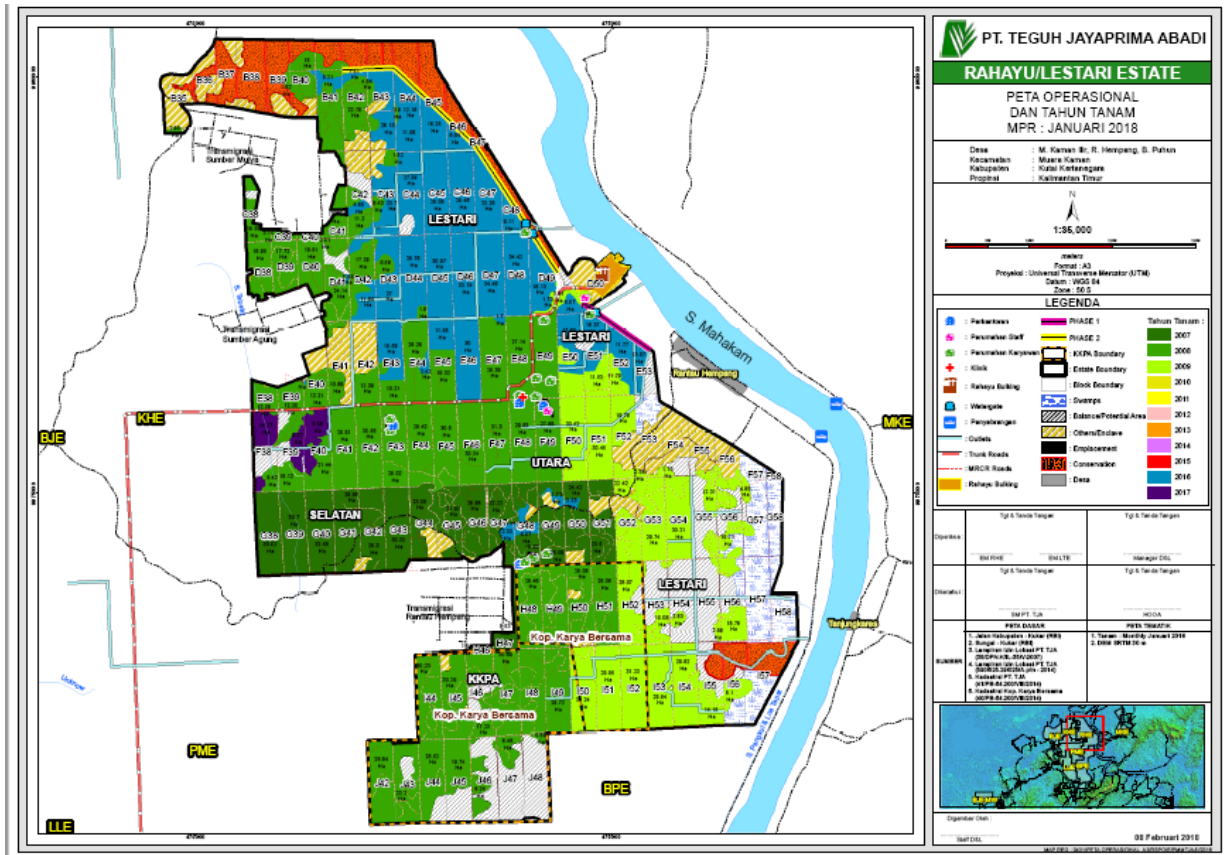
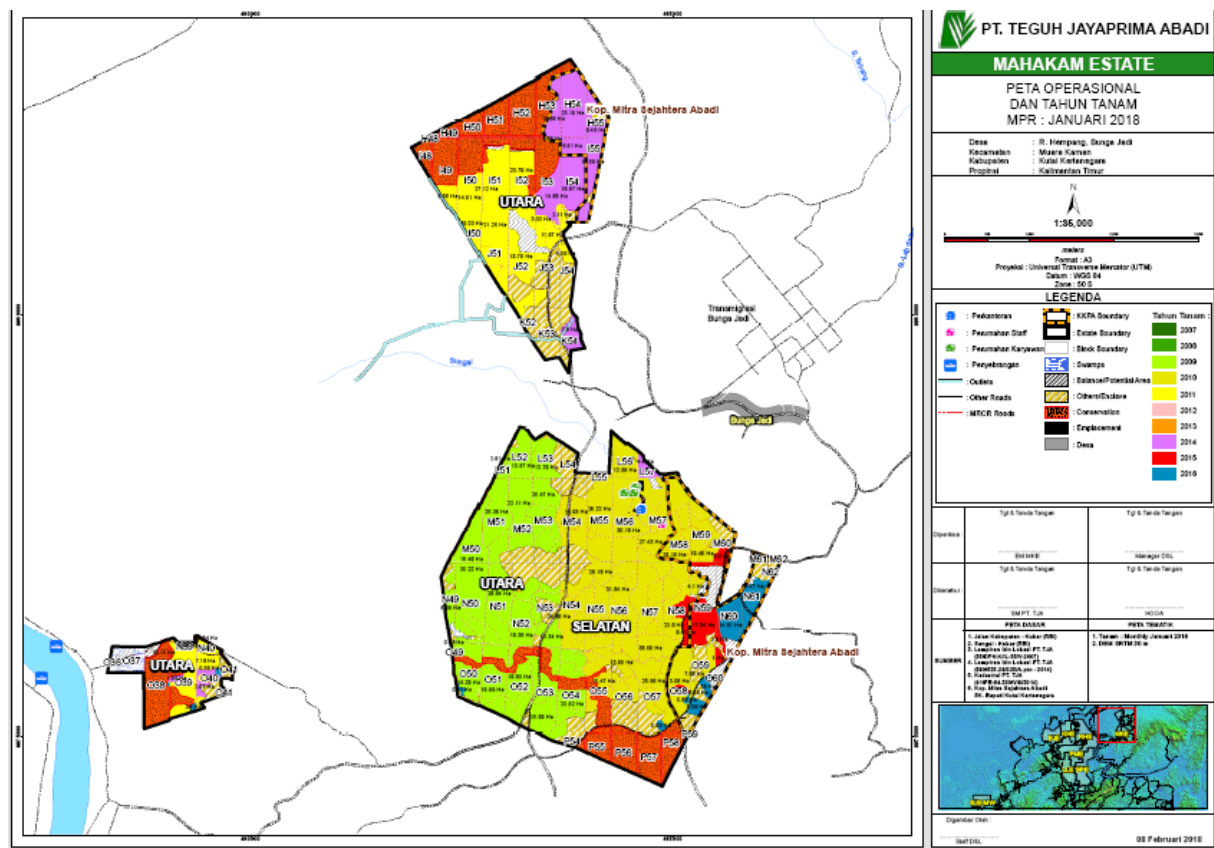


Figure 9. Operational Map of Mahakam Estate – PT Teguh Jayaprima Abadi



Abbreviations Used

ASA	:	Annual Surveillance Assessment
BJE	:	Beringin Jaya Estate
BKSDA	:	<i>Badan Konservasi Sumber Daya Alam</i>
BPE	:	Bumi Permai Estate
BPJS	:	<i>Badan Pelayanan Jaminan Sosial</i>
CH	:	Certificate Holder
CLA	:	<i>Collective Labor Agreement</i>
CPO	:	Crude palm oil
CSPK	:	Certified Sustainable Palm Kernel
CSPO	:	Certified Sustainable Palm Oil
CSR	:	Corporate social responsibility
EFB	:	Empty Fruit Bunch
EIA	:	Environmental Impact Assessment
EHS	:	Environmental Health & Safety
FFB	:	Fresh Fruit Bunch
FGD	:	Forum Group Discussion
FMIS	:	Financial Management Information System
FR	:	Frequency Rate
GCOHS	:	Guiding Committee of Occupational Health & Safety
GHG	:	Green-house Gas
HCV	:	High conservation value
HGU	:	<i>Hak Guna Usaha</i> (Land Use Title)
HRD	:	Human Resources Department
ILO	:	International Labour Organization
ISCC	:	International Sustainability & Carbon Certification
ISPO	:	Indonesian Sustainable Palm Oil
ISO	:	International Standard Organization
IPM	:	Integrated Pest Management
IU	:	Immature Upkeep
KEPMENAKERTRANS	:	<i>Keputusan Menteri Tenaga Kerja & Transmigrasi</i> (Decision of Labor Agency).
KER	:	Kernel Extraction Rate
KHE	:	Kahoi Estate
KSU	:	Koperasi Serba Usaha (<i>Cooperative</i>)
KTP	:	<i>Kartu Tanda Penduduk</i> (ID Card)
KUD	:	<i>Koperasi Unit Desa</i> (Cooperative of Village)
LD50	:	Lethal Dosage 50
LTA	:	Lost Time Accident
MKE	:	Mahakam Estate
MSDS	:	Material Safety Data Sheet
MU	:	Mature Upkeep
NGO	:	Non-Government Organization
NPP	:	New Planting Procedure
LLE	:	Loleng Estate
LSU	:	Leaf Sampling Unit
OER	:	Oil Extraction Rate
OFI	:	Opportunity for Improvement
OHS	:	Occupational Health & Safety
P2K3	:	<i>Panitia Pembina Keselamatan & Kesehatan Kerja</i> (Committee of OHS)
PIC	:	Person In Charge
PK	:	Palm Kernel
PKWT	:	<i>Perjanjian Kerja Waktu Tertentu</i> (<i>Contract workers</i>)

PME	:	Prima Estate
POM	:	Palm Oil Mill
POME	:	Palm Oil Mill Effluent
PPE	:	Personal Protective Equipment
PT KAJ	:	PT Kutai Agro Jaya
PT PMM	:	PT Prima Mitrajaya Mandiri
PT TJA	:	PT Teguh Jayaprima Abadi
RHE	:	Rahayu Estate
RKL-RPL	:	<i>Rencana Kelola Lingkungan – Rencana Pantau Lingkungan</i> (Environmental Management & Monitoring Plan)
RSPO	:	Roundtable on Sustainable Palm Oil
RTE	:	Rare, Threatened, and Endangered
SCCS	:	Supply Chain Certification Standard
SIA	:	Social Impact Assessment
SOP	:	Standard Operation Procedure
SSU	:	Soil Sampling Unit
WTP	:	Water Treatment Plant
WWTP	:	Waste Water Treat Plant

1.0	SCOPE of the CERTIFICATION ASSESSMENT		
1.1	Assessment Standard Used	<ul style="list-style-type: none">Principles and Criteria for Sustainable Palm Oil Production 2018, The Indonesia National Interpretation, Endorsed by the RSPO Board of Governors on 20 April 2020.RSPO Certification System for Principles and Criteria, 14 June 2017	
1.2	Organisation Information		
1.2.1	Organization name listed in the certificate	PT PRIMA MITRAJAYA MANDIRI, PT TEGUH JAYAPRIMA ABADI – MP EVANS GROUP PLC.	
1.2.2	Contact person	Arvind Devadasan	
1.2.3	Organisation address and site address	RSPO registered company: Gedung Graha Aktiva Lt. 10, Jl. HR Rasuna Said Kav. 03 Blok X-1, Kuningan, Jakarta Selatan.	
1.2.4	Telephone	021-52920338	
1.2.5	Fax	021-52920339	
1.2.6	E-mail	arvind@mpevans.co.uk	
1.2.7	Web page address	www.mpevans.co.uk	
1.2.8	Management Representative who completed the application for certification	Sivabalan Subbiah (Head of Operation Agronomy Kaltim)	
1.2.9	Registered as RSPO member	1-0027-06-000-00 dated 08 October 2006.	
1.3	Type of Assessment		
1.3.1	Scope of Assessment and Number of Management Unit	<ul style="list-style-type: none">PT PRIMA MITRAJAYA MANDIRI (Bumi Permai Mill, Beringin Jaya Estate, Kahoi Estate, Lembuswana Estate, Bumi Permai Estate; Prima Estate);PT TEGUH JAYAPRIMA ABADI (Rahayu Estate and Mahakam 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
	Bumi Permai Mill	Benua Puhun Village, Muara Kaman Sub-District, Kutai Kartanegara District, Kalimantan Timur Province, Indonesia.	S 00° 17' 45"E 116° 45' 40"
1.4.2	Location of Certification Scope of Supply Base		
	Name of Supply Base	Location	Coordinate
			LatitudeLongitude
	PT PMM		
	Beringin Jaya Estate	Bukit Jering and Lebak Mantan Village, Muara Kaman Sub-District, Kutai Kartanegara District, Kalimantan Timur Province, Indonesia	S 00° 13' 04"E 116° 41' 20"
	Kahoi Estate	Muara Kaman Hilir Village, Muara Kaman	S 00° 12' 14"E 116° 42' 54"

	Sub-District, Kutai Kartanegara District, Kalimantan Timur Province, Indonesia		
Lembuswana Estate	Loleng and Lebaho Ulak Village, Muara Kaman Sub-District, Kutai Kartanegara District, Kalimantan Timur Province, Indonesia	S 00° 15' 50"	E 116° 41' 24"
Bumi Permai Estate	Benua Puhun Village, Muara Kaman Sub-District, Kutai Kartanegara District, Kalimantan Timur Province, Indonesia	S 00° 17' 21"	E 116° 44' 27"
Prima Estate	Loleng Village, Muara Kaman Sub-District, Kutai Kartanegara District, Kalimantan Timur Province, Indonesia	S 00° 16' 15"	E 116° 44' 02"
PT TJA			
Rahayu Estate	Rantau Hemplang Village, Muara Kaman Sub-District, Kutai Kartanegara Districts, Kalimantan Timur Province, Indonesia	S 00°13' 01"	E 116° 46' 09"
Mahakam Estate	Bunga Jadi Village, Muara Kaman Sub-District, Kutai Kartanegara District, Kalimantan Timur Province, Indonesia	S 00° 12' 03"	E 116° 52' 03"

1.5 Description of Area Statement

1.5.1	Tenure	
	• State	20,507.30 ha
	• Community	ha
	Note: TOTAL HGU + HGB PT PMM: 13,122.79 ha; HGU on progress: 7,384.51 ha	

1.5.2 Area Statement

		PT PMM & PT TJA	Smallholders	Total
• Total area		15,716.10	4,790.66	20,506.76 ha
• Mature area		10,512.42	3,932.54	14,444.96 ha
• Immature area		-	4.00	4.00 ha
• Mill		37.54	-	37.54 ha
• Infrastructure (emplacement (housing), road, office, buildings, drainage and basin		516.62	144.40	661.02 ha
• Occupation		2,798.43	709.72	3,508.15 ha
• HCV		1,851.09	-	1,851.09 ha

1.6 Planting Year and Cycles

1.6.1	Age profile of planting year										
	PT PMM										
	Planting Year	Hectarage (Ha)									
		BJE		KHE		LLE		BPE		PME	Total
		Own Estate	Small holder	Own Estate	Small holder	Own Estate	Small holder	Own Estate	Small holder	Own Estate	
	2007	-	137.38	-	175.37	395.17	-	-	-	166.92	874.84
	2008	664.49	136.75	1,299.75	408.31	212.52	180.00	91.34	-	1,122.49	4,115.65
2009	134.78	-	82.47	319.42	572.38	264.29	841.39	967.11	972.62	4,154.46	
2010	421.64	64.65	-	-	-	-	212.64	-	-	698.93	
2011	-	43.50	-	-	-	262.11	-	-	-	305.61	

2012	-	168.79	-	40.41	-	-	-	-	-	209.20
2013	21.52	-	-	-	-	-	-	-	-	21.52
2014	57.37	-	-	-	-	-	10.85	-	-	68.22
2015	-	-	-	-	-	42.24	-	-	-	42.24
2016	83.04	-	-	5.88	64.20	-	4.80	-	42.97	200.89
2017	25.93	-	24.78	-	-	-	-	-	-	50.71
Total	1,408.77	551.07	1,407.00	949.39	1,244.27	748.64	1,161.02	967.11	2,305.00	10,742.27

PT TJA

Planting Year	Hectarage (Ha)				
	RHE		MKE		Total
	Own Estate	Smallholder	Own Estate	Smallholder	
2007	378.82	-	-	-	378.82
2008	748.72	394.77	-	-	1,143.49
2009	360.72	122.49	321.82	-	805.03
2010	-	-	319.77	65.65	385.42
2011	-	-	214.74	-	214.74
2014	-	-	-	59.98	59.98
2015	-	-	-	39.94	39.94
2016	606.61	-	4.96	33.50	645.07
2017	30.20	-	-	-	30.20
Mature	2,125.07	517.26	861.29	199.07	3,702.69
2018	-	-	-	4.00	4.00
Immature	-	-	-	4.00	4.00
Total	2,125.07	517.26	861.29	203.07	3,706.69

1.6.2 New Planting area after January 2010 1,162.77 ha

1.6.3 Planting Cycle 1st Cycle

1.7 Description of Mill and Supply Base
1.7.1 Description of Mill

Name of Mill	Capacity (tonnes/ hour)	FFB Processed (tonnes/year)	CPO		Palm Kernel	
			Out put (tonnes)	Extraction (%)	Out put (tonnes)	Extraction (%)
Bumi Permai	60	370,661.92	90,009.06	24.28	18,549.93	5.00

**Production data source from September 2019 until August 2020.*

1.7.2 Description of Certification Scope of Supply Base

Name		Total (ha)	Production Area (Ha)	FFB Production	Yield (tonnes/ha/ year)
PT PRIMA MITRAJAYA MANDIRI					
Beringin Jaya Estate	Own Estate	3,228.93	1,408.77	23,508.97	17.00
	Koperasi Subur Makmur (399 SH)	618.07	551.07	11,107.33	20.16
	Koperasi Grenseng Indah (90 SH)				

Kahoi Estate	Own Estate	1,748.97	1,407.00	29,703.15	21.49
	Koperasi Mitra Sawit Mandiri (1,087 SH)	1,106.97	949.39	18,820.72	19.82
Lembuswana Estate	Own Estate	1,832.83	1,244.27	23,420.82	18.82
	Koperasi Maju Membangun (1,184 SH)	805.85	748.64	18,489.83	24.70
	Koperasi Sawit Etam Bersama (612 SH)				
Bumi Permai Estate	Own Estate	1,750.25	1,161.02	19,379.45	16.69
	Koperasi Tanah Sama (652 SH)	1,365.19	967.11	23,803.52	24.61
Prima Estate	Own Estate	2,851.16	2,305.00	48,507.27	21.04
PT TEGUH JAYAPRIMA ABADI					
Rahayu Estate	Own Estate	2,944.78	2,125.07	25,851.22	12.34
	Koperasi Karya Bersama (815 SH)	658.58	517.26	8,832.14	17.07
Mahakam	Own Estate	1,359.18	861.29	14,304.36	16.61
	Koperasi Mitra Sejahtera Abadi (151 SH)	236.00	199.07	1,566.02	7.87
TOTAL		20,506.76	14,444.96	267,294.80	18.61
*Production data source from September 2019 until August 2020.					
1.7.3	FFB description from other source				
	Name of sources/Organisation (RSPO certified / non-certified)	Type of Organisation	Number of smallholders	Supplied to Mill FFB (tonnes/year)	
	Andy Kurniawan-WB	Independent smallholder (Non-certified RSPO)	-	1,869.75	
	PT Budi Duta Agromakmur	(Non-certified RSPO)	-	3,198.27	
	PT Delta Utama Resources	(Non-certified RSPO)	-	4,429.48	
	PT Arus Cipta Eriady	(Non-certified RSPO)	-	3,491.49	
	PT Wong Akeh Utama	(Non-certified RSPO)	-	10,205.78	
	Bahrudin	(Non-certified RSPO)	-	11,725.09	
	Rony Wijayanto	(Non-certified RSPO)	-	7,538.14	
	PT Kutai Agro Jaya	Independent Outgrower (Non-certified RSPO)	-	22,518.20	
	PT Jaya Mandiri Sukses	Independent Outgrower (Non-certified RSPO)	-	3,623.67	
	PT Putra Bongan Jaya	Independent Outgrower (Non-certified RSPO)	-	34,534.78	
	TOTAL			103,134.65	
	*Production data source from September 2019 until August 2020.				
1.7.4	Product categories		FFB, CPO, PK		
1.8	Tonnage of Product				
1.8.1	Past Annual Claim Certified Product		Previous Certificate Claim 26 June 2019 to 25 June 2020 (tonnes/year)		Actual certified product 01 Sep 2018 to 31 Aug 2020 (tonnes/year)
	• FFB Production		287,739		267,294.80
	• CPO Production		68,280		65,236.84
	• Palm Kernel (PK) Production		14,387		13,483.06

1.8.2	Product selling							
	Tonnage of selling product			Period of actual selling product 01 Sep 2018 to 31 Aug 2020 (mt)				
	• CSPO sold as RSPO certified product			-				
	• CSPK sold as RSPO certified product			6,434				
	• CSPO sold under other scheme (ISCC)			64,793				
	• CSPK sold under other scheme			-				
	• CSPO sold as conventional			-				
	• CSPK sold as conventional			3,264.78				
1.8.3	Estimate of Certified FFB Claim							
	Name		Total (ha)	Production (ha)	FFB Production (ton)	Yield (tones/ha/ year)		
	PT Prima Mitrajaya Mandiri							
	Beringin Jaya Estate	Own Estate	3,228.93	1,408.77	25,000	18.08		
		Koperasi Subur Makmur (399)	618.07	551.07	11,600	22.42		
		Koperasi Grenseng Indah (90)						
	Kahoi Estate	Own Estate	1,748.97	1,407.00	30,000	21.70		
		Koperasi Mitra Sawit Mandiri (1,087)	1,106.97	949.39	20,000	21.07		
	Lembuswana Estate	Own Estate	1,832.83	1,244.27	24,000	19.29		
		Koperasi Maju Membangun (1,184)	805.85	748.64	18,000	29.12		
		Koperasi Sawit Etam Bersama (612)						
	Bumi Permai Estate	Own Estate	1,750.25	1,161.02	21,000	18.09		
		Koperasi Tanah Sama (652)	1,365.19	967.11	25,000	25.85		
	Prima Estate	Own Estate	2,851.16	2,305.00	50,000	21.69		
	PT Teguh Jayaprima Abadi							
	Rahayu Estate	Own Estate	2,944.78	2,125.07	26,000	12.41		
		Koperasi Karya Bersama (815)	658.58	517.26	10,000	19.33		
	Mahakam	Own Estate	1,359.18	861.29	17,000	19.74		
		Koperasi Mitra Sejahtera Abadi (151)	236.00	199.07	2,400	12.06		
	Total Own Estate		15,716.10	10,512.42	193,000	18.71		
	Total Smallholders		4,790.66	3,932.54	87,000	22.67		
	Total		20,506.76	14,444.96	280,000	19.49		
	*Projected FFB production for 26 June 2020 to 25 June 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 (%)	
	Bumi Permai	60	280,000	70,000	25.00	15,000	5.36	MB
*Projected CSPO and CSPK production for 26 June 2020 to 25 June 2021								
1.9	Other Certifications							
	ISCC			EU-ISCC-CERT-DE119-62175724 (by ASG CERT)				
	Others			ISPO				
1.10	Time Bound Plan							
1.10.1	Time Bound Plan for Other Management Units							

Management Unit		Estate (Supply Base)	Time Bound Plan	Location	Status
MILL	Time Bound Plan				
Pangkatan	2012	Pangkatan Estate (PT Pangkatan Indonesia)	2012	Labuhanbatu, North Sumatera	Certified
		Sennah Estate (PT Sembada Sennah Maju)	2012	Labuhanbatu, North Sumatera	Certified
		Bilah Estate (PT Bilah Plantindo)	2012	Labuhanbatu, North Sumatera	Certified
		Pangkatan Palm Oil Mill	2012	Labuhanbatu, North Sumatera	Certified
Bumi Permai	2013	Bumi Permai Palm Oil Mill	2013	East Kutai, East Kalimantan	Certified
		PT Prima Mitrajaya Mandiri	2013	East Kutai, East Kalimantan	Certified
		Koperasi Subur Makmur	2013	East Kutai, East Kalimantan	Certified
		Koperasi Sawit Etam Bersama	2013	East Kutai, East Kalimantan	Certified
		Koperasi Tanah Sama	2013	East Kutai, East Kalimantan	Certified
		Koperasi Mitra Sawit Mandiri	2013	East Kutai, East Kalimantan	Certified
		Koperasi Grenseng Indah	2013	East Kutai, East Kalimantan	Certified
		Koperasi Maju Membangun	2013	East Kutai, East Kalimantan	Certified
		Koperasi Sawit Etam Bersama – Tahap II	2024	East Kutai, East Kalimantan	Non-Certified (process HGU)
		Koperasi Maju Membangun – Tahap II	2024	East Kutai, East Kalimantan	Non-Certified (process HGU)
		Koperasi Tanah Sama – Tahap II	2024	East Kutai, East Kalimantan	Non-Certified (process HGU)
		PT Teguh Jayaprima Abadi	2013	East Kutai, East Kalimantan	Certified
		Rahayu Estate	2013	East Kutai, East Kalimantan	Certified
		Mahakam Estate	2013	East Kutai, East Kalimantan	Certified
		Koperasi Karya Bersama	2013	East Kutai, East Kalimantan	Certified
		Koperasi Mitra Sejahtera Abadi	2013	East Kutai, East Kalimantan	Certified
Rahayu or Rantau Hempang	2021	Rahayu Mill PT Teguh Jayaprima Abadi	2021		Non-Certified (commissioning 2020)
	2013	Rahayu Estate PT PJA	2013	East Kutai, East Kalimantan	Certified (currently supply FFB to
		Mahakam Estate PT TJA	2013	East Kutai, East Kalimantan	

		Koperasi Karya Bersama	2013	East Kutai, East Kalimantan	Bumi Permai Mill)
		Koperasi Mitra Sejahtera Abadi	2013	East Kutai, East Kalimantan	
	-	2023	PT Bumi Mas Agro	Kalimantan	Non-Certified (currently send FFB to outsider mill)
			Koperasi Dugai Jaya Mandiri	Kalimantan	
			Koperasi Maruangan Sejahtera Mandiri	Kalimantan	
			Koperasi Jaya Harapan Bersama	Kalimantan	
	Tengkalat	2017	PT Gunung Pelawan Lestari	Bangka	Certified
			Tengkalat Palm Oil Mill	Bangka	Certified
			Koperasi Ikhtiar Sejahtera	Bangka	Certified
			Koperasi Silip Lestari	Bangka	Certified
			Koperasi Mapur Mandiri	Bangka	Certified
			Koperasi Gunung Muda Sejahtera	Bangka	Certified
	-	2023	PT Evans Lestari	Musirawas, South Sumatera	Currently FFB delivered to outside mill
	-	2023	PT Simpang Kiri Plantation Indonesia	Aceh	Currently FFB delivered to outside mill
	Note: TBP approved by Evans Group on 17 September 2020				
1.10.2	Progress of Associated Smallholders and Out growers for Certifiable Standard				
	Smallholder under PT PMM (Koperasi Sawit Etam Bersama – Tahap II, Koperasi Maju Membangun – Tahap II, Koperasi Tanah Sama – Tahap II) currently is in progress of land use title issuance.				

2.0	ASSESSMENT PROCESS
2.1	Assessment Team
ASA-1.1	<p>Onsite Audit Team</p> <ol style="list-style-type: none"> Mohamad Amarullah (Lead Auditor). Indonesian Citizen. Master of Wood Science and Technology from UPM Malaysia and Bachelor of Forestry from IPB University Indonesia, with major in Forest Product Technology. Has experiences as Agronomist and Research Assistant in Indonesia and Malaysia from 2008 to 2014, and very good in conducting RSPO, MSPO and ISPO audit scheme since 2014 on any aspect. Has attended several trainings such as Lead Auditor of ISPO, RSPO, RSPO Supply Chain, ISO 17021, ISO 17065, ISO 9001, ISO 19001, ISO 14001, SA 8000, HCV, life cycle analysis, etc. Fluent in Malay and English. During this Surveillance-1.1 assessment has verify legal, social, OSH and worker welfare. Hasiholan Sihombing (Lead Auditor). Indonesian citizen. Bachelor of Agriculture Majoring in Agronomy, Agriculture Faculty. He has working experienced for 7 (seven) years since 2009 as an Operational Staff in an Oil Palm Plantation Company in Indonesia. The training he has followed namely: Lead Auditor ISPO, RSPO P&C Lead Auditor Course, RSPO Supply Chain Certification Lead Auditor Course, SA 8000 Awareness, Quality Management Systems (ISO 9001:2015), Environmental Management Systems (ISO 14001:2015), OHS General Expert, OHSAS 18001:2007, ISO 19011:2018, ISO 17021:2011 and ISO 17065:2012. During this audit, he assigned to verify BMP, longterm management plan and supply chain aspect. Sansan Suhendar (Auditor), Indonesian citizen, graduated in 2008 from the Department of Forest Product Technology, Faculty of Forestry, Bogor Agricultural Institute. He has experience as a Health, Safety and Environment (HSE Officer) Assistant at the Astra Agro Lestari Group (2010-2016) including PT Sumber Kharisma Persada (2010-2015) and PT Sari Aditya Loka 1 (2015-2016). Have experience in implementing sustainable palm oil management systems (ISPO), implementing occupational safety and health management systems, environmental management, managing areas with high conservation value, and implementing food safety management systems (HACCP) in palm oil mills. He has experience as an ISPO, RSPO auditor and as a Technical Expert for auditing ISO 45001 and ISO 14001 in the Forestry sector when he joined PT SAI Global Indonesia from November 2017 to February 2020. The training that has been attended is: OHS Expert in 2011, High Conservation Value Forest / Area (HCVF / HCVA) in 2012, Food Safety (Hazard Analysis Critical Control Point) HACCP in 2013, ISPO batch 14 with No. certificate 670A / TU.010 / E-ISPO / 12/2014 in 2014, RSPO with no. certificate SS-RSPO-P & C-20/07/18 in 2018, Basic, Implementation and Lead Auditor of Quality Management System (ISO 9001: 2015) in 2018, Occupational Health and Safety Management System (ISO 45001: 2018) in 2019 and Environment Management System (ISO 14001: 2015) in 2020. During this Surveillance-1.1 assessment has verify environment, conservation management and GHG aspects. Putri Oktariani (Observer). Indonesian citizens. Master in Environmental Resources, Faculty of Agriculture. Has experiences as a researcher assistant and laboratory staff in horticultural company. Has attended several trainings such as Lead Auditor of ISO 14001:2015, ISO 9001:2015, IHT in social and worker welfare aspect, and awareness quality management system and safety. During this audit she has observe on OSH and worker welfare verification, supervised by Lead Auditor. <p>Remote Audit Team</p> <ol style="list-style-type: none"> Moh Arif Yusni (Lead Auditor). Indonesian citizen. Bachelor of Agriculture, majoring in Plant Protection. Has experience as an operational staff at a private oil palm plantation company in Indonesia on 2010 to 2012. Has attended several trainings, i.e.: ISO 19011, ISO 9001; ISO 14001, SA 8000, RSPO lead auditor, ISPO lead auditor, OHS expert, OHS auditor based on National Government No. 50/2012, SCCS, etc. Has conducting ISPO, RSPO and MSPO audit as an auditor and lead auditor with expertise on best management practices for estate and mill, legality, worker welfare, safety, social, environment, conservation, transparency, long term economic management plan and supply chain for palm oil mill aspects. During the audit, he verified Legality, Social and SCCS Radytio Puspanjana (Auditor). Indonesian Citizen. Bachelor of agriculture, majoring in Soil Science. Agriculture Faculty. He was working as honorarium Officer at the Riau Province Plantation Agency in the division of huge estate for 1 year. The participated trainings are Survey and Mapping (GIS) Training which was held by National GMIT, ISPO auditor training, ISO 9001/2008 auditor training, ISO 14001/2004 auditor training, IHT Geospatial Information System, IHT High Conservation Value, IHT Environmental Impact Assessment, IHT Green House Gas and RSPO Lead Auditor Course by Checkmark Training. Since 2015 has been following many audits as auditor

	<p>base on Best Management Practice and Environment. Aspect audit: Long term management plan, Environment, HCV, GHG.</p> <p>3. Haikal Ramadhan Kharismansyah (Auditor). Indonesian citizen, Bachelor of Agriculture department of plant and pest disease (Agrotechnology). He has 3 years experiences as an Agronomy Staff in private oil palm plantation in Indonesia. Training which had attended including Basic Management Development Program Agronomy, Integrated Urban Pest Management, Integrated Pest Management, ISO 9001: 2015, Lead Auditor ISPO, Lead Auditor RSPO, ISO 22000, SA 8000, ISO 14000 and SCCS. Has conducting ISPO and RSPO audit with expertise on best management practices, OHS, Worker Welfare, and SCCS. During this audit he verify Best Management Practices, OHS and Worker Welfare</p> <p>4. Asystasya Aishah Silalahi (Auditor). Indonesia Citizen, Bachelor of Economy, Major of Agribusiness, Faculty of Economic and Management. She has one year experience in consultancy. She has followed training such as ISPO Auditor Training, Lead Auditor ISO 9001:2015, OHS General Expert, RSPO lead auditor training course, SCCS, and several in house training related to environmental, BMP, SA 8000. Has been involved in several audit activities since 2016 related to sustainable palm oil certification covering waste management aspect, Social Aspect, Health and Safety Aspect, and Worker Welfare. During this audit, she verify Worker Welfare aspects and OHS aspects.</p>
2.2	Assessment Methodology, Assessment Process and Locations of Assessment
2.2.1	Figure of person days to implement assessment
ASA-1.1	<p>Onsite Audit Number of auditors: 3 Auditors Number of days for ASA-1.1 at site: 4 days Number of working days for ASA-1.1 at site: 12 Working days</p> <p>Remote Audit Number of auditors: 4 Auditors Number of days for Remote audit ASA-1.1: 2 days Number of working days for Remote audit ASA-1.1 document review: 8 Working days</p>
2.2.2	Assessment Process
ASA-1.1	<p>Onsite Audit The assessment was conducted by measuring the sufficiency of implementation with the consistency done by the PT Prima Mitrajaya Mandiri and PT Teguh Jayaprima Abadi (MP Evans Group PLC) to the requirements of Principles and Criteria for Sustainable Palm Oil Production 2018, The Indonesia National Interpretation, Endorsed by the RSPO Board of Governors on 20 April 2020 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. 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). Improvement of findings from <i>main assesment</i> findings were observed by auditors at this ASA-1.1 assessment. All information obtained was recorded in Check List of PT Mutuagung Lestari (MUTU) and part of ASA-1.1.</p> <p>For the assessment program, please find Appendix 2.</p> <p>Remote Audit For this section (Remote Audit RC) The assessment was conducted in One method: document review, aiming to observe the sufficiency of types or substances from required documents. Improvement of findings from resertification findings were observed by auditors at this assessment. All information obtained was recorded in Check List of PT Mutuagung Lestari (MUTU) and part of ASA 1.1. Remote Audit report.</p> <p>The opening meeting was held on 10 July 2020 at 08.30 am through a teleconference (zoom). As for the participants</p>

	<p>who attended the opening meeting included the Estate Manager, Mill Manager, Support Team from sustainability department and other relevant staff. while the closing meeting will take place on 11 July 2020 at 15 pm. attended by the same participants as the opening meeting. Commonly, the audit activities went smoothly with good support from the unit management. The presentation of documents is presented quite well using email or one drive</p>
2.2.3	Locations of Assessment
ASA-1.1	<p>Bumi Permai Mill (15 September 2020)</p> <ul style="list-style-type: none"> • Weigh Bridge Station. Observation and interview with 1 Operator (female), on her understanding towards technical, OSH, manpower, environment and facilities provided by the company. Among technical observed are application of bridge, metrology (calibration) of bridge, as well as separation of RSPO certified and non certified product on the record system (Mill Weigh Bridge Transaction). • Security Gate. Observation and interview with 2 Security Officers, on her understanding towards technical, OSH, manpower, environment and facilities provided by the company. Among technical observed are security checking, recording on FFB-in and CPO or kernel-out and safety of products. • Loading Ramp (7 workers). Observation and interviews with FFB sorting officers regarding work procedures, labour, and OHS. • Sterilizer Station (1 worker). Observation and interview with operator regarding work procedures, OHS and labour aspect. • Press stations (1 worker). Observation and interview with operator regarding work procedures, OHS and labour aspect. • Boiler Station (2 workers). Observation and interviews with operator regarding work procedures, OHS and labour aspect. • Machine House Station (1 worker). Observation and interview with operator regarding work procedures, OHS, and labour aspect. • Kernel stations (1 worker). Observation and interview with operator regarding work procedures, OHS and labour aspect. • Loading Ramp (7 workers). Observation and interview with sortation personnel related to personnel understanding over sortation procedure, the implementation of sortation, fruit criteria, fruit separation with ripeness and rawness criteria. • Sterilizer Station (1 worker). Observation and interview with operator related personnel understanding over the applicable SOP, infrastructure in mill, the implementation of occupational health and safety, medical examination, trainings from company and worker welfare. • Press Station (1 worker). Observation and interview with operator related personnel understanding over the applicable SOP, infrastructure in mill, the implementation of occupational health and safety, medical examination, trainings from company and worker welfare. • Boiler Station (2 workers). Observation and interview with operator related personnel understanding over the applicable SOP, infrastructure in mill, the implementation of occupational health and safety, medical examination, trainings from company and worker welfare. • Engine Room Station (1 worker). Observation and interview with operator related personnel understanding over the applicable SOP, infrastructure in mill, the implementation of occupational health and safety, medical examination, trainings from company and worker welfare. • Kernel Station (1 worker). Observation and interview with operator related personnel understanding over the applicable SOP, infrastructure in mill, the implementation of occupational health and safety, medical examination, trainings from company and worker welfare. • Chemical Warehouse (1 worker). Field observations and interviews related to chemical management, environmental aspects and OSH. • Oil Warehouse (1 worker). Field observations and interviews related to oil management, environmental aspects and OSH. • Hazardous Material Storage (TPS LB3) (1 worker). Field observations and interviews related to the management of hazardous waste, completeness of supporting infrastructure and emergency response in accordance with permits, OSH and environmental aspects. • Workshop (1 worker). Observations and interviews related to environmental aspects, OSH, work procedures, licenses and worker welfare. • Placement of solid waste / Empty Bunch Area. Observations related to compliance with standards for the placement of solid waste such as EFB, shells and fibre produced by mill. • WTP (1 worker). Field observations and interviews related to water management, recording, hazardous materials and hazardous waste management, as well as OSH aspects for workers.

- **WWTP (1 worker).** Observation and interviews related to liquid waste management with potential pollution to the environment, as well as recording the waste applied to the land.
- **Biogas Plant / Methane Capture.** Observations and interviews related to the management of liquid waste which is used to produce methane gas which is used as fuel for electricity generation turbines and the potential for pollution to the environment.
- **Hydrant System (2 Workers).** Hydrant simulation, and interviews related to OSH management and implementation systems in case of emergency.

Lembuswana Estate (16 September 2020)

- **Block O31/32.** Observation on HCV 1 management implementation. The HCV aims to protect *Ulin* tree or Iron Wood (*Eusideroxylon zwageri*).
- **Block O29 Utara KKPA.** Observation on **manual upkeep**, and interview with 1 Foreman and 4 workers (who also **pesticide applicators**), on their understanding towards technical, OSH, manpower, environment, conservation and facilities provided by the company.
- **Block P32.** Observation on supply palms in **terraces areas**, and implementation of **EFB mulching** on immature areas. Dossage applied was 80 kg/palm, divided into two rounds.
- **Block P34/35.** Observation on **Barn Owl House (Gupon)**, harvesting activities and interview with 1 Foreman, 2 Harvesters (male) and 2 Loosefruit Pickers (female), on their understanding towards technical, OSH, manpower, environment, conservation and facilities provided by the company.
- **Block S31.** Observation to Legal Boundary Pole (**BPN Pole**) **No. PMM 041B** where situated in adjacent with secondary forest on Village of Lebahu Ulak. Furthermore there was observation to *Tyto alba* Sanctuary.
- **Block R35.** Observation to **BPN Pole No. PLM LLQ 010 Plasma** where situated in adjacent wit Smallholder Cooperative of Sawit Etam.
- **Chemical and fertilizer storage (2 workers).** Observation and interview regarding management chemical and fertilizer, work procedures, OHS, and labour aspect.
- **Housing complex.** Observation for workers facilities, waste management, and OSH.
- **Clinic (2 paramedics).** Observation for workers facilities, infectious waste management, and interview regarding OSH and labour aspect
- **Elementary school (2 workers).** Observation for workers facilities and interview regarding labour aspect.

Bumi Permai Estate:

- **Bumi Permai Estate Office (4 Pesticide Applicators).** Observation on safe working practices and interview with the pesticide applicator related type of pesticides use according to the procedure, safe working practices and also worker welfare.
- **Block N38 Division Tengah (3 harvesters).** Observation and interview with harvester related fruit ripeness, safe working practices and also worker welfare.
- **Bumi Permai Estate Office (4 Fertilizer Applicators).** Interview with the fertilizer applicator related type of fertilizer use according to the procedure, safe working practices and also worker welfare.
- **Block M45 Division Tengah (Peat Area).** Observation peat area, water management, water level monitoring, piezometer monitoring and subsiden pole conditions and staff interviews on monitoring techniques.
- **Block L41: HGU Pole No. 06B.** Observation the conditions and position of legal boundary.
- **Block L47: HGU Pole No. 09B.** Observation the conditions and position of legal boundary.
- **Employee emplasment.** Observations and interviews related to employee facilities and domestic waste management facilities.
- **Daycare.** Interviews related to labor aspects for TPA officers and observation of child care facilities.
- **Chemical warehouse.** Observations and interviews related to aspects of OSH, environment and waste management
- **Fertilizer warehouse.** Observations and interviews related to OSH, environment and waste management aspects
- **Workshop.** Observations and interviews related to OSH, waste management and environmental aspects
- **Place to wash and store PPE.** Observations and interviews related to OSH, waste management and environmental aspects
- **Gas tank.** Observations related to OSH, environment and waste management aspects

	<ul style="list-style-type: none"> • Fire facilities Observations related to fire emergency response equipment preparedness • Conservation area (Block O42 and O43). Observation of conservation area management in the form of lowland and small forest areas. <p>Rahayu Estate – PT TJA:</p> <ul style="list-style-type: none"> • Block E48 Division Utara (Barn Owl Nest Observation). To check Barn Owl Nest condition and management of integrated pest control systems conducted by the company. • Block E46 Division Lestari (Peat Area). Observation peat area, water management, water level monitoring, piezometer monitoring and subsiden pole conditions and staff interviews on monitoring techniques. • Block D47 Division Lestari (7 Pesticide Applicators). Observation on safe working practices and interview with the pesticide applicator related type of pesticides use according to the procedure, safe working practices and also worker welfare. • Block F44 Division Utara (4 harvesters). Observation and interview with harvester related fruit ripeness, safe working practices and also worker welfare. • Block G42 Division Selatan (7 Fertilizer Applicators). Interview with the fertilizer applicator related type of fertilizer use according to the procedure, safe working practices and also worker welfare. • Block D50: HGU Pole No. TJA013. Observation the conditions and position of legal boundary. • Block E52: HGU Pole No. TJA014. Observation the conditions and position of legal boundary. <p>Kahoi Estate (15 September 2020):</p> <ul style="list-style-type: none"> • Fire facilities and infrastructure. OHS related observations and fire emergency response • Watch tower. OHS related observations and fire emergency response • KHE Afdelling Charlie Blok 25 boundary markers. Observe the maintenance of company boundary markers
2.3	Stakeholder Consultation and Stakeholders Contacted
2.3.1	Summary of stakeholder consultation process.
ASA-1.1	<p>Summary of stakeholder consultation process</p> <p>Consultation of stakeholders for PT Prima Mitrajaya Mandiri and PT Teguh Jayaprima Abadi was held by:</p> <ul style="list-style-type: none"> • Public announcement by Certification Body in 31 August 2020 • Public consultation meeting with government institution 14 September 2020 • Public consultation meeting with surrounding communities including previous land owner 15 September 2020 • Public consultation meeting with internal stakeholders and contractor 15 September 2020 • Public consultation with NGO through email on 07 September 2020 <p>Numbers of input from stakeholders were clarified by PT Prima Mitrajaya Mandiri and PT Teguh Jayaprima Abadi.</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 conducted eight (8) months to twelve (12) months after 25 June 2021

3.0 ASSESSMENT FINDINGS

3.1 Summary of Assessment Report of the RSPO Certification

MUTUAGUNG LESTARI has conducted an assessment of Bumi Permai POM – PT Prima Mitrajaya Mandiri and PT Teguh Jayaprima Abadi (MP Evans Group PLC) operation consisting of one (1) mill and seven (7) oil palm estates.

During the assessment, there are one (1) Nonconformity was assigned against Major Compliance Indicator and three (3) opportunities for improvement were identified.

Further explanation of the non-conformities raised and corrective actions taken by the company are provided in section 3.5. The company has already prepared and implemented the corrective actions that had been reviewed and accepted by Auditors in form of documentation evidences e.g. (document record/photographic/etc.). Those corrective action taken that consist of one (1) Major non-conformity had been closed out shall be verified during next assessment.

MUTUAGUNG LESTARI found that Bumi Permai POM – PT Prima Mitrajaya Mandiri and PT Teguh Jayaprima Abadi (MP Evans group PLC) complied with the requirements of *Principles and Criteria for Sustainable Palm Oil Production 2018, The Indonesia National Interpretation, Endorsed by the RSPO Board of Governors on 20 April 2020 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	Management has list of transparent and confidential documents for public is recorded in Appendix of Transparency Documents dated 2 January 2016. Types of document which is available to the public such as documents are company policies, job description, SOP's, HCV assessment and management plan, GHG monitoring, hazardous materials monitoring, CSR, Guiding Committee of Occupational Safety & Health, list of stakeholders, internal and external complaints, list of employees, company organization chart, OHS Guiding Committee structure, employee agreement. These documents can be accessed by sending a request to management. The document can be provided with the record not abused and in accordance with its designation.	
1.1.2	According to interview with local communities of PT PMM and PT TJA, Environment Agency, Plantation Agency and Man power Agency of Kutai Kartanegara Regency, it was known that company management is considered cooperative in providing data requested and/or data which presented in periodic compulsory report.	
	The company has demonstrated the inspection of its fire extinguishers according to the BAKORTIBA equipment standard according to Permentan No. 5 of 2018. For equipment that is not yet owned, compliance is planned for the 4th quarter of 2020. At the time of the field visit, the company shown evidence of purchase of four types of fire control equipment on 15 July 2020, consist of several head lamp, fire glasses, mask and leather gloves.	
1.1.3 & 1.1.4	The company has shown procedures regarding information responses listed in SOP No. PMM/SOP / General-02 (Revision 1) dated 16 September 2013 concerning Information Transparency. Procedures are prepared with the aim of creating	

good and harmonious communication between the company and the community. Responses to information requests were made 2 weeks after the letter was received.

The company has conducted consultation and communication procedures with all employees of PT PMM & PT TJA, for example, the socialization of consultation and communication procedures for Bukit Permai Estate on 15 April 2020 85 attendees, Lembuswana Estate on 16 April 2020 9 attendees, Rahayu Estate, on 8 May 2020 24 attendees. The socialization for nearest community conducted on 23 January 2020 for Benua Puhun village, 21 January 2020 for Lebaho Ulaq village and 24 January 2020 for Rantau Hempang.

The company has documented communication with the external in the log book of incoming and outgoing mail. In this document, information about communication is mostly in the form of requests for assistance or donations from community activities around the village. For example, there is an incoming letter 11 February 2020 from nearest company (PT Energy Solusi Borneo) related to information requests for environmental document (RKL-RPL), the company provide the information requested to PT Energy Solusi Borneo on 11 February 2020 support by head mill assistance.

1.1.5

The company has a list of stakeholders that inform the name of the institution / agency, contact person, position, cell phone number, and address for each unit as follows:

The stakeholder list for 2020:

1. Village / Village: 8 stakeholders
2. Society costume: 8 stakeholders
3. Cooperative: 8 stakeholders
4. Police station: 5 stakeholders
5. public health facility: 3 stakeholders
6. Government Services / Agencies: 6 stakeholders
7. Nearest company: 5 stakeholders
8. Youth Organization: 10 stakeholders
9. Supplier: 23 stakeholders
10. Contractors: 40 stakeholders
11. Academic: 3 stakeholders
12. Labor Unions: 2 stakeholders

The company also routinely to submit mandatory reports to the relevant agencies, for example:

- 1st quarter of P2K3 reports of Mill and Plantation submitted to the Manpower agency of East Kalimantan Province on August 5, 2020.
- Online mandatory report of PT Teguh Jayaprima Abadi employees to No. 75123.20200413.0001. Next reporting will be on April 13, 2021

Status: Comply

1.2

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

1.2.1 & 1.2.2

Policy on integrity and ethical behavior in all operational implementation and transactions is recorded document of Anti-bribery and corruption code of conduct dated 29 July 2013. The 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.

This policy has been socialized to the contractor and stakeholders on April 15, 2020 to all workers and stakeholders. This policy is available in *Bahasa*. Dissemination of code of integrity and ethical behavior also disseminated by specific socialization or morning briefing to all level of workers. The system to monitoring compliance and the implementation of the policy and ethical business practice explained on finance internal audit document year 2019, based on that document during year 2019 no infraction to policy and ethical business practice.

Status: Comply

PRINCIPLE #2 OPERATE LEGALLY AND RESPECT RIGHTS
2.1

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

2.1.1
Legal aspect

Unit of certification has able to shows evidence on legal rights for operational activities, as follows:

- Location permit for area covers ± 21,500 ha as shows through Regent of Kutai Kartanegara Decree No. 47/DPN.K/IL-46/VI-2007 dated 26 June 2007.
- Plantation business permit as shows through Regent of Kutai Kartanegara Decree No. 503/50/SK-DISBUN KUKAR/VII/2007 dated 26 July 2007 for oil palm cultivation covers about 21,500 ha, as well as Decree No. 503/002/IUP-P/SK-BUN/XI/2011 dated 8 November 2011 for oil palm mill with processing capacity 60 mt FFB/hour.
- Land Rights as shows through Head of BPN Decree No. 28/HGB/BPN-64/2015 dated 05 August 2015.

Worker Welfare aspect

- Paying workers' wages in accordance with the 2020 Kutai Kartanegara Regency minimum wage.
- Paying overtime in accordance with applicable regulations.
- Issue towards PKWT reporting has verify during remote audit and onsite audit. The implementation of reporting has considered satisfactory, as shows through PWKT report submission during 2019 and 2020.

OSH aspect

Company comply the licenses of operator, for example as shows through several licenses, as follows:

- Boiler operator license No. Ser.5/124/AS.02.00/VIII/2019 valid until 9 August 2024.
- Boiler operator license No. Ser.5/125/AS.02.00/VIII/2019 valid until 9 August 2024.
- Boiler operator license No. Ser.5/162/AS.02.00/VIII/2019 valid until 9 August 2024.
- Dump truck operator license No. Reg. 70210-OPK3-LT/PAA/V/2016 valid until 27 May 2021.
- Tractor operator license No. Ser.5/3508/AS.02.00/VIII/2019 valid until 9 August 2024.
- Engine room operator license No. 5/719/AS.02.00/IX/2019 valid until 9 August 2024. From the verification of this license evidence, it is concluded that the correction of NC during RC assessment has been consistently fulfilled.

The company already has a program to include 3 boiler operators in training for steam aircraft operators from external parties, but due to a letter from the directorate general of labor inspection and OSH advising to postpone all training due to the COVID-19 pandemic, the realization of the plan cannot be realized and the company revised the training program to December 2020. The company has opportunity to ensure implementation of steam aircraft operator training in accordance with a predetermined program. **OFI**

Best Management Practices aspect

- Use pesticides that have been registered and have a marketing authorization in accordance with the regulations
- Use certified palm oil seeds originating from registered seed producers

Environment aspect

The company has shown compliance with regulations, for environmental and social aspect such as:

- Reporting of management and monitoring of environmental impact (RKL/RPL) every semester to Environmental Agency of Kutai District and Kalimantan Timur Province.
- Store hazardous waste in the licensed hazardous warehouse.
- POME to Land application permit.
- Allocate and give community CSR every year.

2.1.2

Unit of certification shows list of Applicable Indonesian Laws and/or Regulations that presented in document of "*Evaluasi Pemenuhan Peraturan*". The document informed type of laws/regulations, as well as its pursuance monitoring. Evaluation is divided into four aspect, as follows:

- Occupational Safety and Health aspect consists of 49 laws/regulations. Monitoring of pursuance shows that 130 points monitored were noted comply and the rest of 85 points were not applicable.
- Environment aspect consists of 64 laws/regulations. Monitoring of pursuance shows that 139 points monitored were noted comply and the rest of 32 points were not applicable.
- Plantation, Forestry and Land Legality aspect consists of 66 laws/regulations. Monitoring of pursuance shows that 222 points monitored were noted comply and the rest of 45 points were not applicable.
- Manpower Aspect consists of 46 laws/regulations. Monitoring of pursuance shows that 230 points monitored were noted comply and the rest of 49 points were not applicable.

The above evaluation has conducted by PIC from Department of Sustainability annually. Last update and evaluation were carried out by the PIC in September 2020. In 2020, there is one new regulation identified, i.e. Circular Letter of Ministry of Manpower No. 03 in 2020 about Labour Protection towards Covid-19 Pandemic.

2.1.3

Unit of certification shows report of BPN Poles Monitoring dated January 2020. The report informed that there were four poles in KHE has missing, i.e No. PMM125B, No. PMM 127B, No. PMM 128B and No. PMM 134B. Installation on new poles on the same location has been carried out in 27 January 2020. Based on observation to BPN Pole No. 06B in Block L41 BPE, Pole No. 09B in Block L47 BPE, Pole No. 18 in Block C25 KHE, Pole No. PMM 041B Block S3L LLE, Pole No. PLM LLO 010 Block R35 LLE, and Pole No. 013 and 014 RHE, it was known that all poles were installed in accordance with BPN coordinate. Furthermore, condition of poles has considered satisfactory. Moreover, based on observation to Pole No. TJA013 in Block D50 and Block TJA014 in Block E52, it was known that poles coordinate were in accordance with BPN Cadastral Map, as verified by estate management during 13-25 July 2019 for whole poles in PT TJA.

Status: Comply

2.2

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

2.2.1

The company shows stakeholders list of PT PMM and TJA consisting of representatives from local communities, indigenous peoples, smallholder cooperatives, police and *Koramil*, hospitals/health facilities, government agencies, company surrounding plantations, suppliers, and contractors. Based on the list, there were 42 contractors working with the company.

2.2.2, 2.2.3

The company shows the example of agreements with FFB and loose fruit transport contractors, No. TJA / RHE / 03/2020/068 between PT TJA and H (individuals) and No. PMM / BPE / 04/2020/042-TRANSPORT TBS between PT PMM and Cooperative. Then company shows one of the implementation of legal compliance, among others payment documentation for contractor worker of Kernel transport and FFB transport for April and June 2020.

The company also shows an example of a work agreement with an external FFB supplier with work agreement No. 23 / MKT-PMM / VIII / 2019 between PT PMM and PT ACE. Article 7 paragraph 4 of the employment agreement states that the parties are obliged to comply with all applicable laws and regulations and codes of conduct relating to prohibition of child labour, anti-slavery and anti-human trafficking that can be applied by the first party from time to time as required, but not limited to Modern Slavery Act 2015.

Based on the document and interview with contractor representative, it is known that they have fulfilled their obligations to workers by paying their BPJS.

Status: Comply

2.3

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

2.3.1

Apart from the plantation / unit itself, the company can show a list of direct FFB suppliers received by the Mill. The company already has traceability data on the origin of this FFB, shown from the Supplier Initial Selection Form which explains the Supplier Information (name of supplier, address, telephone number and line of business); Supplier Assessment

(Coordinate Point of Plantation Location; FFB has a sustainability certificate; Legality Data; Proof of Land Rights to Suppliers' Plantation; Operational Permit or Business Permit.

List of supplier names that can be shown by the company in the form of address / location, land ownership status, operational permit and coordinate points accompanied by a map of the supplier's plantation location. Thus it can be concluded that the Company already has the legality of the FFB received.

2.3.2

In addition to receiving FFB from direct suppliers, the company also receives FFB from indirect suppliers and includes collectors / agents, however the company already has complete information on the origin of FFB such as geolocation information, land ownership status and business permits it has. Some examples of farmers who supply FFB to collectors or agents who supply their FFB to the company are in the names of AK, BD, RW and WA which are complete with addresses, coordinates and land ownership status. Thus, the company can also ensure the legality of FFB from indirect suppliers.

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 Certification Unit has an annual and long-term plan for the year 2020-2024 which informs work plans, production projections, yields, projected financing of all plantation activities, sales projections, projected total revenues and total expenditure. For example in 2024 it is targeted to have a FFB production of 205,124 tons with CPO production of 97,492 tons and PK production of 21,448 tons.

Evaluation of work plans is carried out routinely by the management of both central management and management units. Examples of evaluations carried out in units in the form of Audit Visit Report. The company has shown examples of Audit Visit Reports conducted on 12, 13 and 14 November 2019. The report describes the achievements / results of the work plans that have been carried out.

The company has also presented a Management Review document conducted on 1 February 2020 that discusses the level of achievement of objectives, targets, programs, target evaluations, work plans and others towards the implementation of the sustainability system applied. Smallholder management itself is under the management of the company, so the long-term plan also includes both of the main estate and smallholder.

3.1.2

Based on the distribution of planting years it is known that the age of the oldest plants is 13 years (planting year 2007) so that at least in the next five years the certification unit will not carry out replanting activities. As explained in the procedure, replanting will be considered including when the plant is aged between 25-30 years.

3.1.3

The certification unit has presented a Management Review document conducted on 1 February 2020 that discusses the level of achievement of objectives, targets, programs, evaluation of targets, plans and others for the implementation of the sustainability system applied.

Status: Comply

3.2

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

3.2.1

The company has shown evidence of action plans for continuous improvement including the results of evaluation and monitoring of occupational health and safety performance as well as fire prevention and control. Another action plan for the social and environmental impacts and opportunities that the company has undertaken is by conducting integrated internal audits such as the RSPO, ISPO and ISCC which were carried out under the MP Evans Group sustainability team

from 27 January to 1 February 2020 by producing several findings of non-conformity for Bumi Permai Mill and Rahayu Estate. All non-conformance findings have been fixed with quick fixes, root cause analysis and root cause corrective action. Thus, the Company has implemented evidence of continuous improvement in all major aspects it faces.

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.

Status: Comply

3.3

Operating procedures are appropriately documented, consistently implemented and monitored.

3.3.1

The company has palm oil cultivation and processing procedures (SOP) available in Indonesian. Cultivation procedures regulate activities starting from the stage of land clearing, nursery, planting, maintenance, harvesting, sending FFB to the factory until replanting, while the processing procedure regulates activities starting from the FFB acceptance to testing the product quality. SOP has cover the key processes for example harvesting, transportation, manuring, IPM, GAP, and SCCS.

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

The entire procedure both of plantation and mill has been included of safe working instruction, other than those described in the HIRAC document.

3.3.2 and 3.3.3

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

Scope of inspection as stated in the report is the administration of bank cash, plant inventory, administration of oil palm plantations, and maintenance of oil palm plantations. In addition there are also internal checks on the quality of work as carried out by GM Agronomy Audit whose main focus is on maintenance activities (spray, fertilizer, and pruning) and FFB production. In a summary visit on 12 December 2019, it was mentioned that manuring and upkeep in general were in good condition, including in the production of FFB. Some things need to be improved, for example in IPM implementation (barn owl box multiplication). Furthermore, monitoring on contractor pursuance towards Indonesia Laws and Regulations report has caarried out through Inspection on contractors employee work quality report, RSPO internal audit report and its management review. Those documents mentions above are available.

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

Environmental document.

PT. PMM and PT TJA has adequate environmental document, as described belows:

1. Environmental Impact Assessment (EIA) for Mill, composed in 2010 covering an area of 46,055 ha including Storage Tank and special dock area of 28 ha. Has been approved by Regent Kutai Kartanegara on 13 December 2010.
2. EIA for Estate of PT PMM, made in 2008 covering area of 21,500 ha. Has been approved by the regent Kutai Kartanegara on 24 September 2008.
3. EIA for estate of PT TJA in 2009 covering an area of 13,550 ha, approved by local authorities on 16 March 2009.

Structure and content of those EIA documents in PT PMM and PT TJA have met the requirement and regulations and have been approved by the authorities. Those EIA documents provided evidence of public consultation processes with the interested parties to identify impacts and formulating necessary mitigation measures.

Social Impact Assessment document.

A social impact assessment was done in June 2012, conducted by PT Aksenta Gagas Dinamika and final report prepared in October 2012. In the SIA report document showed enclosed the involvement of the community and employees. Community and employees participative are showed in FGDs attendant list and photograph, questioner document, and direct interviews. There is a list of attendance and documentation of meetings with the surrounding community which involves 94 parties. There is SIA Assessment for Plasma of PT PMM by BIOREF of Forestry Faculty of IPB. It was conducted on March 6th-10th 2017. Public consultation was been held on March 6th 2017.

There is a list of attendees and documentation of FGD meetings with the surrounding community, a list of 94 community resource persons and other attachments stating that the document was prepared by involving the surrounding community. In addition there is evidence in the form of photographs of activities at the time of the meeting with the community.

The results of public consultations with stakeholders, especially with the community around the company, in general the company has carried out the activities planned in the SIA. The response from the surrounding community is that the relationship between the company and the surrounding community is well-established and that the absorption of labour by the company greatly helps improve the economic development of the community.

3.4.2 and 3.4.3

The Implementation of environmental monitoring and management plan are documented on periodical report of environmental monitoring and management implementation report (RKL-RPL) report for PT PMM & PT TJA. The company are consistently done the environmental management and monitoring as outlined in the Report of the Environmental Management and Monitoring per semester regularly. The significant impacts that are managed and monitored based on AMDAL Documents (RKL and RPL) include the new environmental documents. Based on the EIA document, CH has developed an Environmental Management Plan (RKL) as outlined in the matrix of impact management plan:

PT PMM

1. Management and monitoring plan of environmental impacts in mill that includes aspects: work safety, public health problems, noise, ambient air quality, odor, occupational health, public health, emergency, Potential fires and explosions.
2. Management and monitoring plan of environmental impacts in Estate of PT PMM covers: Decrease in water quality, reduction in the number and diversity of aquatic biota, decline in business opportunities for community, disorders of occupational health and safety, ambient air quality, public health, attitudes and perceptions of community.

PT TJA

Implementation report of RKL-RPL in Estate of PT TJA including:

- Decrease in the quality of surface water (Sabiluntung, Mahakam, and lakes around the project)
- The decline in aquatic biota at project site
- The emergence of risk of health problems and accidents
- Quality of ambient air
- Disruptions of traffic
- Disruption of public health
- Impaired occupational health for workers
- The decline in environmental sanitation
- Decrease in ambient air quality
- Noise
- Attitude and positive perception of society
- Quality of HR community
- Employment and business opportunities

The company has shown the RKL-RPL report for the first semester of 2020, the report has discussed the management

and monitoring of several impacts, including: Air quality, occupational safety and health, noise, increased odor, decreased soil fertility, disturbance of aquatic biota, decrease in surface water quality, environmental sanitation, increase in liquid waste, CSR programs (public attitudes & perceptions), emergencies (potential fires and explosions) and public health problems. The report has also been complemented by an evaluation of tendencies, critical levels and compliance.

The company has carried out monitoring of all environmental impacts listed in the environmental management and monitoring matrix, with the result that all measurement parameters still meet the quality standards required in the regulations.

Social impact assessment (SIA) including records of meetings or Forum Group Discussion (FGD) has been documented in Social Assessment Report PT. PMM an PT. TJA. The SIA review was carried out by involving the surrounding community through FGD on January to February 2020. The village communities involved include: Benua Puhun Village, Bukit Jering Village, Lebaho Ulaq Village, Lebak Mantan Village, Muara Kaman Hilir Village, Rantau Hemplang Village and Bunga Jadi Village.

The results of the FGD were written in the form of a management plant SIA for 2018-2020, where the important impacts to be considered included:

- The existence of community-owned oil palm plantations in the Cooperative plasma permit area
- Identify ownership of community land legality during field surveys.
- Coordinating with stakeholders.
- Increasing the socialization of the importance of developing smallholdings for the community, especially members of cooperatives.
- Increase community understanding regarding the positive impact of independent plasma plantations.
- Providing CSR programs in the fields of education, health, infrastructure and community empowerment.
- Conduct health and medical checks on the community.
- Road repair and maintenance.
- Training in community empowerment programs.
- Environmental management program
- Employment aspects.

Unit of certification has consistency evaluate any testing results of parameters beeing checked. This is conformed by auditor during document verification on RKL/RPL semester report.

	Status: Comply	
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	3.5 A system for managing human resources is in place.	
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3.5.1
Procedures related to employee recruitment, promotion, retirement and termination of employment are stated in the company regulations. In company regulations article 5 regarding employee procurement explains that recruitment of employees is tailored to the needs of the company and those accepted as employees must meet the requirements set by the company. The assessment of work performance, class changes, and mutations, and termination of employment are described in article 13. Company regulations are documents that are accessible to the public, so they are available to workers and their representatives.

3.5.2
The company shows documents related to procurement of workers, such as a work agreement letter and a decree of employee appointment. They also show the result of the management assessment as a basis for appointing employees by considering some aspects such as discipline, work quantity, work quality, cooperation, work attitude and responsibility.

	Status: Comply	
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	3.6 An Occupational Health and Safety (H&S) plan is documented, effectively communicated and implemented.	
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3.6.1
The company has a policy of occupational safety and health were written in Bahasa. The policy has been legalized by Top Management. This policy is designed to control hazards in every activity that is in the working environment to prevent

accidents and occupational diseases. Management have work program of occupational health safety every year. Realization of the program of work will be monitored through regular meetings Guiding Committee of Occupational Safety & Health every month. This work program applies generally to all workers in the workplace. If the plans have been made yet on target then will be evaluated in the management review to assess effectiveness.

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

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

3.6.2

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

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

Status: Comply

3.7

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

3.7.1 & 3.7.2

The company shows some training programs for 2020 in order to improve the competence and expertise of all employees. Planned training covers all activities from the best cultivation technique, waste management, to occupational safety and health. The training also involves the contractor. Realization of training for example are awareness of RSPO in RHE dated 25 May 2020 and Contractor OHS Training on 24 April 2020 for PT PMM and 20 April 2020 for PT TJA

Records of training realization are complemented by training locations, presenters, training targets, training dates, training times, training materials, attendance lists and training documentation. Result of interview with workers in the field indicated that they understood the training provided by the company.

3.7.3

Training and socialization were carried out for each division that have critical role in implementation of SCCS. The training was held on 17 April 2020 in the BPM meeting room which was attended by 6 attendees. Further socializations were carried out on 9 June 2020 for security post, 11 June 2020 for FFB grading, 20 June 2020 for Laboratory, 22 June 2020 for weighbridge. Records of socialization accompanied by material and photos of activities.

Status: Comply

3.8

Supply Chain Requirements for Mills

3.8.1 and 3.8.2

Based on Bumi Permai Mill production data for period 2019 to August 2020, as well as observation and interview with Security Officers and Weighbridge Operator, it was known that Bumi Permai Mill has received and process FFB from its 7 (seven) main supply base estates which mentioned in scope of certification, 8 (eight) independent out-growers and 3 (three) independent smallholders. Only the former that has certified by RSPO, consist of 5 and 2 estates from PT PMM

and PT TJA, respectively. Thus, it could be concluded that Bumi Permai mill has claim its RSPO certified products (CPO and PK) from processing of the RSPO certified FFB as Mass Balance (MB).

3.8.3

Estimation of RSPO certified products (CSPO and CSPK) for period 2019/2020 license period is presented in the certificate appendix (annex) and could be accessed through RSPO Palm-trace and this ASA-1.1 report. Record of RSPO certified production and its estimation for the next license period is presented in the following Table:

Certified Product	Last Year Projection	Actual Production	Estimate Production
	26 Jun 2019 to 25 Jun 2020 (mt)	01 Sep 2019 to 31 Aug 2020 (mt)	26 Jun 2020 to 25 Jun 2021 (mt)
FFB	287,739	267,294.80	280,000
CSPO	68,280	65,236.84	70,000
CSPK	14,387	13,483.06	15,000

Note:

- OER projection 2019/2020 license 23.71 % vs OER actual 24.41 %;
- KER projection 2019/2020 5.00 % vs KER actual 5.04 %;
- For estimation: FFB increase 4.76 % from actual production 2019/2020, OER 25.00 % and KER 5.36 %.

According to the table above, actual RSPO certified products production of 12 months period was not passed last year projection. However, there were two period of three months extension due to covid-19 situation, as follows:

- Extension date approved on 05 Jun 2020, with type of extension is time of remote audit that scheduled in 09-10 July 2020. Time of license extension was 26 June to 25 September 2020.
- Extension volume approved on 10 July 2020, with type of extension are volume of FFB scheme or associated for 18,900 mt and volume of FFB estates for 48,600 mt; and CSPO for **13,560 mt**. Email of additional CSPO quota request to CB conducted on 08 July 2020.
- Extension volume approved on 06 August 2020, with type of extension are volume of CSPK for **1,851 mt**. Email of additional CSPK quota request to CB conducted on 05 August 2020.
- Extension date approved on 11 September 2020, with type of extension was time of license from 26 September to 25 December 2020.

After Extension balance

Certified Product	Last Year Projection	Actual Production
	26 Jun 2019 to 25 Sep 2020 (mt)	01 Jun 2019 to 31 Aug 2020 (mt)
CSPO	81,840	83,928.77
CSPK	16,238	17,714.97

Based on the Table above, it was known that actual production for 15 months period has bigger than the quota projection (after extension for 3 months). Regarding this matter, unit of certification proposed additional quota that used for second extension (up to 25 December 2020) to the CB through email dated 17 September 2020. Quota proposed were 17,490 mt and 4,630 mt for CSPO and CSPK, respectively.

3.8.4

RSPO IT Platform member registration number for Bumi Permai Mill of PT Prima Mitrajaya Mandiri is RSPO_PO1000001488. Another member information is presented in the following Table.

Member Information	
License ID	CB90989
Start Date	26-09-2019
End Date	25-09-2020
RSPO Membership	1-0027-06-000-00 dated 08 October 2006.

As checked through RSPO Palm-Trace in 14 September 2020, it was known there is number of Certified Sustainable

Palm Oil (CSPO) and Certified Sustainable Palm Kernel (CSPK) sold for period 26 June 2019 to 13 September 2020 are summarized in the following Table:

Certified Product	Last Year Projection (mt)	Remaining Certified Products (mt)	Additional Volume Extension (mt)
CSPO	68,280	9,834.74	13,560
CSPK	14,387	2,192.42	1,851

According to the Table above, it was known that during 26 June 2019 to 13 September 2020, CSPO and CSPK sold were about 72,005.26 mt and 14,045.58 mt, respectively. Detail on RSPO certified products sold on that particular period is presented in the following Tables:

CSPO Sold

Transaction Date	Model	Transaction Type	Volume (mt)	RSPO Credit (mt)	Buyer/Notes
02-09-2020	MB	Removing stock	3,000.25	-	ISCC
24-08-2020	MB	Removing stock	3,000.24	-	ISCC
24-08-2020	MB	Removing stock	3,000.32	-	ISCC
24-08-2020	MB	Removing stock	3,000.41	-	ISCC
25-06-2020	MB	Removing stock	3,000.38	-	ISCC
25-06-2020	MB	Removing stock	3,000.14	-	ISCC
25-06-2020	MB	Removing stock	3,000.19	-	ISCC
25-06-2020	MB	Removing stock	3,000.30	-	ISCC
25-06-2020	MB	Removing stock	3,000.20	-	ISCC
25-06-2020	MB	Removing stock	3,000.05	-	ISCC
25-06-2020	MB	Removing stock	3,000.14	-	ISCC
25-06-2020	MB	Removing stock	3,000.20	-	ISCC
25-06-2020	MB	Removing stock	3,000.08	-	ISCC
25-06-2020	MB	Removing stock	3,000.12	-	ISCC
20-12-2019	MB	Removing stock	3,000.09	-	ISCC
20-12-2019	MB	Removing stock	3,000.27	-	ISCC
20-12-2019	MB	Removing stock	3,000.95	-	ISCC
20-12-2019	MB	Removing stock	3,000.20	-	ISCC
20-12-2019	MB	Removing stock	3,000.18	-	ISCC
20-12-2019	MB	Removing stock	3,000.15	-	ISCC
20-12-2019	MB	Removing stock	3,000.23	-	ISCC
20-12-2019	MB	Removing stock	3,000.07	-	ISCC
20-12-2019	MB	Removing stock	3,000.02	-	ISCC
20-12-2019	MB	Removing stock	3,000.07	-	ISCC
Total			72,005.26	-	-

CSPK Sold

Transaction Date	Model	Transaction Type	Volume (mt)	RSPO Credit (mt)	Buyer/Notes
02-09-2020	MB	Shipping	400.99	-	PT SIP
24-08-2020	MB	Shipping	401.05	-	PT SIP
24-08-2020	MB	Shipping	400.56	-	PT SIP
10-07-2020	MB	Shipping	6,343.00	-	PT SIP
09-07-2020	MB	Shipping	401.09	-	PT SIP
25-06-2020	MB	Shipping	400.51	-	PT SIP
25-06-2020	MB	Shipping	400.71	-	PT SIP
05-05-2020	MB	Shipping	399.26	-	PT SIP
20-04-2020	MB	Shipping	399.83	-	PT SIP
20-04-2020	MB	Shipping	399.97	-	PT SIP
20-04-2020	MB	Shipping	400.31	-	PT SIP

20-04-2020	MB	Shipping	400.14	-	PT SIP
20-04-2020	MB	Shipping	400.17	-	PT SIP
20-04-2020	MB	Shipping	400.67	-	PT SIP
20-04-2020	MB	Shipping	400.21	-	PT SIP
20-04-2020	MB	Shipping	395.66	-	PT SIP
20-12-2019	MB	Shipping	403.87	-	PT SIP
20-12-2019	MB	Shipping	398.66	-	PT SIP
20-12-2019	MB	Shipping	398.86	-	PT SIP
20-12-2019	MB	Shipping	500.06	-	PT SIP
22-08-2019	MB	Shipping	501.54	-	PT SIP
22-08-2019	MB	Shipping	400.92	-	PT SIP
Total			14,045.58	-	-

(Note: PT SIP = PT Sumber Indah Perkasa of SMART)

All transactions has been shown in shipping announcement, for example Shipping Announcement No. TR-3a4a15b8-69b9 dated 02 September 2020 related to the sale of CPSK for 400.99 mt to PT SIP. Furthermore, transaction No. ST-TR-888ac522-de74 dated 25 June 2020 related to the sale of CSPO for 3,000.20 mt for ISCC.

3.8.5

Procedure of RSPO mass balance supply chain is presented in document No. MNL/6.1/3 (Rev. 04) dated 13 August 2019. The procedure has identified the role of the PIC for the implementation of RSPO supply chain, such as Mill Manager, Assistant, Head of Administration, Laboratory Assistant and Bulking Staff. Furthermore, the procedure also covering all of the element of the supply chain starting form FFB receiving, dispatch CPO, internal and external audit, record keeping, stock monitoring, the handling of non-conforming products, outsource activity, registration of transaction, training, mass balance records, claims, grievances, validity of license, etc. overproduction prediction is conducted by Marketing in HO Jakarta and Mill Manager.

Based on interview with Weighbridge Operator of BPM it was known that mill has receive FFB from owned estates which already RSPO certified and another 8 (eight) independent out-growers and 3 (three) independent smallholder which not RSPO certified yet, included from PT PMM non certified areas that mentioned in Time Bound Plan. Record of FFB accepted is recorded through application namely "Mill Weigh Bridge Transaction". Information of RSPO certified and non-certified product is shows through print out of Weigh Bridge Ticket.

3.8.6

Internal audit mechanism and schedule is explained in the RSPO sustainability manual for palm oil mill (PMM/MAN-03B) clause 4.0 that described that the company should conduct internal audit and preparation for external audit by independent CB. Internal audit includes compliance, traceability and mass balance, SCCS audit and others should be carried out prior external audit by CB.

Last internal audit has carried out in 27 January 2020 – 01 January 2020 by sustainability team. Based on internal audit there one non conformity regarding evidence of training with contractors is not yet available on RSPO, SCCS, ISCC and OHS but socialization has been carried out to the factory manufacturing contractor on 18 July 2019.

3.8.7

Bumi Permai Mill has record of FFB received as RSPO certified and non-certified. For example, record for period September 2019 to August 2020 is presented in the following Table:

Period	FFB (mt)		
	RSPO Certified	Non-Certified	Total
Sep-19	24,499.96	5,415.82	29,915.78
Oct-19	30,068.09	8,323.95	38,392.04
Nov-19	25,551.91	8,618.33	34,170.24
Dec-19	23,690.00	9,482.08	33,172.08

Jan-20	22,475.07	9,359.75	31,834.82
Feb-20	19,738.42	8,146.96	27,885.38
Mar-20	21,254.63	8,869.13	30,123.76
Apr-20	20,516.06	11,907.55	32,423.61
May-20	20,352.12	7,335.31	27,687.43
Jun-20	20,844.73	7,929.03	28,773.76
Jul-20	17,881.48	7,999.20	25,880.68
Ags-20	20,422.33	9,747.54	30,169.87
Total	267,294.80	103,134.65	370,429.45

Based on the Table above, it was known that unit of certification has satisfactory records FFB production and divided its RSPO Certified and non-certified status. Certified FFB production for 12 months period (July 2019 to June 2020) or (September 2019 to August 2020) are not passed the quota, which were 281,522.26 mt and 267,294.80 mt, respectively. Credit given was 287,739 mt.

3.8.8

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

Documents verifications and interview with management units obtained information if in last 12 months before audit (July 2019 – June 2020) there is no CSPO that sold as certified products. CPO products sold as under another scheme (ISCC). For CSPK documents verifications it was known there are 7,092.22 mt dispatch as RSPO certified products where the product that has been claims is 6,299.53 mt. Furthermore, based on document verification, it was known if claim related CSPK products is no longer than 3 months since the product delivered. For example, shipping announcements with transaction id TR-Off60153-5402 dated 20 April 2020, volume 400.14 mt, to PT Sumber Indah Perkasa the shipping was done in 08 February 2020.

3.8.9

Based on document verification obtained information if the unit of certification outsourced the transport of PK to contractors. The clausal regarding how to ensure that certification body (CB) have access to the outsourcing contractor or operation if an audit is deemed necessary has been described in work agreement. The company shows Letter of Agreement No. PMM/BPM/05/2020/044 --Transport of Palm Kernel dated 12 May 2020 between PT PMM and Surya Dharma located in Bukit Jering Village, Muara Kaman District, Kutai Kartanegara District. The second party is an individual body that provides transportation services, transportation of materials including PK. In article 10 point 9, the second party is obliged to comply with the applicable provisions, including the rules contained in the RSPO, ISPO rules and ISCC rules. This Letter of Agreement has been signed by both parties.

3.8.10

Unit of certification only have 1 contractor for CSPK transporter, namely PT Surya Darma from Muara Kaman, Sub District Muara Kaman, District of Kutai Kartanegara. Contractor company profile data which consist of address, contact person, email and phone number, contract agreement and period, list of vehicles (trucks), etc are available.

3.8.11

Based on review list of transporters, information from previous assessment, it was known that there is no new contractor added for CSPK transportation work, namely PT Surya Darma.

3.8.12

Bumi Permai POM have maintain accurate, complete and update FFB receives, processed and CPO and PK production from its supply base. The record keeping saves in "Mass Balance Report" for example periods July 2019 – August 2020. Within this record, the certificate holders maintain the FFB's sources based on monthly bases, as follows:

Period	FFB (mt)		
	RSPO Certified	Non-Certified	Total
Sep-19	24,499.96	5,415.82	29,915.78
Oct-19	30,068.09	8,323.95	38,392.04
Nov-19	25,551.91	8,618.33	34,170.24
Dec-19	23,690.00	9,482.08	33,172.08
Jan-20	22,475.07	9,359.75	31,834.82
Feb-20	19,738.42	8,146.96	27,885.38
Mar-20	21,254.63	8,869.13	30,123.76
Apr-20	20,516.06	11,907.55	32,423.61
May-20	20,352.12	7,335.31	27,687.43
Jun-20	20,844.73	7,929.03	28,773.76
Jul-20	17,881.48	7,999.20	25,880.68
Agst-20	20,422.33	9,747.54	30,169.87
Total	267,294.80	103,134.65	370,429.45

CSPO Production and Dispatch

Month	CPO Production (mt)		Total Production (mt)	Cert. CPO Dispatch (mt)		
	Certified	Non-Certified		RSPO	Other Scheme	Non-Cert
Sep-19	6,013.40	1,239.20	7,252.60	-	9,000	-
Oct-19	7,217.40	2,018.10	9,235.50	-	9,001	-
Nov-19	6,506.40	2,182.40	8,688.80	-	6,000	3,001
Dec-19	5,981.60	2,405.10	8,386.70	-	9,000	-
Jan-20	5,697.80	2,346.10	8,043.90	-	6,500	-
Feb-20	4,856.50	2,000.60	6,857.10	-	3,000	-
Mar-20	5,269.00	2,134.90	7,403.90	-	9,001	-
Apr-20	4,936.50	2,838.70	7,775.20	-	3,000	5,600
May-20	4,908.60	1,746.90	6,655.50	-	3,000	9,301
Jun-20	4,968.60	1,908.70	6,877.30	-	3,000	3,001
Jul-20	4,145.35	1,846.54	5,991.88	-	6,000	3,000
Aug-20	4,735.69	2,242.00	6,977.69	-	6,001	-
Total	65,236.84	24,909.24	90,146.07	-	72,504	23,903

Based stock record, it was known that there is stock CSPO for about 18,691.37 mt from previous September 2020. Thus, total CSPO stock was 83,691.37 mt. Hence, it could be concluded that delivery of RSPO CSPO has only derived from a positive stock.

CSPK Production and Dispatch

Month	PK Production (mt)			PK Dispatch (mt)			
	Certified	Non-Cert.	Total	RSPO	ISCC	Non-Cert	Total
Sep-19	1,336.46	280.42	1,616.87	441.48	-	-	441.48
Oct-19	1,649.54	455.23	2,104.77	-	-	800.00	800.00
Nov-19	1,405.15	537.71	1,942.86	377.09	-	1,600.00	1,977.09
Sub Total	4,391.15	1,273.36	5,664.51	818.57	-	2,400.00	3,218.57
Dec-19	1,180.89	475.73	1,656.62	1,298.59	-	800.00	2,098.59
Jan-20	1,084.52	444.80	1,529.32	653.17	-	2,003.48	2,656.65
Feb-20	1,054.24	437.43	1,491.68	946.29	-	756.52	1,702.81

Sub Total	3,319.65	1,357.96	4,677.61	2,898.05	-	3,569.00	6,458.05
Mar-20	975.55	402.67	1,378.22	512.16	-	800.00	1,312.16
Apr-20	936.97	538.80	1,475.78	286.77	-	900.00	1,186.77
May-20	938.92	351.54	1,290.46	400.00	-	1,000.00	1,400.00
Sub Total	2,851.44	1,293.02	4,144.45	1,198.93	-	2,700.00	3,898.93
Jun-20	1,032.11	388.01	1,420.12	141.94	-	910.00	1,051.94
Jul-20	876.76	389.82	1,266.58	741.94	-	1,000.00	1,741.94
Aug-20	1,011.95	485.90	1,497.85	458.06	-	800.00	1,258.06
Sub Total	2,920.82	1,263.73	4,184.55	1,341.94	-	2,710.00	4,051.94
Total	13,483.06	5,188.06	18,671.12	6,257.49	-	11,370.00	17,627.49

Based on the Tables above, it could be concluded that delivery of RSPO CSPK has only derived from a positive stock.

3.8.13 and 3.8.14

Bumi Permai Mill has performed FFB processing to produce CPO and PK only. Conversion factors are based on actual extraction.

3.8.15

Bumi Permai Mill has only implementing RSPO mass balance supply chain system. Separation has only conducted through administrative recording. Source of FFB received is classified from owned estate RSPO-certified, independent out-growers and independent smallholders, as detailed explained in Indicator 2.3.1. All FFB suppliers has recorded /recapitulated/and maintained its current status. During shipping the truck is sealed (colour orange) to ensure that the RSPO certified product does not mixed with other sources.

3.8.16.

The Bumi Permai Mill has been registered of certified products of RSPO (CSPO and CSPK) with Member ID: RSPO_PO1000001488. Shipping announcement carried out has in accordance with internal SPO requirement, and there were confirmation from the buyer in the RSPO IT Platform. The tracing has conducted annually. Moreover, it was known that volume sold under conventional is being removed from the certified product volume. Documentation for the CSPO consist of daily record of the FFB acceptance, daily record of CPO production, which classified as the CSPO, CPO (RSPO) sale record, stock record that has been reconciled with the FFB acceptance, monthly production and sale and annual recapitulation. Furthermore, documentation for the CSPK consist of FFB dispatch record, which further will be counted the daily production of the Sustainable PK, daily production record of the PK, which classified as the Sustainable PK, monthly recapitulation of the Sustainable PK's sale, stock record, which has been reconciliation with the FFB acceptance record, monthly sale production and annual recapitulation.

Documents verifications and interview with management units obtained information if in last 12 months before audit, there is no CSPO that sold as certified products. CPO products sold as under another scheme, i.e., ISCC. For example, according to CSPK documents verifications from July 2019 to June 2020, it was known there are 7,092.22 mt dispatch as RSPO certified products where the product that has been claims is 6299.53 mt. Claim related CSPK products is no longer than 3 months since the product delivered. For example, shipping announcements with transaction ID TR-Off60153-5402 dated 20 April 2020, volume 400.14 mt, to PT Sumber Indah Perkasa the shipping was done in 08 February 2020. For CSPO and CSPK sold as conventional or other scheme during this period has been removed from certified stock

3.8.17

According to transaction documents in 2019 to 2020, it was known that all CSPK from Bumi Permai Mill are claims as mass balance and conventional, while CSPO has fully sold as ISCC. Bumi Permai Mil does not use RSPO trademark 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 shown a policy to respect human rights in the Corporate Social Responsibility policy adopted on 27 April 2015 by the President Director. The policy describes respecting human rights and respecting race, nation, culture, religion and without forced labor, ensuring that all employees receive fair remuneration, fair management and opportunities to develop careers. The company has demonstrated Management Policy Training at the Mahakam Estate to 111 employees. Interview with worker representatives, bipartite and gender committee representative known that there was no human rights violation and discrimination issue.

4.1.2

Based on the results of field visits to estates and mill, there were no visible presence of mercenaries in the company's operational areas. Result of interview with employee representatives (gender committee and bipartite), village representatives and related agency of Kutai Kartanegara known that there was no issue of confrontation and intimidation by the company to maintain peace and order.

Status: Comply

4.2

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

4.2.1

The company has a procedure for complaints and grievances No. HRD-SOP02-01 dated 01 October 2019 contains objectives, scope, responsibilities, references, and procedures. The complaint must be written in the complaint book available at the office, then the unit leader is obliged to make efforts at least 2 weeks after the report is received. If it cannot be resolved, the reports will be forwarded to the head of representative. At each stage of completion, documentation is made and kept by the head of representative.

There is also a whistleblower system policy No. 001/PD-WBS/08/2017 which aims to accommodate all complaints and reports owned by staff and employees as well as the community living around the plantation. One of the procedures is to continue processing notifications submitted anonymously as long as the notifications is accompanied by evidence and can be evaluated.

4.2.2

The company has procedure number PMM/SOP/General-22 revision 2 dated 27 April 2015 regarding Communication and Consultation. The procedure explains the mechanism for communication and consultation between the company and internal and external stakeholders. Stakeholders can submit complaints or communicate with the company through a PIC that has been designated by the company. Thus, for stakeholders who cannot read and write, they can submit complaints to the PIC to be recorded by the PIC.

4.2.3

The company documents the resolution of complaints submitted by employees. During the past 1 year, there were no complaints from external stakeholders. Complaints from employees related to the improvement of housing facilities and have been resolved by the company and have been known by the complainant. For example, complaints from LLE employees on 7 February 2020 related to repairing cracked and repaired house walls on 18 February 2020. Photo documentation is available before and after repairs.

For case of employee layoffs, the company shows a notification letter from the MA dated 18 March 2020. The letter states that the case has been received and registered with No. 422 K/Pdt.Sus-PHI/2020. However, the company has not received the final decision of that case.

4.2.4

The company shows procedures of conflict No HRD-SOP15-01 dated 03 February 2020 as a reference in managing conflict in terms of conflict mapping, conflict analysis, settlement planning, negotiation, mediation and monitoring at various management levels. If an agreement has not been reached at the negotiation stage, conflict resolution will enter the mediation stage which will involve an independent third party. In the conflict resolution process, the complainants also have freedom to choose individuals or groups to support them and/or act as observers.

Status: Comply

4.3
The unit of certification contributes to local sustainable development as agreed by local communities.
4.3.1

Based on verification, the RKL-RPL semester I 2020 report contains adequate environmental management and monitoring components as required in the PT PMM & PT TJA environmental document matrix. The results of the evaluation concluded that the environmental conditions of PT PMM and PT TJA were still in accordance with the environmental capability threshold to accept all impacts from the company's operational activities.

The company shows a review of the implementation of social management for the period January - December 2019 which informs the description, actions, frequency, plans, implementation, PIC and status. Example: Capacity building by providing guidance to the management of plasma cooperatives and reviewing CSR programs once a year. The study has explained the social impact management and monitoring plan that will be implemented by the company. During the ASA-1.1 audit, the Company's remote audit showed a document on the Social Impact Management (SIA) activity plan for the period 2019-2020 which includes internal and external social impacts. The components that are managed and monitored consist of several components. The management and monitoring plan for the period 2019 - 2020 is prepared in a participatory manner by involving the closest community.

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 Free, Prior and Informed Consent (FPIC).
4.4.1

The unit of certification has demonstrated the legality of the land and the process of land legality that is still in the process. Summary of certified area that has land use title and not has land use title, described as follows:

Description	PT PMM (ha)		PT TJA (ha)		Total (ha)
	Own Estate	Smallholders	Own Estate	Smallholders	
Certified Area	11412.67	3896.08	4303.97	894.58	20507.30
Has land use title (HGU) + HGB	8695.28	2311.63	2115.88	-	13122.79
Do not has HGU (progress)	2717.39	1584.45	2188.09	894.58	7384.51

The detail described as follows:

PT PMM
Own Estate

Land use title (HGU) with the Decree of the Head of National Land Agency No. 02/HGU/KEM-ATR/BPN/2017 dated 05 January 2017 with a total area of **8,683.05 ha**, and there is land use title for building (HGB) of mill covering 12.23 ha based on Decree of the Head of National Land Agency No. 28/HGB/BPN-64/2015 dated 03 August 2015. For areas that have not received HGU, there are some area that still process of release status of forest area covered 760.00 ha with the status of Production Forest that can be converted.

Scheme Smallholders of PT PMM

Total land use title that owned by scheme smallholders of PT PMM are 2,311.63 ha, consist of:

- Grengseng Indah Cooperative (Beringin Jaya Estate) has received the HGU with Decree of National Land Agency of East Kalimantan Province number 83/HGU/BPN-64/2016 dated 29 September 2016 with a total area of 176.21 ha.
- Subur Makmur Cooperative (Beringin Jaya Estate) has received HGU with the Decree of the Minister of Agrarian and Spatial number 11/HGU/KEM-ATR/BPN/2017 dated 24 January 2017 with total area of 391.70 ha.
- Sawit Etam Cooperative (Lembuswana Estate) has obtained HGU with decree of National Land Agency of East Kalimantan Province No. 84/HGU/BPN-64/2016 dated 29 September 2016 with a total area of 180 ha.
- Mitra Sawit Mandiri Cooperative (Kahoi Estate) has obtained HGU with the Decree of the Minister of Agrarian and Spatial No 083/HGU/KEM-ATR/BPN/2016 dated 22 December 2016 with a total area of 971.59 ha.
- Maju Bangun Cooperative (Lembuswana Estate) has obtained HGU with the Decree of the Minister of Agrarian and Spatial No. 083/HGU/KEM-ATR/BPN/2016 dated 22 December 2016 with total area of 592.13 ha.

Based on explanation above it was known there are ± 4,985.37 ha area in PT PMM with no land use title. PT PMM is able to shows the progress to obtained land title delayed due forest status and currently in cadastral process.

PT TJA

Unit of PT TJA can present land use title documents, as follows:

No Certificate	Dated	Valid until	Area (ha)
00216	25 February 2020	18 October 2054	1,623.04
00217	25 February 2020	18 October 2054	86.42
00218	25 February 2020	18 October 2054	406.4200
Total			2,115.88

Based on explanation above it was known there are $\pm 3,082.66$ ha area in PT TJA with no land use title. PT TJA is able to shows the progress to obtained land title delayed due forest status and currently in cadastral process.

Based on RSPO announcement dated 01 April 2020 were stated that RSPO grower for Recertification (RC) audits, the unit of certification can continue with their certification provided that adequate genuine evidence that the company is taking actions to move towards obtaining the HGU is available and it must comply with all the requirements at the time and for Surveillance audits on the unit of certification can continue as announced earlier

4.4.2

Land compensation is conducted through process calculation of "*Ganti Rugi Tanam Tumbuh* (GRTT)" or compensation on land and any living plants above. Summary of land compensation on surrounding villages is presented in the following Table:

No.	Village	Total Area of GRTT (ha)
1	Benua Puhun	848.95
2	Bukit Jering	487.95
3	Lebaho Ulaq	1,894.82
4	Lebak Mantan	814.73
5	Loleng	2,754.75
6	Muara Kaman	1,864.00
7	Muara Kaman Ilir	30.31
8	Rantau Humpang	321.21
Total Land Compensated (ha)		9,016.71

Based on the table above, it was known that total compensation through GRTT process was about 9,016.71 ha. According to information from unit of certification, BPN and Plantation Agency, as well as representative from Village of Loleng, Rantau Empang and Lebahu Ulaq, it was known that process of land compensation had settled up since 2018. For example, several evidences related to land compensation is presented in documents as bellows:

- Official Report of Field Checking and Physical Survey No. 012/590/18/2001/MW/III/2017 dated 20 February 2017 on area covers $\pm 20,000$ m² (2.00 ha), where situated on Muara Wis Beringin Jaya Estate. Compensation agreed by both parties was IDR 20,000,000.- and had paid on 07 February 2018. The report acknowledge by government representatives.
- Official Report of Field Checking and Physical Survey No. 019/590/18/2001/MW/III/2017 dated 20 February 2017 on area covers $\pm 212,300$ m² (1.23 ha), where situated on Dusun Tanjung Linung in Sub District of Muara Wis. Compensation agreed by both parties was IDR 12,300,000.- and had paid on 07 February 2018. The report acknowledge by government representatives.

4.4.3

Unit of certification shows Operational map with scale varies from 1:50,000 to 1:120,000. The map has clearly informed coordinate line, legal boundary, as well as location of conservation area, smallholder's area, rivers distribution, mill, building and infrastructures, etc. Based on interview with BPN and Plantation Agency of Kutai Kartanegara, as well as with representatives from Village of Loleng, Rantau Empang and Lebahu Ulaq, it was known there were no occupation and/or overlapped with another busines activities on the estate operational areas. Furthermore, based on field observation, it was known that the map has giving actual situation on unit certification areas.

4.4.4

Assessment impact, benefit sharing and legal arrangement matters were presented in document of work agreement between unit of certification with surrounding communities, as follows:

- Agreement No.001/SPK/KOPSAGI/05/2010 dated 27 May 2010 with Cooperative of Perkebunan Kelapa Sawit

<p>Grenseng Indah. Agreement valid for 30 years or up to 27 May 2040.</p> <ul style="list-style-type: none"> • Agreement No. 001/SPK/KOPBUNMM/05/2010 dated 22 May 2010 with Cooperative of Perkebunan Maju Membangun. Agreement valid for 30 years or up to 22 May 2040. • Agreement No. 001/SPK/KMSM/MK-MKI/XI/2010 dated 19 November 2010 with Cooperative of Mitra Sawit Mandiri. Agreement valid for 30 years or up to 19 November 2040. • Agreement No. 001/SPK/KSEB/04/2010 dated 16 April 2010 with Cooperative of Sawit Etam Bersama. Agreement valid for 30 years or up to 16 April 2040. • Agreement No. 001/SPK/KTS/12/2010 dated 03 December 2010 with Perkebunan Tanah Sama. Agreement valid for 30 or up to 03 December 2040. • Agreement No. 001/SPK/KSUSM/08/2010 dated 03 August 2010 with Perkebunan Tanah Sama. Agreement valid for 30 or up to 03 December 2040. <p>Agreement mentioned above signed by representative of Cooperative, unit of certification, Head of Village, Head of Sub-District, Head of Plantation Agency, Head of Industrial and Cooperative Agency of Kutai Kartanegara District. Agreement was available in Bahasa.</p>		
<p>4.4.5</p> <p>Based in interview with Village Head from Village of Loleng, Rantau Empang and Lebahu Ulak (who also previous land owners), as well as information from Head of BPN of Kutai Kartanegara District, it was known that compensation had carried out properly. There no new compensation since 2018. Field checking and survey has participately conducted directly by affected parties. Furthermore, there is no land conflict and occupation areas within unit of certification operational areas.</p>		
<p>4.4.6</p> <p>Process of negotiation towards value of compensation has conducted through FPIC approach, as shows through Official Report of Field Checking and Physical Survey document which informed date of survey and land measurement, calculation of compensation that considering value of land and plants grows on the above (GRTT). The report has agreed by previous land owner and unit of certification, acknowledge by government representatives (Head of Village, Head of Sub-District and Head of BPN, Head of Plantation Agency and Head of Industrial and Cooperative Agency.</p>		
	Status: Comply	
<p>4.5</p> <p>No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.</p>		
<p>4.5.1; 4.5.2; 4.5.4; 4.5.6; 4.5.7 and 4.5.8</p> <p>Based on information from Head of BPN Agency and Head Village of Loleng, Rantau Empang and Lebahu Ulak, it was known that there is no new compensation and planting on local peoples land. There were planting of oil palm for an area of 212.33 ha and 606.76 ha in PT PMM and PT TJA, respectively. Planting areas that carried out in 2016-2017 are still included in the location permit and cadastral map that owned by PT TJA and PT PMM. The company has conducted RSPO NPP on February 2013.</p>		
<p>4.5.3 and 4.5.5</p> <p>Based on information from Head of BPN Agency and Head Village of Loleng, Rantau Empang and Lebahu Ulak (who also previous Land owner), it was known that has a right to reject the value of compensation proposed by the unit of certification. Compensation has settled up since 2018.</p>		
	Status: Comply	
<p>4.6</p> <p>Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.</p>		
<p>4.6.1</p> <p>Procedure of land compensation and identification of land owners is presented in document No. PMM/SOP/Umum-19 dated 01 January 2009. Procedure mentioned that unit of certification will conduct socialization on plantation operational activities, included planting of oil palm. During socialization, Land Verification Team will identify and looking information directly from village representative and cross check with the land owner. Measurement, land survey and mapping later on to be conducted by both parties, witnessed by village representatives and land owners of surrounding compensated objects. Final map as result</p>		

of FPIC process will be used as reference for compensation calculation. Land owner has a right to reject the value of compensation.

Based on information from Head of BPN Agency and Head Village of Loleng, Rantau Empang and Lebahu Ulak, it was known that compensation process has conducted properly through fair and transparent approach, without any pressure from other parties. Furthermore, there is no issue related with land conflict and occupation within unit of certification operational areas.

4.6.2

Based on information from Head of BPN Agency and Head Village of Loleng, Rantau Empang and Lebahu Ulak, it was known that compensation process has conducted properly through fair and transparent approach, without any discrimination towards gender aspect. Compensation is conducted for male and female land owner without any differences on value of calculation.

4.6.3

Based on information from Head of BPN Agency and Head Village of Loleng, Rantau Empang and Lebahu Ulak, it was known that compensation process has conducted properly through fair and transparent approach, without any discrimination towards gender aspect. Compensation is conducted for male and female land owner without any differences on value of calculation.

4.6.4

Evidence related to land compensation is presented in documents as bellows:

- Official Report of Field Checking and Physical Survey No. 012/590/18/2001/MW/III/2017 dated 20 February 2017 on area covers $\pm 20,000 \text{ m}^2$ (2.00 ha), where situated on Muara Wis Beringin Jaya Estate. Compensation agreed by both parties was IDR 20,000,000.- and had paid on 07 February 2018. The report acknowledge by government representatives.
- Official Report of Field Checking and Physical Survey No. 019/590/18/2001/MW/III/2017 dated 20 February 2017 on area covers $\pm 212,300 \text{ m}^2$ (1.23 ha), where situated on Dusun Tanjung Linung in Sub District of Muara Wis. Compensation agreed by both parties was IDR 12,300,000.- and had paid on 07 February 2018. The report acknowledge by government representatives.

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

Procedure of land compensation and identification of land owners is presented in document No. PMM/SOP/Umum-19 dated 01 January 2009. Procedure mentioned that unit of certification will conduct socialization on plantation operational activities, included planting of oil palm. During socialization, Land Verification Team will identify and looking information directly from village representative and cross check with the land owner. Measurement, land survey and mapping later on to be conducted by both parties, witnessed by village representatives and land owners of surrounding compensated objects. Final map as result of FPIC process will be used as reference for compensation calculation. Land owner has a right to reject the value of compensation. Based on information from Head of BPN Agency and Head Village of Loleng, Rantau Empang and Lebahu Ulak, it was known that compensation process has conducted properly through fair and transparent approach, without any pressure from other parties. Furthermore, there is no issue related with land conflict and occupation within unit of certification operational areas.

4.7.2

Land compensation is conducted through process calculation of "*Ganti Rugi Tanam Tumbuh* (GRTT)" or compensation on land and any living plants above. Based on GRTT record, it was known that total compensation through GRTT process was about 9,016.71 ha. According to information from unit of certification, BPN and Plantation Agency, as well as representative from Village of Loleng, Rantau Empang and Lebahu Ulak, it was known that process of land compensation had settled up since 2018. For example, several evidences related to land compensation is presented in documents as bellows:

- Official Report of Field Checking and Physical Survey No. 012/590/18/2001/MW/III/2017 dated 20 February 2017 on area covers $\pm 20,000 \text{ m}^2$ (2.00 ha), where situated on Muara Wis Beringin Jaya Estate. Compensation agreed by both parties was IDR 20,000,000.- and had paid on 07 February 2018. The report acknowledge by government representatives.
- Official Report of Field Checking and Physical Survey No. 019/590/18/2001/MW/III/2017 dated 20 February 2017 on area covers $\pm 212,300 \text{ m}^2$ (1.23 ha), where situated on Dusun Tanjung Linung in Sub District of Muara Wis.

Compensation agreed by both parties was IDR 12,300,000.- and had paid on 07 February 2018. The report acknowledge by government representatives.

4.7.3

Compensation has conducted through FPIC process and agreed by both parties satisfactory. Other benefit provided by unit of certification was presence of smallholders' scheme that fully managed by unit of certification, as shows through several agreement, as follows:

- Agreement No.001/SPK/KOPSAGI/05/2010 dated 27 May 2010 with Cooperative of Perkebunan Kelapa Sawit Grenseng Indah. Agreement valid for 30 years or up to 27 May 2040.
- Agreement No. 001/SPK/KOPBUNMM/05/2010 dated 22 May 2010 with Cooperative of Perkebunan Maju Membangun. Agreement valid for 30 years or up to 22 May 2040.
- Agreement No. 001/SPK/KMSM/MK-MKI/XI/2010 dated 19 November 2010 with Coopertive of Mitra Sawit Mandiri. Agreement valid for 30 years or up to 19 November 2040.
- Agreement No. 001/SPK/KSEB/04/2010 dated 16 April 2010 with Cooperative of Sawit Etam Bersama. Agreement valid for 30 years or up to 16 April 2040.
- Agreement No. 001/SPK/KTS/12/2010 dated 03 December 2010 with Perkebunan Tanah Sama. Agreement valid for 30 or up to 03 December 2040.
- Agreement No. 001/SPK/KSUSM/08/2010 dated 03 August 2010 with Perkebunan Tanah Sama. Agreement valid for 30 or up to 03 December 2040.

Based on information from Head Village of Loleng, Rantau Empang and Lebahu Ulak, it was known that majority of village occupants works for PT PMM or PT TJA.

Status: Comply

4.8

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

4.8.1; 4.8.2; 4.8.3 and 4.8.4

Based on information from Head of BPN Agency and Head Village of Loleng, Rantau Empang and Lebahu Ulak, it was known that there is no new compensation and planting on local peoples land. Furthermore, there is no land conflict within unit of certification operational areas. Compensation process has clean and clear as explained in Indicator 4.4.2.

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

Based on the plasma plantation development cooperation agreement between PT. PMM dan PT TJA with KUD, the determination of the purchase price of FFB from plasma plantations follows the FFB price setting by the Provincial Government of East Kalimantan. The determination is made every month by the Team for the Determination of the Purchase Price of Oil Palm FFB, East Kalimantan Province.

The company can show the Minutes of the Results of the Meeting of the FFB Purchasing Price Team in East Kalimantan for the previous period, namely July 2020 and the current period, namely August 2020. Pricing is based on the price of CPO and kernel and is also adjusted to the age of the plant. Based on interviews with the KKPA cooperative, it was explained that the prices were obtained directly from the Plantation Agency and had been informed to members through direct information from company staff and informed via SMS.

As for the FFB price for independent farmers who are not partnered, the FFB price is determined based on the daily commercial price in East Kalimantan Province which is delivered daily via email or other means of communication, then agreed by both parties, namely the company and the selling farmer.

Based on the explanation above, it is known that the company already has a FFB price document for partner farmers and

independent farmers, as the basis for purchasing FFB from legitimate farmers.

5.1.2

Based on the plasma plantation development cooperation agreement between PT. PMM and PT. TJA with KUD, the determination of the purchase price of FFB from plasma plantations follows the FFB price setting by the Provincial Government of East Kalimantan. The determination is made every month by the Team for the Determination of the Purchase Price of Oil Palm FFB, East Kalimantan Province.

As for the FFB price for independent farmers who are not partnered, the FFB price is determined based on the daily commercial price in East Kalimantan Province which is delivered daily via email or other means of communication, then agreed by both parties, namely the company and the selling farmer.

5.1.3

Based on the plasma plantation development cooperation agreement between PT. PMM with KUD, the determination of the purchase price of FFB from plasma plantations follows the FFB price setting by the Provincial Government of East Kalimantan. The determination is made every month by the Team for the Determination of the Purchase Price of Oil Palm FFB, East Kalimantan Province.

As for the FFB price for independent farmers who are not partnered, the FFB price is determined based on the daily commercial price in East Kalimantan Province which is delivered daily via email or other means of communication, then agreed by both parties, namely the company and the selling farmer. To ensure a fair price determination, the determination and fixing of prices as well as the latest information on the price of the FFB is stated in the SPK of the FFB sale and purchase agreement agreed by both parties.

5.1.4

Based on the plasma plantation development cooperation agreement between PT. PMM and PT. TJA with KUD, the determination of the purchase price of FFB from plasma plantations follows the FFB price setting by the Provincial Government of East Kalimantan. The determination is made every month by the Team for the Determination of the Purchase Price of Oil Palm FFB, East Kalimantan Province.

The company can show the Minutes of the Results of the Meeting of the FFB Purchasing Price Team in East Kalimantan for the previous period, namely July 2020 and the current period, namely August 2020. Pricing is based on the price of CPO and kernel and is also adjusted to the age of the plant. Based on interviews with the KKPA cooperative, it was explained that the prices were obtained directly from the Plantation Agency and had been informed to members through direct information from company staff and informed via SMS.

As for the FFB price for independent farmers who are not partnered, the FFB price is determined based on the daily commercial price in East Kalimantan Province which is delivered daily via email or other means of communication, then agreed by both parties, namely the company and the selling farmer.

Based on the explanation above, it is known that the company already has a FFB price document for partner farmers and independent farmers, as the basis for purchasing FFB from legitimate farmers.

5.1.5

The company shows the contract agreement with the plasma and independent smallholders which explains the object of the agreement, the validity period, the terms of plasma development, the terms of cooperation, financing, pricing, rights & obligations, sanctions and dispute resolution. The agreement was signed by representatives of the cooperative and company and acknowledged by the head of the village & sub-district, the Head of the Plantation Service, the head of the Cooperative Office and the Regent of Kab. Kutai Kartanegara. Cooperation contracts with cooperatives include:

- Cooperation Agreement with the Joint Etam Palm Oil Cooperative (No. 001 / SPK / KSEB / 04/2010 dated 16 April 2010) with a validity period until 16 April 2040
- Cooperation Agreement with Koperasi Maju Build (No. 001 / SPK / KOPBUNMM / 05/2010 dated 22 May 2010) with a validity period until 22 May 2040

Cooperation contracts with independent smallholders are mutually agreed upon, including:

- Cooperation agreement with independent farmers on behalf of Andi Kurniawan (No. 32 / PMKT-PMM / X / 2019 dated

15 October 2019) with a validity period until 15 October 2020

- Cooperation agreement with independent farmers on behalf of Bahrudin (No. 32 / PMKT-PMM / X / 2019 dated 13 September 2019) with a validity period until 13 September 2020

5.1.6

The company shows proof of payment for the purchase of FFB according to the provisions, for example based on the document of Recapitulation of Participants in the Palm Oil Plantation Cooperative Grenseng Indah, Karya Bersama, Maju Build, Mitra Sawit Madiri and Sawit Etam Bersama in July 2020 which was printed on August 25, 2020. This document explains TBS weight yield (kg) for the 2008 and 2010 planting years (> 10 years) multiplied by Rp. 1,349.04 / kg in accordance with the above decree.

As for the FFB price for independent farmers who are not partnered, the FFB price is determined based on the daily commercial price in East Kalimantan Province which is delivered daily via email or other means of communication, then agreed by both parties, namely the company and the selling farmer. An example of payment for purchasing FFB to independent farmers that the company can show is for payment in March 2020 with the amount of 136,406 Kg of FFB multiplied by the daily FFB price for March 2020.

5.1.7

The results of document verifications it was known that the certification unit has routinely calibrated the weighing equipment carried out by a third party. The certification unit has also shown documents on the weighbridge calibration carried out in March 2020:

Information on test results No. 510.63 / 61 / Disperindag / Metrology / III / 2020 dated 03 March 2020 for Scales Type E1205 with serial number 103950243 with a capacity of 60,000 Kg by Legal Metrology UPTD Industry and Trade Office of the Government of Kutai Kertanegara Regency with a validity period until 02 March 2021.

5.1.8

In its support for independent smallholders to make their plantations RSPO certified, the Company has facilitated farmers with some initial training, such as the one that was held in January and February 2020, training materials provided include: RSPO Certification System for independent smallholders. The result of this training is the formation of a group / team that will be maximized in conducting internal audits as well as providing outreach / socialization related to the RSPO certification program.

5.1.9

The company has several procedures related to the complaint mechanism for farmers, including:

- Internal and External Complaints Procedure with No. PMM / SOP / General-05 documents which came into effect on January 1, 2011. The procedure has a clause that guarantees the confidentiality of whistle blowers and reporting witnesses.
- Internal and external complaint SOP with No. Document HRD-SOP02-01 which came into effect on October 1, 2019. The procedure contains objectives, scope, responsibilities, references, and procedures.

To accommodate complaints, a suggestion box is also provided as a means of submitting complaints that can be submitted anonymously.

The complaint flow is that the employee writes the problem in the complaint book available at the garden office. Then, at least 2 weeks, the unit leader is obliged to seek a solution first. If it cannot be resolved, forward it in writing to the head of representative. At each stage of completion, documentation is made and kept by the head of the representative.

The results of the verification of the Company's internal and external complaint recap data documents in 2020, it is known that there are several complaints and complaints from employees, for example a complaint letter on April 7, 2020 regarding requests for outreach to employees regarding the prohibition of bathing and washing clothes in the company's prayer room. The company responded to the letter on April 14, 2020 by carrying out outreach.

From the results of the document verification, all employee complaints and complaints have been responded to by the company in accordance with existing procedures.

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

Records of company activities with FFB supplier farmers in order to improve livelihoods by increasing the productivity of their gardens and the process of following RSPO certification have been carried out from January 2020 to February 2020 in several surrounding villages including: Benua Puhun Village, Bukit Jering Village, Lebaho Ulaq Village, Lebak Former Village and Muara Kaman Ilir Village. In addition, it was also carried out at the KKPA Division on June 26, 2020. The training materials delivered by the company included: Best Management Practices for Agronomy related to integrated pest control (IPM) including the use of pesticides that are good and correct and responsible for the environment, safety and health. Work and fire prevention and control. This training activity was followed with enthusiasm and enthusiasm by member farmer suppliers. The delivery of training activities was carried out using classroom and physical field training methods.

The results of the training were that farmers were able to carry out best practices in oil palm plantation management and care about land fires and were able to handle and control them. The company can show minutes and attendance lists as well as photos of training activities.

5.2.3

The legality of FFB production has been described in indicator 2.3

5.2.4

The plasma in PT PMM and PT TJA is a full manage model, which is managed as a whole by the company, so there are no plasma farmers.

Records of company activities with FFB supplier farmers in order to improve livelihoods by increasing the productivity of their gardens and the process of following RSPO certification have been carried out from January 2020 to February 2020 in several surrounding villages including: Benua Puhun Village, Bukit Jering Village, Lebaho Ulaq Village, Lebak Former Village and Muara Kaman Ilir Village. In addition, it was also carried out at the KKPA Division on June 26, 2020. The training materials delivered by the company included: Best Management Practices for Agronomy related to integrated pest control (IPM) including the use of pesticides that are good and correct and responsible for the environment, safety and health. Work and fire prevention and control. This training activity was followed with enthusiasm and enthusiasm by member farmer suppliers. The delivery of training activities was carried out using classroom and physical field training methods.

The results of the training were that farmers were able to carry out best practices in oil palm plantation management and care about land fires and were able to handle and control them. The company can show minutes and attendance lists as well as photos of training activities.

5.2.5

All support programs for farmers are reviewed and evaluated periodically by the company in the RSPO internal audit which is conducted once a year, the last audit is on January 27-February 1, 2020 which also includes smallholders for FFB suppliers. In addition, the support program for farmers is also reported publicly through the media every year in the Annual Report.

Status: Comply

PRINCIPLE #6 RESPECT WORKERS' RIGHTS AND CONDITIONS
6.1
Any form of discrimination is prohibited.
6.1.1; 6.1.2

The company has a policy related to the same opportunities and treatment to get employment opportunities in document of Evans Group Indonesia Sustainability and Business Ethics Policy established in July 2019 explaining that:

- The company will provide equal opportunities for all workers to obtain decent work and income and to develop their careers without discriminating on race, caste, nationality, ethnicity, religion, disability, gender, sexual orientation, union membership, political affiliation or age.

- The company assigns all workers according to their expertise, propriety, abilities, skills and experience, as well as company needs.
- The company will not tolerate any discrimination based on sex, such as role restrictions, labeling, violence, intimidation and excessive workload.

Based on interview with worker representatives, bipartite and committee gender, it is known that recruitment of workers is based on the needs of the company regardless of ethnic background, religion, race and class. All prospective employees are entitled to have opportunity according to their scientific background and company needs. In addition, during 2019-2020 there were no issues related to discrimination against workers.

6.1.3

Based on procedure of employee recruitment, document number PMM/SOP/General-25, dated 1 September 2013, it is known that the requirements for recruitment of non-staff employees include about minimum age limit, submitting an application file, and are willing to be placed according to company needs. Whereas for staff admission based on SOP number TJA / SOP / General-24 dated 1 September 2013, it was stated that the recruitment of new staff was carried out by passing the selection, interview, and medical tests.

The company shows examples of employee recruitment documentation as follows.

- A copy of the employee's identity
- Application letter
- Work agreement No.33 / SPK-PKWT / 04/2020 dated 1 April 2020 on behalf of the KFL
- Decree on appointment of permanent employees on behalf of KFL No. 107/K-SKU-H/PT.PMM/BPE/06/2020 on 1 June 2020

6.1.4

The company shows notification letter explaining about pregnant and breast-feed workers are prohibited to do *spraying*. Based on interview with gender committee representative and worker representatives, it is known that pregnant workers will be moved to other proper job.

6.1.5

The company formed a gender committee to prevent and protect workers from immoral cases and violence for women and men workers. Each estate has a gender committee. The gender committee structure consists of the Trustees (Estate Manager), the chair of the gender committee, and 3 members for the empowerment, service, and research / development department. Activities undertaken by the gender committee, for example, receive when there are complaints of violence or immoral acts from employees, conduct *Posyandu* activities and have been documented in the form of accountability reports and reports on the activities of the Gender Committee.

6.1.6

The company shows payment documentation for employees in May 2020, for example as follows.

- LLE harvester with ID number 2013110405 received a basic salary of Rp3.179.673.
- RHE harvester with ID number 2011020667 receive a basic salary of Rp3.179.673
- BPE harvester with ID number 2018123812 receive a basic salary of Rp3.179.673.

Based on the description above, it is known that the company provides equal pay for the same scope of work.

Status: 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 worker requirements are stated in the Company Regulation for the period 2019 - 2021 which is valid from 23 January 2019 to 22 January 2021. The Company Regulation covers the scope of recruitment and transfer of workers, working hours, wages, workloads, sick days assistance, overtime work and wages, provisions regarding premiums, PPE, old age

insurance, type of work, termination of employment, separation, company and worker obligations, methods of resolving labor disputes and strikes, and others condition.

The company shows sample of payment document for company and contractor of FFB transporter employees in May 2020. Based on payment document and interview with employee representatives, it is known that they receive wages in accordance with the work agreement.

6.2.2

The company shows the appointment documents of contract employees into permanent daily employees, for example decree No. 068 / SK-SKU-H / RHE / VII / 2020 dated 1 July 2020. The decree explains the wages earned by workers, positions, workers' status, and obligations that workers must obey.

The company also has company regulations for the period 2019 - 2021, effective from 23 January 2019 to 22 January 2021. The PP covers the scope of recruitment and transfer of workers, working hours, wages, workloads, sick days assistance, overtime work and wages, provisions regarding premiums, PPE, old age insurance, type of work, termination of employment, separation, company and worker obligations, methods of resolving labor disputes and strikes, and others condition.

As for the salary breakdown document, it is explained in the salary document which informs about the revenue component and the deduction component. The income component consists of basic salary, overtime, *JKK* benefits, *JKM*, *JHT*, harvest premiums, pension guarantee benefits.

Based on the field visit, there was a person doing harvesting activity (helping to collect FFB to the collection point). Based on interview with this person known that he is not an employee of the company. The company also has not been able to show the work agreement letter of the person's name.

According to Law No.13 / 2003, a work relationship occurs when there is a work agreement between the company and the worker. Based on the explanation above, the company has not been able to show that everyone carrying out operational activities has a work agreement. Raised **Non conformity No.2020.01 with major category**.

6.2.3

Company showed the evidence of compliance with regular work hours, overtime, sick leave, vacation rights, etc., among others, are as follows.

- The company pays overtime for workers who work more than 7 hours a day. Details of overtime calculation is in accordance with applicable regulations. For example, based on Security BPM overtime data documents for the May 2020 period, overtime for 40 hours is paid for Rp2.251.487.
- The company provides employees with maternity leave. This is written in the Company Regulations.

6.2.4; 6.2.5

House and other facilities such as school, mosque, sport area, and clinic are in good condition. The power availability for housing comes from biogas, while water from pump wells channelling to reservoir.

There is a cooperative in the Kahoi unit which provides basic food supplies. For other units, based on the results of interviews with management and worker representatives, it is known that there were mobile car selling drinking water and groceries. There are also stalls selling groceries and other necessities around the employee housing.

6.2.6

Based on the RSPO Guidance for Implementing a Decent Living Wage document dated 1 June 2019, a living wage has been determined for 3 provinces in Indonesia, including North Sumatra, West Kalimantan and East Kalimantan. The document informs that the DLW gross for the Province of East Kalimantan is Rp3,048,335.

Then, the company showed a copy of East Kalimantan Governor's Decree No. 561 / K.636 / 2019 issued on 5 December 2019 concerning the Determination of the Minimum Wage of Samarinda City, West Kutai Regency and Kutai Kartanegara

Regency in 2020. Based on the document, the minimum wage for the Kutai Kartanegara Regency is Rp 3.179.673 or bigger than DLW which has been determined by the RSPO.

The company also shows prevailing wage calculations at PT PMM TJA. Based on these calculations, prevailing wage received by workers amounted to Rp 3.515.074 with in kind benefits received by workers amounting to Rp 335.401 and basic wages of Rp 3.179.673. This shows that the company has given a living wage to its workers.

6.2.7

Based on the employee list document, it is known that there are no contract workers. The status of workers are SKU-H, SKU-B, and workers on probation. The company showed a letter No HRD A23-001-02 regarding the procurement of employees, where the probation period is at most 3 months and non-permanent contracts are only for prospective employees whose types of work are seasonal. This provision is valid from 1 July 2020. As an implementation of the letter, the company showed a sample of work acceptance decision letter No. 038 / SK- (SKU-H) / LLE / IX / 2020 for office girl with 3 months of probation from 1 September to 1 December 2020.

6.2.2 Status: Non Conformity No 2020.01

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 freedom of association listed in the Evans Group Indonesia Sustainability and Business Ethics Policy established in July 2019. The document explains that:

- The company respects the right of workers to join the association and organization with other individuals
- The company provides an opportunity for all workers to establish a free, open, independent, democratic and responsible trade union and to register the union with the relevant legal authorities.
- The company gives the choice to all workers to become union members or not without coercion from any party.
- The company recognizes employees' rights to form and join trade unions.

6.3.2; 6.3.3

The Bipartite conducts regular meetings with the company every 3 to 6 months. The company showed a minute of meeting between representatives of the bipartite and the company on 8 May 2020 at the Kahoi Estate office regarding the replacement of the day off which was attended by 5 people.

Based on interview with bipartite representative, it is known that the management Bipartite consists of worker and company representatives. Membership includes all employees who work in the company. The representatives of bipartite are elected by the workers without any interference from the CH.

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 related to the age requirements of workers in the Evans Group Indonesia Sustainability and Business Ethics Policy established in July 2019 explaining that:

1. The company prohibits the use of child labor in all of its operational activities both those that are run alone and those run by its suppliers.
2. The minimum age for work is 18 years.

Policies related to child labor protection are also included in contracts with contractors, for example contract number No. TJA / RHE / 03/2020/068 between PT TJA and H (individuals) and contract number PMM / BPE / 04/2020/042-TRANSPORT TBS between PT PMM and the Perkebunan Tanah Sama Cooperative. In the clause of the implementation of work, both agreements explain that all work carried out by the contractor must meet the terms and conditions of the Ministry of Manpower and Transmigration in accordance with Law No. 13 of 2013.

Based on review of employee list document and field visit, it is known that they have no worker below 18 years old. The young worker employed as a loose fruit picker and checker (harvest clerk). Result of interview with worker representatives known that they understand that people under 18 years old are not allowed to work.

Status: Comply

6.5

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

6.5.1; 6.5.2; 6.5.3

The company has a policy related to the age requirements of workers, protection of reproductive rights, and maintaining decency in the Evans Group Indonesia Sustainability and Business Ethics Policy established in July 2019 explaining that:

- The company prohibits the use of child labor in all of its operational activities both those that are run alone and those run by its suppliers.
- The minimum age for work is 18 years.
- The company is very committed to creating and maintaining a work environment that is free from sexual harassment.
- The company will submit a case of reasonable sexual harassment to the appropriate authorities to obtain legal action; if proven, it will take decisive action, such as termination of employment with employees who have been found guilty of this violation
- Company will give special dispensation to women workers who suffer from menstrual pain, who are pregnant or breastfeeding in accordance with the rules and regulations.
- Company will not allow pregnant employees to carry out high-risk work that threatens the safety of mothers and children, such as lifting heavy loads, operating heavy equipment and handling chemicals such as pesticides, herbicides, fertilizers and laboratory chemicals.

The company shows monitoring of maternity leave for female workers and sample of maternity leave letter which accompanied by a request form for permission and a letter of recommendation from the doctor.

The company also provides a clinic equipped with examination room for pregnant women and delivery room. There is also a *Posyandu* program including counseling for mothers, where the material varies according to their needs.

Based on interview with gender committee, there was sexual harassment case happened in BPE unit. The case had been resolved in accordance with company regulation. As a follow-up to this incident, the gender committee conduct sexual harassment counseling routinely.

6.5.4.

The company has a procedure for complaints and grievances contains objectives, scope, responsibilities, references, and procedures. The complaint must be written in the complaint book available at the office, then the unit leader is obliged to make efforts at least 2 weeks after the report is received. If it cannot be resolved, the reports will be forwarded to the head of representative. At each stage of completion, documentation is made and kept by the head of the representative.

There is also a whistle blower system policy No. 001/PD-WBS/08/2017 which aims to accommodate all complaints and reports owned by staff and employees as well as the community living around the plantation. One of the procedures is to continue processing notifications submitted anonymously as long as the notifications is accompanied by evidence and can be evaluated.

Status: Comply

6.6

No forms of forced or trafficked labour are used.

6.6.1 & 6.6.2

Based on the procedure of recruiting non-staff employees, it is known that the workers accepted are those who have sent job applications to the company. In addition, there were no complaints from employees regarding forced labor or job substitution based on an internal complaint book. All workers come from within the country and they were attaching copies of ID card and family card when applying for work.

The company shows examples of new employee recruitment documentation, for example:

- A copy of KTP in behalf of KFL
- Copy of family card

- Application letter

Based on the employee list document, it is known that there are no contract workers. The status of worker are SKU-H, SKU-B, and workers on probation. The company showed a letter No HRD A23-001-02 regarding the procurement of employees, where the probation period is at most 3 months and non-permanent contracts are only for prospective employees whose types of work are seasonal. This provision is valid from 1 July 2020.

As implementation of the letter, the company showed decree No. 068 / SK-SKU-H / RHE / VII / 2020 dated 1 July 2020 regarding appointment of permanent daily employee and decree of work acceptance No. 038 / SK- (SKU-H) / LLE / IX / 2020 for office girl with 3 months of probation from 1 September to 1 December 2020. The decree explains the wages earned by workers, position, employee status, and obligations which must be obeyed by workers.

Based on explanation above, it is known that there is no forced labor and both company and worker has agree with each other.

Status: Comply

6.7

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

6.7.1

The company already has persons that responsible for the OHS program within the organizational structure of Committee of Occupational Health and Safety (*P2K3*) established in each management unit. The organization routinely conducts monthly meetings on OHS issues in the workplace. The documentation of the meeting were recorded and stored well.

The company routinely send *P2K3* quarterly reports to the Office of Manpower and Transmigration Agency, for example, indicated by minutes of PT PMM and PT TJA *P2K3* Quarterly II Report on 30 July 2020. Example of record of *P2K3* PT PMM monthly regular meeting on 28 January 2020, which discusses cleaning work areas and evaluating compliance with PPE usage. Based on interviews to workers who are members of the *P2K3* organization it is known that monthly meetings are always routinely conducted to discuss about OHS such as consistency of PPE usage, work accident report, fire simulation, checking of emergency response equipment, OHS sign board, cleanliness of work area, etc.

6.7.2

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

PT PMM and PT TJA has already licensed first aid officers and there was first aid training conducted on 6 Februari 2019 in training centre. 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.

6.7.3

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

with workers, on their understanding towards PPE and PPE management. According to combination of audit method above, it could be concluded that there is no negative issue related to PPE implementation.

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

6.7.4

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

There are some contractors in certification unit. Based on interview with contractor representative, it is known that the accident insurance and health insurance for contractor's workers is covered by the head of contractor itself. The company can show evidence of *BPJS Ketenagakerjaan* payment from the employees used by the contractor.

There is claim for work accident. However, based on interview with worker representative, unit management, as well as information from Manpower Agency of Kutai Kartanegara District, it was known that every accident had covered by BPJS. Furthermore, there is no negative issues related to claim for work accident.

6.7.5

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

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 activity budgeted on the program were consist of detection, census and monitoring of pests and diseases attack, biological control such as barn owl nest installation and planting of beneficial plants. IPM programs are conducted by the company, among others Pest Detection Program carried out periodically every two months and in case of attack symptom is held every month and Beneficial plant maintenance activities performed every month. According to IPM activity records for January to August 2020 such as program and realization of rat census, leaf eating caterpillar census, and termite census, it could be concluded that all the census results were still under its economic threshold. There is no invasive species attack. This may lead to zero use of pesticides for pests and diseases control. It could be concluded that IPM techniques implemented by biological methods is effective to control pests and diseases, and also to minimize the use of chemicals. Furthermore, according to pesticides used record in 2019, agrochemical uses was only implemented for weeds control purposes.

The company has a good commitment to improve the use of pest natural predator as part of integrated pest control. One of natural predator development is the reproduction and the construction of barn owl box as a mechanism to control rat. It monitoring barn owl box occupation at least once a month. The auditors conducted a field visit to the owl farm at

Lembuswana Estate, the captive conditions are very good, and the company is developing the owl population as a natural enemy of rats. During the RC assessment, the company received OFI regarding the realization of owl nest construction and during this ASA-1.1 assessment the company had built an owl captivity and owl nest starting from Lembuswana Estate at PT PMM and Rahayu Estate at PT TJA. The results of auditors' visits to owl nests at Lembuswana Estate and Rahayu Estate concluded that owl nests had been installed and had been inhabited by owls. The company's future target is to build an owl's nest with a target of 1 owl nest every 30 ha.

Based on field observation on harvesting activities in Bumi Permai Esatate, Lembuswana Estate and Rahayu Estate, it was concluded that there were no significant pest attacks. This is in accordance with the result of the census.

7.1.2

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

7.1.3

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

Status: Comply

7.2

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

7.2.1

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

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

7.2.2

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

7.2.3 and 7.2.4

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

7.2.5

Evans Group Indonesia has a policy on Sustainability and Business Ethics issued in July 2019 wherein the Occupational Health and Safety section in point VIII states that the Group will not use paraquat.

Based on document verification and field visit to pesticide storage, Bumi Permai Esatate, Lembuswana Estate and Rahayu Estate no longer use paraquat and in the last 1 years do not use pesticide with WHO 1A or 1B class.

7.2.6

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

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

7.2.7

The company has a material and chemical management procedure (TJA/SOP/Umum-17 and PMM/SOP/Umum-17) which explains the inspection of materials and characteristics including hazardous chemicals. Officers who control are warehouse officers. Officers periodically monitor the condition of stored materials to find out damage and expiration.

Based on the results of field visits in the pesticide (chemical) storage warehouse at Bumi Permai Esatate, Lembuswana Estate and Rahayu Estate it is known that the storage of all pesticides is in accordance with the procedure and does not mix with other materials.

7.2.8

The company has shown SOP for the Management of Hazardous and Toxic Waste SOP No SUS-SOP08-01 which was passed on October 1, 2019. In this document, it describes the control of waste from the use of hazardous and toxic chemicals including used pesticides. To manage all hazardous and toxic waste generated from operational activities, the Company has a cooperation agreement with PT Sumber Agung Srimarti (PT SAS has obtained a collection and transportation permit from the authorized government agency) with agreement number 09 / S & C / SPK-Limbah / PMM-SAS / 03/2020 dated 23 March 2020 for hazardous Waste Transport & Collection activities, with a validity period of one year. Implementation time every 3 months.

The delivery of hazardous waste that was carried out was on 24 February 2020, 4 April 2020 and on 7 July 2020 using a vehicle with the police number KT 8205 NU (permit for dangerous transportation (B3) number: SK.00033 / AJ.309 / 1 / DJPD / 2019 / 100003021-00007 on March 20, 2020 which is valid for 1 year). The types of waste sent include: used oil, used batteries, used oil filters, used pesticide packaging, hazardous contaminated solid waste, medical waste, used paint cans, and electronic waste. Based on field visits to each housing and temporary storage for hazardous waste, it was known that all used pesticide containers are not reused for other purposes, but all have been stored in temporary storage for hazardous waste. This indicated consistency on this matter is considered very satisfactory.

7.2.9

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

7.2.10

The company has list of pesticide operator based on latest data of August 2020 as many as 32 workers in Bumi Permai Estate, 41 workers in Lembuswana Estate and 27 workers in Rahayu Estate. Medical examination (cholinesterase) has been conducted on 9-11 September 2019 and 25 November 2019 to all pesticides workers. The result of medical examination is informed to the workers and all pesticide operators are in a healthy condition (normal result). And also, based on interview with the workers, it is known that they are never get experience of occupational injury which caused by chemical such as irritation.

7.2.11

The company has Circular Letter No SE/HoO-A/03/2012/002 dated 01 March 2012 from the Head of Operational Agronomy to all managers, staff and employees of PT PMM and PT TJA which explains about the dangers of Spraying for health, prohibiting pregnant and lactating women from doing Spraying activities and transferring work to other safer places. From the results of interviews with spray workers at Bumi Permai Estate, Lembuswana Estate and Rahayu Estate, it was found that none of the female workers sprayed chemicals. Audit team also got information that the personnel have understood that female personnel cannot work with chemical material if they are pregnant or lactating.

Status: Comply

7.3

Waste is reduced, recycled, reused and disposed of in ways that are environmentally and socially responsible manner.

7.3.1

All waste products and sources of pollution have been identified and documented in the waste management and identification document for the period 2020. Based on document verification, it appears that the company has implemented waste management in accordance with the source identification and waste management plan, including:

- o Estate, sources of waste: chemical activities, types of waste: used pesticide containers (toxic and hazardous waste) and infectious waste are managed by being stored in a temporary storage place for hazardous waste and then sent to a licensed transporter.
- o Mill, source of waste: FFB process, type of waste: shells and fibers (non-toxic / hazardous waste), managed using renewable energy for boilers
- o Mill, source of waste: FFB process, type of waste: palm oil mill effluent, managed by waste pond and land application as a nutrient cycle.
- o Esatate, sources of waste: pruning activities, types of waste: palm fronds (organic waste), managed by heaping fronds.
- o Housing, organic and inorganic waste resulting from household activities are managed by making a landfill and landfill.

7.3.2 and 7.3.3

The company has shown SOP for the Management of Hazardous and Toxic Waste SOP No SUS-SOP08-01 which was passed on October 1, 2019. In this document, it describes the control of waste from the use of hazardous and toxic chemicals including used pesticides.

To manage all hazardous and toxic waste generated from operational activities, the Company has a cooperation agreement with PT Sumber Agung Srimarti (PT SAS has obtained a collection and transportation permit from the authorized government agency) with agreement number 09 / S & C / SPK-Limbah / PMM-SAS / 03/2020 dated 23 March 2020 for Hazardous Waste Transport & Collection activities, with a validity period of one year. Implementation time every 3 months.

The delivery of hazardous waste that was carried out was on 24 February 2020, 4 April 2020 and on 7 July 2020 using a vehicle with the police number KT 8205 NU (permit for dangerous transportation (B3) number: SK.00033 / AJ.309 / 1 / DJPD / 2019 / 100003021-00007 on March 20, 2020 which is valid for 1 year). The types of waste sent include: used oil, used batteries, used oil filters, used pesticide packaging, hazardous contaminated solid waste, medical waste, used paint cans, and electronic waste.

Based on field visits to TPS LB3 (Temporary storage warehouse for hazardous waste) and interviews with employees in charge of TPS LB3, they already have an understanding of hazardous waste management.

From the information above, it can be concluded that the company has managed the waste it produces in accordance with the applicable regulations, namely by submitting it to the final waste manager who has a permit, and the company does not burn all the waste it produces, either openly or closed.

Based on interviews with management related to the disposal of domestic waste and hazardous waste, domestic waste in housing is separated between organic and an-organic and then transported once a week to the final waste storage area, then it will be piled up after the waste pits are full. For hazardous waste generated from the company's operations, the company does not use it but is directly stored in a temporary storage warehouse for hazardous waste which will be handed over to third parties who collect and exploit / destroy hazardous waste that have received permission from the

government.

Based on field visits to housing and landfills, two trash bins have been provided in front of the housing, namely for organic and an-organic waste, the housing environment is clean and well-maintained, and there is no burning of waste and use of used pesticide containers. Based on a visit to the warehouse, where the hazardous and toxic waste is temporarily stored, all used pesticide containers have been stored there.

Status: Comply

7.4

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

7.4.1 and 7.4.3

The company has a fertilization procedure (AGR-SOP09-01 dated 3 March 2020) which explains good practices for providing nutrients for plants to optimize yields and utilize organic nutrient sources such as empty fruit bunch, application of effluent and recycling of organic materials when replanting to minimize the impact on the environment.

The auditors conducted interviews with fertilizer workers from Bumi Permai Estate, Lembuswana Estate and Rahayu Estate. From the interview results, it is known that the company has implemented manual fertilizer application, where the dosage has been adjusted according to the recommendations. The workers also understand the types of fertilizers that are applied and understand the benefits of these fertilizers for oil palm plants.

The company has a strategy of recycling nutrients, such as the use of the frond (pruning), application of effluent and EFB composting. The company shown a recording of the realization of composting applications in 2020 on Bumi Permai Estate and Lembuswana Estate, for example composting application in August 2020 as much as 1,132 tons.

7.4.2

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

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

7.4.4

The company shows the results of fertilizer recommendations in 2020. The types of fertilizers used are Urea, RP, TSP, MOP, Kieserite, Borate, Dolomite dan NPK. The verification of fertilization activities documents for the period until August 2020 in each estate were in accordance with the recommended dosage. Fertilization activity records are recorded well by the company that explains the type of fertilizer, the number of workers, work performance, and the dosage used. For example in the Bumi Permai Estate for urea fertilizer has a program in 2020 totaling 212.05 tons and as of August 2020 it has been realized 201.06 tons and in the Lembuswana Estate for urea fertilizer has a program in 2020 totaling 277 tons and as of August 2020 it has been realized 296 tons.

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

Status: Comply

7.5

Practices minimise and control erosion and degradation of soils.

7.5.1; 7.5.2 and 7.5.3

The company can show the soil map of PT PMM and PT TJA on the results of semi-detailed 2009 soil survey conducted by PT Earth Line at a scale of 1: 90,000 and the land suitability map of PT PMM at a scale of 1: 40,000 and PT TJA at a scale of 1: 35,000. Based on the map study, it can be concluded that there is no land with a slope > 20°. Potential fragile land is peat (Sapric Haplohemists) of 17.79% from 15,308.36 Ha or 2,723.58 Ha in PT PMM area and 19.50% from 5,198.94 or 1,013.71 ha in PT TJA area. Based on general field observations, it is known that the area in PT PMM and PT TJA is dominant flat. There is no steep area planted with palm oil. At the time of the audit activity, there were no new planting activities in the area of the company's management.

Status: Comply

7.6

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

7.6.1; 7.6.2; and 7.6.3

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

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

Status: Comply

7.7

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

7.7.1

As information from the distribution of planting years, it is known that the range of planting years in the company's operational area is between 2007 and 2017. There is no additional planting after the 2017 period both in the mineral area, especially in the peat area.

7.7.2

The certification unit has sent a peat inventory report to RSPO (ghg@rspo.org) on 15 November 2019. The reported areas are planted areas while unplanted areas are not yet included. In addition, referring to the 2009 soil survey, the area of peat reported by PT PMM was greater than the results of the soil survey. The attached map of the peat planted area does not yet have information on area. Then the company sent again a peat inventory report to the RSPO (ghg@rspo.org) on 13 September 2020, which has explained the entire peat area in PT PMM and PT TJA, including planted areas, unplanted areas and HCV. The total area of peat is 3,737.29 Ha of which 2,724.31 Ha are planted, 479.91 Ha of unplanted area and 533.06 Ha of HCV

7.7.3

The company shows the results of monitoring of the subsidence stake from February 2019 to February 2020. Monitoring of the subsidence stake is carried out once a year. From the results of the monitoring, various results were obtained. For example, in the block M45 Bumi Permai Estate from February 2019 to February 2020 there was a land subsidence of 2 cm. In general, the results of monitoring of subsidized stakes concluded that there was no significant land subsidence.

The results of the auditor's field observations at Blok M45 Bumi Permai Estate, it is known that the company has installed subsidence stakes and is in a well maintained condition.

7.7.4 and 7.7.6

The company regulates the water level and subsidence the peat soil surface to inhibit carbon emissions from peatlands. Companies can show water level and piezometer monitoring documents for the period January to August 2020 which are carried out regularly every week at all compliance points. The results of monitoring the water level varied from week to week. For example, the third week of August 2020 shows an average water level of 62 cm from the ground surface and

in the fourth week of August 2020 shows an average water level of 65 cm from the ground surface. The company has a water management system using a water gate to always maintain the water level in the range of 60-80 cm above the ground. The company also conducts routine monitoring of rainfall every day as supporting data in the water management system in peat areas.

From the results of field observations in block M45 Bumi Permai Estate, the water level at the point of compliance is 62 cm from the ground surface. Based on field observations in PT PMM and PT TJA peat areas in general, there are ground cover crops such as legumes and nephrolepis in the field.

7.7.5

The company has not yet carried out a drainability assesment. Based on the hectare statement data for 2020, the earliest planting year at PT PMM and PT TJA was 2007 or at the time of the ASA 1.1 audit activity was still thirteen years old. The life cycle of one cycle is set for 25-30 years. Thus, the company does not have a replanting plan in the near future.

7.7.7

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

Status: Comply

7.8

Practices maintain the quality and availability of surface and ground water

7.8.1, 7.8.2

The company has identified water flows in its operational areas in the HCV document and there is also a water management plan that is included in the HCV management plan, environmental management plan document (RKL / RPL document) and procedure no. SUS-SOPP01-01 dated 01 October 2019. The plans include:

1. Designation of river boundaries (riparian), protection of river boundaries by not applying chemical spraying of pesticides or herbicides 50 m left and right along the river
2. Put up a sign that prohibits spraying 50 m either side of the river by making wooden stakes painted with red and white paint
3. Conducting river water quality tests on a regular basis every 6 months with environmental quality standard parameters as regulated in the East Kalimantan Provincial Regulation No. 2 of 2011.
4. Conducting clean water quality tests for housing and monitoring wells for land applications every 6 months with environmental quality standard parameters as regulated in Permenkes 32 of 2017.
5. Enrichment of trees along the riverbank.

Based on field visits to spraying work, employees understand which areas should not be sprayed and understand the limits for spraying that the company has established.

In addition, to provide adequate access to clean water, a sense of security and health responsibility, the company has also built drilled wells in every employee housing and tests the quality of river water and clean water every 6 months and monitors the volume of water use. The last clean water and river water tests were carried out on January 3, 2020 and February 27, 2020.

7.8.3

All palm oil mill effluent produced by Bumi Permai Palm Oil Mill are processed at waste water treatment plant before it distributed to estates as land applications. This pome applications was conducted based on decree of Kutai Kartanegara regent No. 660.1/002 /BHI/SK-LA/BLHD/III/2014.

POME quality testing document review shown for Januari 2020 to August 2020 all of POME testing parameters are compliant to the standards quality (for examples BOD on August 2020 are 615.42 mg/l with threshold 5000 mg/l and pH 8.01), and all of waste water management and monitoring has been reported to related institutions for regular basis per 3 months.

7.8.4

The procedure of water use monitoring in mill available under document Procedure of Water Treatment Plant. Water consumption monitored by using flowmeters installed in the piping system of WTP. According to water use data in the last period Januari 2020 to August 2020 average water used for processing still below the determined budget (1.13 m³/ton FFB while the budget is 1.5 m³/ton). The overall use of water under the budget of the company (Letter of Manager Mill No: 01/SE-Efficiency/BPM/01/2014).

Status: Comply

7.9

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

7.9.1

A plan for improving efficiency of the use of fossil and optimize renewable energy were available, implemented and monitored refer to document of inventory and mitigation report of PT PMM and PT TJA years 2020. The company already maximizing the use of renewable energy (fiber & shell) as boiler fuel. For example, use of shells and fiber period January to August 2020 has produces 1,123,651.20 kWh of electricity from turbine, while electricity generated from diesel fuel 198,734.10 kWh. The efficiency renewable energy use per ton of palm product in the mill is 30.10 kWh / MT CPO, while result Direct fossil fuel used is 6,78 kWh / MT CPO.

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

The company has identified source of pollution and air emission sources, including gaseous, particles and shoot emissions and effluent covering emissions and pollution sources from estate and mill operations. The emission source identified from estate and mill operation among others are land use change, vehicle operation, machine operation, fertilizer and pesticide application, use of AC/refrigerator, waste piling and electricity consumption.

Identification of significant GHG gas emission source is identified and the mitigation plan has been developed by the company covering mill and estate. The significant GHG emission among others are land use change, POME, use of fertilizer and pesticide, use of fossil fuel for operation and transport. The mitigation plan among others are correct dosage use for fertilizer and application as recommended, reduce reuse and recycle action, electric use limitation, transport and engine maintenance, periodic air quality test.

Fossil fuel reducing on Bumi Permai POM have been implemented by fiber/shell usage for boiler. POME has been monitored every months and monitoring periods January 2019 to February 2020 shown that all of waste water testing parameters is compliant to the standards quality.

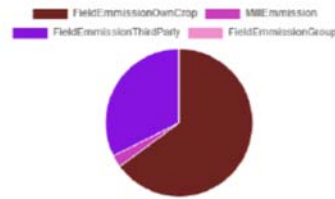
Based on document review for examples: pesticides usages monitoring, diesel fuel monitoring, HCV identification and etc found that accurate data has been put into the RSPO palm GHG Calculator.

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

Summary Emission

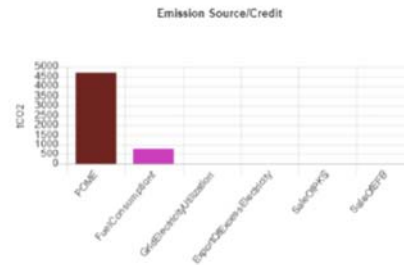
Product	tCO ₂ e / tProduct	Action
CPO	2.16	
PK	2.16	
PKO	0.00	
PKE	0.00	

Description	Unit	Value	Action
Oil palm planted on mineral soil	Ha	12370.53	✓
Oil palm planted area on peat	Ha	2741.48	✓
Total oil palm planted area	Ha	15112.01	✓
Conservation area (Forested)	Ha	1872.28	✓
Conservation area (Non-Forested)	Ha	0.00	✓
FFB Production per hectare	t/ha	21.23	✓
OER	%	24.62	✓
KER	%	5.29	✓



Mill Emissions and Credits

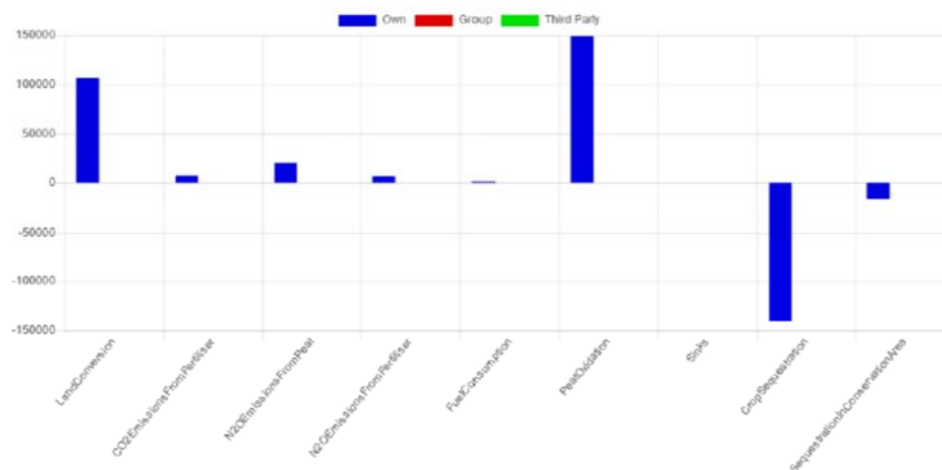
Description	tCO ₂	tCO ₂ e/t FFB	Action
Emission Sources			
POME	4722.91	0.01	
Fuel Consumption	800.98	0.00	
Grid Electricity Utilisation	0.00	0.00	
Credits			
Export of Excess Electricity to Housing & Grid	0.00	0.00	
Sale of PKS	0.00	0.00	
Sale of FFB	0.00	0.00	
Total	5523.89	0.02	



Estate/Plantation field emissions and sinks

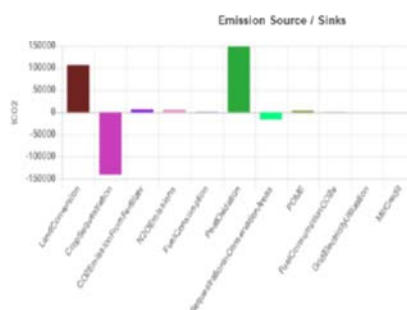
	Own			Group			3rd Party			
Description	tCO2e	tCO2e/ha	tCO2e/t FFB	tCO2e	tCO2e/ha	tCO2e/t FFB	tCO2e	tCO2e/ha	tCO2e/t FFB	Total
Emission Source										
Land Conversion	107563.26	7.12	0.38	0.00	0.00	0.00	0.00	0.00	0.00	107563.26
CO2 Emissions from Fertiliser	7450.52	0.49	0.03	0.00	0.00	0.00	0.00	0.00	0.00	7450.52
N2O Emissions from Peat	20522.21	1.36	0.07	0.00	0.00	0.00	0.00	0.00	0.00	20522.21
N2O Emissions from Fertiliser	6665.57	0.44	0.02	0.00	0.00	0.00	0.00	0.00	0.00	6665.57
Fuel Consumption	1615.44	0.11	0.01	0.00	0.00	0.00	0.00	0.00	0.00	1615.44
Peat Oxidation	149685.91	9.91	0.53	0.00	0.00	0.00	0.00	0.00	0.00	149685.91
Sinks										
Crop Sequestration	-141474.51	-9.36	-0.50	0.00	0.00	0.00	0.00	0.00	0.00	-141474.51
Sequestration in Conservation Area	-17168.81	-1.14	-0.05	0.00	0.00	0.00	0.00	0.00	0.00	-17168.81
Total	134859.48	8.92	0.48	0.00	0.00	0.00	67265.60	0.00	0.00	202125.09

Field Emission and Sinks



Emissions from Palm Kernel Crusher

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



Palm oil mill effluent (POME) treatment

Diverted to compost	70%
Diverted to anaerobic digestion	30%

POME diverted to anaerobic digestion

Diverted to anaerobic pond	0 %
Diverted to methane capture (flaring)	0 %
Diverted to methane capture (electricity generation)	100 %

7.10.2

Until audit ASA-1.1 were planting of oil palm for an area of 212.33 Ha in PT PMM and 606.76 Ha in PT TJA. Planting areas are carried out in 2016-2017 are still included in the location permit and cadastral map that owned by PT TJA & PT.PMM. The company has conducted RSPO NPP on February 2013.

The Company has conducted a HCV Assessment to a large area that is in accordance with the location permit PT PMM and PT TJA on August 2011. According to the result of the document review and interview, the land clearing has been conducting since April 2007, but has been first conducted HCV identification before land clearing. Liability of disclosure has been sent to RSPO Compensation Team on 23 July 2014.

7.10.3

The company has identified pollutions and emissions sources of Bumi Permai POM for the period 2020, such as CO₂ (boiler, generator, transportation), CH₄ (POME), hazardous waste (WTP, chemical storage), noise (machinery). The sources of pollution and emissions for the estate are listed on the identification documents and management plans for pollution sources for the period 2020, such as emissions (CO₂, CO), noise, chemical waste, organic and inorganic waste, and infectious waste.

Plans to reduce or minimize have been implemented and monitored as explained in RKL-RPL semester I the year 2020. Fossil fuel reduction on Bumi Permai POM have been implemented by fiber/shell usage for the boiler.

Status: Comply

7.11

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

7.11.1

It is the same as the previous assessment that the company has a land clearing procedure (PMM / SOP / AGRO-02). Land clearing without the use of fire, cutting (imas / falling), leaving in a certain path (stacking) and using heavy equipment for mechanical stacking. Block area for flat area is 30 ha and for hill area adjust road boundary. The principal unit per hectare is set at 136 points / ha (Guidelines for oil palm cultivation, planting).

Based on review towards long-term management plan and hectare statement 2020, as well as information from estate management, it was known that there are no replanting and / or new planting activities in the near future. It is known that the company has the oldest plant age of 11 years (planting year 2007), so the replanting activity has not been programmed. As well as information from representative surrounding Villages, it was known that there is no burning activities for land clearing in PT. PMM and PT. TJA. Land preparation is conducted mechanically by heavy equipments.

7.11.2

The company already has several procedures related to fire prevention and control and has procedures related to land clearing without burning. To support the implementation of these procedures, the company has formed an emergency response team / committee (including fire) in each unit which receives regular fire management training once a year. The last training was held on January 31, 2020 and July 03, 2020 which was conducted jointly between PT. PMM and PT TJA. Based on the observation of simulated firefighting activities at the Kahoi Estate and hydrant simulations at Bumi Permai Mill, it is known that the fire emergency response team can run simulated activities well, and the equipment used is in standby condition.

7.11.3

Based on the results of interviews with management and verification of monitoring documents and reports of land fires, it was found that there were 4 incidents of land fires in the PT PMM plantation unit and 2 land fires in the plasma area, while in the PT. TJA does not occur land fires. All reports of investigations and assessments of fire and land damage that occurred in the PT PMM unit and its surroundings have been shown along with reports to related agencies. For example, an investigation report and study of fire and land damage events in BJE on September 5, 2019 and has been reported to the Muara Kaman Police agency on September 6, 2019 through letter No. 080 / PMM-BJ / 09/2019 and the Plantation Office dated 25 September 2019 through letter No. PMM / SC / 2019 / IX / 178. The company has also demonstrated preventive or follow-up measures from these fires, such as conducting regular fire patrols and monitoring that no fire triggers occur around the plantation area.

For both plasma and core areas, the company has also collaborated with communities around the company in terms of reporting and jointly handling in the event of a fire.

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

The Company has conducted a HCV Assessment to a large area that is in accordance with the location permit PT PMM and PT TJA on August 2011. According to the result of the document review and interview, the land clearing has been

conducting since April 2007, but has been first conducted HCV identification before land clearing. Liability of disclosure has been sent to RSPO Compensation Team on 23 July 2014.

Until ASA-1.1 audit conducted, no new planting activities above 15 November 2018. There were replanting of oil palm for an area of 212.33 Ha in PT PMM and 606.76 Ha in PT TJA. Relanting areas are carried out in 2016-2017 are still included in the location permit and cadastral map that owned by PT TJA & PT.PMM. The company has conducted RSPO NPP on February 2013.

7.12.2

The company has conducted the identification of HCV in the operational area of PT. PMM & TJA in 2011 – 2012 in collaboration with competent third party (Envirologic and Aksenta Consulting). Executive identification member is RSPO *approved HCV assessor*. The identification of HCV have involved communities surrounding villages (Benua Puhun, Rantau Hempang, Loleng), owner of enclave area and land acquisition team. Based on identification, HCV area covering 1,410.71 ha in PT PMM and 440.93 ha in PT TJA. Total HCV area for this certification is 1,851.09 ha. HCS is not applicable because PT PMM and PT TJA are already operating and there is no new land clearing after November 2018.

7.12.3

Base on document submitted by Proforest namely RSPO No deforestation consultancy: High Forest Cover Lenscape, Consultancy report on definitions and recommendations to the RSPO June 2018 as known not set HFCL for Indonesia.

7.12.4

The management unit has compiled a Management and Monitoring Plan of HCV until year of 2020. This program was developed by stakeholders participate. The measures taken to protect RTE and HCV are:

- Training protected vegetation inventory and monitoring inspections.
- Training wildlife conflict mitigation.
- Creating and maintenance of signboards.
- Installment of signboard of HCV and conservation area in each estate
- Transect plot mapping
- Identify threats and sources of threats.
- Vegetation Analysis
- Creating a mechanism flowchart protected animals.

The company has HCV management plan to protect the HCV area, for example: regularly monitoring of HCV signboard was conducted together with security patrol. The company has implemented HCV Management and Monitoring in accordance with the HCV Management and Monitoring Plan. The management and monitoring plan were reviewed in March 2020 by involving the community around the company.

7.12.5

The company has conducted socialization regarding the existence of conservation areas, rare animals and plants to employees and the surrounding village community, including Muarakaman Ilir Village, Lebak Mantan Village, Lebaho Ulaq Village, Bukit Jering Village and Benua Puhun Village. In this outreach, the company provides a form of cooperation in managing and monitoring its conservation areas with the community.

7.12.6

The company have established HCV management plan, and implemented it well. Regularly patrols record shown company has been monitored illegal hunting, and other illegal activities. All of records for daily patrols on each estate are available and verified by auditors. The Company has comply with legal requirement to protected species in accordance to Government Regulation number 7 year of 1999.

For example patrols summary results on semester I 2020 for Conservation area such as Based on species monitoring result, that founds several Endangered species, such as: *Manis javanica*, *Prionailurus planiceps*, *Nasalis larvatus*, *Buceros rhinoceros* and *Hylobates muelleri*.

The company has been conducted HCV & RTE socialization (community and worker) regularly every year, the last socialization on 15 April 2020.

7.12.7

The company have established HCV management plan, and implemented it well. Regularly patrols record shown company has been monitored illegal hunting, and other illegal activities. All of records for daily patrols on each estate are available and verified by auditors. The Company has comply with legal requirement to protected species in accordance to Government Regulation number 7 year of 1999.

For example patrols summary results on semester I 2020 for Conservation area such as Based on species monitoring result, that founds several Endangered species, such as: *Manis javanica*, *Prionailurus planiceps*, *Nasalis larvatus*, *Buceros rhinoceros* and *Hylobates muelleri*.

The company has also revised the monitoring references for protected flora and fauna types based on PemenLHK P106 of 2018. This is stated in the revised report and review of the HCV Diversity Data Action Plan which are categorized as protected. The protected flora types according to PemenLHK P106/2018 in the Company's area are as follows:

1. *Egretta eulophotes* (Kuntul cina)
2. *Pandion haliaetus* (Elang tiram)
3. *Elanus caeruleus* (Elang tikus)
4. *Haliastur indus* (Elang bondol)
5. *Microhierax fringilarius* (Alap-alap capung)
6. *Anthracoseros malayanus* (Kangkareng hitam)
7. *Anthracoseros albirostris* (Kangkareng putih)
8. *Buceros rhinoceros* (Rangkok badak)
9. *Calorhamphus fuliginosus* (Takur Amois)
10. *Platysmurus leucoplerus* (Tangkar kambing)
11. *Gracula religiosa* (Tiong emas)
12. *Aethopyga siparaja* (Burung-madu sepa raja)

In addition, the company has also evaluated the results of HCV management and monitoring every year and the results of these evaluations become improvements for management and monitoring plans in the coming year.

7.12.8

Until audit ASA-1.1 were planting of oil palm for an area of 212.33 Ha in PT PMM and 606.76 Ha in PT TJA. Planting areas are carried out in 2016-2017 are still included in the location permit and cadastral map that owned by PT TJA & PT.PMM

PT PMM and PT TJA has conducted environmental and social assessment prior the land clearing which explained on document of Environmental and Social Assessment of Oil Palm Developments PT PMM and PT TJA by Environmental Management & Monitoring Pty Ltd. The assessment carried out by Charlie Ross on April 2007. The results of a study conducted by Charlie Ross in April 2007 show that the areas in PT PMM and TJA are not primary forest.

The Company has conducted a HCV Assessment to a large area that is in accordance with the location permit PT PMM and PT TJA on August 2011. According to the result of the document review and interview, the land clearing has been conducting since April 2007, but has been first conducted HCV identification before land clearing. Liability of disclosure has been sent to RSPO Compensation Team on 23 July 2014.

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√
ASA-1.1	The company didn't use logo and trademark RSPO.	√
	Status: Comply	
2.	Implementation of certificate and trademark used by Client comply with size and type (shape) against Guideline of trademark Use	X or√
ASA-1.1	The company didn't use logo and trademark RSPO.	√
	Status: Comply	
3.	Implementation of Certificate and Trademark is not used on product	X or√
ASA-1.1	The company didn't use logo and trademark RSPO.	√
	Status: Comply	
4.	Controlling of Certificate and Trademark, including withdrawing inappropriate trademark.	X or√
ASA-1.1	The company didn't use logo and trademark RSPO.	√
	Status: Comply	

3.3 Summary of RSPO Partial Certification.

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

MP Evans Group PLC Time Bound Plan (TBP) is explained in table 1.10. MP Evans Group PLC has sixteen (17) management units with three (3) mills. MP Evans Group PLC has informed the TBP progress, MUTU has considered that MP Evans Group PLC is complied with the RSPO requirement for TBP. The Time Bound Plan was revised and declared by MP Evans Group PLC on 17 September 2020.

MUTU has verified partial certification for un-certified unit's subsidiary of MP Evans Group PLC based on their Time Bound Plan. There are one (1) uncertified mills and six (7) uncertified estates of MP Evans Group PLC. MUTU Auditor verified positive assurance against the company internal audit and supporting evidence as well as any information from others sources.

MUTU Auditor has verified company partial certification and concludes that:

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

Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
2.1.1	Did the company conduct an internal audit? If so, has a positive assurance statement been produced?	<p>Yes and positive assurance is developed under MP Evans Group PLC</p> <p>Auditor verification Based on the document review, there is a company internal audit that was conducted on 6 – 7 July 2020. Positive assurance is at this table that is also been verified.</p>
2.1.2	<p>No replacement after dates defined in Nis Criterion 7.3 of:</p> <ul style="list-style-type: none"> • Primary forest. • Any area identified as containing High Conservation Values (HCVs). • Any area required to maintain or enhance HCVs in accordance with RSPO criterion 7.3. 	<ul style="list-style-type: none"> - PT. Simpang Kiri Plantation Indonesia. RACP is not applied for this unit because the last land clearing was conducted before November 2005. The unit does not have mill. - PT. Evans Lestari (PT.EL) has conducted HCV and SIA identification by Forestry Faculty of Institute Pertanian Bogor (IPB) on March 2013 led by Dr. Ir. Jarwadi Budi Hernowo Msc, before land clearing. Therefore the unit has no liability related to RACP. PT Evans Lestari also conducted NPP on 17 December 2013 conducted by Certification Body of Control Union. - PT Bumi Mas Agro: HCV has conduct on 2014 and disclose the land clearing after November 2005 was conducted by non member. <p>Auditor verification</p>

		<p>Based on internal audit results and evidence provided (communication to RSPO on liability disclosure) the three uncertified units of:</p> <p>PT Simpang Kiri Plantation Indonesia: Last land clearing happened before November 2005 and there is no new land clearing of new planting.</p> <p>PT Evans Lestari Land clearing was conducted after November 2005 but has been first conducted HCV identification before land clearing. Liability of disclosure has been sent to RSPO Compensation Team on 23 July 2014.</p> <p>PT Bumi Mas Agro Planting year in PT Bumi Mas Agro consist of 2012 to 2017. Previously PT Bumi Mas Agro owned is not RSPO member and since 2017 has been take over by MP Evans Plc (RSPO member).</p>
2.1.3	Any new plantings since January 1 st 2010 must comply with the RSPO New Plantings Procedure.	<p>There is new planting after 1 Jan 2010 in PT Bumi Mas Agro, which conduct by non member RSPO. Since 2018 PT Bumi Mas Agro has been takeover by RSPO member (MP Evans Plc).</p> <p>Auditor verification Based on internal audit, documented time of land clearing and liability disclosure sent to RSPO, there is new planting/land clearing after 1st January 2010 for PT Gunung Pelawan Lestari and PT Evans Lestari but NPP has been conducted for these units. Evidence of submission to RSPO is provided and the NPP notification are at RSPO website.</p> <p>PT Bumi Mas Agro has new development after 1 January 2010 without NPP and will be subject to sanction.</p>
2.1.4	Any Land conflicts are being resolved through a mutually agreed process, e.g. RSPO Grievance procedure or Dispute Settlement Facility, in accordance with RSPO criteria 6.4, 7.5 and 7.6.	<p>There is land conflict in PT Bumi Mas Agro and has been resolved.</p> <p>Auditor verification Based on evidence provided, the company merely conducted planting on the area that has been compensated from the land owner by FPIC. The documentation of each land compensation/leasing is documented.</p>
2.1.5	Any Labour disputes are being resolved through a mutually agreed process, in accordance with RSPO criterion 6.3.	<p>Company has internal and external grievance mechanism. There is labor disputes in PT Bumi Mas Agro and has been documented. There is no information from public source and RSPO website on any labour conflict for uncertified unit of the group subsidiaries.</p> <p>Auditor verification There is labor disputes in uncertified unit and resolved</p>

		process has been documented. There is no information from RSPO website on any labour conflict for uncertified unit of the group subsidiaries and also from stakeholder consultation during 1 st surveillance audit of the PT PMM.
2.1.6	Any Legal non-compliance is being resolved in accordance with the legal requirements, with reference to RSPO criteria 2.1 and 2.2.	<p>Yes, there is process for land legality.</p> <p>Auditor verification Land legal process is still going on and there is a detail update progress documented by the company for each year.</p> <p>Update legal for PT Evans Lestari: the company has got plantation business permit (IUP) from Bupati Decree of Musi Rawas No. 891/KPTS/Disbun/2012 dated 12 November 2012 for 20,000 ha. It is in accordance with the scale of the company location permit (Decree of Bupati Musi Rawas No. 578/KPTS/BPM=PTP/2012 dated 30 October 2012 for 20,000 ha). However the location permit has been expired – need further HGU process information or any other legal process.</p>

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	: Satria Adi Putra
Date Issued	: 17 May 2019	Time Limit	: 16 August 2019
NC Grade	: Major	Date of Closing	: 12 August 2019
Standard Ref. & Requirement	: 2.1.1 Evidence of compliance with relevant laws and regulations must be available		
Evidence observed (filled by auditor): Based on document verification it is known that: <ul style="list-style-type: none"> - In Kahoi Estate there are 102 PKWT workers. There is no evidence that the PKWT workers have been registered with the Department of Manpower and Transmigration, Kutai Kertanegara Regency. - In Prima Estate there are 71 PKWT workers. There is no evidence that the PKWT workers have been registered with the Department of Manpower and Transmigration, Kutai Kertanegara Regency. - At Bumi Permai Mill there are 28 PKWT workers. There is no evidence that the PKWT workers have been registered with the Department of Manpower and Transmigration, Kutai Kertanegara Regency. 			
Non-Conformance Description (filled by auditor): The company has not been able to show evidence of PKWT reporting and recording in accordance with Kepmenakertrans No. 100 of 2004 concerning Provisions for the Implementation of PKWT, Article 13 that PKWT must be recorded by the employer to the agency responsible for the employment of the local regency / city no later than 7 (seven) working days from the signing.			
Root Cause Analysis (filled by organization audited): PT Prima Mitrajaya Mandiri and PT Teguh Jayaprima Abadi are not aware of any regulations relating to PKWT reporting to the relevant agencies			
Correction (filled by organization audited): Corrective actions taken by PT Prima Mitrajaya Mandiri and PT Teguh Jayaprima Abadi are: <ol style="list-style-type: none"> 1. Conduct an inventory of all PKWT employees in each unit 2. Reporting PKWT employees to relevant agencies (evidence attached) 			
Corrective Action (filled by organization audited): PKWT monitoring and reporting to the relevant agencies every month			
Assessor Evaluation and Conclusion (filled by auditor): Verification is August 12, 2019 The company has shown evidence of improvements including: <ul style="list-style-type: none"> - 1 file PKWT Employee Reporting Period May 2019 - Beringin Jaya Estate PT PMM - 1 file PKWT Employee Reporting Period May 2019 - Bumi Permai Mill PT PMM - 1 file PKWT Employee Reporting Period May 2019 - Bumi Permai Estate PT PMM - 1 file PKWT Employee Reporting Period May 2019 - Kahoi Estate PT PMM - 1 file PKWT Employee Reporting Period May 2019 - Lembuswana Estate PT PMM - 1 file PKWT Employee Reporting Period May 2019 - Prima Estate PT PMM - 1 file PKWT Employee Reporting Period May 2019 - Rahayu Estate PT TJA - 1 file PKWT Employee Reporting Period May 2019 - Mahakam Estate PT TJA 			

Reporting was submitted to the Head of the Manpower and Transmigration Office, Head of the Industrial Disputes Division of Kutai Kartanegara Regency on June 17, 2019.

Auditor Conclusion:

Based on the evidence of improvement shown, this nonconformity is fulfilled.

Verified by : **Satria Adi Putra**

NCR No.	: 2019.02	Issued by	: Brigitta prita
Date Issued	: 17 May 2019	Time Limit	: ASA 1.1
NC Grade	: Minor	Date of Closing	: 12 August 2019
Standard Ref. & Requirement	: 2.2.2 Legal boundaries are demonstrated clearly and maintained.		
Evidence observed (filled by auditor): <ul style="list-style-type: none"> Based on field observations in Block I 50 –I 51 Division of North Mahakam Estate; in Blcok P50 & P58, South Division of Mahakam Estate, PT TJA, it is known that there are no legal boundaries. Based on interviews with the management of the area do not yet have land use right and are still in the cadastral process. 			
Non-Conformance Description (filled by auditor): Based on the explanation above, the company has not been able to show evidence of clear boundaries in the field area.			
Root Cause Analysis (filled by organization audited): PT Teguh Jayaprima Abadi of Mahakam Estate unit, has not yet installed any boundary markers.			
Correction (filled by organization audited): <ul style="list-style-type: none"> Conduct an inventory installation of boundary markers (map attached). Installing boundary markers that have been made since the date of 13 to 25 July 2019 total of 106 markers (evidence attached). 			
Corrective Action (filled by organization audited): PT Teguh Jayaprima Abadi conducts boundary monitoring which is done once a month.			
Assessor Evaluation and Conclusion (filled by auditor): Verification, 12 August 2019. The company shows the minutes of the installation of boundary stones carried out on July 13 th , 2019 - July 25 th , 2019 as many as 75 boundary stones. There is an inventory map of boundary stones installation according to the cadastral plan covering 1,489.06 ha in Teguh Jayaprima Abadi. Based on the explanation above, this non-conformance is declared to have been fulfilled and will be observed during the next surveillance.			
Verified by	:	Brigitta Prita	

NCR No.	: 2019.03	Issued by	: Haikal Ramadhan Kharismansyah
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Date Issued	: 17 May 2019	Time Limit	: 16 August 2019
NC Grade	: Major	Date of Closing	: 14 August 2019
Standard Ref. & Requirement	4.3.4 Subsidence of peat soils shall be minimised and monitored. A documented water and ground cover management programme shall be in place		
Evidence observed (filled by auditor):			
<ul style="list-style-type: none">• Soil suitability map of PT PMM and PT TJA states that there is land with the type of peat in the operational area of the company• PMM / MAN-12 concerning Damage Control for Biomass Land for Production effective October 1, 2017 stating:<ul style="list-style-type: none">- Peat Subsidence: Mount subsidence pole (weathered wood sticks, such as ironwood) that are stamped (scale) until they reach a stable base- Water management: can maintain a water level as high as 50 - 70 cm in the collecting duct or 40 - 60 cm on the piezometer- Regular monitoring of water level is important by installing a numerical measuring device at a strategic location and the entrance of the collecting channel. Number 0 on the peat surface that has been planted.- If the water level is > 25 cm then flow and if > 65 cm is held so that the water level returns to the recommendation limit• RSPO Manual on Best Management Practices (BMPs) for Existing Oil Palm Cultivation on Peat :<ul style="list-style-type: none">- The measurement of subsidence of peat can be done by installing a vertical hollow iron pipe with an outer diameter of about 8 cm and installed firmly into the mineral substrate. Area 2 x 2 m is maintained around the stake- Installing water level gauges at strategic locations and behind weirs. Make sure level 0 is on the peat surface planted- If the water level is > 25 cm then flow and if > 65 cm is held so that the water level returns to the recommendation limit• Based on field observation found the following facts :<ul style="list-style-type: none">- Block L39: Level 0 water stick is not on the surface of the peat- Block M41: Subsidence pole are not made of hardwood and are not perfectly embedded and are not equipped with a scale- Block H37: Point 0 is the face of the peat and the water shows the number 90 cm - But water is still flowing- Block E24: Subsidence pole made of iron pipes and equipped with a scale- Block I52: Subsidence pole made of paralon is not covered with scale / mark- Block J51: Level 0 water stick is not on the surface of the peat- Record of repairs to water level block L39 PME on 15 May 2019. Point 0 has been adjusted to the surface of the peat			
Non-Conformance Description (dilengkapi oleh auditor):			
<ol style="list-style-type: none">1. Monitoring of peatland subsidence and water management by the company has not fully referred to the RSPO Manual on Best Management Practices (BMPs) for Existing Oil Palm Cultivation on Peat and has not referred to the established procedures.2. The company has not been able to show sufficient evidence that all peat monitoring carried out has used accurate measuring instruments.			
Root Cause Analysis (filled by organization audited):			
There is no special officer who consistently summarizes peat management data so that the procedures have not been implemented well by the unit			

Correction *(filled by organization audited):*

1. Socialization of standardization of piezometer, water level and subsidence pole on July 18, 2019 followed by GM, SM, Manager, Senior Assistant and Assistant (evidence attached)
2. Improving the installation of piezometer, water level and subsidence pole on:
 - KHE on July 30, 2019 (evidence attached)
 - PME on May 14, 2019 (evidence attached)
 - MKE on August 1, 2019 (evidence attached)

Corrective Action *(filled by organization audited):*

Monitoring piezometer and water level regularly once a week. Whereas the Stake Subsidence is observed once every year. The officer in charge is Sustainability & Certification clerk.

Assessor Evaluation and Conclusion *(filled by auditor):*
Verification on August 12, 2019

The company shows evidence of improvements in the form of:

1. Training and Socialization of Piezometer Standardization, Peat Subsidence, and Water Level Installation on July 18, 2019 conducted by the Sustainability and Certification Department, attended by 21 people from GM to Assistant to PT PMM and TJA Divisions.
2. Record of Improvement of Subsidence Pole on August 1, 2019 in blocks M - 40 to M - 43 Prima Estate (8 Unit)
3. Record of Repair of the Piezometer on August 1, 2019 on blocks M - 40 to M - 43 Prima Estate (8 Units)
4. Record of Improvement of Piezometer, Peat Subsidence, and Water Level block E24, C27, D27, F36, G36 and water level block C28.29 KKPA division and H / I 37 Central Division on August 1, 2019
5. Record of Water Level Repair for J-51 block and reprint
6. Record of Installing the Piezometer and Benchmark Subsides in block I50; 1151; and I52
7. Record of Installation of Water Level block J51

However hasnt show :

1. Sampling of observations of water level and piezometer as written (will be observed once a week)
2. Information about the actual number of water levels, subsidence pole, and location of their distribution (can be shown in the distribution map)
3. Responsible officer for monitoring peat management

In addition it needs additional information on root cause, correction, and corrective analysis. Thus the nonconformity was declared not yet fulfilled

Verification on August 14, 2019

The company shows additional evidence of improvement in the form of:

1. Weekly piezometer observations in June, July and August 2019
2. Weekly water level observations in June, July and August 2019
3. The person responsible for monitoring peat management is the sustainability & certification clerk
4. Map of the distribution of PT PMM and TJA piezometer, subsidence pole, and water level with the following details:
 - Kahoi Estate: 5-point piezometer; Benchmark 5-point subsidence; and 2 point water level
 - Prima Estate: 8-point piezometer, 8-point subsidies; and 9 point water level
 - Mahakam Estate: 3-point piezometer; Stake Subsides 3 points; and 1 point water level

Based on the root causes analysis, corrections, and corrective actions the discrepancies are declared fulfilled. Implementation and consistency of the improvement plan will be OBSERVED again in the next assessment.

<i>Verified by</i>	:	Haikal Ramadhan Kharismansyah
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NCR No.	:	2019.04	Issued by	:	Trismadi N
Date Issued	:	17 May 2019	Time Limit	:	16 August 2019
NC Grade	:	Major	Date of Closing	:	14 August 2019
Standard Ref. & Requirement	:	4.6.6 Storage of pesticides shall be according to recognized best practices. All pesticides containers shall be properly managed according to the existing regulations and or instructions enclosed on the containers (see criterion 5.3).			
Evidence observed (filled by auditor): The company has a procedure for handling ex-pesticide container and other agrochemical materials in document No. TJA/SOP/K3-11 and No. PMM/SOP/K3-11 dated 1 January, 2011. About the hazardous waste management. The procedure is explained as follows: <div><div>a.</div><div>The former chemical containers after use shall be washed at least three times and the containers is perforated before sending to the hazardous waste store. Flushing water should be managed and used again in the spraying activity.</div></div> <div><div>b.</div><div>Place the pesticide container in a place that has obtained license from the related agency.</div></div> <div><div>c.</div><div>Send the pesticide container to the licensed transporter.</div></div>					
Non-Conformance Description (filled by auditor): Based on field observation result in the housing complex, around the Mahakam Estate Office and child care in Mahakam Estate. There were found chemical container used for trash bins. However, not all pesticide container is managed in accordance with the procedures and regulations.					
Root Cause Analysis (filled by organization audited): Pesticide container using has not been accommodated by the procedures.					
Correction (filled by organization audited): <div><div>1.</div><div>The company has recommendation letter for chemical containers usage as a trash bin from the Environmental Agency of Kutai Kartanegara Regency number 660.1/004/B.I.2/BLHD/II/2014 dated 24 February 2014.</div></div> <div><div>2.</div><div>The hazardous waste management procedure has been revised.</div></div>					
Corrective Action (filled by organization audited): The periodically monitoring of chemical containers usage as garbage bin.					
Assessor Evaluation and Conclusion (filled by auditor): Verification on 12 August 2019 The company were shown several evidences, as follows: <div><div>1.</div><div>SOP ENV-SOP08-01 dated 1 August 2019 about Hazardous Waste Management. The following explained about:<div><div>1.4.5.</div><div>Chemical containers should be washed with a minimum of three rinsing and the packaging is perforated before entering the hazardous waste store. Rinsing water should be collected and used again in the field.</div></div><div><div>1.4.6.</div><div>The utilization of chemical containers can be reused for trash bins, only if there are recommendations from the governments.</div></div></div></div>					

2. Environment Agency of Kutai Kartanegara Regency Letter number 660.1/004/B.I.2/BLHD/II/2014 dated 26 February 2014, addressed to PT Prima Mitrajaya Mandiri. Regarding: responses to the pesticide used drums and used oil drums. It was explained that chemical containers can be reused at the hazardous waste store located in estates as: trash bin, dirty oil reservoirs, and sand droplets.
3. Environment Agency of Kutai Kartanegara Regency Letter number 660.1/005/B.I.2/BLHD/II/2014 dated 26 February 2014, addressed to PT Teguh Jayaprima. Regarding: responses to the pesticide used drums and used oil drums. It was explained that chemical containers can be reused at the hazardous waste store located in estates as: trash bin, dirty oil reservoirs, and sand droplets.

Verification on 14 August 2019

The company were shown several evidences:

Logbook on the jerry cans used for the trash bin in each unit on April 2019, such as: (PME: 8 pcs), June 2019 (PME: 13 pcs), while KHE was not utilized for trash bins from April to June 2019.

Auditor conclusions:

Based on above explanations, this nonconformity has been closed.

Verified by : **Trismadi N**

NCR No.	: 2019.05	Issued by	: Satria Adi Putra
Date Issued	: 17 May 2019	Time Limit	: 16 August 2019
NC Grade	: Major	Date of Closing	: 15 August 2019
Standard Ref. & Requirement	: 4.7.3 Records of Occupational Safety and Health (K3) training programs (see 4.8) and Personal Protective Equipment (PPE) in accordance with the results of hazard identification and risk analysis must be available to all workers.		

Evidence observed (filled by auditor):

(1)

- Based on the results of field visits and interviews with J40 Prima Estate Block, it was found that there were 2 harvest workers doing personal PPE purchases.
- Based on the results of the field visit to Kahoi Estate C33 Block, it was found that there were 1 harvest worker doing personal PPE purchases.
- Based on the results of a field visit to the Kahoi Estate Material Warehouse, it was found that there were no helmets and shoes stock.
- Based on the results of a field visit to Blok M55 of the KKPA Division, Mahakam Estate found that there were 1 harvest worker who made personal PPE purchases.
- The company has a Circular Letter No. 03 / SEHOOA / 10/2017 regarding PPE standards from the Head of East Kalimantan Agronomy Region Operations dated October 2, 2017 intended for all Senior Managers, Estate Managers, Assistant Heads, Assistants, Foremen of PT.PMM and TJA and S&C Department which stated, among others:
 - Point 7: All personal protective equipment that has been distributed and damaged before the replacement time will be replaced by the company on condition that it shows and returns the damaged PPE.
 - Point 11: Manager, Assistant head, Division Assistant and foreman are responsible for carrying out an inventory of the needs and procurement of appropriate PPE and monitoring use in the field.

(2)

- Based on the results of field visits and interviews with FFB transport contractor workers in Block L38, Prima Estate, it is known that workers do not use PPE (shoes and gloves).
- Risk Assessment Document Analysis of OHS Risk Assessment for the description of the work of transporting fruit from the Field Collection to the Truck / Trailer states that the control measures for the potential danger of accidents include using PPE in the form of cloth gloves, boots/work shoes).

(3)

- Based on the results of field visits and interviews with workers at the Engine Room station, it is known that workers have not been given safety shoes, while the shoes used are rubber boots.
- Risk Assessment Document Analysis of OHS Risk Assessment for work locations in the Engine Room states that control measures for potential accident hazards include PPE in the form of safety shoes, helmets and semi-leather gloves).

(4)

- Based on the results of field visits and interviews with workers at the Engine Room station, it is known that workers do not yet have Operation Licence Permit related to Lift and Production aircraft.
- Request for Training for First Class Operators (Generator) for Mahmud.
- Permenaker No. 38 of 2016 Chapter IV concerning *Penggerak Mula* (operators must be trained).

(5)

- Based on the results of a visit to the PPE storage warehouse in Prima Estate, it is known that there are several PPE lockers (for fertilizer workers). In addition it is known that there are 2 lockers with incomplete (masks and gloves).
- Based on the results of a visit to the PPE storage warehouse at Kahoi Estate, it is known that the company has provided several PPE lockers. But there is no PPE for fertilizer workers in the Central Division and KKPA.
- Based on the results of the field visit and the Daily Work Plan, there are no fertilization activities.
- IK PPE Storage (step 4) states that Save PPE to the place provided and do not take it home.

Non-Conformance Description (filled by auditor):

The company has not been able to demonstrate that the provision of PPE and OHS related training is in accordance with existing procedures and applicable laws and regulations.

Root Cause Analysis (filled by organization audited):

PT Prima Mitrajaya Mandiri and PT Teguh Jayaprima Abadi already have procedures related to OHS but have not been done properly.

Correction (filled by organization audited):

PT Prima Mitrajaya Mandiri and PT Teguh Jayaprima Abadi have taken corrective actions as follows:

1. Completing PPE which is in employee locker on May 16, 2019 at Kahoi Estate (evidence attached)
2. Completing PPE which is in the employee locker on May 14, 2019 at Prima Estate (evidence attached)
3. Socialization and provision of PPE to the contractor on May 15, 2019 at Prima Estate (evidence attached)
4. Socialization and provision of PPE to Mr. Mahmud on May 17, 2019 (evidence attached)

5. Providing Operator Licence Permit training to Mr. Mahmud and he has obtained a temporary decree No 3030 / PTICB / VII / 2019 on July 15-20 2019 conducted by PT Indotrain Consultant (evidence attached)

Corrective Action (filled by organization audited):

Monitoring PPE and OHS socialization on a regular basis to all employees of PT Prima Mitrajaya and PT Teguh Jayaprima Abadi and to provide training to steam and lift transport operators.

Assessor Evaluation and Conclusion (filled by auditor):

Verification is August 12, 2019

The company has shown evidence of improvements including:

- New Employee Training and Socialization Documents on behalf of M Mahmud on May 17, 2019 with materials including the submission of OHS policies, RSPO/ISPO/ISCC Principles, workers' prohibitions and the administration of PPE in the form of safety shoes (evidence has been completed in the form of photos, attendance list and minutes of PPE handover).
- Minutes of PPE at Fertilizer storage on May 16, 2019 at Kahoi Estate
- Minutes of PPE for Employees on May 14, 2019 at Prima Estate with the addition of 3 pairs of rubber gloves and 2 pairs of cloth gloves made by Field Assistant, OHS Expert and approved by the Sustainable & Certification Department Team and Estate Manager.
- Minutes of PPE handover and Training of FFB Contractors on May 15, 2019 at Prima Estate. Documentation and attendance are made by Field Assistant, OHS Expert and approved by the Estate Manager.
- Certificate No. 3030/PTICB/VII/2019 which states that workers on behalf of M. Mahmud (PT PMM) had followed the OHS guidance in the field of Steamers (Boilers) on 15-20 July 2019 and were organized by PT Indotrain Consultant. The attendance list is attached and has been known by the Manpower Supervisor of PUBT Disnakertrans of East Kalimantan Province.

Based on the evidence of improvements provided, there are still a number of things that need to be verified by the auditor team such as:

Proof of improvement in Point 1, namely:

- Based on the results of field visits and interviews at Block J40 Prima Estate, it was found that there were 2 harvest workers doing personal purchases.
- Based on the results of the field visit to Kahoi Estate C33 Block, it was found that there were 1 harvest worker doing personal purchases.
- Based on the results of a field visit to Blok M55 KKPA Division, Mahakam Estate found that there were 1 harvest workers doing personal purchases.

Is there evidence of improvement regarding the non-conformance above? Is there evidence of monitoring and outreach so that similar things do not recur? (in accordance with specified corrective actions).

Proof of improvement in Point 4, namely:

- Based on the results of field visits and interviews with workers at the Engine Room station, it is known that workers do not yet have Operator Licence Permit related to *Pesawat Angkat Angkut*.
- Request for Training for First Class Operators (Generator) for Mahmud.
- Permenaker No. 38 of 2016 Chapter IV concerning *Penggerak Mula* (operators must be trained). Has Mr M Mahmud was transferred to the Boiler station?

If so, has there been any appointment of a new operator at the Engine Room station and training has been carried out to obtain the Operator Licence Permit of the *Penggerak Mula* (Generator) in accordance with *Permenaker* No. 38 of 2016 Chapter IV concerning *Penggerak Mula*.

In addition, it is submitted on the proof of improvement (as the document attached below):

- Minutes of PPE Fertilizer storage on May 16, 2019 at Kahoi Estate
- Minutes of PPE Employee completeness on May 14, 2019 at Prima Estate with the addition of 3 pairs of rubber gloves and 2 pairs of cloth gloves made by Field Assistant, OHS Expert and approved by the Sustainable & Certification Department Team and Estate Manager.

Is there evidence of monitoring and outreach so that similar things do not recur? (in accordance with specified corrective actions).

Related to the above, **the non-conformity No. 2019.06 has not been fulfilled.**

Verification is August 14, 2019

Point 1

The company has shown the improvement documents including:

- Daily PPE inspection monitoring for harvest workers at Kahoi Estate, Mahakam Estate and Prima Estate.
- OHS Training and Use of PPE in Prima Estate (South Division) on July 19, 2019, the training was attended by 16 maintenance employees, 82 harvester/fruit picker and foremen, 12 fertilizers, 8 sprayers and foremen. Photo documentation attached.
- OHS Training and Use of PPE in Prima Estate (Central Division) on July 17, 2019, the training was attended by 12 maintenance employees, 99 harvester/fruit picker and foremen, 20 fertilizers, 15 sprayers and foremen. Photo documentation attached.
- OHS Training and Use of PPE at Prima Estate (Northern Division) on July 15, 2019, the training was attended by 12 and 16 maintenance employees, 33 harvester/fruit picker and foremen, 16 fertilizers, 11 sprayers and foremen. Photo documentation attached.
- OHS training (including the use of PPE) at the Mahakam Estate on July 12, 2019, the training was attended by 58 employees. Photo documentation attached.
- OHS Training and Use of PPE at Kahoi Estate (Central Division) on July 27, 2019, the training was attended by 12 maintenance employees, 45 harvester/fruit picker and 28 employees.
- OHS Training and Use of PPE at Kahoi Estate (North Division) on July 30, 2019, the training was attended by 10 maintenance employees, 72 harvester/fruit picker and 9 fertilizer employees.
- OHS Training and Use of PPE at Kahoi Estate (KKPA Division) on July 29, 2019, the training was attended by 24 maintenance employees, 116 harvester/fruit picker and 10 fertilization employees.

Based on the evidence of improvement given, there is still something that needs to be verified by the auditor team regarding the existence of a double document certifying the development of OHS. In repairs sent previously stated that Mr. Mahmud did training related to Boiler Operator Class I and II (including the attendance list on 15-20 July 2019). While the evidence of improvement sent on August 14, 2019 states that Mr. Mahmud was the *Penggerak Mula* Operator (the statement did not match the attendance list given previously). Please provide justification related to this matter, as well as proof of *Penggerak Mula* operator training (if there is a replacement).

Based on this, **the non-conformity No.2019.05 is declared unfulfilled.**

Verification is August 15, 2019.

The company has shown Certificate No. 0129 / PTICB / VIII / 2019 dated August 15, 2019 from PT Indotrain Consultant stating that Mr. M Mahmud has participated in the *Penggerak Mula* Operators of the Republic of Indonesia Ministry of Manpower, which was conducted on 15-20 July 2019. Related all evidence of corrections submitted, **the non-conformity No. 2019.05 has been declared fulfilled and will be observed in the next assessment.**

Verified by	: Satria Adi Putra
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NCR No.	: 2019.06	Issued by	: Trismadi N
Date Issued	: 17 May 2019	Time Limit	: ASA 1.1
NC Grade	: Minor	Date of Closing	: 16 August 2019
Standard Ref. & Requirement	: 5.1.3. Environment monitoring plan document, its implementation report, and the corrective plan (if non-conformance arised from the monitoring result) shall be available. This plan is reviewed on two yearly basis.		
Evidence observed (filled by auditor): The company was shows some evidence as follows: <ul style="list-style-type: none">a. Realization report of RKL-RPL PT PMM-Mill in semester II year of 2018 has explained the management and monitoring of several impacts, including: air quality, OSH, noise, increasing odor, decreasing soil fertility, disturbing of aquatic biota, decreasing the quality of surface water, environment sanitation, increased waste water, CSR program, emergencies and public health problem.b. Realization report of RKL-RPL PT PMM-Estate in semester II year of 2018 has explained the management and monitoring of several impacts, including: water quality improvement, reduction of the number and variety of biota, charity of assistance to the fisheries community, OHS disruption, decreasing the ambient quality, disruption of the communitie's respiratory tract, and communitie's perceptions.			
Non-Conformance Description (filled by auditor): <ul style="list-style-type: none">a. The RKL-RPL realization report Mill Unit not yet discussed the management and monitoring of potential fire and explotions in accordance to RKL-RPL Matrix.b. In the discussion chapter of Estate Unit, there are somethings that are not yet appropriate, so the trend evaluation, critical level evaluation, and compliance evaluation are preciseless. For example:<ul style="list-style-type: none">- Emission testing result in Bumi Permai Mill with NO2 parameters exceeding the quality standard, however it not been evaluated.- Ambient testing result in front of Bumi Permai Mill Office on December 2018 are written as the test result of the Housing complex of Bumi Permai Mill.- The naming of the river not yet according to environment documents, for example: unnamed river (supposedly Bukit Jering River) in Prima Estate and Tebelai River (supposedly Muara Kaman Tua River) in Kahoi Estate.			
Root Cause Analysis (filled by organization audited): Weakness in the preparation of the EIA implementation report for PT Prima Mitraaya Mandiri on Semester II year of 2019.			
Correction (filled by organization audited): <ul style="list-style-type: none">1. Revised EIA implementation report on the mill and estate of PT Prima Mitrajaya Mandiri Semeter II year of 2018.2. Reporting the EIA implementation on the mill and estate of PT Prima Mitrajaya Mandiri to the relevant offices.			
Corrective Action (filled by organization audited): S&C department will ensuring preparation of EIA report in accordance with matrix, and will be conducted discussions in accordance to result of the monitoring test.			
Assessor Evaluation and Conclusion (filled by auditor): Verification on 12 August 2019 The company shows several evidence as follows: <ul style="list-style-type: none">1. Revision of the EIA implementation report of PT Prima Mitrajaya Mandiri POM in year of 2018, including:<ul style="list-style-type: none">- SO2 & COD emissions test results for September and December 2018 in accordance to quality standards. However ther is no evaluation of boiler emission test result (NO2 parameter) that exceeds quality standards.			

- Result of ambient air testing in front of the BPM G2 Housing are appropriate, for example: SO₂: <0.012 µg/m³; NO₂: 2.04 µg/m³; CO: 57 µg/m³; TSP: 34.92 µg/m³.
 - Result of surface water monitoring for July 2018 in the Kedang Semilis Hulu & Hilir Rivers, and also Mahakam Hulu & Hilir Rivers.
 - Discussion on the monitoring and management fire in mill; including: socialization of fire hazards, electrical installations according to standards, repairing & replacing peeling power cables, installing signboard of prohibited from igniting fires, installing adequate fire extinguisher, installing evacuation routes if there are fires in any room that could potentially cause a fire.
2. Revision of EIA implamantation report in second semester of 2018 on PT Prima Mitrajaya Mandiri-Estate, including:
 - River water quality analysis for July and November 2018 in the Tebelai River, Mahakam Hulu River, Kedang Semilis Hulu & Hilir Rivers, Keham Hulu & Hilir Rivers. However, there has not been revision of the naming of rivers, such as: Without name river (supposedly Bukit Jering River) in Prima Estate and Tebelai River (supposedly Muara Kaman Tua River) in Kahoi Estate.
 3. Receipt of the revision EIA implementation report of PT PMM-Estate and PT PMM-Mill for Semester II year of 2018 to the Environment Agency of Kalimantan Timur Provice, Kutai Kartanegara Regency, and Ministry of Environment & Forestry on 20 June 2019.

Verification on 16 August 2019

The company shown overlay EIA Map and Actual river map in the field, in addition it was explained that the unknown River is the downstream from the Bukit Jering River. Whereas Tebelai River is the downstream of Muara Kaman Tua River.

Auditor conclusions:

Based on the above evidence, this nonconformity was closed. While related to the existence or condition of the Bukit Jering River and Muara Kaman Tua River on the field will be reviewed during next assessment.

Verified by	: Trismadi N
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NCR No.	: 2019.07	Issued by	: Trismadi N
Date Issued	: 17 May 2019	Time Limit	: ASA 1.1
NC Grade	: Minor	Date of Closing	: 14 August 2019
Standard Ref. & Requirement	: 5.3.3. A documented waste management plan to avoid or reduce pollution and its implementation shall be available.		
Evidence observed (filled by auditor):			
1. The company has a procedure for hazardous waste management number PMM/SOP/K3-11 dated 2 January 2011 which describes the procedure for hazardous waste management as stipulated in the Environment Law and prevents & overcomes pollution or environment damage caused by hazardous waste.			
2. The company shows the minute of meeting infectious waste transportation on 2 April 2019, consisting of 1,021 kassa, 195 syringes, 79 ampoules, 37 underpads, and 173 hanscoen. With the weight of each medical waste: 10 Kg and sharp medical waste: 2.8 kg. Based on interview with S&C Department Staff, it was explained that medical waste was transported by PT Mitra Hijau Asia.			
3. Based on field observations at landfill, block J36, Prima Estate founded that there were three used paint cans.			
Non-Conformance Description (filled by auditor):			

1. The company has not been able to demonstrate the manifest of infectious waste collect by PT Mitra Hijau Asia.
2. The hazardous waste procedure has not been properly implemented by the company.

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

1. Hazardous waste (infectious waste) of PT PMM has not been carried out on schedule.
2. Lack of implementation of hazardous waste management, especially paint cans.

Correction *(filled by organization audited):*

1. Revision of identification of waste sources and management documents.
2. Socializing the hazardous waste management on each units.
3. Attached minutes of removal of three used paint cans to the hazardous waste store.
4. Logbook balance updated.

Corrective Action *(filled by organization audited):*

Admin of Sustainability and Certification will ensures that all waste management procedures can be carried out properly by each units.

Assessor Evaluation and Conclusion *(filled by auditor):*
Verification on 12 August 2019

The company were shown hazardous waste manifest on behalf PT Mitra Hijau Asia Number ATO 0100567 with infectious characteristic amount 22 Kg (four item) from PT PMM dated 17 June 2019. There are also record of waste management socialization to the workers, as follows:

- a. Dated 13 July 2019 has socialized to the 64 workers in RHE.
- b. Dated 15 July 2019 has socialized to the 32 workers in RHE.
- c. Dated 29 May 2019 has socialized to the 39 workers in BJE.
- d. Dated 28 May 2019 has socialized to the 39 workers in BJE.
- e. Dated 31 May 2019 has socialized to the 70 workers in BJE.
- f. Dated 28 May 2019 has socialized to the 29 workers in BPE.
- g. Dated 15 May 2019 has socialized to the 146 workers in PME.
- h. Dated 25 May 2019 has socialized to the 17 workers in Rahayu Bulking.
- i. Dated 3 July 2019 has socialized to the 109 workers in MKE.

Verification on 14 August 2019

The company was shown minute of removal three paint cans and updated hazardous waste logbook/balance dated 14 May 2019.

Auditor Conclusions:

Based on above explanataions, this nonconformity has been closed.

Verified by : **Trismadi N**

NCR No.	: 2019.08	Issued by	: Brigitta Prita
Date Issued	: 17 May 2019	Time Limit	: 16 August 2019
NC Grade	: Major	Date of Closing	: 16 August 2019
Standard Ref. & Requirement	E.4.2 (Module E) The site shall inform the CB immediately if there is a projected overproduction of		

	certified tonnage.													
Evidence observed (filled by auditor): The company shows production estimates for FFB, CPO and PK with the following details: <table border="1"> <thead> <tr> <th>Description</th> <th>Certificate period for ASA 4 26 June 2018 – 25 June 2019</th> <th>Actual period 1 May 2018 – 30 April 2019</th> </tr> </thead> <tbody> <tr> <td>FFB</td> <td>237,764</td> <td>274,037.05</td> </tr> <tr> <td>CPO</td> <td>54,686</td> <td>64,995.51</td> </tr> <tr> <td>PK</td> <td>13,077</td> <td>13,546.60</td> </tr> </tbody> </table>			Description	Certificate period for ASA 4 26 June 2018 – 25 June 2019	Actual period 1 May 2018 – 30 April 2019	FFB	237,764	274,037.05	CPO	54,686	64,995.51	PK	13,077	13,546.60
Description	Certificate period for ASA 4 26 June 2018 – 25 June 2019	Actual period 1 May 2018 – 30 April 2019												
FFB	237,764	274,037.05												
CPO	54,686	64,995.51												
PK	13,077	13,546.60												
Non-Conformance Description (filled by auditor): Based on the explanation above, it is known that there is overproduction for CPO & PK with CPO production of 64.995.51 MT and PK 13.546.60 MT.														
Root Cause Analysis (filled by organization audited): Because the company using license period to production quota not actual data production for 1 year.														
Correction (filled by organization audited): Ask CB to increase production volume in palm trace.														
Corrective Action (filled by organization audited): <p>The company has showed a reporting mechanism if the excess production is listed in the procedure Supply chain number MNL/6.1/3 valid dated on August 13th 2019. In the point 7, Volume. If the production volume is close to 1000 MT, the palm trace management license must report to the certification body to request an increase in the applicable palm trace license quota.</p> <p>The company has showed monitoring of CSPO/CSPK production start from May 2019 until 12 August 2019 its informs date, FFB certified (MT), FFB Non certified (MT), FFB carry forward, FFB carry forward RSPO, FFB Balance, FFB Processed, RSPO FFB Processed, (%) RSPO FFB Processed, CPO Produced, Previous CSPO percentage, CPO in Tank, PK produced, CSPK produced, Previous CSPK percentage, PK in Tank, Current CSPO percentage, CPO dispatch volume RHB, CPO in bulking, and others. Based on that explanation, Indicator No.2019.08 it's become closed and its will be verified in the next surveillance.</p>														
Assessor Evaluation and Conclusion (filled by auditor): Verification, 12 August 2019. Based on palm trace data on 12 August 2019, FFB Estate & FFB Smallholders have experienced additional production of 274,037.05 MT & CSPK of 13,835 MT. The results of the panel committee meeting Indicator E 4.2 have not been fulfilled, so the company still needs to fill in the root cause analysis, corrective and corrective actions.														
Verification, 16 August 2019. The company has showed a reporting mechanism if the excess production is listed in the procedure Supply chain number MNL/6.1/3 valid dated on August 13 th 2019. In the point 7, Volume . If the production volume is close to 1000 MT, the palm trace management license must report to the certification body to request an increase in the applicable palm trace license quota.														

The company has showed monitoring of CSPO/CSPK production start from May 2019 until 12 August 2019 its informs date, FFB certified (MT), FFB Non certified (MT), FFB carry forward, FFB carry forward RSPO, FFB Balance, FFB Processed, RSPO FFB Processed, (%) RSPO FFB Processed, CPO Produced, Previous CSPO percentage, CPO in Tank, PK produced, CSPK produced, Previous CSPK percentage, PK in Tank, Current CSPO percentage, CPO dispatch volume RHB, CPO in bulking, and others. Based on that explanation, Indicator No.2019.08 it's become closed and its will be verified in the next surveillance.

Verified by : **Brigitta Prita**

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

NCR No.	:	2020.01	Issued by	:	Mohamad Amarullah
Date Issued	:	17 September 2020	Time Limit	:	16 December 2020
NC Grade	:	Major	Date of Closing	:	15 December 2020
Standard Ref. & Requirement	:	6.2.2 Critical Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reason for dismissal, period of notice, etc. In compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed.			
Evidence observed (filled by auditor): Based on field observation, interview and document review, the following evidences are found: <ul style="list-style-type: none">• Observation at Central Division of block N38 BPE, found that there was person doing harvesting activity, helping to move FFB from the harvest block to the collection point. Based on the interview, the person is not the company employee.• PT PMM has not been able to show evidence that the person is registered as an employee.• National Law No. 13 / 2003 Chapter IX concerning about work relation, article 50 mention that work relationship happens due to a work agreement between employer and workers.					
Non-Conformance Description (filled by auditor): Based on the evidence above, it can be concluded that there are people who carry out company operations without having work agreement.					
Root Cause Analysis (filled by organization audited): <ul style="list-style-type: none">a. Lack of monitoring from assistants and foremen on the presence of people other than employees who help employees in doing work.b. Harvest employees do not pay attention to company policies regarding the prohibition of people other than employees entering the work area					
Correction (filled by organization audited): <ul style="list-style-type: none">a. Making SOP related to sanction to reaffirm to all employees and family members of employees about the prohibition for people other than employees to enter and or do work in the areas of PT Prima Mitrajaya Mandiri and PT Teguh Jaya Abadi.b. Re-socialize about the prohibition for people other than employees to enter and or do work in the areas of PT Prima Mitrajaya Mandiri and PT Teguh Jaya Abadi.					
Corrective Action (filled by organization audited): <ul style="list-style-type: none">a. Monitoring of all work in each unit by the Foreman and Assistantb. Imposing strict sanctions for employees who violate the rules by bringing or asking for help from people other than employees. If the employee is unable to carry out their duties, they are obliged to inform their supervisor.					
Assessor Evaluation and Conclusion (filled by auditor): Verification on October 23, 2020 The company shows: <ul style="list-style-type: none">1. SOP No HRD-SOP20-01 dated October 1, 2020 regarding draft of warning letters and sanctions to provide guidelines for the procedures for issuing warning letters and sanctions to company workers. The SOP regulates the prohibition against workers, one of which is every unit worker who will bring other people who are not registered as dependent family to visit / stare at the company environment, so the worker must report to the head of administration for approval.2. The document report of the socialization on workers prohibition from bringing non-company employees to the					

work area held on September 18, 2020. The socialization was conducted at the BPE central division office, attended by 464 workers.

Based on the evidence of improvement that has been provided, there are still several things that need to be re-verified by the auditor, namely:

1. In the SOP of draft of warning letter and sanctions does not include prohibitions for people other than employees to enter and carry out work in the PT PMM and PT TJA areas.
2. How is the monitoring mechanism implemented? When is the implementation?
3. Is there an evaluation of re-socialization that has been carried out?

Based on explanation above, the **non-conformity No. 2020.01 has not been fulfilled.**

Verification on 15 December 2020

1. The company shows SOP No IDN-HRD-SOP20-01 dated November 26, 2020 regarding warning letters and sanctions. The SOP explains that :
 - a. Every unit worker who will bring someone else who is not registered as dependent family to visit / stay in the company environment, the worker must report to the Head of Administration for approval from the unit leader.
 - b. Apart from workers appointed by the leader, they are not allowed to be in and or carry out any activities at the work location.
 - c. Violations will be given a warning letter
2. Evidence of the socialization of company regulations and previous training on company policies is shown, namely:
 - a. Company policy training on April 15, 2020 at BPE middle division which was attended by 58 employees
 - b. Socialization of company regulations on 18 May 2020 at BPE which was attended by 6 fertilizer and spray workers
 - c. Socialization of company regulations on June 13, 2020 at BPE South division which was attended by 25 employees

Based on the evidence of improvement as well as an explanation of the root cause analysis and corrective action, the non-conformity in indicator 6.2.2 has been **closed** and its effectiveness and implementation **will be observed** in the next audit activity.

Verified by	:	Mohamad Amarullah
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3.4.3. Opportunity for Improvement

No	Ref. Std.	Description
1	2.1.1	The company has opportunity to ensure implementation of steam aircraft operator training in accordance with a predetermined program
2	7.3.1	Based on document review and field visits for medical waste management, the company has managed it well, where both the clinic and the temporary storage place for hazardous and toxic waste have used the appropriate symbols, besides the proof of delivery to a licensed 3rd party well documented, but the storage area in temporary storage for hazardous and toxic waste has not used refrigeration in accordance with existing regulations, therefore companies are encouraged to use refrigerators to store medical waste in accordance with Minister of Environment and Forestry Regulation (PermenLHK) No. P. 56 of 2015. Thus, unit of certification has an opportunity to manage infectious waste properly in accordance to PermenLHK No. P.56 of 2015.
3	7.8.1	Based on the review of monitoring wells testing documents for Land Applications, the company has carried out regular monitoring every 6 months with the results of all test parameters complete and none of them exceed the quality standards required in Minister of Health Regulation (Permenkes.) No. 416 of 1990, but the regulation has expired. Hence in the future, companies are encouraged to use the latest references from quality standards and test parameters to the latest applicable regulations, i.e., Permenkes No. 32 of 2017. Thus, unit of certification is encouraged to update reference for monitoring well testing parameters in accordance with applicable related regulation (Permenkes No. 32 of 2017).

3.4.4. Noteworthy Positive Components

No	Description
1	The company's commitment in implementing the principles of sustainable palm oil management.
2	Good teamwork and competency of counterpart team.
3	Good document presentation during process audit.
4	Has received ISPO and ISCC certificates.
5	Carry out breeding of owls (<i>Tyto alba</i>) as a rats control biologically.
6	Received Green PROPER in 2019
7	Doesn't use pesticides with active paraquat ingredients.

3.5 Summary of Arising Issues from Public and Auditor Verification

Public Issues (Institution/ NGO/Community)	Auditor Verification
<p>Manpower Agency of Kutai Kartanegara District Date of interview: 14 September 2020 Interviewee: Deputy Head of Industrial Relation Manpower Agency</p> <ul style="list-style-type: none"> The company routinely submits mandatory and periodic reports such as report of P2K3, report of company employee, etc. There are no negative issues related to discrimination, SARA, and under-age employee. There was layoff case and that case has been registered in MA. However, the Manpower agency not yet receive the progress of that case. 	<p>The company has well managed relationship with the agency. In term of progress of layoff case has been explained in criterion 4.2.3</p>
<p>Environment Agency of Kutai Kartanegara District Date of Interview: 14 September 2020 Interviewee: Head of Environment Agency of Kutai Kartanegara District</p> <ul style="list-style-type: none"> The company routinely sends its environmental management and monitoring reports according to the predetermined period, such as the RKL-RPL report, the hazardous waste handling report and the POME monitoring report. Environmental permits owned by the Company are still valid, such as permits for temporary storage of hazardous waste, permits for disposal of liquid waste, etc. There is no change regarding environmental documents owned by the company. There are no issues related to environmental pollution for PT PMM and PT. TJA 	<p>In general, environmental regulations have been implemented and well managed by the certification unit (fulfillment of environmental permits, reporting, management etc.). There are no issues related to environmental pollution and environmental destruction.</p>
<p>National Land Agency of Kutai Kartanegara District Date of Interview: 14 September 2020 Interviewee: Head of Agency</p> <p>Auditor Notes:</p> <ul style="list-style-type: none"> Unit of certification has clean and clear land right legality evidence, as shows through Land Title. Compensation has satisfactory conducted in accordance with Indonesian relevant regulations. All operational areas in PT PMM and PT TJA were situated on "Areal Penggunaan Lain". There were no occupation areas and no presence of operational areas overlapped with forest area and other business activities (ex. Mining, plantation etc.). Unit of certification has develop smallholder scheme with total areas more than 20 % from its business permit. Unit of certification has considered transparent and cooperative in providing data information requested. Furthermore, Annual Land Right Usage Report has 	<p>Unit of certification implementation towards land right regulation pursuance has considered in accordance with relevant regulation in Indonesia. The Land Title (HGU) has fully used for oil palm plantation operational activities. Furthermore, relationship with Agency is considered satisfactory.</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<p>delivered on schedule.</p> <ul style="list-style-type: none"> In term of legl aspect, there were no more customary right within unit of certification operational areas. Composition of village was heterogen, consist of several tribe such as Kutai, Dayak, Banjar, Bugis, Melayu, Jawa, etc. 	
<p>Plantation Agency of Kutai Kartanegara District.</p> <ul style="list-style-type: none"> The company has done the class estate assessment and got class II, still valid. The Company has a Plantation Business License (IUP). The Company has plasma Report on plantation business activities (LKUP) are routinely reported. Fire Extinguisher Equipment of company is sufficient and one year behind there is no issue of land fires that occurred in the area of PT PMM and PT TJA. Communication between the company and the agency is also well established, and if the office requested data, the company quickly responded. 	<ul style="list-style-type: none"> The company has had all plantation permit and has been complied all obligation reports. Based on hydrant simulation in Bumi Permai POM dan landfires simulation in Bumi Permai Estate, known that company has adequate facilities and infrastructure of fire and functioning properly. Company has realized the assistance to local communities based on needs of society that explained.
<p>Village Representatives and Previous land Owners Date of Interview: 15 September 2020 Interviewee: 1. Headman of Loleng 2. Headman of Rantau Empang 3. Headman of Lebahu Ulaq</p> <p>Auditor Notes:</p> <ul style="list-style-type: none"> Process of land compencsation has satiffactory conducted by the unit of certification. Calculation of compensation process (GRTT) was transparent, involving government representatives, village representatives and land owners. All process were conducted in accordance with relevant regulation. There is no more customary community(-ies) on the village. Village occupant were mixed, consist of people from Kutai, Dayak, Banjar, Melayu, Bugis, Jawa, etc. There is no land conflict and occupation within estate operational areas. Presence of PT PMM and PT TJA has considered gave a positive impact for economic and social community life. For example as carried out throguh smallholder scheme, work opportunity, continuous CSR program, etc. Head of Village, elders and other village representative has been involved on annual CSR program, through participatory ways such as socialization and meeting (<i>Musrembangdes</i>). There is negative issues related to land fire and environment pollution or contamination, caused by company operational acitivities. 	<p>In general, the presence of PT PMM and PT TJA has positively contribute on village development. There were no negative issues caused by plantation activities towards social and environmental matters. Relationship between company ad surrounding communities is considered satisfactory and comply with RSPO principles and criteria.</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<ul style="list-style-type: none"> Several socialization that had been conducted by unit of certification are protected flora and fauna, conservation area management, CSR, company code of conduct, several procedure, etc. 	
Gender committee Date of Interview: 15 Sept 2020 Interviewee: Head of committee BPE unit <ul style="list-style-type: none"> The company has policy about pregnant and breast-feed employee The company provides health facility and programs to meet women employee's needs. There are no negative issues related to discrimination, SARA, and under-age employee. There was sexual harassment happened in BPE unit. However, it has been resolved. 	In general, company has provided women employee's needs. The immoral case has been resolved by the company procedure explained in criterion 6.5.1
Bipartite Date of interview: 15 Sept 2020 Interviewee: Head of Bipartit <ul style="list-style-type: none"> Bipartite has routinely meeting with company. The company has provide personal protective equipment (PPE) to all workers and could be replaced when broken or inappropriate to be used There were no issue about payment, discrimination, SARA, and under-age employee. 	The relationship between company and bipartite is considered good enough and has fulfilled the RSPO principles and criteria.
Koperasi Perkebunan Tanah Sama (FFB transport contractor) Date of interview : 16 Sept 2020 Interviewee : Cooperative chairman <ul style="list-style-type: none"> No significant obstacles of payments Provision of PPE for drivers and cargo personnel provided by the company BPJS employment is included, proof of payment is shown by the company. Contractors come from the surrounding area 	There are no negative issues that need to be further verified regarding OSH and labor aspects. The parties have carried out their obligations in accordance with the agreement. The relationship between the company and the contractor is considered quite good and has met the RSPO principles and criteria

4.0	CERTIFIED ORGANISATION'S ACKNOWLEDGEMENT OF INTERNAL RESPONSIBILITY
4.1	Formal Sign-off of Assessment Findings
	<p>Hereunder sign by management representative from inspected company to acknowledge a field assessment and agree for all content explained in this assessment report, included of non-compliance findings.</p> <p>Signed on behalf of:</p> <div style="display: flex; justify-content: space-around; align-items: flex-end;"> <div style="text-align: center;"> <p>PT Prima Mitrajaya Mandiri Management Representative</p>  <p><u>Arvind Devadasan</u></p> <p>Tuesday, 15 December 2020</p> </div> <div style="text-align: center;"> <p>PT Mutuagung Lestari Lead Auditor</p>  <p><u>Mohamad Amarullah</u></p> <p>Tuesday, 15 December 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	Plantation Agency	Kutai Kartanegara District	0853-4745-4438	Interview by phone	14 September 2020	✓	
2	Environment Agency	Kutai Kartanegara District	0813-4769-9991	Interview by phone	14 September 2020	✓	
3	Manpower Agency	Kutai Kartanegara District	0812-4438-0673	Interview by phone	14 September 2020	✓	
4	National Land Agency	Kutai Kartanegara District	0813-8800-0872	Interview by phone	14 September 2020	✓	
5	Gender Committee	Kutai Kartanegara District		Direct interview	15 September 2020	✓	
6	Bipartite	Kutai Kartanegara District		Interview by phone	15 September 2020	✓	
7	Headman of Rantau Humpang	Kutai Kartanegara District	085752542066	Interview by phone	15 September 2020	✓	
8	Headman of Loleng	Kutai Kartanegara District	081244380673	Interview by phone	15 September 2020	✓	
9	Headman Lebahu Ulaq	Kutai Kartanegara District	081346544868	Interview by phone	15 September 2020	✓	
10	Koperasi Perkebunan Tanah Sama	Kutai Kartanegara District	08246644190	Interview by phone	16 September 2020	✓	
11	NGO - Sawit Watch - AMAN - Walhi - WWF	Indonesia	info@sawitwatch.or.id rumahaman@cbn.net.id informasi@walhi.or.id wwf-indonesia@wwf.or.id	Email	7 September 2020		✓ ✓ ✓ ✓
12	Bumi Permai POM - 7 sortation operators - 1 sterilizer operator - 1 press operator - 1 kernel operator - 1 engine room operator - 2 boiler operators	PT PMM, Kutai Kartanegara District	-	Direct Interview	8 September 2020	✓	

13	Bumi Permai Estate - 3 harvesters - 4 fertilizer applicators - 4 pesticide applicators	PT PMM, Kutai Kartanegara District	-	Direct Interview	8 September 2020	✓	
14	Lembuswana Estate - 2 warehouse officer - 2 school office girl - 2 clinic officer - 1 housewife	PT PMM, Kutai Kartanegara District	-	Direct interview	8 September 2020	✓	
15	Rahayu Estate - 4 harvesters - 7 fertilizer applicators - 7 pesticide applicators	PT TJA, Kutai Kartanegara District	-	Direct Interview	9 September 2020	✓	

Appendix 2. Assessment Program

DATE	09 – 10 July 2020 (Remote Audit)	
PROGRAM	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
Thursday, 09 July 2020 (Western Indonesian Time)		
08.00 – 08.30	Opening meeting preparation	All Auditor
08.30 – 09.00	Opening meeting (recorded video conference) <ul style="list-style-type: none">Auditee Speech (Introduction of PIC, Profile of Certified Management Unit)Auditor Team Speech (Introduction, Audit Objective, Audit Scope, Audit Plan Discussion, Determine of Audit Sample, Transparency and Confidentiality Clarification)	
09.00 – 12.00	<ul style="list-style-type: none">Document review and completing audit checklist.Verification of Basic Information Mill and EstateConfirmation of Time Bound PlanReview of Partial Certification	All Auditor
12.00 – 14.00	<ul style="list-style-type: none">Break	All Auditor
14.00 – 16.15	<ul style="list-style-type: none">Document review and completing audit checklist.	All Auditor
16.15 – 17.00	<ul style="list-style-type: none">Presentation of Daily Progress.	All Auditor
Friday, 10 July 2020 (Western Indonesian Time)		
08.00 – 11.00	<ul style="list-style-type: none">Document review and completing audit checklist.	All Auditor
12.00 – 15.30	Internal discussion by auditor team preparing for Closing Meeting	All Auditor
15.30 – 16.30	Closing Meeting (recorded video conference) <ul style="list-style-type: none">Presentation of audit findings (Noteworthy Positive Component, Non Conformities, OFI, Timelie of CAR's, Conclusion)/Comments, Responses and Questions	All Auditor

Date	14 – 18 September 2020 (Onsite Audit)	
PLANNED TIME	PROCESS / CLAUSES TO BE AUDITED	AUDITOR
Monday, 14 September 2020		
06.55 – 10.20	Jakarta → Samarinda	All Auditor
10.20 – 14.00	<ul style="list-style-type: none"> Stakeholders consultation to related agencies in Kutai Kartanegara Regency Samarinda → Site	SSS HHS/MAH/PUT
14.00 – 15.00	OPENING MEETING <ul style="list-style-type: none"> Auditee Speech (Introduction of PIC, Profile of Certified Management Unit) Auditor Team Speech (Introduction, Audit Objective, Audit Scope, Audit Plan Discussion, Determine of Audit Sample, Transparency and Confidentiality Clarification) 	Manajemen PT PMJ HHS/MAH/PUT
15.00 – 17.00	Documents Review <ul style="list-style-type: none"> Review of previous (Initial assessment) findings Verification of Basic Information Mill and Estate Confirmation of Time Bound Plan Review of Partial Certification 	All Auditor
Tuesday, 15 September 2020		
08.00 – 09.00	<p>Stakeholder consultation to affected communities surrounding the plantations, indigenous peoples, local communities, smallholders and previous land owners.</p> <p>Interview with Gender Committee, Worker's Union, Worker's Cooperative (if any), Local Contractor (for Mill and Estate), Third Party Supplier (if any), local NGO (if any)</p> <p>Field Observation to Rahayu and Mahakam Estate (PT Teguh Jayaprima Abadi) Aspect to be verified :</p> <ul style="list-style-type: none"> Implementation of Legal Aspect (Land Ownership, Legal Boundaries), HCV; Implementation of Agronomy Aspect (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application), Implementation of Occupational Health & Safety Aspect, Implementation of Employment Procedure and Mechanism Aspect <p>Implementation of Environmental, and Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management), Observation of Workers Facilities (Housing, School, Worship Place).</p>	MAH PUT (accompanied by MAH) HHS HHS SSS
12.00 – 14.00	Break/Istirahat	All Auditor
14.00 – 17.00	Field Observation to Bumi Permai POM Aspect to be verified <ul style="list-style-type: none"> Supply Chain verification (FFB Receiving, Weighbridge), 	MAH

	<ul style="list-style-type: none"> Implementation of Occupational Health & Safety Aspect, Implementation of Employment Procedure and Mechanism Aspect, security post, FFB Sorting, Processing Activity, Despatch CPO) Implementation of Environmental aspect, Inspection to Chemical Storage, Hazardous Waste Storage, Fire Control Simulation, POME Pond & land application 	HHS/PUT SSS
Wednesday, 16 September 2020		
08.00 – 12.00	Field Observation to Bumi Permai Estate (PT Prima Mitrajaya Mandiri) Aspect to be verified : <ul style="list-style-type: none"> Implementation of Legal Aspect (Land Ownership, Legal Boundaries), HCV; Implementation of Agronomy Aspect (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application), Implementation of Occupational Health & Safety Aspect, Implementation of Employment Procedure and Mechanism Aspect Implementation of Environmental, and Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management), Observation of Workers Facilities (Housing, School, Worship Place). Field Observation to Lembuswana Estate (PT Prima Mitrajaya Mandiri) Aspect to be verified : <ul style="list-style-type: none"> Implementation of Legal Aspect (Land Ownership, Legal Boundaries), HCV; Implementation of Agronomy Aspect (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application), Implementation of Occupational Health & Safety Aspect, Implementation of Employment Procedure and Mechanism Aspect Implementation of Environmental, and Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management), Observation of Workers Facilities (Housing, School, Worship Place).	MAH MAH PUT (accompanied by MAH) HHS HHS SSS
12.00 – 14.00	Break/Istirahat	All Auditor
14.00 – 17.00	<ul style="list-style-type: none"> Continue Field Observation and field observation clarification Verification of documents and completing checklist 	All Auditor
Thursday, 17 September 2020		
08.00 – 12.00	Continue Field Observation and field observation clarification (if needed)	All Auditor
12.00 – 14.00	Break/Istirahat	All Auditor
14.00 – 16.00	Interim Meeting (closing meeting preparation)	All Auditor

16.00 – 17.00	CLOSING MEETING	All Auditor
Friday, 18 September 2020		
09.00 – 11.00 12.45 – 13.50	Site → Samarinda Samarinda → Jakarta	All Auditor