

***Roundtable on Sustainable Palm Oil Certification  
RSPO***

**[✓] Surveillance**

Name of Management Organisation : AMP Palm Oil Mill – PT AMP Plantation subsidiary of Wilmar International, Ltd.  
 Plantation Name : PT AMP Plantation (AMP 1 Estate, AMP 2 Estate, AMP 3 Estate and AMP 4 Estate); Scheme Smallholders of PT AMP (KUD Tompek Tapian Kandis; KUD Bukit Sandiang Tigo; KUD Agro Wira Masang and KUD Mutiara Sawit Jaya); and PT Primatama Mulia Jaya (PMJ Estate);  
 Location : Village of Tapian Kandis, Sub District of Palembayan, District of Agam, Province of Sumatera Barat Indonesia  
 Certificate Code : MUTU-RSPO/096  
 Date of Certificate Issue : 21 August 2017                      Date of License Issue : 07 April 2021  
 Date of Certificate Expiry : 06 June 2022                      Date of License Expiry : 06 June 2021

Assessment	Assessment Date	PT Mutuagung Lestari Auditor	Reviewed by	Approved By
ASA-1.3 Remote Audit	18 to 19 June 2020	Arif Faisal Simatupang (Lead Auditor), Mohamad Amarullah, Bayu Yogatama and Johannes Pandiangan	Ardiansyah	Octo H.P.N. Nainggolan
ASA-1.3 Onsite Audit	23 to 27 November 2020	Arif Faisal Simatupang (Lead Auditor), Satria Adi Putra, Rindu Galih Rezza Rachmansyah and Nurdin Chaeriana		

Assessment	Approved by MUTUAGUNG LESTARI on:
ASA-1.3	24 December 2020

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Figure 1. Location Map of PT AMP Plantation

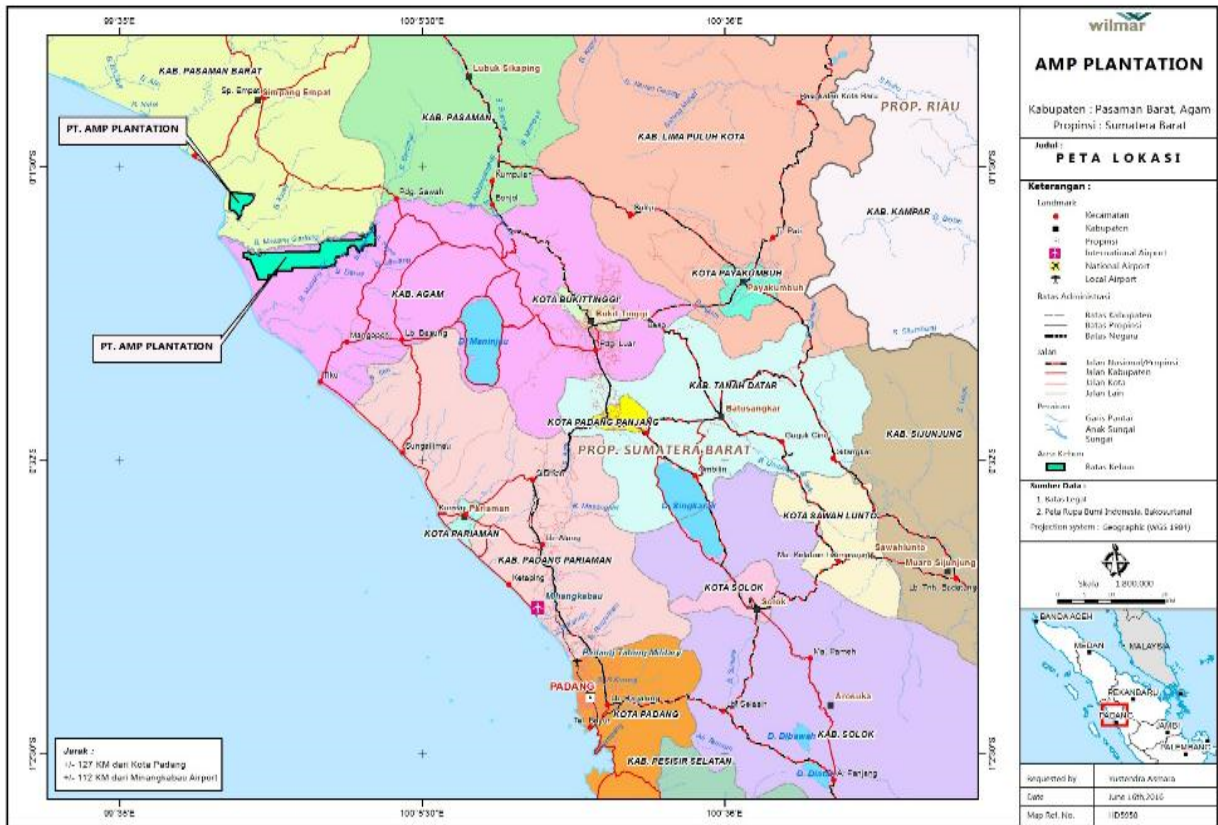


Figure 2. Location Map of PT Primatama Mulia Jaya



Figure 3. Operational Map of PT AMP Plantation

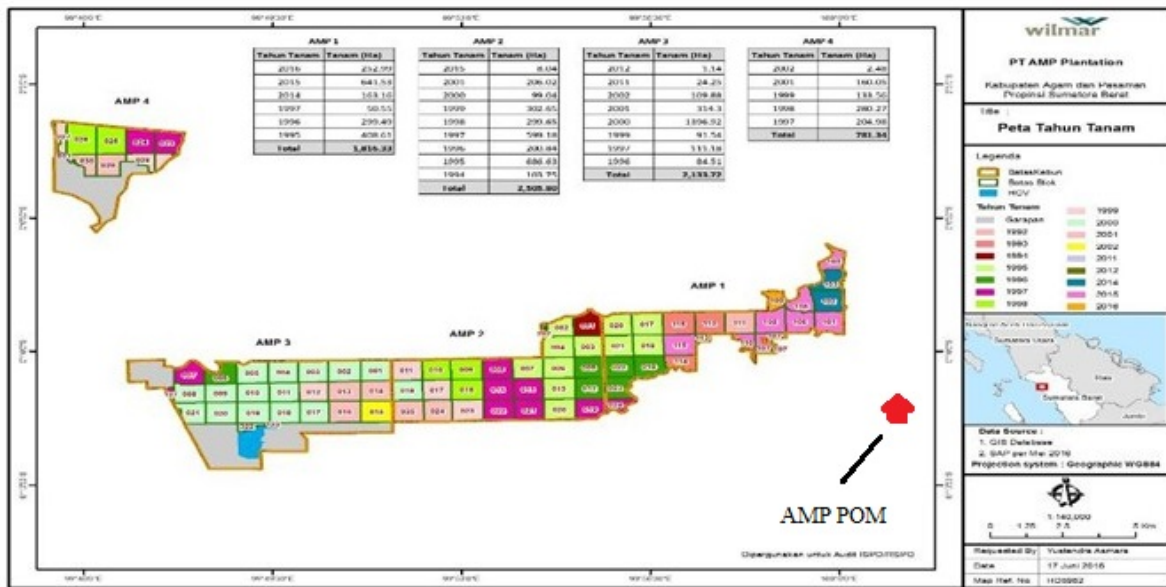
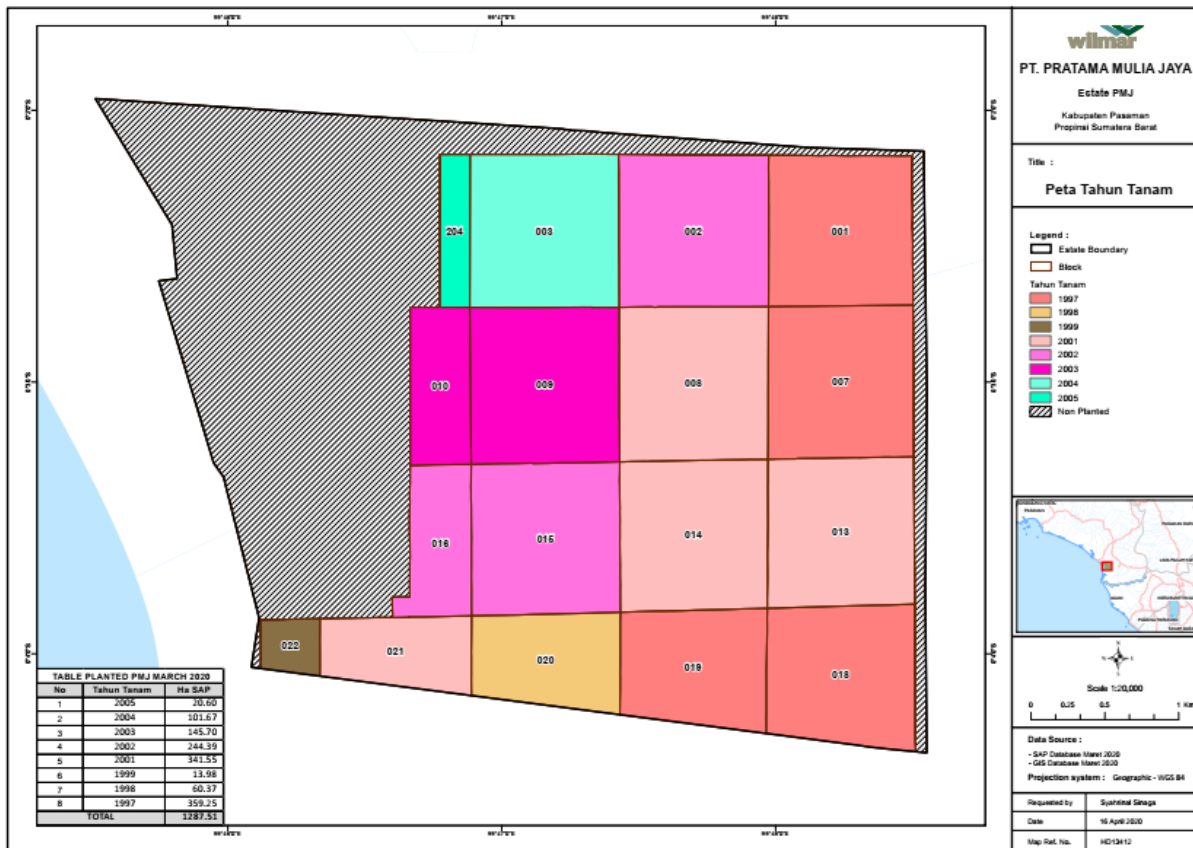
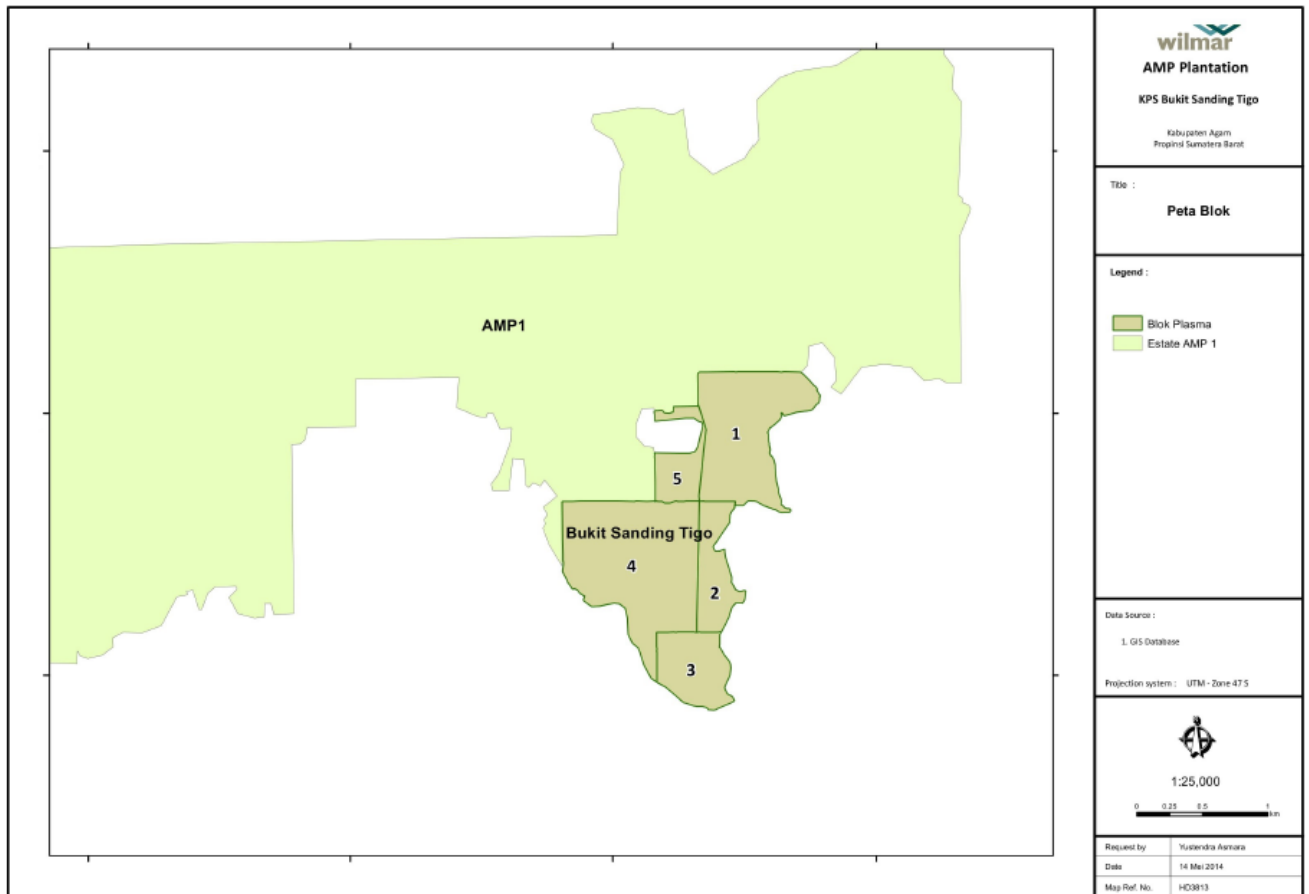


Figure 4. Operational Map of PT Primatama Mulia Jaya

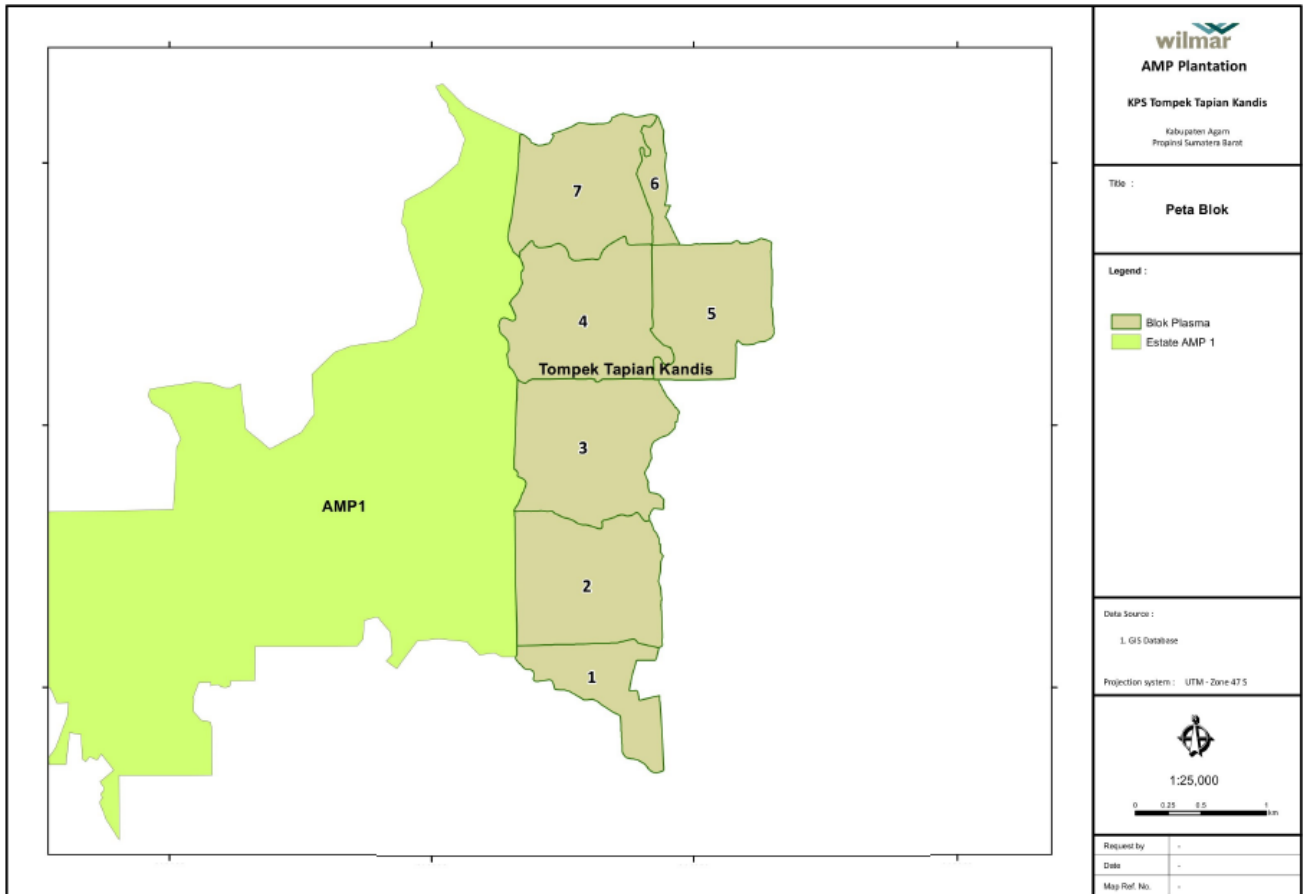


**Figure 5. Operational Map of KPS Bukit Sanding Tigo**



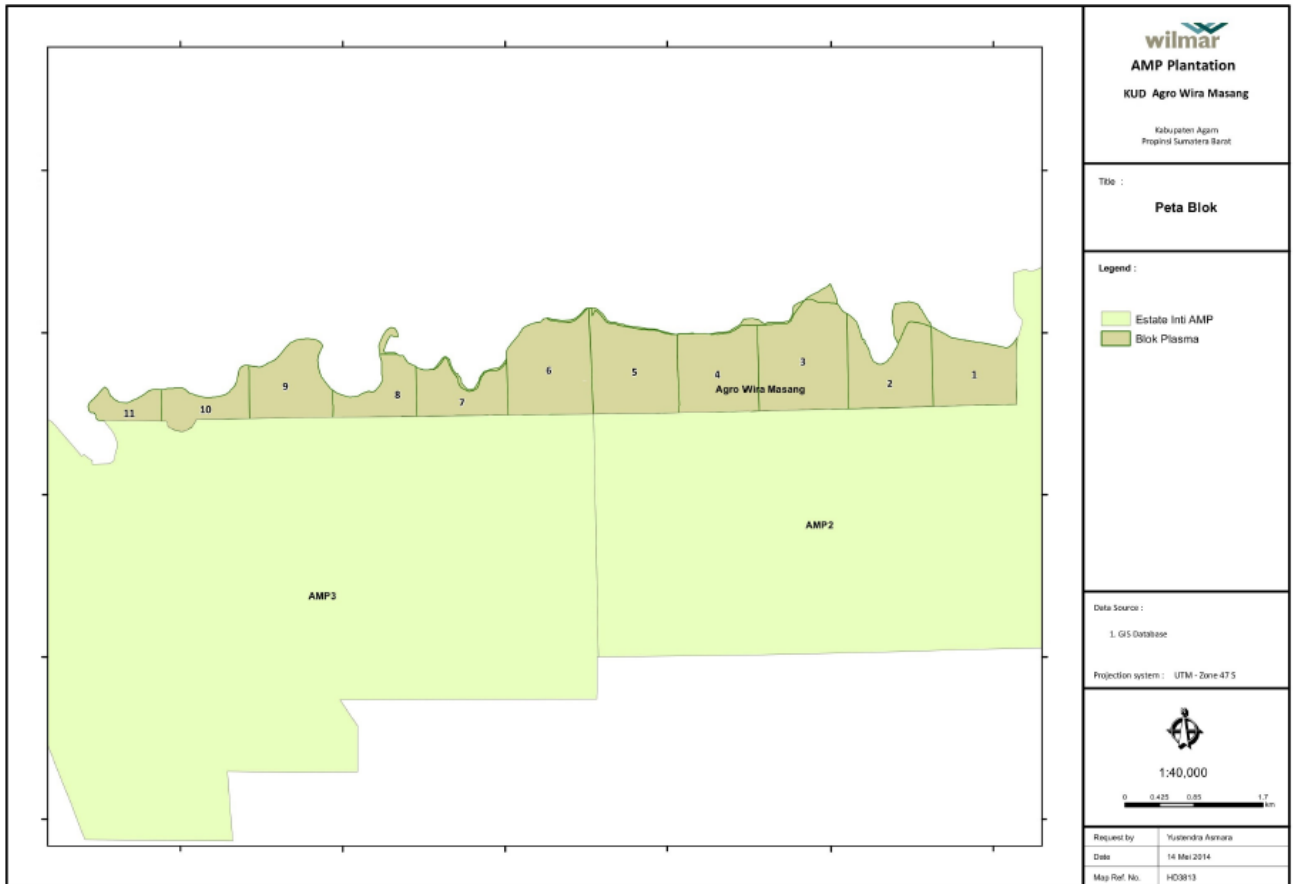


**Figure 6. Operational Map of KPS Tompek Tapian Kandis**

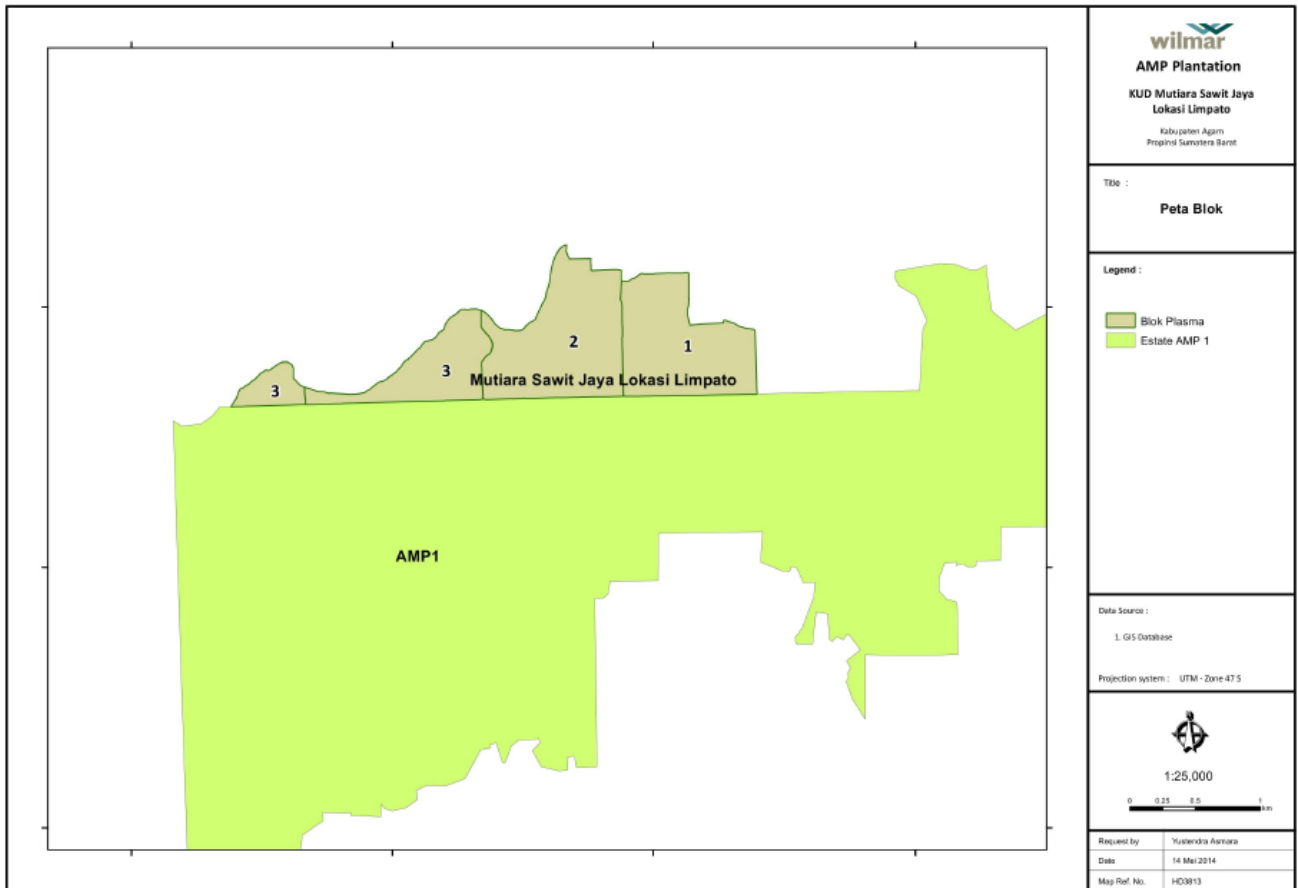




**Figure 7. Operational Map of KUD Agro Wira Masang**



**Figure 8. Operational Map of KUD Mutiara Sawit Jaya**



Abbreviations Used

AMP-1	:	AMP-1 Estate
AMP-2	:	AMP-2 Estate
AMP-3	:	AMP-3 Estate
AMP-4	:	AMP-4 Estate
ASA	:	Annual Surveillance Assessment
AWM	:	Agro Wira Masang (Associated Smallholders of AMP Plantations)
BMS	:	Block Manuring System
BPBD	:	<i>Badan Penanggulangan Bencana Daerah</i> (Regional Disaster Management Agency)
BPN	:	<i>Badan Pertanahan Nasional</i> (National Land Agency)
BSS	:	Block Spraying System
BST	:	Bukit Sanding Tigo (Associated Smallholder of AMP)
CB	:	Certification Body
CH	:	Certificate Holder
CPO	:	Crude Palm Oil
CR	:	Collection Road
CSPK	:	Certified Sustainable Palm Kernel
CSPO	:	Certified Sustainable Palm Oil
CSR	:	Corporate Social Responsibility
EFB	:	Empty Fruit Bunch
EHS	:	Environment Health and Safety
EWS	:	Early Warning System
ENT	:	Ear Nose Throat
FFB	:	Fresh Fruit Bunch
GAPKI	:	<i>Gabungan Pengusaha Kelapa sawit Indonesia</i>
GEM	:	General Estate Manager
GHG	:	Greenhouse Gasses
GM	:	General Manager
HCV	:	High Conservation Value
HGB	:	<i>Hak Guna Bangunan</i> (Land Use Title for Building)
HGU	:	<i>Hak Guna Usaha</i> (Land Use Title/Right)
HRGA	:	Human Resources General Administration
IPM	:	Integrated Pest Management
ISCC	:	International Sustainability & Carbon Certification
ISPO	:	Indonesian Sustainability Palm Oil
KAMU	:	Karya Agung Megah Utama
KMSI	:	<i>Komisi Minyak Sawit Indonesia</i>
KUD	:	<i>Koperasi Unit Desa</i>
LA	:	Land Application
MR	:	Main Road
MSDS	:	Material Safety Data Sheet
MSJ	:	Mutiara Sawit Jaya
NGO	:	Non-Government Organization
OHS / OSH	:	Occupational Health and Safety
P&D	:	Pest & Disease
P2K3	:	<i>Panitia Pembina Keselamatan dan Kesehatan Kerja</i> (OHS Committee)
PANP	:	Perkebunan Anak Negeri Pasaman
PHP	:	Permata Hijau Pasaman -1
PIC	:	Person In Charge

PMJ	:	Primatama Mulia Jaya
POM	:	Palm Oil Mill
POME	:	Palm Oil Mill Effluent
PPE	:	Personal Protective Equipment
PTUN	:	<i>Pengadilan Tata Usaha Negeri</i> (Government Administration Court)
RKL/RPL	:	<i>Rencana Kelola Lingkungan/ Rencana Pemantauan Lingkungan</i> (Environmental Management Plan / Environmental Monitoring Plan)
RTE	:	Rare threatened and Endangered
SCCS	:	Supply Chain Certification System
SEIA	:	Social Environment Impact Assessment
SHM	:	<i>Sertifikat Hak Milik</i> (Ownership Right)
SIA	:	Social Impact Assessment
SUMBAR	:	Sumatera Barat
SOP	:	Standard Operation Procedure
SPS	:	Siak Prima Sakti
SPSI	:	Serikat Pekerja Seluruh Indonesia
TTK	:	Tompek Tapian Kandis
UOC	:	Unit of Certification
WTP	:	Water Treatment Plant
WWTP	:	Waste Water Treatment Plant
YOP	:	Year Of Planting

<b>1.0</b>	<b>SCOPE of the CERTIFICATION ASSESSMENT</b>		
<b>1.1</b>	<b>Assessment Standard Used</b>	<ul style="list-style-type: none"> <li>Principles and Criteria for Sustainable Palm Oil Production 2018, The Indonesia National Interpretation, Endorsed by the RSPO Board of Governors on 20 April 2020.</li> <li>RSPO Certification System for Principles and Criteria, 14 June 2017</li> </ul>	
<b>1.2</b>	<b>Organisation Information</b>		
1.2.1	Organisation name listed in the certificate	PT AMP PLANTATION, subsidiary of Wilmar International Ltd	
1.2.2	Contact person	Jules Sonny Parapat	
1.2.3	Organisation address and site address	Head Office 56 Neil Road, Singapore 088830  <u>Official Liaison Office:</u> Multivison Tower Lt. 15 Jl. Kuningan Mulia Kav. 9B, Kuningan, Jakarta, 12980, ndonesia.	
1.2.4	Telephone	(62-21) 29380777	
1.2.5	Fax	-	
1.2.6	E-mail	<a href="mailto:jules.parapat@id.wilmar-intl.com">jules.parapat@id.wilmar-intl.com</a>	
1.2.7	Web page address	<a href="http://www.wilmar-international.com/">http://www.wilmar-international.com/</a>	
1.2.8	Management Representative who completed the application for certification	Jules Sonny (Certification Lead Indonesia)	
1.2.9	Registered as RSPO member	2-0017-05-000-00 15 August 2005	
<b>1.3</b>	<b>Type of Assessment</b>		
1.3.1	Scope of Assessment and Number of Management Unit	Estates: AMP-1, AMP-2, AMP-3, AMP-4, PT Primatama Mulia Jaya (PMJ Estate),  Smallholders Cooperatives (full managed by PT AMP) Tompek Tapiah Kandis, Mutiara Sawit Jaya, Bukit Sandiang Tigo, Agro Wira Masang.	
1.3.2	Type of certificate	Single	
<b>1.4</b>	<b>Locations of Mill and Plantation</b>		
1.4.1	Location of Mill		
	<b>Name of Mill</b>	<b>Location</b>	<b>Coordinate</b>
			<b>Latitude</b> <b>Longitude</b>
	AMP POM	Tapian Kandis Village, Palembang Sub-District, Agam Regency, Sumatera Barat Province, Indonesia	S 00° 09' 22"      E 100° 01' 40"
1.4.2	Location of Certification Scope of Supply Base		
	<b>Name of Supply Base</b>	<b>Location</b>	<b>Coordinate</b>
			<b>Latitude</b> <b>Longitude</b>
	AMP 1	Tapian Kandis Village, Palembang Sub-District, Agam District, Sumatera Barat Province, Indonesia	S 00° 08' 23"      E 100° 00' 28"

AMP 2	Tapian Kandis Village, Palembayan Sub-District, Agam District, Sumatera Barat Province, Indonesia	S 00° 09' 30"	E 99° 55' 13"
AMP 3	Tapian Kandis Village, Palembayan Sub-District, Agam District, Sumatera Barat Province, Indonesia	S 00° 10' 48"	E 99° 49' 06"
AMP 4	Village of Ampat Koto, Sub-District of Kinali, Pasaman Barat District, Sumatera Barat Province, Indonesia	S 00° 04' 23"	E 99° 48' 10"
PT. PMJ	Jorong IV Koto Kenagarian Kinali, Sub-district of Kinali, Pasaman Barat District, Sumatera Barat Province, Indonesia	S 00° 03' 17"	E 99° 47' 51"
Cooperative of Tompek Tapian Kandis	Tepian Kandır Village, Palembayan Sub District, Agam District, Sumatera Barat Province, Indonesia	S 00° 08' 20"	E 100° 01' 00"
Cooperative of Mutiara Sawit Jaya	Taratak Nan Tigo Tiku Village, Tanjung Mutiara Sub District, Agam District, Sumatera Barat Province, Indonesia	S 00° 08' 42"	E 99° 58' 32"
Cooperative of Bukit Sandiang Tigo	Bawan Village, Ampek Nagari Sub District, Agam District, Sumatera Barat Province, Indonesia	S 00° 10' 25"	E 99° 59' 29"
Cooperative of Agro Wira Masang	Kinali Village, Kinali Sub District, Pasaman Barat District, Sumatera Barat Province, Indonesia	S 00° 10' 02"	E 99° 52' 58"

**1.5 Description of Area Statement**

1.5.1	Tenure	
	• State	11,188.52 Ha
	• Community	1,857.78 Ha
	• <b>Total</b>	<b>13,046.30 Ha</b>

**1.5.2 Area Statement**

	Own Estate	Scheme Smallholders	Total	
• Total area	11,188.52	1,857.78	13,046.30	Ha
• Mature area	7,494.48	1,763.31	9,257.79	Ha
• Immature area	1,124.01	19.06	1,143.07	Ha
• Infrastructure	274.87	63.31	338.18	Ha
• HCV	255.74	-	255.74	Ha
• Nursery	11.91	-	11.91	Ha
• Unplantable	60.24	-	60.24	Ha
• Land Preparation	26.53	12.10	38.63	Ha
• Occupation	1,918.64	-	1,918.64	Ha
• Mill	22.10	-	22.10	Ha

**1.6 Planting Year and Cycles**

1.6.1	Age profile of planting year										
	Hectarage (Ha)										
Planting Year	AMP-1	AMP-2	AMP-3	AMP-4	PMJ	TTK	MSJ	BST	AWM	Total	

1992	-	-	-	-	-	74.86	-	-	-	74.86	
1993	-	-	-	-	-	52.49	75.64	73.63	-	201.76	
1994	-	-	-	-	-	92.58	142.61	96.07	-	331.26	
1995	-	413.63	-	-	-	17.27	-	25.96	-	456.86	
1996	-	174.31	84.51	-	-	65.14	-	22.87	646.38	993.21	
1997	-	599.18	110.98	197.78	359.25	105.96	-	-	110.70	1,483.85	
1998	-	299.65	-	280.27	60.37	66.25	-	-	-	706.54	
1999	-	302.65	91.54	129.15	13.98	-	-	-	-	537.32	
2000	-	99.04	1,410.53	-	-	-	-	-	-	1509.57	
2001	-	206.02	314.30	162.53	341.55	-	-	-	-	1024.40	
2002	-	-	55.07	-	244.39	-	-	-	-	299.46	
2003	-	-	-	-	145.70	-	-	-	-	145.70	
2004	-	-	-	-	101.67	-	-	-	-	101.67	
2005	-	-	-	-	20.60	-	-	-	-	20.60	
2011	-	-	24.25	-	-	-	-	-	102.60	126.85	
2012	-	-	1.14	-	-	-	-	-	-	1.14	
2014	160.66	-	-	-	-	-	-	-	-	160.66	
2015	637.94	4.63	-	-	-	-	-	-	-	642.57	
2016	447.21	-	-	-	-	-	-	-	-	447.21	
<b>Sub Total Mature</b>	<b>1,245.81</b>	<b>2,099.11</b>	<b>2,092.32</b>	<b>769.73</b>	<b>1,287.51</b>	<b>474.55</b>	<b>218.25</b>	<b>218.53</b>	<b>859.68</b>	<b>9,257.79</b>	
2018	758.15	365.86	-	-	-	-	-	-	-	1,124.01	
2019	-	-	-	-	-	19.06	-	-	-	19.06	
<b>Sub Total Immature</b>	<b>758.15</b>	<b>365.86</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>19.06</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>1,143.07</b>	
<b>TOTAL</b>	<b>2,003.96</b>	<b>2,464.97</b>	<b>2,092.32</b>	<b>769.73</b>	<b>1,287.51</b>	<b>493.61</b>	<b>218.25</b>	<b>218.53</b>	<b>859.68</b>	<b>10,400.86</b>	
1.6.2	New Planting area after January 2010			-						Ha	
1.6.3	Planting Cycle			2 <sup>nd</sup> Cycle							
<b>1.7</b>	<b>Description of Mill and Supply Base</b>										
1.7.1	Description of Mill										
	<b>Name of Mill</b>	<b>Capacity (tonnes/ hour)</b>	<b>FFB Processed (tonnes/year)</b>	<b>CPO</b>		<b>Palm Kernel</b>					
				<b>Out put (tonnes)</b>	<b>Extraction (%)</b>	<b>Out put (tonnes)</b>	<b>Extraction (%)</b>				
	AMP POM	80	357,423.11	66,698.55	18.66	16,925.61	4.74				
	<i>*Production data from 12 months previous the audit: October 2019 to September 2020. This period adjusts to the MB SCCS quarterly closure period.</i>										
1.7.2	Description of Certification Scope of Supply Base										



	Name of Estate	Total Area (Ha)	Production Area (Ha)	FFB (tonnes/year)	Yield (tonnes/ha/year)	Supplied to Mill	
						FFB (tonnes/year)	%
	AMP 1	2,128.33	1,245.81	31,605.61	25.37	31,605.61	100
	AMP 2	2,595.08	2,099.11	33,537.93	15.98	33,537.93	100
	AMP 3	3,225.11	2,092.32	35,431.67	16.93	35,431.67	100
	AMP 4	1,300.00	769.73	18,562.24	24.12	18,562.24	100
	PMJ	1,940.00	1,287.51	30,225.99	23.48	30,225.99	100
	TTK (256 SH)	511.78	474.55	4,123.63	8.69	4,123.63	100
	MSJ (110 SH)	220.00	218.25	4,086.09	18.72	4,086.09	100
	BST (113 SH)	226.00	218.53	2,370.52	10.85	2,370.52	100
	AWM (450 SH)	900.00	859.68	14,628.95	17.02	14,628.95	100
	<b>TOTAL</b>	<b>13,046.30</b>	<b>9,257.79</b>	<b>179,124.58</b>	<b>18.84</b>	<b>179,124.58</b>	<b>100</b>
	<i>*Production data from 12 months previous the audit: October 2019 to September 2020. This period adjusts to the MB SCCS quarterly closure period.</i>						
1.7.3	FFB description from other source						
	Name of sources/Organisation RSPO certified (C) / non-certified (NC)	Type of Organisation	number of smallholders	Production Area (Ha)	Supplied to Mill FFB (tonnes/year)		
	PANP (C, until Nov 19)	Outgrower	-	977.65	2,779.72		
	KAMU (C, until Nov 19)	Outgrower	-	871.55	1,772.23		
	<b>Sub Total Certified</b>				<b>4,551.95</b>		
	KUD MANGGOPOH 1 (NC)	Wimar Smallholder	97	250.55	2,030.75		
	KUD MANGGOPOH 2 (NC)	Wimar Smallholder	736	1,187.45	6,794.26		
	PLS YTM (NC)	Wimar Smallholder	9	19.16	164.69		
	KUD LEMBAH SUBUR – AMP 3 (NC)	Wimar Smallholder	300	338.49	586.34		
	KUD DAMAI SEJAHTERA – PLS 3 (NC)	Wimar Smallholder	840	1,303.46	6,022.18		
	PANP BT.BIYU (NC)	Wimar Smallholder	1,039	2,030.23	376.53		
	KAMU (Dec 19 onward)	Independent Outgrower		871.55	12,220.11		
	PANP (Dec 19 onward)	Independent Outgrower		977.65	18,321.83		
	Other	Independent Supplier			131,781.86		
	<b>Sub Total Un-certified</b>				<b>178,298.54</b>		
	<b>TOTAL</b>				<b>182,850.48</b>		
	<i>*Production data from 12 months previous the audit: October 2019 to September 2020. This period adjusts to the MB SCCS quarterly closure period.</i>						
1.7.4	Product categories			FFB, CPO, PK			
1.8	Tonnage of Product						
1.8.1	Past Annual Claim Certified Product			Last Year Projected Certified Volume (MT)		Last Year Actual Certified Volume (Oct 2019 to Sep 2020) (MT)	

	FFB Processed		232,346		179,124.58			
	CPO Production		42,609		31,472.46			
	Palm Kernel (PK) Production		11,822		8,621.84			
1.8.2	Product selling							
	Type of selling product	Actual selling product for last year (Oct 2019 to Sep 2020) (MT)						
	CSPPO sold as RSPO certified product				18,962.20			
	CSPK sold as RSPO certified product				8,602.44			
	CSPPO sold under other scheme				12,357.59			
	CSPK sold under other scheme				0			
	CSPPO sold as conventional				0			
	CSPK sold as conventional				0			
1.8.3	Estimate of Certified FFB Claim							
	<b>Name of Estate(s)</b>	<b>Total Area (Ha)</b>	<b>Production Area (Ha)</b>	<b>FFB (tonnes/year)</b>	<b>Yield (tonnes/ha/year)</b>			
	AMP 1	2,128.33	1,245.81	30,100	24.16			
	AMP 2	2,595.08	2,099.11	37,300	17.77			
	AMP 3	3,225.11	2,092.32	33,200	15.87			
	AMP 4	1,300.00	769.73	18,600	24.16			
	PMJ	1,940.00	1,287.51	31,200	24.23			
	TTK (256 SH)	511.78	474.55	3,900	8.22			
	MSJ (110 SH)	220.00	218.25	2,200	10.08			
	BST (113 SH)	226.00	218.53	2,400	10.98			
	AWM (450 SH)	900.00	859.68	17,400	20.24			
	<b>TOTAL</b>	<b>13,046.30</b>	<b>9,257.79</b>	<b>176,300</b>	<b>19.03</b>			
	<i>*Projected FFB production for 12 months of certificate</i>							
1.8.4	Estimate of Certified Palm Product Claim							
	<b>Name of Mill</b>	<b>Capacity (tonnes/ hour)</b>	<b>FFB Processed (tonnes/year)</b>	<b>CPO</b>		<b>Palm Kernel</b>		<b>Supply Chain Module</b>
				<b>Out put (tonnes)</b>	<b>Extraction (%)</b>	<b>Out put (tonnes)</b>	<b>Extraction (%)</b>	
	AMP POM	80	176,300	35,300	20	8,900	5	MB
	<i>*Projected CSPO and CSPK production for 12 months of certificate</i>							
1.9	Other Certifications							
	ISCC	AMP; PMJ; KAMU; PANP; Plasma EU-ISCC-Cert-ID218-20180035						
	ISPO	PT AMP Plantation: ISPO Sertifikat No. MUTU-ISPO/022 valid until 27 July 2025						
1.10	Time Bound Plan							
1.10.1	Time Bound Plan for Other Management Units							
	<b>Management Unit</b>	<b>Estate (Supply Base)</b>	<b>Time</b>	<b>Location</b>	<b>Status</b>			

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

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

		PT Permata Hijau Pasaman (block 22)	2023	West Sumatra	-
Daya Labuhan Indah POM (PT Daya Labuhan Indah)	2013	Wonosari	2013	North Sumatra	Certified
		Sei Deras	2013	North Sumatra	Certified
		Cabang Dua (PT Milano)	2013	North Sumatra	Certified
Agro Palindo Sakti POM (PT Agro Palindo Sakti)	2014	Agro Palindo Sakti Estate	2014	South Sumatra	Certified (POM has been closed down)
Murini Samsam POM (PT Murini Sam Sam)	2015	Murini Sam Sam Estate	2015	Riau	Certified
		Part of PT Murini Samsam areas (466 ha)	2023	Riau	-
Musi Banyuasin POM (PT Musi Banyuasin Indah)	2023	Sei Selabu	2023	South Sumatera	-
		Sei Jarum	2023	South Sumatera	-
		KUD Karya Gatra	2023	South Sumatera	-
		KUD Karya Makmur Sriwijaya	2023	South Sumatera	-
		KUD Panca Karya Jaya	2023	South Sumatera	-
		KUD Sumber Makmur	2023	South Sumatera	-
		KUD Tri Tunggal Karya	2023	South Sumatera	-
Sinarsiak Dianpermai POM (PT Sinarsiak Dianpermai)	2023	Sinarsiak Dianpermai Estate	2023	Riau	-
Agro Indah Persada 2 POM (PT. Agroindo Indah Persada)	2023	-	2023	Bangko – Jambi	NPP Audit
<b>Malaysia</b>					
Sapi POM (PPB Oil Palms Berhad)	2008	Sapi 1	2008	Sandakan, Sabah, Malaysia	Certified
		Sapi 2	2008	Sandakan, Sabah, Malaysia	Certified
		Kiabau	2008	Sandakan, Sabah, Malaysia	Certified
Reka Halus POM (PPB Oil Palms Berhad)	2008	Reka Halus	2008	Sandakan, Sabah, Malaysia	Certified
Sabahmas POM (PPB Oil Palms Berhad)	2008	Sabahmas	2008	Lahad Datu, Sabah, Malaysia	Certified
Saremas 1 POM (PPB Oil Palms Berhad)	2010	Saremas	2010	Bintulu, Serawak, Malaysia	Certified
		Saremas 2 (Div D)	2010	Bintulu, Serawak, Malaysia	Certified
		Suai	2010	Bintulu, Serawak, Malaysia	Certified
Saremas 2 POM (PPB Oil Palms Berhad)	2010	Saremas 2 (exclude Div D)	2010	Bintulu, Serawak, Malaysia	Certified
		Kaminsky	2010	Bintulu, Serawak, Malaysia	Certified

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

	<p>smallholder under PT AMP Plantation and PT Primatama Mulia Jaya), KSU Mutiara Bosa Sikilang, KUD Permata Sawit Maligi, KUD Rantau Pasaman – Sasak and KUD Kapar (its supply based from PT Gersindo Minang Plantations POM)</p> <p>The revision of time bound plan because two companies (PT Karya Agung Megah Utama &amp; PT Perkebunan Anak Negeri Pasaman) has terminated the management agreement with PT AMP Plantation as stated in the termination agreement letter on 31 May 2019.</p> <p>The result of internal discussion referring RSPO P&amp;C Certification System, 2017 and communicating with auditee that Auditor has not accepted the revision of time bound plan for some cooperatives (KUD Karya Bersama, KUD Sejahtera Bersama, KUD Tabiku Makmur &amp; KUD Kosudra) as supply base from PT Kerry Sawit Indonesia be year 2023 because it is not compliance with RSPO Certification System clause 4.1.3 so auditor has issued final decision as seen on table 8 above.</p>
1.10.2	<p><b>Progress of Associated Smallholders and Outgrowers for Certifiable Standard</b></p>
	<p>KUD Damai Sejahtera (DASTRA) as an associated smallholder which supervised management by the PT. AMP and PT. PMJ has failed to be submitted within 1<sup>st</sup> certification cycle due to cooperative internal problem (land conflict). Therefore, this cooperative has postponed for certification.</p>



2.0	<b>ASSESSMENT PROCESS</b>
2.1	<b>Assessment Team</b>
ASA-1.3 Remote Audit	<ol style="list-style-type: none"> <li>1. <b>Arif Faisal Simatupang (Lead Auditor)</b> Bachelor of Agriculture, from Department of Agriculture Agronomy, Faculty of Agriculture, University of Gadjah Mada. He has successfully completed an RSPO endorsed P&amp;C Lead Auditor Training, RSPO SCCS endorsed Lead Auditor Training, Indonesian Sustainable Palm Oil (ISPO) Lead Auditor Training, Management System Certification ISO 9001-2008 Lead Auditor Training, Environmental Management System ISO 14001 Lead Auditor Training, ISO 17021 and ISO 17065 Awareness Training, Management of High Conservation Value (HCV) Training, Social Accountability SA 8000 Training. He has four years of working experience as a Field Assistant on oil palm plantation company in Indonesia. Since 2014, he works as an auditor of RSPO and ISPO in the aspects of legal, social, best management practices of mill and estate, OHS, employment, and environmental. In this audit, he was assessing the aspects of best management practices of agronomy and processing, SCCS and Legal aspect.</li> <li>2. <b>Mohamad Amarullah (Auditor)</b>. Indonesian Citizen. Master of Wood Science and Technology and Bachelor of Forestry with major in Forest Product Technology. Has experiences as Agronomist and Research Assistant in Indonesia and Malaysia from 2008 to 2014. 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, etc. very good in conducting RSPO, MSPO and ISPO audit scheme since 2014 on any aspect. Fluent in Malay and English. During this assessment verified OHS &amp; Worker Welfare aspect.</li> <li>3. <b>Bayu Yogatama (Auditor)</b>. Bachelor of Forestry, Department of Forest Resources Conservation and Ecotourism, Bogor Agricultural University. Has attended the ISO 9001: 2015 Quality Auditor / Lead Auditor Course Quality Management System (QMS) course and ISO 19011: 2011 Guidelines for Auditing Management System, ISPO Lead Training, SA 8000, RSPO Lead Training, IHT RSPO NPP, IHT RSPO RaCP, IHT ISO 17021, and IHT ISO 17065. Having experience working in plywood field as Inspector in foreign private company. Currently working for an independent certification body. During this assessment has verified environment, conservation and GHG aspect.</li> <li>4. <b>Johannes Pandiangan (Observer)</b>. Bachelor of Agriculture Department of Social Economics of Agriculture, Faculty of Agriculture. He has 7 years experience working as operational staff of one of the leading private oil palm plantation companies in Indonesia.</li> </ol>
ASA 1.3 Onsite Audit	<ol style="list-style-type: none"> <li>1. <b>Arif Faisal Simatupang (Lead Auditor)</b> Bachelor of Agriculture, from Department of Agriculture Agronomy, Faculty of Agriculture, University of Gadjah Mada. He has successfully completed an RSPO endorsed P&amp;C Lead Auditor Training, RSPO SCCS endorsed Lead Auditor Training, Indonesian Sustainable Palm Oil (ISPO) Lead Auditor Training, Management System Certification ISO 9001-2008 Lead Auditor Training, Environmental Management System ISO 14001 Lead Auditor Training, ISO 17021 and ISO 17065 Awareness Training, Management of High Conservation Value (HCV) Training, Social Accountability SA 8000 Training. He has four years of working experience as a Field Assistant on oil palm plantation company in Indonesia. Since 2014, he works as an auditor of RSPO and ISPO in the aspects of legal, social, best management practices of mill and estate, OHS, employment, and environmental. In this audit, he was assessing the aspects of Legality, and supply chain aspect.</li> <li>2. <b>Satria Adi Putra</b>. Indonesian citizen, Diploma III majoring in Palm Oil Plantation. Have experience of work more than six years since 2009 as the operational staff of private oil palm plantations in Indonesia. Training have been followed including Occupational Health and Safety Expert, Orang Utan and Wildlife Management, ISPO Auditor Training, ISCC Auditor, IHT Potential Mapping and Conflict Resolution in Production Forests, OHSAS 18001, SA 8000, RSPO Lead Training, Lead Auditor Training for ISO 9001, ISO 14001, ISO 17021, ISO 17065, ISO 19011, ISO 22000. During this assessment he was verified best management practices, OHS and transparency.</li> <li>3. <b>Nurdin Chaeriana</b>. Indonesian Citizen. Diploma of Forest Management, Faculty of Forestry, has 5 years working experience in Industrial Plantation Forest Companies as Environment, Health and Safety staff and worked for 5 years in plantations as Assistant Manager of Sustainability. Training attended was ISPO Auditors, General OHS Expert, Hazardous and toxic waste material Management Technical Guidance, Fundamentals of Forest and Land Fire Control, Training of Trainer Fire Fighting Course, Basic Fire Fighting Course, Fire Management, Fire Fighting Technique Prevention &amp; Control, ISO 14001:2004 Internal Auditor. During this audit, he was conducted verified environment, GHG and HCV.</li> <li>4. <b>Rindu Galih Rezza Rachmansyah</b>. Indonesian citizen, Bachelor of Agriculture with major in Plant Pest and</li> </ol>

	<p>Disease. Has one year experience as Field Expert in Pesticide Company and 3 years' experience in Industrial Forest Management, Forest Rehabilitation and Reclamation on Indonesia Stated Owned Company as Assistant. Training which had attended including Lead Auditor ISO 9001, ISO 14001, ISO 17021, ISO 19011, SA 8000, ISPO, RSPO, RaCP and NPP Awareness and OHSAS 18001:2007. Has involved in several audit activities related to sustainable palm oil since 2017. During assessment, he assigned to conduct verification towards worker welfare and social aspect.</p>
<b>2.2</b>	<b>Assessment Methodology, Assessment Process and Locations of Assessment</b>
<b>2.2.1</b>	<b>Figure of person days to implement assessment</b>
<b>ASA-1.3 Remote Audit</b>	<p>Number of auditors: 3 auditors &amp; 1 Observer          Number of days for <b>Remote ASA-1.3</b> document review: 2 days          Number of working days for <b>Remote ASA-1.3</b> document review: 6 Working days</p>
<b>ASA-1.3 Onsite Audit</b>	<p>Number of auditors: 4 auditors          Number of days for <b>Remote ASA-1.3 at site</b>: 4 days          Number of working days for <b>Remote ASA-1.3</b> document at site: 16 Working days</p>
<b>2.2.2</b>	<b>Assessment Process</b>
<b>ASA-1.3 Remote &amp; Onsite Audit</b>	<p>The assessment was conducted by measuring the sufficiency of implementation with the consistency done by the PT AMP including its scheme smallholders that were full managed by the company, to the requirements of <b>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.</b></p> <p>For this section (Remote Audit ASA-1.3) The assessment was conducted in One method: document review, aiming to observe the sufficiency of types or substances from required documents. Some opportunities for improvement of the results ASA-1.3 Remote Audit by the MUTU auditor to the management unit and the results are the subject will be verified at the next assessment phase ASA-1.4 Onsite Audit. Improvement of findings from ASA-1.2 findings were observed by auditors at this ASA-1.3 assessment. All information obtained was recorded in Check List of PT Mutuagung Lestari (MUTU) and part of ASA-1.3.</p> <p>The opening meeting was held on Thursday 18 June 2020 at 08 am through a teleconference (zoom meeting). As for the participants who attended the opening meeting included the AMP 1, AMP 2, AMP3, PMJ and AMP POM Manager, Supported Team Jakarta and other staff at PT AMP. While the closing meeting will take place on June 19, 2020 at 16 pm. attended by the same participants as the opening meeting.</p> <p>The onsite audit 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 1.3 delivered by the MUTU auditor to the management unit and the results are the subject will be verified at the next assessment phase ASA – 1.4. Improvement of findings from ASA-1.2 findings were observed by auditors at this ASA 1.3. All information obtained was recorded in Check List of PT Mutuagung Lestari (MUTU) and part of ASA 1.3.</p> <p>The assessment program please find Appendix 2</p>
<b>2.2.3</b>	<b>Locations of Assessment</b>
<b>ASA-1.3</b>	<p>Number of units in this certification are one Mill and nine Estates (including four full managed scheme smallholders). In conducting the assessment, the Auditors using a sampling system with the formula of <math>0.8\sqrt{(y) \times (z)}</math> in accordance</p>

**Onsite Audit**

with the RSPO Certification System, where y is the number of Estates and z is a multiplier of risk factor defined by the risk assessment (value 1 for low risk, value 1.2 for medium risk, and a value of 1.4 for high risk).

Based on the risk assessment, the company has a medium risk (considering the previous Audit result, and issues from NGOs / internet). Based on the calculation, the result equals to three Estates. However, if the calculation results less than four, then the sample shall be rounded to four Estate.

When the number of samples calculated, in selecting the Estates to be audited shall consider the issues that arise and/or the Estate that has not been assessed in previous audit. The Estates sampled in this audit namely AMP 1 Estate, AMP 2 Estate, PMJ Estate, and KUD Agro Wira Masang. In the term of Mill, in every audit must be assessed according to the Certification System.

The locations visited in every unit are presented as follows:

**AMP POM**

- **Security Post.** Observation related to the acceptance of FFB and employment aspect of securities.
- **Weighbridge Station.** Observation and interview related of supply chain implementation, and weighbridge calibration.
- **Grading and Loading Ramp Station.** Observation and Interview with workers related to personnel understanding over the applicable SOP, implementation of OHS, training from company and worker welfare.
- **Station Sterilizer.** Observation and interview with operator, on his understanding towards technical, OSH, manpower and environment, as well as facilities provided by the company.
- **Station Clarification.** Observation and interview with operator, on his understanding towards technical, OSH, manpower and environment, as well as facilities provided by the company. Also observed 2 **Apprentices** on maintenance activities.
- **Station Press.** Observation and interview with operator, on his understanding towards technical, OSH, manpower and environment, as well as facilities provided by the company.
- **Station Crane.** Observation to crane activities.
- **Station Nut and Kernel.** Observation and interview with operator, on his understanding towards technical, OSH, manpower and environment, as well as facilities provided by the company.
- **Station Boiler.** Observation and interview with operators, on their understanding towards technical, OSH, manpower and environment, as well as facilities provided by the company.
- **Engine Room.** Observation and interview with operator, on his understanding towards technical, OSH, manpower and environment, as well as facilities provided by the company.
- **Hazardous Waste Storage.** Observations related to the fulfillment of the attribute's health and safety, recording, and the implementation of compliance requirements hazardous waste temporary storage, wages and complaint mechanism.
- **Workshop.** Observations and interviews related to wages and overtime, waste management activities, OHS implementations and health inspections.
- **Spare Part and Oil Storage.** Observation minimum stock of PPE's and housekeeping implementation.
- **Chemical Storage.** Observation related to management of chemical material and waste, MSDS, emergency response facilities and the types of chemical used.
- **Solar Tank.** Observation of OHS, environment aspect, emergency response and fire facilities.
- **Waste water treatment plant.** Observation about WWTP condition and interview with WWTP operator about his job description and WWTP management
- **WTP.** Observations and interviews related to water management, recording of water use, health checks, PPE and waste management.
- **Empty bunch areas.** Observation for empty bunch management and OHS

**AMP 1 Estate**

- **Land demarcation and HGU stones No. 1 (Block 109), No. IV (Block 109), land boundary on Block 111, 108.** Observation of aspect of boundary demarcation and maintenance of HGU stone, and land dispute potency.
- **HCV of Masang Kanan River riparian Block 111.** Observation of HCV management on riparian area of Masang

- Kanan River.
- **Harvesting at Block 5C.** Observation and interviews with foreman and harvester related FFB quality, harvesting round, OHS, and employment.
  - **Beneficial Plant at Block 8B/C.** Observation and interviews with workers related beneficial plant to support development of natural enemy for suppressing palm leaf eating caterpillar, plant maintenance, OHS, and employment.
  - **Pheromone Trap at Block 12 B.** Observation related Integrated Pest Management to suppress horn beetle manifestation in the field.
  - **Owl Nest at Block 4B.** Observation of Integrated Pest Management, related to suppress rat infestation by installing and monitoring owl nest.
  - **Spraying at Block 8B.** Interviews of spraying mechanism, work tools, chemicals used, doses used, medical examinations, extra fooding, PPE, labor aspect and environment.
  - **Manuring at Block 15A/B.** Interviews of spraying mechanism, work tools, chemicals used, doses used, medical examinations, extra fooding, PPE, labor aspect and environment.
  - **Nursery at Block 4B.** Observation of Palms (from seeds and tissue culture) upkeep and best nursery management practces were managed under AMP 1 Estate.
  - **Fire Monitoring Tower at Block 4B.** Observation related to fire monitoring and firefighting facility.
  - **Land Application at Block 8B.** Observation related to Land Application in the field.
  - **Housing Complex I.** Observation and interview with residents about housing facilities, domestic waste management.
  - **Domestic Waste Landfill, Block 5 C** Observation related domestic waste management.
  - **Fire Fighting Facilities.** Observation and simulation the emergencies response facilities.
  - **Daycare.** Observation and interview with worker related labor aspect and OHS.
  - **Spare part and PPE warehouse.** Observation minimum stock of PPE's.
  - **Diesel Tank.** Observation of OHS, environment aspect, emergency response and fire facilities.
  - **Lubricant and Agrochemicals Warehouse.** Observation related to management of oil and agrochemical material and waste, MSDS, emergency response facilities and the types of pesticides used.
  - **Hazardous Waste Warehouse (Temporary).** Field observations related to the fulfillment of the attribute's health and safety, recording, and the implementation of compliance requirements hazardous waste temporary warehouse, wages and complaint mechanism.
  - **Workshop.** Observations and interviews related to wages and overtime, waste management activities, OHS implementations and health inspections.
  - **Fertilizer warehouse.** Observation related to management of agrochemical material and waste, MSDS, emergency response facilities and the types of fertilizer used.
  - **Pesticide warehouse.** Observation related to management of agrochemical material and waste, MSDS, emergency response facilities and the types of fertilizer used.
  - **Generator (Electricity).** Observation for waste management, and interviews related to workers facility, electricity, domestic waste, sources offresh water, socialization of company policy and complaint mechanism.
  - **Clinic.** Observation related to medical facility and medical waste.
  - **Used sack shower facility.** Observation about management Used sack storage.
  - **Pesticide applicator PPE rinse room.** Observation related to management of agrochemical material and waste, MSDS, emergency response facilities and the types of fertilizer used.
  - **Clinic.** (1 paramedic). Observation First aid rooms reasonably clean condition, medical waste recording, labor medical check up and work accident.

**AMP 2 Estate**

- **Land demarcation and HGU stones No. BPN 04 (Block 001).** Observation of aspect of boundary demarcation and maintenance of HGU stone, and land dispute potency.
- **HCV of Masang Kanan River riparian Block 001.** Observation of HCV management on riparian area of Masang Kanan River.
- **Beneficial Plant at Block 007.** Observation and interviews with workers related beneficial plant to support development of natural enemy for suppressing palm leaf eating caterpillar, plant maintenance, OHS, and employment.

- **Harvesting at Block 007.** Observation and interviews with foreman and harvester related FFB quality, harvesting round, OHS, and employment.
- **Water management on peat land, Block 007.** Field observations related to the implementation of water management (weirs, water level meter) in peat land.

**PMJ Estate**

- **Land demarcation and HGU stones No. I (Block 18), No. II (Block 19), No. III (Block 20), No. IV (Block 22).** Observation of aspect of boundary demarcation and maintenance of HGU stone, and land dispute potency.
- **FFB Harvesting, Block 003.** Observation and interview with harvesters related to FFB harvest activities, fruit quality, OSH aspects and employment.
- **Selective weeding, Block 001.** Observation related best management practices, labor aspect, OHS and payment.
- **Integrated Pest Management, Block 002/008.** Observation related implementation of natural enemy such as Turnera sp, Antigonon leptopus and Tyto alba.
- **Water Level Stick and Subsidence, Block 002.** Field observations related to the implementation of water and soil management in peat areas.
- **Housing Complex,** Observation and interview with residents about housing facilities, domestic waste management.
- **Domestic Waste Landfill,** Block 15 D Observation related domestic waste management.
- **Fire Fighting Facilities.** Observation and simulation the emergencies response facilities.
- **Daycare.** Observation and interview with worker related labor aspect and OHS.
- **Spare part and PPE warehouse.** Observation minimum stock of PPE's.
- **Diesel Tank.** Observation of OHS, environment aspect, emergency response and fire facilities.
- **Lubricant and Agrochemicals Warehouse.** Observation related to management of oil and agrochemical material and waste, MSDS, emergency response facilities and the types of pesticides used.
- **Hazardous Waste Warehouse (Temporary).** Field observations related to the fulfillment of the attribute's health and safety, recording, and the implementation of compliance requirements hazardous waste temporary warehouse, wages and complaint mechanism.
- **Workshop.** Observations and interviews related to wages and overtime, waste management activities, OHS implementations and health inspections.
- **Fertilizer warehouse.** Observation related to management of agrochemical material and waste, MSDS, emergency response facilities and the types of fertilizer used.
- **Pesticide warehouse.** Observation related to management of agrochemical material and waste, MSDS, emergency response facilities and the types of fertilizer used.
- **Generator (Electricity).** Observation for waste management, and interviews related to workers facility, electricity, domestic waste, sources offresh water, socialization of company policy and complaint mechanism.
- **Clinic.** Observation related to medical facility and medical waste.
- **Used sack shower facility.** Observation about management Used sack storage.
- **Pesticide applicator PPE rinse room.** Observation related to management of agrochemical material and waste, MSDS, emergency response facilities and the types of fertilizer used.
- **Clinic. (2 paramedic).** Observation First aid rooms reasonably clean condition, medical waste recording, labor medical check up and work accident.

**KUD Agro Wira Masang (Scheme Smallholder)**

- **Harvesting, Block 7.** Observation and interviews with foremen and harvest workers related to work procedures, health insurance and labor protection, safe working practices and use of PPE.
- **Spray Circle & Path, Block 1.** Interviews of spraying mechanism, work tools, chemicals used, doses used, medical examinations, extra fooding, PPE, labor aspect and environment.
- **Water Level Stick and Subsidence, Block 5 & Block 1.** Field observations related to the implementation of water and soil management in peat areas.
- **HCV Area, Block 2.** Observation of HCV area that will be excluded from concession area due to land legality reason.
- **Insertion Plant (Year of Plant 2011), Block 9.** Observation related planting year and plant condition.

**Consulted Stakeholder**



	<ul style="list-style-type: none"> <li>- SERBUNDO (Labour Union) PT AMP Plantation.</li> <li>- PUK-SPPP-SPSI (Labour Union) PT AMP Plantation.</li> <li>- Agro Wira Masang Cooperative (Scheme Smallholder) and Nagari Kinali Local Community.</li> <li>- Datuk Kando (Ninik Mamak Nagari Bawan)</li> <li>- Investment and Manpower Agency of Agam Regency.</li> <li>- Local Contractor for Empty Bunch Transport.</li> <li>- Local Contractor (Civil Engineering AMP POM)</li> <li>- Serikat Pekerja Seluruh Indonesia (SPSI – AMP POM)</li> <li>- Serikat Pekerja Seluruh Indonesia (SPSI – PMJ)</li> <li>- Gender Committee of AMP POM</li> <li>- Gender Committee/Women on Working Group PT AMP</li> <li>- Gender Committee/Women on Working Group PT PMJ</li> <li>- Fresh Fruit Bunch Supplier.</li> <li>- National Land Agency of Agam Regency.</li> <li>- Agriculture Agency of Agam Regency.</li> <li>- Environment Agency of Agam Regency.</li> </ul>
<b>2.3</b>	<b>Stakeholder Consultation and Stakeholders Contacted</b>
<b>2.3.1</b>	<b>Summary of stakeholder consultation process.</b>
<b>ASA-1.3</b>	<p>Summary of stakeholder consultation process            Consultation of stakeholders for <i>PT AMP Plantation – AMP POM</i> was held by:</p> <ol style="list-style-type: none"> <li>1. Public Notification on PT Mutuagung Website on November 9, 2020.</li> <li>2. Consultation with NGO (Walhi, Sawit Watch, AMAN and WWF) via email on November 17, 2020.</li> <li>3. Public consultation with government institutions of Agam Regency by phone (National Land Agency or BPN, Agriculture Agency, Manpower Agency, Environment Agency) November 25, 2020.</li> <li>4. Public consultation meeting with locals of the nearby village by phone (Datuk Kando (Ninik Mamak Nagari Bawan) on November 25, 2020.</li> <li>5. Consultation meeting and interview with internal stakeholder such as labor union, gender committee &amp; local contractor on November 25, 2020.</li> </ol> <p>Numbers of input from stakeholders were clarified by <i>PT AMP Plantation</i></p>
<b>2.3.2</b>	<b>Stakeholder contacted</b>
<b>ASA-1.3 Remote &amp; Onsite Audit</b>	<i>Please find appendix 1</i>
<b>2.4</b>	<b>Determining Next Assessment</b>
<b>ASA-1.3 Remote &amp; Onsite Audit</b>	The next visit ( <i>ASA-1.4</i> ) will be conducted eight (8) month to twelve (12) month after date of annual license.

**3.0 ASSESSMENT FINDINGS**

**3.1 Summary of Assessment Report of the RSPO Certification**

MUTUAGUNG LESTARI has conducted an assessment AMP POM – PT AMP operation consisting of one (1) mill and six (5) Esatete (AMP 1 Estate, AMP 2 Estate, AMP 3 Estate, AMP 4 Estate & PMJ Estate) and Four (4) Scheme Smallholders of PT AMP (KUD Tompek Tapian Kandis; KUD Bukit Sandiang Tigo; KUD Agro Wira Masang and KUD Mutiara Sawit Jaya).

During the assessment, No Nonconformities were found during the audit activity and five (5) opportunity for improvement were identified.

MUTUAGUNG LESTARI found that AMP POM – PT AMP, 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 continue.

Ref Std.	VERIFICATION RESULT of MUTU-Certification	
<b>PRINCIPLE #1 BEHAVE ETHICALLY AND TRANSPARENTLY</b>		
<b>1.1</b>	<b>The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.</b>	
<b>1.1.1</b>	The unit of certification is able to shows several public-available documents related to manpower and safety aspect, as well as it's evidence of delivery to Manpower Agency of Agam District, Pasaman Barat District and Sumatera Barat Province. For example: annual report " <i>Wajib Laporan Ketenagakerjaan di Perusahaan</i> " (WLKP) for period 2019 that had delivered online with report No. 26164.20200530.0002 dated 30 May 2020 and No. 26567.20200612.0001 dated 12 June 2020 for PT AMP Plantation and PT Primatama Muliajaya (PT PMJ), respectively. Furthermore, quarter report of P2K3L (OSH and Environment) for Period January to March 2020 had delivered through document No. 005/APM-P2K3L/Ext-I/2020 dated 27 April 2020 and No. .../PMJ-Ext/V/2020 dated 15 May 2020 for PT AMP and PT PMJ, respectively. The latest plantation progress report (LPUP) period of Semester II 2019 has been sent to Plantation Agency on 9 January 2020. The latest HGU use annual report has been sent to Land Agency on 9 January 2020	
<b>1.1.2.</b>	Based on the results of the document review, it is known that the company has an Information Service SOP for Stakeholders (PRO-BNM-006, Revision 03, dated February 9, 2016), wherein the document lists the types of documents that are available to the public and can be informed to stakeholders including: <ul style="list-style-type: none"> <li>• AMDAL documents</li> <li>• Company annual reports</li> <li>• Company policy</li> <li>• Company Licenses, HGU Permits and related Permits</li> <li>• The operational area of the plantation and mill is accompanied by a map</li> <li>• Estate and mill operational procedures</li> <li>• HCV Report and HCV Management Plan</li> <li>• Social Impact Study Report</li> <li>• Company CD &amp; CSR Implementation Report</li> <li>• General summary of the certification assessment</li> <li>• Results of the identification of aspects of environmental impacts and OHS risks</li> <li>• OHS &amp; Environment Program</li> </ul>	



- Records of complaints and their handling
- Conflict Resolution SOP
- Records of Public Relations Handling
- Continuous Improvement Plan

Based on interview with the stakeholder (local contractor) and worker union, it is known that the company has inform and dissemination related information that can access for public. They said that the company has an open information related payment, grievance and etc.

**1.1.3**

The company shows documents related to requests for information and responses contained in the FRM-BNM-020 document which describes the response and status of information completion. Based on this document, it is known that there were no requests for information from January-May 2020. The requests for information and responses were in 2019. One example is as follows:

Incoming letter dated 28 May 2019, No. 590 / Perkim / 2019/23 May 2019 regarding the Minutes of the Internal Meeting of the Agam Local Government Team Mediation. The company's response: a meeting held by the Agam local government team led by the Agam regional secretary.

**1.1.4.**

The company has shown documents related to the consultation and communication procedure socialization, which is stated in the minutes of the socialization of the company's policies, procedures and operating standards of the PT AMP Plantation company which was carried out on June 15, 2020. The socialization was also socialized with regard to providing information to stakeholders, receiving complaints and disputes, as well as communication, consultation and coordination with stakeholders. The socialization was attended by 16 participants.

**1.1.5**

The company has shown documents related to the list of stakeholders owned by the company. In this document, it explains things related to the name, agency, position, address and contact number of the stakeholder. The stakeholders owned by the company are as follows:

1. District, sub-district and village governments: 77 stakeholders
2. External suppliers: 93 stakeholders
3. Indigenous peoples and non-governmental organizations: 29 stakeholders
4. Contractors: 29 stakeholders
5. Labour Unions: 1 stakeholder

**Status: Comply**

**1.2**

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

**1.2.1**

The company has a Company Code of Ethics (applicable to Plantation & Industry), Approved by the Country Head, known by HRGA Corporate Head (Human Resource and General Affair) and Examined by the Sustainability Division Head, effective from 15 December 2015, Revision 01 dated 28 / 3/2016 (Document No: 044 / DIR-KP / XII / 2015). The policy explains some things, including:

- Point 1. General (General) that employees are required to be good and polite in accordance with ethical values and behavior according to ethical standards and norms set by the Company
- Point 5. Bribery and Illegal or Unethical Trading Practices that employees must refrain from illegal or unethical actions that can damage the company's reputation
- Point 9 besides information related to confidentiality, there is also information that can be given to the parties.

The company has documented and communicated the Company's Code of Ethics to all employees and other relevant stakeholders. This was done as an effort to continuously ensure the understanding of workers and stakeholders towards the Company's Code of Ethics.

Based on the results of interviews with local contractors, it is known that the company has always delivered socialization

related to the code of ethics to local contractors at the time of signing the work contract so that the contractor understands the provisions well. In addition, during interviews with harvest, fertilizer, spray workers and factory operators, it was found that workers had a good understanding of the code of ethics in working in the company's operational environment.

**1.2.2**

Based on interviews with company management, it is known that the company has a system to monitor compliance and the implementation of policies and ethical behavior, namely the internal audit mechanism which is carried out annually and external audits of public accountants to monitor the company's financial flows. One of the recommendations issued by the internal audit is the existence of a tender committee for the submission of the contract, which took effect in 2018

**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**

Compliance evidence towards manpower regulations has shows through several documents, for example as follows:

- Annual Report of Manpower (WKLP) in 2019 had delivered online at 20 May 2020 and 12 June 2020, for PT AMP and PT PMJ, respectively.
- Implementation of minimum wage had verified through cheking on employees payment slip, as refers to the Decree of Sumatera Barat Governor No.562-827-2019 dated 29 October 2019, which was about IDR 2,484,041/month or IDR 99,362/day or IDR 14,359/hour. This Decree responded by through Internal Memorandum of HR Manager No. 001/WIP-HRR/Int-XII/2019 dated 17 December 2019 about employees minimum wages in 2020 which was refers to Governors Decree.
- Implementation of structure and scale of wages was refers to Internal Memorandum of HR Manager No. 001/WIP-HRR/Int-I/2020 dated 02 January 2020 has satisfactory implemented to all level of employees, as comply with Manpower Minister Regulation No. 01 of 2017.
- Payment of overtime was inline and comply with the Decree of Manpower Minister No. 102 of 2004.
- The were Labour Union that registered to The Manpower Agency. Furthermore, as sighted to online sources, it was known thae there were no issues related to manpower such as worker and gender discriminations, force labour, child labour under 18 years old, etc.
- All workers were covered by BPJS Ketenagakerjaan and BPJS Kesehatan.
- The company has been shown the legal compliance toward Indonesia law such as HGU and IUP that described in more detail in indicator 4.4.1

Compliance evidence towards occupational health and safety regulations has shows through several documents, for example as follows:

- OSH Committee P2K3 Registration for all units as presented through several documents, as follows:
- PT AMP (Estate and Mill), TTK and BST Cooperative were under P2K3 of PT AMP as endorsed by Manpower Agency of Sumatera Barat Province No. 564/24/P2K3/Hi-Was/2020 dated 07 February 2020. The Secretary of P2K3 was an OSH Expert as shows through Minister of Manpower Decree No. KEP. P.1582/NAKER-BINWASK3/VI/2017 dated 05 June 2017, valid for 3 years. Extension process on OSH Expert License shows through Director of PT Arpindo Pratama Letter (safety training organizer) No. 425/AP/K3/VI/2020 dated 17 June 2020 which mentioned that the extension was still ongoing process.
- PT PMJ and AMP 4 were under P2K3 of PT PMJ as endorsed by Manpower Agency of Sumatera Barat Province No. 564/134/Hi-Was/2017 dated 19 June 2017. The Secretary of P2K3 was an OSH Expert as shows through Minister of Manpower Decree No. KEP. P.1579/NAKER-BINWASK3/VI/2017 dated 05 June 2017, valid for 3 years. Extension process on OSH Expert License shows through Director of PT Arpindo Pratama Letter (safety training organizer) No. 423/AP/K3/VI/2020 dated 17 June 2020 which mentioned that the extension was still ongoing process.
- Quarter Report of P2K3L (OSH and Environment) for Period January to March 2020 had delivered through document No. 005/APM-P2K3L/Ext-I/2020 dated 27 April 2020 and No. .../PMJ-Ext/V/2020 dated 15 May 2020 for PT AMP and PT PMJ, respectively.
- PPE Distribution to all employees has comply with HIRAC and MSDS. Implementation on this matter will be verified

through field observation (on-site audit).

- General medical checkup and special Medical Checkup (e.g. cholinesterase, spirometry and audiometry) has been conducted and monitored annually to the related employees. Follow up will be taken when the results indicates abnormal.

CH already has permits related to environmental aspects such as:

- Environmental Document dated 12 March 2018 with no. 660/24 / 8K / TL / DLH-2018 and Environmental Permit dated 4 April 2018 No. 660-5-2018. For an area of 7926.42 Ha and 22,099 Ha Factory. (PT AMP)
- Environmental document number 188.045 / 183 / BUP-PASBAR-2009 dated January 7, 2009 (PT PMJ)
- The company already has a permit for Hazardous Waste temporary storage located at AMP1 Estate, AMP POM and PT PMJ, all permits are still valid.
- AMP POM has a permit for utilization of PT AMP factory wastewater in accordance with the Decree of the One-Stop Integrated Service Investment Service Agam District No. 01 of 2018 is dated April 6, 2018 and is valid as long as the company conducts its business and will be reviewed at least once every 5 years.
- the environmental management report is contained in the report on the implementation of RKI-RPL for semester 2 of 2019 (PT PMJ & PT AMP) which has been reported to the Environmental Office of West Pasaman Regency on February 17, 2020.
- The company has reported on hazardous waste management to related agencies, for the fourth quarter 2019 report it has been reported to the Agam District Environmental Service on February 15, 2020, and the 2020 Quarterly Report is reported on April 29, 2020.
- The company has reported on liquid waste management to relevant agencies, for the fourth quarter of 2019 reports have been reported to the Agam Regency Environmental Service on February 15, 2020, and the first quarterly reports 2020 are reported on April 29, 2020
- The company has shown the receipt of the RKL RPL report for semester 1 of 2020 and the report on the management of LB3 and land application for the second quarter of 2020 dated 27 July 2020 by the Environmental Service of Agam Regency and the Environmental Service of West Sumatra Province
- The company has shown a receipt for the Hazardous and Toxic Waste management report and land application report for the 2nd quarter of 2020 dated 29 October 2020 by the Environmental Service of Agam Regency and the Environmental Service of West Sumatra Province

Some of regulation compliance towards BMP aspect is presented as follows:

- There are no burning activities during land clearing.
- Estate management has only use oil palm planting materials from recognized seeds producers in Indonesia.
- Estate management has implementing integrated pest management to overcome pest incidence. Furthermore, type of pesticide has also carefully selected by avoiding over application and minimizing active ingredients,
- Good agriculture practices such as field upkeep, soil fertility management through nutrient balance approach has a long time to satisfactory implanted on the field.

### 2.1.2

Procedure of monitoring and update of laws and/or regulation are presented in procedure No. PRO-BNM-005 (Rev. 03) dated 01 October 2013 about Identification and Evaluation of Applicable Laws/Regulations; and procedure No. PRO-BNM-004 (Rev. 02) dated 01 October 2013 about Law/Regulation Requirements Pursuance or Compliance. Both procedure mentioned that monitoring and update of laws/regulations was carried out every Semester by the respective Managers, described as follows:

- *Bina Mitra* Manager for plantation and best management practices (BMP) aspect.
- Environment Health and Safety (EHS) Manager for environment, occupational and safety (OSH) aspect.
- Human Resources Department (HRD) Manager for manpower aspect.

Source of Laws and Regulations were derived from Industry Associations (for example KMSI, SPSI, GAPKI); Non Government Organizations (NGO); Public Media (Radio, Television, Newspaper and Respective Websites); Government Institutions; etc. Based on the results of the review of the Registration Law evaluation document carried out on 18 December 2019, it was found that the certification unit had made additions to these documents related to 15 new regulations and the elimination of 7 old regulations that were no longer in the evaluation during the evaluation. In general, for compliance with

laws and regulations in accordance with the Register Law that is owned, the certification unit has tried to comply with these regulations and there is still one fulfillment that is still in the processing stage related to the Domestic Waste Permit.

To evaluate the compliance of existing regulations to contractors and suppliers, the certification unit has conducted annual evaluations to parties related to compliance with labor regulations, OHS, and other legal regulations.

**2.1.3**

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

**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**

List of contractor for period 2020 is presented in document Form No. FRM-GEN-050 (Rev. 03) dated 25 Juli 2019. The list has informed name of contractor, PIC, ID number of PIC, number of NPWP (Tax), address, bank account number, contact number, number of employee, number of BPJS (a compulsory government insurance scheme for manpower and health) and type work conducted (ex. transportation, field upkeep and EFB application). Furthermore, list of FFB supplier as per 30 January 2020 informed that there were 15 suppliers for Non-RSPO certified and 11 suppliers under Wilmar Plantations (RSPO Certified).

Work agreement with contractor mentioned that operation activities shall be comply with applicable Indonesian laws and regulations. Implementation on this matters shows through Contractor Law Register dated 09 January 2020 which inform checklist of contractor compliance against 12 Indonesia regulations related to manpower and safety aspect.

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

**2.2.2**

Clause of law and regulation pursuant to contractor is presented in several documents, such as procedure of FFB purchasing No. 001/TBS-SOP/VIII/2015 dated 10 August 2015, which mentioned that FFB suppliers should declare and give a guarantee that FFB delivered were came from their owned estates and not from forest area or illegal sources. Furthermore, rules of FFB supply has also presented in work agreement which covers FFB payment, FFB transportation and administration, FFB quality standard and grading, FFB price, period of agreement, agreement code of conduct, force majeure, dispute, addendum of agreement and other provisions. To ensure all FFB suppliers has comply with procedure, CH management has conducting field crosscheck and verification through direct survey. The survey has informed supplier estate location, GPS Coordinate and palm profiles. Furthermore, the unit of certification shows Contractor Law Register dated 09 January 2020 which inform checklist of contractor compliance against 12 Indonesia regulations related to manpower and safety aspect. According to Law Register for CV Usaha Ayah (EFB Transportation) and CV Purnama Sari (EFB Application), it was known that regulation pursuant has considered satisfactory. However, Law register for Agent of FFB Supplier has also available.

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

The results interviews with contractor workers (FFB & CPO transport) revealed that workers had received wages above the

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

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

**2.2.3**

Unit certification policy towards clauses on disallowing child, force labour and trafficked worker labour is presented in company policy that issued by Group Plantation Head and Group CSR Head on September 2010. Furthermore, this policy also stated in Chapter 3 on the Collective Labor Agreement (PKB). Socialization on this matter had conducted to employees and contractor on 22 January 2020 and 24-26 February 2020.

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

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

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

**Status: Comply**

**2.3**

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

**2.3.1**

The Mill receive FFB from direct supplier that is scheme smallholders (can be seen in basic info part 1.7.3). The company has the information of address, geo coordinate, land title status, management representative and contact number. Related plantation permit like STDP (*Surat Tanda Daftar Budidaya Perkebunan*), the smallholders do not have it because the plantation permit has been based on plasma/scheme smallholder process that has been approved by Regent in the Contractual Agreement of the Plasma.

All the KUD (cooperative) have had contractual agreement with the company signed by Regent, such as contractual agreement with KUD Manggopoh II No. 108/AMP-DIR/PK-IX/1997 & KUD.M II/110/09/97 dated 13 September 1997.

**2.3.2**

For FFB's sourced from independent supplier, the company is being identify the smallholders. The company has carried out an inventory and identification related to geolocation information, land ownership status and business permits for FFB sources from third parties. However, not all data on the legality of each source from these third parties have been identified. This is an opportunity for improvement for the company regarding the follow-up of the identification / inventory process until November 15, 2021 in accordance with the requirements for indicator 2.3.2. **(OFI)** The management stated to comply this indicator in 15 November 2021 according to the indicator's guidance.

**2.3.2 Status:OFI**

**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**  
 Unit management shows long term management plan which issued by the respective Estate or Mill Manager, Account Manager and GEM, approved by Head Office in Medan. The CH (sampled estates and cooperatives) are able to shows PT AMP Plantation six year budget for period 2019-2024. Among parameters budgetted are financials, area statement, replanting, crop and estate cost, FFB production, FFB processed and milling cost, capital expenditure, FFB, CPO and PK price, maintenance cost, as well as sustainability implementation cost, and the company always conducts annual evaluations of long-term plans owned by both the Estate and the palm oil mill to ensure business continuity.

**3.1.2**  
 The company shows the replanting plan document within a period of 5 years, namely 2019-2023. The replanting plan is:  
 - 2019: 307.54 ha  
 - 2020: 397.31 ha  
 - 2021: 412.23 ha  
 - 2022: 496.91 ha  
 - 2023: 507.02 ha  
 The company also conducts an annual evaluation related to the plan to replant oil palm. Based on an annual evaluation, the company's management explained that the plans for replanting in 2019 and 2020 were shifted to 2021 due to the fact that they were still managing their replanting permits to the local government. Permission processing is due to the still problems of social conflict.

**3.1.3**  
 The company conducts a management review in the planned time according to the scale of activities and the nature of the activities carried out. Management reviews are conducted once a year. The management review includes internal audit results, customer feedback, process performance and product suitability, the status of preventive and corrective actions, the resulting follow-up and management review, changes that can affect the management system, and recommendations for improvement. An example is the findings of a field audit conducted on 6 and 20 March 2020, which are the results of inspections in the field report harvest intervals in accordance with the actual field, while the response from the Estate management will always maintain and maintain the harvest interval under 10 days.

**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**  
 Management review towards occupational safety and health implementation has conducted every month through P2K3 meeting. Minutes of meeting, as well as is follow up progress and notes are presented in quarter P2K3 report. Moreover, review towards manpower shows through monitoring on company facilities, such as housing for employee, electricity and water quality, minimum wages, emergency facility properties, etc. those of review has also object of RSPO internal audit.

The company conducted regular annual Management Review of RSPO supply chain implementation, latest conducted on 8 February 2020. The management review discussion has covered the input from internal audit result, correction and corrective action, process performa and product compliance, follow up of previous management review, and recomendation for improvement.

The company has carried out periodic internal audits, carried out environmental management and monitoring according to its Manage matrix and conducted periodic evaluations of the results of environmental monitoring. Has applied the Biogas Plant since September 2019.

**3.2.2**  
 Based on interviews with company management, it is known that the company has not made an annual report to the RSPO Secretariat for continuous monitoring and improvement because the RSPO metric template has not been published, but

the company has reported the RSPO Annual Communication of Progress 2019. The company was reported ACOP every year.

**Status: Comply**

**3.3**

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

**3.3.1**

Estate and Mill management informed that there are no revision on the current procedure of oil palm agronomy and processing, describes as follows:

- Procedure for oil palm procesing are presented in document No. Dok PRO-MIL-001 to Dok PRO-MIL-008 dated 24 July 2014. The procedure has covers FFB acceptance, FFB procesing, products (CPO and PK) storage, workshop, FFB purchasing from locals, products delivery and supply chain. Furthermore, there are procedure No. Dok SOP-MIL-001 to Dok SOP-MIL-028 which covers technical matters on station of weighbridge, grading, loading ramp, sterilizer, capstan, threshing, press, clarification, nut and kernel, boiler, power house, water treatment, kernel crushing plant, effluent, EFB transportation, haardous waste storage, mill security, workshop, land applications, commodity delivery, sounding, statistic crane, CPO storage tank, mass balance, solid waste management, material handling, etc.
- Procedure for oil palm agronomy are presented in document No. PRO-EST-001 to PRO-EST-008. The procedure has covers nursery, land clearing through zero burning, planting, upkeep, harvesting, pestiide application, integrated pest management, and leaf and soil analysis. Furthermore, there are procedure No. SOP-EST-001 to SOP-EST-026 which covers technical matters on manuring, pesticide application through spraying methid, selective weeding, proning, pest and disease management, weeds control, EFB mulching, road maintenance, planting platform, racking, BMP on sandy area, pesticide application device callibration, soil erosion measurement, integrated pest management, replanting and fertilizer callibration.
- Safety procedure are presented in document No. PRO-GEN-008 (Rev. 02) and PRO-GEN-014 dated 01 October 2013. Detail of safety working procedure is described in Hazard Identification Risk Assessment Control (HIRAC) and Material Safety Data Sheet (MSDS) of agrochemicals

The company conducted regular annual Management Review of RSPO supply chain implementation, latest conducted on 8 February 2020. The management review discussion has covered the imput from internal audit result, correction and corrective action, process performa and product compliance, follow up of previous management review, and recomendation for improvement.

**3.3.2**

The company has a system to ensure consistency in the implementation of its SOPs, such as the Checking or Inspection of Work Quality (Mill and Estate), ISPO and RSPO Internal Audit which checks whether the procedures in the Unit of Certification have been implemented by the company. Operational audits (Crop and Cost) are conducted once a month (on September 16, 2020). An operational audit evaluates the operational and administrative operations of plantations and mills. The operational activities are recorded in the form of monthly reports for plantations and factories. The operational activities report is a recap of daily activities. This report is a routine report prepared by the plantation and mill management unit and submitted to top management.

RSPO internal audit is carried out to evaluate the implementation of sustainability procedures in plantations and factories. Furthermore, management representatives (Assistant, Managers, and related Superiors) routinely visit inspectorates to control the implementation of procedures. Beside that, the company has monitored the performance of contractors that conducted every 6 month (example on June 30, 2020), the EFB application contractor monitors the technical work, quality and quantity of results, environment aspect, PPE discipline, communication and obey the company rules to support the management implementation system.

**3.3.3**

The company has shown monitoring records of the application of the standards owned by the company, this is stated in the results of internal audits conducted by the company, both field audits and internal audits of RSPO, ISPO, and ISCC. An example is the findings of an internal audit on March 6 and 20, 2020, namely the condition of the circle and bush path in AMP 1, spraying using Isopropyl amine glyphosate and Methilmetsulfuron which will be carried out in April 2020. During the



audit activities took place, the findings The repair has been completed.

The results of field visits and interviews with harvesting supervisors show that they record all operational activities in the daily supervisory report and submit the report every day. The daily report explains the type of work, the number of workers, the use of materials, and individual employee achievements. Furthermore, the operational activities are recorded in the form of a monthly report for oil palm plantations and mills. The operational activities report is a recap of daily activities. The evaluation mechanism for all operational activities, both plantations and mills, is carried out by the manager. This report is a routine report prepared by the plantation and mill unit manager and submitted to top management.

The company also in carrying out its operational activities in collaboration with contractors, contractors always have a work contract as a basis for starting work within the scope of the company's operations. In the employment contract, it is explained about years of service, type of work, work costs, obligations and rights, and other information. The contractor provides facilities in the form of PPE for all workers while working within the scope of the company's operations. Based on interviews company management representatives always monitor contractor compliance with procedures by conducting daily supervision in conjunction with other plantation operations. For example in the use of PPE for EFB Transportation.

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 & 3.4.2**

Until ASA-1.3 activities, the company did not add new operational areas, AMP-1, AMP-2, AMP-3 estates and AMP mill shown addendum document for DELH 2018, covered activities for 7926.42 ha estates, 80 tons/hour POM capacity included methane capture plant operations and replanting activities. These documents have environmental permit based on decree West Sumatra Governor No. 660-5-2018 on 4 April 2018.

PT PMJ has *dokumen pengelolaan dan pemantauan lingkungan hidup* (DPPL) on 2009 covered 2000 ha estate areas, meanwhile Bukit Sandiang Tigo cooperatives has *dokumen pengelolaan lingkungan hidup* (DPLH) covered 226 ha estate areas and Tompek Tapian Kandis cooperatives also has *dokumen pengelolaan lingkungan hidup* (DPLH) covered 511.18 ha estate areas. There is different about 0.6 ha between areal statement and covered environmental study areas for Tompek Tapian Kandis cooperatives (511.78 ha vs 511.18 ha). During the onsite audit, the Company has shown evidence of consultation with the local government regarding this matter, and the company has shown a letter from the environment of Agam district to the Tompek Tepian Kandis cooperative (no 660.1 / 616 / TL-1/2020 dated 4 September 2020) that explained related to editorial errors in writing the area of the plantation area where the DPLH document was written as 511.18 Ha while the actual area in the field was 511.78 Ha. At the time of the onsite audit, the Company showed a letter from the environment of Agam district to the Tompek Tepian Kandis cooperative (no 660.1 / 616 / TL-1/2020 dated 4 September 2020) which explained that it was related to an editorial error in writing the area of the plantation area which was in the document The written DPLH is 511.18 Ha while the actual area in the field is 511.78 Ha.

These documents explained the impact that probably caused by the company's operations such as land acquisition, construction of roads, infrastructure development, processing mills development, land preparation, crop management, oil palm planting, development, etc. EIA documents also describe environmental management and monitoring plan that should be done by the company.

For AMP 4, environmental documents that are owned is based on the Environmental Management Document Endorsement Letter No. 660/02 / BIP-PASBAR-2011 PT AMP Plantation dated July 4, 2011 which was ratified by the Regent of West Pasaman. The study area is 1300 hectares. Has been presented to the technical team representatives from related agencies / agencies in West Pasaman Regency. Parameters that must be monitored are:

- Decrease in surface water quality
- Increased river sedimentation
- Improvement of soil physical and chemical properties, as well as soil fertility status
- Disturbance of aquatic biota habitat

- Decrease in population and diversity of flora and fauna
- Employment Opportunity
- Increase in community income
- Public perception
- Public health problems
- Occupational safety and health problems

For environmental documents for the Agro Wira Masang cooperative, a UKL UPL document prepared by a third party in 2014 for the Wira Masang Agro Plantation Cooperative covering an area of 810 hectares and the Mutiara Sawit Jaya Plantation Cooperative has an area of 310 ha.

However, the UKL-UPL document has not received approval from the Regional Government. The company has shown documentation of ratification since 2015, but is constrained by the fulfillment of the requirements for approval from the cooperative. In this regard, the company has the opportunity for improvement related to the ratification and issuance of UKL-UPL documents from the Regional Government, referring to Government Regulation No. 27 of 2012 concerning Environmental Permits. **(OFI)**.

Environmental management and monitoring plans include:

- Job opportunities and business every 6 months
- Microclimate changes every 6 months
- Soil quality and erosion every 6 months
- Surface water quality includes plankton, benthos, nekton in the right and left trunk masang rivers and the Batang anggung rivers (upstream and downstream) every 6 months
- Public health
- Air quality and noise every 1 year
- Flora and fauna every 1 year

The company has PT AMP Plantation's Social Impact Assessment Report, carried out in 2010 by AKSENTA Consultants. Field data collection was carried out on April 18 - May 4 2010. The scope of the SIA study included AMP1, AMP2, AMP3, AMP4, KAMU, PMJ, PANP units and the plasma units studied were dastra 1, dastra 2, manggopoh1, manggopoh 2, MSJ TNT, MSJ Kinali, and MSJ Limpoto. Meanwhile, PT AMP Plasma Tompek Tapian kandis, plasma bukit sanding tigo, plasma MSJ, and plasma agro wira masang had a social impact study conducted on 17 July 2014. The social impact assessment activities were conducted based on discussions with affected parties during the period of 17 June - 21 June 2014. This study explains the impacts arising from plasma activities, including: employment, natural resources, public health, economic development, physical development, population migration, and work safety.

The social impact management plans for 2020 include:

- The need for employment for the community around the company is managed by providing work training outside the plantation sector because the company has limited recruitment of employees (plans include providing training in sewing, making snacks and others).
- Complaints arising from the community are managed by improving the quality of service or giving responses.
- Jealousy from the community regarding the scholarship program is managed by providing scholarships for students not only for employees' children but also for non-employee children.
- There has been a decline in community interest in local arts and culture by providing facilities and funds for the implementation of local cultural activities
- The old road of the AMP intersection, which is damaged and dusty, is managed by routine maintenance, periodic watering

PT AMP, PT PMJ and Mutiara Sait Jaya Cooperative has conduct social impact assessment by independent consultant, PT AMP has been done SIA in 2010, PT PMJ in 2011 and for Mutiara Sawit Jaya Cooperative in 2014. The scope of study are impact of plantation and mill operation to workers and community surrounding company areas. These assessment also identified negative and positive impact of plantation and mill operation towards social aspect. The development of SIA have been followed by participation of affected stakeholders in Focus Group Discussion (FGD), for PT AMP has been conducted in 2010, PT PMJ in 2011 and for Mutiara Sawit Jaya Cooperative in 2014. Based on this, it can be concluded that the

certification unit already has SIA documents that have been made in a participatory manner with relevant stakeholders, starting from the initial preparation to the preparation of the management and monitoring plan.

Based on the results of interviews with the surrounding community (Nagari Kinali and Nagari Bawan), it is known that some people have known that the certification unit has involved the community in the implementation of socialization related to the Social Management and Monitoring Plan in 2019 and 2020. However, this has not been done thoroughly and several important parties have not been included due to the COVID-19 pandemic in 2020 so that the community and certification unit have not dared to conduct a comprehensive socialization again. There are several social issues that have not been identified because there has not been a thorough evaluation and outreach to all affected parties, namely, customary issues, labor from tribes outside Minang, and other issues. (OFI in indicator 3.4.3).

### **3.4.3**

Company are consistently done the environmental management and monitoring as outlined in the Report of the Environmental Management and Monitoring for regular basis. These reports described realization of monitoring and management of the environment in accordance with environmental parameters in the RKL/RPL. Public consultation with Environmental agency of Agam indicate that the company has made environmental management and there is no issue of pollution caused by the company's operational activities. Review for environmental monitoring / management plans have been developed and listed on evaluation chapter on every semester RKL/RPL report, for examples evaluation for AMP estate and POM, semester 2 2019 report shown that company has properly managed and reduced all impact caused by plantation activities. Results of environmental monitoring for second semester 2 2019 indicates company has done well regarding environmental management, environmental parameter regarding air quality, surface water quality. Pome quality are not exceeding the relevant standards.

The implementation of Social Management can be seen in the 2019 SIA implementation report, there are several activities that are monitored and managed, such as:

- PT AMP Plasma KUD strengthening program
- Recording of complaints and conflicts
- Increased welfare or other businesses outside of oil palm plantations
- Livestock Management
- Healthy Village Program

For PT PMJ, the company has carried out management, monitoring and reviewing the Manage and monitor both social and environmental plans on a regular basis, the environmental management report is contained in the report on the implementation of RKL-RPL semester 1 of 2020 (PT PMJ) which has been reported to the Environmental Office of West Pasaman Regency on the 17th. February 2020. Air quality

- Decrease in air quality and noise
- Decreasing surface water quality
- Changes in biodiversity (flora and fauna)
- Management of the impact of disturbance to aquatic biota
- Social, economic, cultural and public health management
- Work accident
- Public health

The company has implemented Management and Monitoring in accordance with the RKL RPL matrix that has been stipulated in the UKL UPL document. In monitoring the air and river water quality carried out by the environmental laboratory of the Environmental Office of Agam Regency, it was found that there were no parameters that exceeded the predetermined quality standards.

The Social and Environmental Impact Management Plan is evaluated in every implementation by involving relevant stakeholders. The last review was carried out in 2019, for example the implementation of the review was carried out on April 25, 2019 at Jorong Masang Nagari Tiku V which was attended by 17 representatives of village figures & on April 20, 2019 in Jorong Katiagan - Nagari Katiagan, Kinali District which was attended by 10 community representatives. The 2-year review planned to be carried out in 2020 is hampered by pandemic conditions. Several villages did not provide access to hold meetings (FGD). Management shows the plan for implementing stakeholder consultation in review activities for

Jorong and Other Nagari that have not been carried out, such as in Jorong Anak Aia Kasing, Lumpato and Gadih Angkik which are planned to be carried out on the 3rd week of June with a note that the pandemic conditions have improved and the Village Community is willing / give permission to have a meeting. the company has the opportunity to conduct stakeholder consultation for all affected villages / hamlets around the company.

Based on the results of interviews with the surrounding community (Nagari Kinali and Nagari Bawan), it is known that some people have known that the certification unit has involved the community in the implementation of socialization related to the Social Management and Monitoring Plan in 2019 and 2020. However, this has not been done thoroughly and several important parties have not been included due to the COVID-19 pandemic in 2020 so that the community and certification unit have not dared to conduct a comprehensive socialization again. There are several social issues that have not been identified because there has not been a thorough evaluation and outreach to all affected parties, namely, customary issues, labor from tribes outside Minang, and other issues.

The certification unit has evaluated the Social Management and Monitoring Plan (RKS / RPS) for the 2017-2019 period from 2019 to October 2020 and until now the process is still ongoing (constrained due to the COVID-19 Pandemic). This resulted in the participatory study of the Social Management and Monitoring Plan (RKS / RPS) for the period 2020-2022 being hampered and not yet fully endorsed by the certification unit. So that there are still parties who have not been included in the study or identification of new social impacts that have emerged.

The company has opportunities for improvement related to the completion of the evaluation of the previous study period and the follow-up study of the Social Management and Monitoring Plan (RKS / RPS) for the 2020-2022 period as a whole so that all social impacts can be identified, monitored and managed properly. (OFI)

Status: Comply

**3.5**

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

**3.5.1**

Procedure of recruitment is presented in document No. PRO-HRD-001 dated 01 October 2011. Meanwhile, procedure of employees' evaluation is presented in document No. PRO-HRD-03 dated 01 October 2011. Evaluation will be conducted quarterly. Furthermore, clause of termination is presented in Work Agreement Article 5. In general, mechanism of recruitment, selection, hiring promotion, retirement and termination is presented in document of "Perjanjian Kerja Bersama (PKB)" or collective working agreement between the unit of certification and Labour Union, as follows:

- PKB of PT AMP Issued by Investment and manpower Agency of Agam District No. 02 TAHUN 2018 dated 17 may 2018, valid until 22 December 2019. Extension of this PKB is shows through document of Decree of Kepala Dinas Penanaman Modal Pelayanan Terpadu Satu Pintu Dan Ketenagakerjaan or Head of Investment and Manpower Agency of Agam District No. 3 TAHUN 2020 dated 05 February 2020 about extension of PKB between PT AMP Plantation and Labour Union PUK-SPPP-SPSI PT AMP Plantation. Extension of PKB will be valid until 02 February 2021. Agreement of PKB estension has been made by employer and employee in 02 January 2020.
- PKB of PT PMJ Registration shows through Decree of Manpower Gency of Pasaman Barat District No. KEP.022/PP-PKB/DISNAKER/2019 dated 17 June 2019. This PKB is valid until 17 June 2021.

The PKB was provided in Bahasa. Furthermore, work agreement with employees were available in premises. Employee's status in the unit of certification are permanent workers on daily or monthly basis.

**3.5.2**

The certification unit always documented all labor procedures that have been carried out properly such as recruitment, promotion, performance assessment and others. The following are some sample labor procedures that have been implemented and are well documented by certification unit, including:

- Recruitment information advertisement for Harvester and FFB Loader in PT AMP and PT PMJ. Advertisement informs several requirement uch as ID Card, Education Certificate, description of health condition and ages between 18 to 40 years old. Contact person from Human Resources Deptment is available.
- Promotion for Press Operator of AMP Mill from 2B to 2C level through Letter No. 28/AMP-HRR/SK-I/2019 dated 01

- January 2019. One of promotion consideration is good evaluation on work performance with score 4.1 (Good category).
- Promotion of FFB Loader of PT PMJ after passed three months probation through Decree No. 105/SK-PGA/IV/2019 dated 01 April 2019, due to good performance with score 4.43.
- Proof of handover on November 26, 2020 regarding a Decree (SK) for the appointment of workers at KUD Agro Wira Masang to workers who were previously contract workers to become permanent employees totaling seven (7) workers.
- Proof of handover on November 26, 2020 regarding a Decree (SK) for the appointment of workers at PT Primatama Mulia Jaya to workers who were previously contract workers to become permanent employees of two (2) workers.

Based on interviews with workers at AMP Mill (process operator), AMP 1 Estate (harvester, sprayer, and manuring worker), and KUD Agro Wira Masang (harvester and spayer), it is known that the certification unit has provided quite good socialization to all its workers regarding recruitment system, career path and other employment information. In addition, evidence of its implementation has also been shown well, such as the appointment of workers, an increase in the class of workers according to the results of performance appraisals and others.

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

**Status: Comply**

**3.6**

**An Occupational Health and Safety (H&S) plan is documented, effectively communicated and implemented.**

**3.6.1**

Risk assessment of all plantation operation activities has been conducted by OSH Committee, which presented in several Risk assessment mechanism in presented in document No. SOP-GEN-009 (Rev. 05) dated 09 September 2019. Risk assessment of all plantation operation activities has been conducted by OSH Committee that presented documents No. FRM-GEN-017 (Rev. 05) about hazard identification risk analysis and control (HIRAC), which lastly updated (reviewed) on 29 April 2020 which was the 12<sup>th</sup> revision. Subject of review was about wrprs in Covid-19 pandemy. The HIRAC has been socialized on the date of review and every day on muster morning.

Based on field observation towards pesticide applicator at Agro Wira Masang Cooperative, known that PPE used by applicators were in accordance with MSDS and HIRAC requirement such as carbon mask, shoes, faceshield, gloves rubber and etc.

**3.6.2**

The company regularly (every month) holds an internal meeting of the OHS committee to discuss the implementation of OHS in the company operational areas as follows the OHS Committee meeting was held on October 16, 2020. The discussion included the dissemination of the use of PPE, the dissemination of OHS, medical check up monitoring, fogging for emplacement area and LTA monitoring. The company has a reporting OHS Meeting to the Labor Agency on October 30, 2020.

**Status: Comply**

**3.7**

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

**3.7.1**

Program/matrix of training and/or socialization for mill and estates period 2020 is presented in document Form No. FRM-HRD-018 (Rev. 03). The training consist of technical refreshment for Harvester, FFB Grader, Upkeep Worker in February and May 2020; trainig of emergency situation and fire drill on April 2020; socialization of First Aid, OSH and environment in April 2020; socialization of HIV, AIDS and drugs on April 2020; and scoalization of company core value and policy on March 2020. Training and socialization has also conducted for contractors.

Based on interview with local contractor, it is known that the company has provided training, among others, regarding the delivery and provision of information, regulatory compliance, conservation areas and so on.

**3.7.2**

Record of training is properly documented by the unit of certification, for example as follows:



- Socialization of OSH, environment, law register and human rights is delivered to employee and contractor representatives on 22 January 2020 and 26 February 2020, recorded in Form No. FRM-GEN-016 (Rev. 04) and Form No. FRM-HRD-014 (Rev. 03) for minutes of socialization and attendance, respectively.
- Training of pesticide and fertilizer application in PT AMP had conducted on 24 February 2020, meanwhile for prohibition of agrochemical application on riparian zone had delivered on 20 May 2020. Minutes of training and attendance were recorded in in Form No. FRM-GEN-016 (Rev. 04) and Form No. FRM-HRD-014 (Rev. 03), respectively.
- Training of first aid, medical check up test socialization and BPJS has conducted by 229 employees of PT PMJ on 09 March 2019.

Record of training through individual basis has also available. For example, list of training/socialization that has been completed by Harvester are ergonomic harvesting technique, socialization safety and environment, emergency training, HIV/AIDS, first aid and company policy. Meanwhile, list of training for Processing Foreman completed in 2019-2020 are technical procedure on Loading Ramp, Sterilizer, Capstand and Boiler Station, company code of conduct, ISCC, socialization safety and environment, emergency training, HIV/AIDS and first aid.

Based on interview with weighbridge operator, it is known that the company has provided training such as RSPO P&C and SCCS.

**3.7.3**

The training of SCCS has been conducted for SCCS related workers on 28 February 2020. Based on interview to the workers involved in SCCS operations, such as security (for FFB receiving verification), weighbridge operator (for deviding amount of certified and uncertified sourced), and Administration Head (for recording and monitoring the MB data), known that the workers understood the SCCS mechanism, and the MB record has conducted and monitored well.

**Status: Comply**

**3.8**

**Supply Chain Requirements for Mills**

**3.8.1, 3.8.2**

Based on document verification, the Mill only implemented the MB Module, which is received both FFB from certified and uncertified sources (third party FFB suppliers). Verification of Mass Balance record, the Mill has been recorded well the separation of FFB and products (CPO and PK) from certified and uncertified sources. The Mill only claims certified products from certified sources.

**3.8.3**

Estimated certified product recorded in the last Assessment Report and Certificate, and updated in the RSPO Palm Trace. Actual certified produced has been verified during this assessment, and not exceed the estimate. The estimates of certified production for the next license period also have been set, in reasonable amount considering the last year's production. The data are shown in the following table:

Product	Estimate Production of 12 month (MT)	Actual Production of 12 months (MT) previous audit Oct 19 to Sep 20	Estimate Production of next 12 months (MT) license
FFB	232,346	179,124.58	176,300
CSPO	42,609	31,472.46	35,300
CSPK	11,822	8,479.18	8,900

**3.8.4**

The Mill has registered as RSPO member under Wilmar International Limited (No. 2-0017-05-000-00), and also registered in RSPO Palm Trace as PT AMP Plantation Unit POM with License ID CB94326, and Member ID RSPO\_PO1000000601.

The reporting requirements in the period of 12 months previous the audit has been conducted by the Mill through RSPO Palm Trace, such as product sales announcement and confirmation from the buyer. Other than that, the product sold in another certified scheme has been removed.

**3.8.5**

The Mill has had procedures of RSPO Supply Chain of Mass Balance (No. SOP-MILL-24 Rev. 07 dated 9 September 2019). The regular dissemination and training of the procedures has been conducted on 28 February 2020.

The procedure has covered all aspects in latest RSPO supply chain standard, such as receiving and recording that identify the traceability of RSPO certified and uncertified source and products, FFB processing, the announcement in RSPO Palmtrace not later than 3 months after despatch, key persons such as security, weight bridge clerk, dispatch/kernel officer, production clerk, Administration Head, as well as the training. CH has the opportunity to review references in the Supply Chain procedure **OFI**

**3.8.6**

The company has had the internal audit procedure (PRO-GEN-003 dated 01 March 2018) which described the internal audit conducted every 12 months. Based on document review, the latest internal audit for supply chain has been conducted on 7 February 2020. All of SCCS indicators has been assessed and complied.

Management Review of RSPO supply chain implementation conducted on 8 February 2020. The management review discussion has covered the input from internal audit result, correction and corrective action, customer feedback, process performa and product compliance, follow up of previous management review, and recomendation for improvement.

**3.8.7**

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

Month	FFB (MT)		
	RSPO Certified	Non-Certified	Total
Oct 19	16,215.82	7,004.63	23,220.45
Nov-19	13,704.38	10,033.02	23,737.41
Dec 19	10,563.58	13,397.56	23,961.14
Jan-20	14,851.71	11,255.29	26,107.01
Feb-20	14,628.45	14,521.18	29,149.63
Mar-20	15,956.08	14,754.06	30,710.14
Apr-20	16,515.75	17,199.85	33,715.59
May-20	14,850.41	17,550.03	32,400.44
Jun-20	18,450.83	20,606.74	39,057.57
Jul-20	15,400.47	18,411.76	33,812.23
Aug-20	14,538.24	16,712.36	31,250.60
Sep-20	13,448.85	16,852.06	30,300.91
<b>Total</b>	<b>179,124.58</b>	<b>178,298.54</b>	<b>357,423.11</b>

The Mill saw projected overproduction and inform the CB for volume extension twice during the license, that were in September (20,146 MT of FFB, 3,628 of CSPO, and 769 MT of CSPK) and October (19,000 MT of FFB, 4,181 of CSPO, and 1,353 MT of CSPK).



Product	Estimate Production of 12 month (MT)	Actual Production of 12 months (MT) previous audit Oct 19 to Sep 20
FFB	232,346	179,124.58
CSPO	42,609	31,472.46
CSPK	11,822	8,479.18

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

**3.8.8**

The products were sold has met the requirements of certified product information. Supporting documents shown were contract agreement, delivery order, delivery ticket, report of loading, weighing minutes, weighing card, and delivery note. Those documents cover information of delivery date, description of product and supply chain model, product quantity, unique number, certificate number, sender's name and address of the seller.

Transaction ID	Shipping	Seller	Seller Ref.	Buyer	Product	Volume*	Status
TR-ab9d2ad6-6124	30-04-2020	PT. AMP Plantation Unit POM	PK Apr 2020	PT. Usaha Inti Padang	CSPK	796.79	Confirmed
TR-fcb1214d-e001	30-04-2020	PT. AMP Plantation Unit POM	CPO Apr 2020	PT. Wilmar Nabati Indonesia - Padang	CSPO	2267.4	Confirmed

**3.8.9, 3.8.10, 3.8.11**

There is no contractors for processing or physical handling of RSPO certified oil palm products. The whole CPO and PK transportation were the responsibility of the buyer based on sales contract.

**3.8.12**

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

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

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

**Mass Balance record of CPO**

Period	All CPO Production (MT)			CSPO Dispatch (MT)				Stock of CSPO	Non Cert CPO Dispatch (MT)
	CSPO	Non Cert CPO	Total	RSPO	Other Scheme (ISCC)	As Non Cert	Total CSPO Dispatch		
Stock from previous month								344.00	
Oct 19	3,230.80	1,391.65	4,622.45	2,873.37	-	-	2,873.37	701.43	1,233.67
Nov-19	2,741.94	1,974.52	4,716.46	2,219.41	-	-	2,219.41	1,223.96	1,597.96

Dec 19	2,066.31	2,532.88	4,599.19	2,219.41	-	-	2,219.41	1,070.86	2,702.49
<b>Closing 3 Monthly</b>	<b>8,039.05</b>	<b>5,899.05</b>	<b>13,938.10</b>	<b>7,312.19</b>	<b>-</b>	<b>-</b>	<b>7,312.19</b>	<b>1,070.86</b>	<b>5,534.12</b>
Jan-20	2,769.39	2,132.69	4,902.08	2,359.44	-	-	2,359.44	1,480.81	1,395.71
Feb-20	2,769.64	2,733.81	5,503.45	2,735.47	250.00	-	2,985.47	1,264.98	3,650.31
Mar-20	2,981.98	2,743.83	5,725.81	2,981.66	-	-	2,981.66	1,265.30	2,371.79
<b>Closing 3 Monthly</b>	<b>8,521.01</b>	<b>7,610.33</b>	<b>16,131.34</b>	<b>8,076.57</b>	<b>250.00</b>	<b>-</b>	<b>8,326.57</b>	<b>1,265.30</b>	<b>7,417.81</b>
Apr-20	2,906.90	3,204.63	6,111.53	2,719.17	283.41	-	3,002.58	1,169.62	3,383.82
May-20	2,301.39	3,572.52	5,873.91	854.27	1,680.83	-	2,535.10	935.91	2,808.27
Jun-20	2,310.55	4,144.76	6,455.31	-	3,105.38	-	3,105.38	141.08	4,428.72
<b>Closing 3 Monthly</b>	<b>7,518.84</b>	<b>10,921.91</b>	<b>18,440.75</b>	<b>3,573.44</b>	<b>5,069.62</b>	<b>-</b>	<b>8,643.06</b>	<b>141.08</b>	<b>10,620.81</b>
Jul-20	2,469.98	3,747.63	6,217.61	-	2,713.67	-	2,713.67	(102.61)	4,258.63
Aug-20	2,375.71	3,551.14	5,926.85	-	2,231.90	-	2,231.90	41.20	3,171.88
Sep-20	2,547.87	3,495.25	6,043.12	-	2,092.41	-	2,092.41	496.66	3,613.86
<b>Closing 3 Monthly</b>	<b>7,393.56</b>	<b>10,794.02</b>	<b>18,187.58</b>	<b>-</b>	<b>7,037.98</b>	<b>-</b>	<b>7,037.98</b>	<b>496.66</b>	<b>11,044.37</b>
<b>Total</b>	<b>31,472.46</b>	<b>35,225.31</b>	<b>66,697.77</b>	<b>18,962.20</b>	<b>12,357.59</b>	<b>-</b>	<b>31,319.80</b>	<b>496.66</b>	<b>34,617.11</b>

**Mass Balance Record of PK**

Period	All PK Production (MT)			CSPK Dispatch (MT)				Stock of CSPK	Non Cert PK Dispatch (MT)
	CSPK	Non Cert PK	Total	RSPO	Other Scheme (ISCC)	As Non Cert	Total CSPK Dispatch		
Stock from previous month								142.66	
Oct 19	750.56	319.89	1,070.45	797.38	-	-	797.38	95.84	75.56
Nov-19	622.81	458.85	1,081.66	620.67	-	-	620.67	97.98	47.69
Dec 19	501.32	631.81	1,133.13	550.00	-	-	550.00	49.30	127.04
<b>Closing 3 Monthly</b>	<b>1,874.69</b>	<b>1,410.55</b>	<b>3,285.24</b>	<b>1,968.05</b>	<b>-</b>	<b>-</b>	<b>1,968.05</b>	<b>49.30</b>	<b>250.29</b>
Jan-20	706.38	538.39	1,244.77	717.80	-	-	717.80	37.88	479.32
Feb-20	703.29	697.35	1,400.64	743.29	-	-	743.29	(2.12)	714.43
Mar-20	749.92	699.15	1,449.07	649.70	-	-	649.70	98.10	723.17
<b>Closing 3 Monthly</b>	<b>2,159.59</b>	<b>1,934.89</b>	<b>4,094.48</b>	<b>2,110.79</b>	<b>-</b>	<b>-</b>	<b>2,110.79</b>	<b>98.10</b>	<b>1,916.92</b>
Apr-20	793.67	817.45	1,611.12	789.11	-	-	789.11	102.66	900.61
May-20	699.10	830.70	1,529.80	692.80	-	-	692.80	108.96	717.75
Jun-20	882.62	978.41	1,861.03	940.96	-	-	940.96	50.61	1,055.33
<b>Closing 3 Monthly</b>	<b>2,375.39</b>	<b>2,626.56</b>	<b>5,001.95</b>	<b>2,422.87</b>	<b>-</b>	<b>-</b>	<b>2,422.87</b>	<b>50.61</b>	<b>2,673.69</b>
Jul-20	733.78	896.21	1,629.99	739.93	-	-	739.93	44.46	903.79
Aug-20	725.66	826.78	1,552.43	757.94	-	-	757.94	12.18	771.68
Sep-20	610.07	755.02	1,365.10	602.86	-	-	602.86	19.40	819.47
<b>Closing 3 Monthly</b>	<b>2,069.51</b>	<b>2,478.01</b>	<b>4,547.52</b>	<b>2,100.73</b>	<b>-</b>	<b>-</b>	<b>2,100.73</b>	<b>19.40</b>	<b>2,494.94</b>
<b>Total</b>	<b>8,479.18</b>	<b>8,450.01</b>	<b>16,929.19</b>	<b>8,602.44</b>	<b>-</b>	<b>-</b>	<b>8,602.44</b>	<b>19.40</b>	<b>7,335.84</b>

**3.8.13**

The conversion rate of production of CPO (OER) and PK (KER) were based on actual production. Then the management will monitor if the rate reasonable. Based on production data 12 months previous audit the certified products average OER are 18.20 %, while KER 4.99 %.

**3.8.14**

The conversion rate of production of CSPO (OER) and CSPK (KER) were based on actual production. This extraction rate value from this Mill is considered as low compared to the common ratio because the Mill received FFB from third party supplier. However, it is also means not too high, that too high extraction meaning possibility there are some non-certified product claimed as certified.

**3.8.15**

The Mill only applying RSPO Supply Chain Module of Mass Balance.

**3.8.16**

Based on delivery and transaction document review, it was known that the announcement was carried out regularly, not later after three months after dispatch. The supply chain PIC already known that for P&C 2018 (included supply chain standard) the announcement should be conducted within three months after the delivery date. The removing stock of certified product that sold under other scheme conducted for several amount.

For example, there were agreement of PK sales amount of 20.000 MT PT Usaha Inti Padang on 5 January 2020. The dispatch conducted several time, such as on 7, 8, 9, 11 and 12 January 2020 amount of 691.38 MT, announced on 31 January 2020 with transaction ID TR-dc1cd1a6-e25a.

**3.8.17**

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

**Status: Comply**

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

**4.1**

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

**4.1.1 & 4.1.2**

The company already has a Human Rights Policy signed by (Group Plantation Head) and (Group CSR Head), updated June 2014 and is included in the Wilmar Policy (5 December 2103, updated 16/1/2015) at point 3 that it will not do exploitation of fellow humans and local communities.

The company has carried out the socialization of the policy to all workers, the socialization was carried out in each unit at the morning meeting. The following is the socialization that the company has provided to its employees, including:

- Socialization of Human Rights Policy on 15 February 2019 which was attended by 177 workers at PT Primatama Mulia Jaya
- Socialization of Human Rights Policy on March 30, 2019 which was attended by 94 participants at AMP-2 Estate

The commitment of the certification unit in respecting human rights has been quite well implemented in the absence of issues and incidents of human rights violations that occurred in the operational area of plantations and factories. This is evidenced by statements from plantation workers (harvesters, sprayers and maintenance), factories (mill operators and warehouse workers) as well as contract workers who state that so far there have been no incidents or issues of human rights violations occurring in the operational area of the certification unit.

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

<p>Status: Comply</p>	
<p><b>4.2</b>  <b>There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties.</b></p>	
<p><b>4.2.1, 4.2.2, 4.2.3, &amp; 4.2.4</b>          The company has procedures for conflict resolution:</p> <ul style="list-style-type: none"> <li>• Procedure for Acceptance of Complaints and Dispute Resolution (PRO-BNM-007, Effective 09 February 2017, Revision 05). This procedure is a technical guide in accepting various complaints submitted by stakeholders or other related parties as well as the resolution process.</li> <li>• Employee Complaints and Complaints Procedure (PRO-HRD-005, effective date 23 April 2015, Revision 03). This procedure is a guideline for accommodating complaints and complaints from employees who work at PT AMP Plantation.</li> </ul> <p>Based on the procedure above, it is explained that if it is related to complaints from other stakeholders (external / non-employee), the person responsible for receiving complaints is Bina Mitra at the unit (estate) level and then forward them to Bina Mitra Regional Office. If the complaint comes from the employee (internal), then the person in charge of receiving complaints (verbal or written) is the supervisor in each work unit and then forward it to the Personal General Affairs (PGA) / LKS Bipartite Officer by filling out the Complaint Acceptance Form (FRM-HRD- 052). As for the options for using a third party or a mediator have been described in this SOP in point 6.HGU</p> <p>To ensure that everyone (people who cannot read and write) can understand the existing procedures in the system implemented by the company, which is to provide flexibility for stakeholders or employees to make complaints accompanied by representatives who can read and write.</p> <p>The company shows the complaint document recorded in the FRM-BNM-020 document regarding the response and Resolution Status. The system that runs the <i>Bina Mitra</i> team delivers information to the personnel who report complaints. To ensure this system runs, interviews will be conducted with stakeholders during the Onsite audit activity.</p> <p>Based on interview with National Land Agency of Agam Regency, it is known that they understand how to communicate and consult with PT AMP Plantation, In addition, there is also information on land disputes in the operational area between the certification unit and the surrounding community (KAN Tiku V Jorong and KAN Bawan), whose information has reached the central government and a special team has been formed to resolve the problem.</p> <p>Based on the results of interviews with representatives of surrounding communities (Nagari Bawan), the community has known about the communication procedures and to people who served as communicators between the company and community so that people who cannot read / write can be informed by the related communicators. However, related to land disputes in the operational area between the certification unit and the surrounding community (KAN Tiku V Jorong and KAN Bawan), it has been known by both parties and the government and is currently still in the process of being resolved by a special team formed from all interested parties.</p> <p>Based on the review of complaints/dispute documents from the surrounding community, it was found that there were land disputes with claimant from KAN Tiku V Jorong and KAN Bawan for HGU (land title) Number 11 (4,360 Ha). The claimant has been responded in FPIC and has had a mutual agreement in accordance with the time period between the claimant &amp; certification unit. This dispute has included other parties such as the Government of Agam Regency, Regency Police Organization, Regency Attorney Office, Ninik Mamak Nagari Bawan, Ninik Mamak Tiku V Jorong, and PT AMP Plantation. To resolve this dispute, the government has formed a special team consisting of interested parties in accordance with the Decree of the Regent of Agam No. 422 of 2020 on 13 November 2020. The last meeting between parties was conducted in 16 November 2020 which discusses several things, namely: team meetings will be held regularly every 2 weeks, compensation for the use of customary land and the realization of plasma plantations in HGU 11 with a composition of 70/30. The next meeting will be held on November 30, 2020 to further discuss the matters conveyed at the previous meeting. Based on the foregoing, it can be concluded that the certification unit has carried out a complaint / dispute resolution procedure by including the affected parties and has been well documented.</p>	

Status: Comply

**4.3**

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

**4.3.1**

The certification unit has demonstrated the 2019-2020 Community Development (CD) program for Tapian Kandis, Lubuk Basung, Koto Gadang, Salareh Aia, Kinali, Bawan, Manggopoh, Mandiingin, Kp. Pisang, IV Koto, Simpang Ampek, Wonosari dan lainnya. The compilation of the 2019-2020 Community Development (CD) program was carried out in a participatory manner using the FGD method with the surrounding village community, government and community representatives annually as a statement of agreement regarding the program to be carried out.

The certification unit also showed a report on the realization of Community Development (CD) implementation for the 2019-2020 period, for example as follows:

- Assistance for routine development of traditional arts "Tari Gelombang" and "Tambua Tasa" at Kp. Pisang.
- Support for routine sports coaching for the Kinali Youth Organization (OPEK) Football School (SSB).
- Routine coaching assistance for the Wonosari Football School (SSB).
- Regular assistance for teachers' salaries in Al-Quran Schools (TPA) Babul Ulum Kp. Pisang, Istiqomah Bayur Kabung, Miftahul Ulum Kp. Pisang and Kindergarten Cahaya Mata.

Based on interviews with the surrounding community (Nagari Kinali and Nagari Bawan), certification unit has also conducted prior consultations regarding the Community Development (CD) program that will be carried out annually.

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**

Total of certification scope: **13.046.30 Ha certified area**. Divided into 11,188.52 Ha land title (HGU and HGB), 92 private land title and 1,768 Ha customary land title. The company has plantation business permit (IUP) No. 499 of 2008 dated 8 August 2008 and No. 188 of 2012 dated 12 July 2012.

Each certification unit has had land legal as follows:

- PT. AMP Plantation  
Total of HGU covering **9,226.42 Ha** that issued in 1997, 2000, 2004, and HGB covering **220.990 m<sup>2</sup>** that issued on 1996.
- PT. Primatama Mulia Jaya  
Total of land title **1,940 Ha**
- Cooperative Bukit Sandiang Tigo  
Customary land title **226 Ha** (113 smallholder)
- Cooperative Tompek Tapian Kandis  
Private land title **512 Ha** (256 smallholder)
- Cooperative Agro Wira Masang  
Customary land title **810 Ha** (405 smallholder) and **90 Ha** (private land title)
- Cooperative Mutiara Sawit Jaya  
Private land title **220 Ha** (110 smallholder)

**4.4.2, 4.4.3, 4.4.4, 4.4.5, 4.4.6**

Based on document review, the Regent facilitated Wilmar to start their operation in Agam and Pasaman Barat District since early 1990. There also no new planting or new acquisition process after 2005. It means, there is no FPIC mechanism upon that process. However, due to Minangnese customary right, the land acquisition process has proceeded with Minangnese elder called *Ninik Mamak* and witnessed by government agency. Company representatives has been met with *Ninik Mamak* in each operation area to discuss about land acquisition scheme. The process has been made in Indonesian language, and provided by participatory mapping.

Certificate holder has showed the statement letter from each *Ninik Mamak* as follows:

- Statement letter on land handover from *Ninik Mamak* Bawan on 25 August 1991.
- Statement letter on land handover from *Ninik Mamak* Kinali Salareh Aia on 9 April 1993.
- Statement letter on land handover from *Ninik Mamak* Kinali Jorong VI Koto Selatan on 9 April 1993.
- Statement letter on land handover from *Ninik Mamak* Tapian Kandis on 7 April 1993.
- Statement letter on land handover from *Ninik Mamak* Bawan on 25 August 1991.
- Statement letter on land handover from *Ninik Mamak* Manggopoh on 1 March 1994.
- Statement letter on land handover from *Ninik Mamak* Tapian Kandis on 29 November 1994.
- Statement letter on land handover from *Ninik Mamak* Kinali Nagari Katiagan on 24 August 1995

**Status: Comply**

**4.5**  
**No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.**

**4.5.1 to 4.5.8**  
 Based on document review, interview with management, and field observation, the company did not conduct new planting activity.

**Status: Comply**

**4.6**  
**Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.**

**4.6.1**  
 Based on document review, the Regent facilitated Wilmar to start their operation in Agam and Pasaman Barat Regency since early 1990. There also no new planting or new acquisition process after 2005. However, currently the company has had procedure related to FPIC mechanism such as SOP of Land Dispute Settlement (No. Dok: PRO-BNM-013, Rev. 02 dated 23 Augustus 2016) and SOP of Grievance and Complaint (No. PRO-BNM-007, Rev. 02, dated 17 February 2017).

**4.6.2**  
 Procedure for calculating and distributing fair compensation described in SOP of Land Acquisition (No. SOP-IJIN LAHAN&OPS-006 dated 15 October 2008). This procedure has covers process of identifying legal rights, customary or user rights and mechanism of people entitled to compensation identification. The scope of procedure is all activities related to the compensation process for land over the land right cultivated by the Company, the purpose is to ensure the area of plantation free from others right.

**4.6.3, 4.6.4**  
 Based on document review, the Regent facilitated Wilmar to start their operation in Agam and Pasaman Barat Regency since early 1990. There also no new planting or new acquisition process after 2005. Due to Minangnese customary right, the land acquisition process has proceeded with Minangnese elder called *Ninik Mamak* (customary leader and representatives) and witnessed by government agency. Company representatives has been met with *Ninik Mamak* in each operation area to discuss about land acquisition scheme. The process has been made in Indonesian language and provided by participatory mapping.

Based on year of planting in sampling estate during Re-Certification which are AMP-3 Estate, Smallholders TTK and BST, there are no found an oil palm plantation was developed after November 2005. However, in PMJ Estate there was a planting year after November 2005 (YoP 2006, 2009 and 2010). The land status is from compensation from villagers that have been agreed to release their land to the company. The land is located within the permitted area or HGU of the company. Negotiated agreement to compensate its land has been provided and available in place. The process of land compensation was following the FPIC mechanism.

**Status: Comply**



**4.7**

**Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.**

**4.7.1, 4.7.2**

Procedure to identify people entitled to compensation described in SOP of Land Acquisition (No. SOP-IJIN LAHAN&OPS-006 dated 15 October 2008). This procedure has covers process of identifying legal rights, customary or user rights and mechanism of people entitled to compensation identification, as well as the calculation of the compensation. The scope of procedure is all activities related to the compensation process for land over the land right cultivated by the Company, the purpose is to ensure the area of plantation free from others right.

**4.7.3**

The opportunities to benefit from plantation development has been served in several ways, such as the establishment of scheme smallholder plantation (Plasma) and acceptance of independent smallholders FFB's. Moreover, related social impact has been assessed in SIA and managed in SIA management and monitoring plan, that has some purposes to improve livelihoods quality of surrounding communities, includes the previous landowner, such as acceptance (buying) of communities FFB, acceptance of local workers and contractors, economic development program, and any other CSR programs. Those things have been verified through document review and stakeholders consultation.

**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; 4.8.4**

Based on document review, District Government facilitated Wilmar to start their operation in Agam and Pasaman Barat District since early 1990. There also no new planting or new acquisition process after 2018. Due to Minangnese customary right, the land acquisition process has proceeded with Minangnese elder called *Ninik Mamak* (customary leader and representatives) and witnessed by government agency. Company representatives has been met with *Ninik Mamak* in each operation area to discuss about land acquisition scheme. The process has been made in Indonesian language and provided by participatory mapping.

Based on document verifications, interview with management, community including elderly and local government as well as verification through internet and RSPO Website, obtained information there are several land dispute in the company operational area, as follows:

- a. Conflict between PT AMP with minangnese elderly (*Ninik Mamak*) Bawan and Tiku V Jorong regarding issue in Land Tittle No 11 PT AMP
- b. Conflict between PT PMJ with Indigenous People (*Masyarakat Adat*) Luhak regarding PT. Primatama Muliajaya has occupy their customary land without FPIC process.

As a guidance to settlement land dispute the company has had procedure to handling and manage land conflict (*Prosedur Penyelesaian Sengketa Lahan* No. Dok: PRO-BNM-013, Rev. 02 dated 23 Augustus 2016). This procedure are contain a specific guidance which is refer to FPIC mechanism to manage land conflict such as gathering information, conduct a meeting with complainant and use the understanding language during the process. As explained by the management representative, a mutually agreed upon system for handling complaints will be established when a conflict found.

Based on document verification and interview with affected parties it was known if the process of resolving disputes / grievance above has been discussed together and documented. The activity was mediated by the local government. During 2019 - 2020 there are several meetings between the company and the local community of Koto Aman related to the settlement of disputes/claims from villagers. The meeting is mediated by local government (Related institution, police, regent and etc), but until this assessment conducted there is no agreement has been reached (see 4.2). Furthermore regarding land dispute between PT PMJ with Indigenous People (*Masyarakat Adat*) Luhak the process of settlement has been involved RSPO complaint panel, where the issue and update are available in RSPO Website (<https://sforce.co/2PcAzyD>). Based on document verifications the unit of certification can presented the map for every disputed area.



Based on field observation and direct interview with sampled workers and communities, it was known that the unit of certification has no evidence to instigate violence in maintaining peace and order in their current operations. Generally, the certificate holder has complied with the right to use the land.

**Status: Comply**

**PRINCIPLE #5 SUPPORT SMALLHOLDER INCLUSION**

**5.1**

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

**5.1.1, 5.1.2 & 5.1.3**

The certification unit received the FFB from smallholder named Agro Wira Masang – Cooperative of Manggopoh. The pricing mechanisms for plasma, or local businesses are specified in the work agreement. For example the pricing of Agro Wira Masang – Cooperative of Manggopoh has been set in contractual agreement (No. 108/AMP-DIR/PK-IX/19997 & KUD.M II/110/09/97 dated 13 September 1997), that signed by both parties and Agam Regent. In the contract, FFB is determined based on the monthly pricing from the Plantation Agency of Agam Regency.

A monthly FFB pricing letter was available from the Plantation Agency. Interview with member of Agro Wira Masang Smallholder, known that pricing letter dissemination through online and attached in monthly payment documentation.

**5.1.4 & 5.1.5**

The agreement of certification unit with Agro Wira Masang – Cooperative of Manggopoh was signed since 13 September 1997. The agreement was signed by both parties (certification unit and cooperative official) and independent representative that was Agam Regent. Based on Indonesian regulation, the smallholder determination was set in government level (Officials of Village, Sub-District, Regency, and Province). The smallholders commonly represented by family head (commonly gentlemen).

Based on review of contractual agreement, as well as consultation with Cooperative Official, the agreement has been set and the Official has been understood the provision of financial, FFB pricing, management, management fee, loan, dispute, etc. The agreement has been made with legal, fair, transparent, and has a time frame, that was one oil palm cycle and can be extended if agreed by both party.

For other business services like local contractor, based on consultation with EFB transporter (CV Usaha Ayah) contractor was known that the work contracts has explained the pricing of each work unit. The parties have understood the provisions of work contracts, the contracts has been made fairly, transparently and legally. Payment of work has been done in a timely manner, in accordance with the provisions in the contracts.

**5.1.6**

Review of FFB Payment, and EFB transporter payment, as well as interview with member of Agro Wira Masang and local contractor, it was known that FFB/unit price were are paid according to the provisions, and on date of payment was not exceed the further month. The payment report of has been covered detail of FFB/EFB amount, deduction, and total paid. Period of payment is reasonable and acceptable, i.e. does not exceed the 20th of the following month.

**5.1.7**

The Mill's weighbridge has been calibrated annually. The latest calibration conducted based on certificate of calibration issued by Industrial Agency.

**5.1.8**

The certification unit has carried out socialization related to RSPO certification to the 20 independent smallholder that has been link with FFB supplier which was held on 25 September 2020. After socialization, there has been no further information or the desire of the independent smallholder to participate in RSPO certification.

**5.1.9**

The Certificate Holder has the Procedure of Complaints Acceptance Procedure Complaints and Dispute resolution (PRO-BNM-007, effective since 9 February 2017, Revision 05). These procedure as a technical guidance in receiving various complaints raised by stakeholders or another party and way to process of completion. There is no complaint from smallholders during a year previous the audit.

**Status: Comply**

**5.2  
The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.**

**5.2.1, 5.2.2, 5.2.3 & 5.2.5**

The certification unit has carried out socialization related to RSPO certification to the 20 independent smallholder that has been link with FFB supplier which was held on 25 September 2020. After socialization, there has been no further information or the desire of the independent smallholder to participate in RSPO certification. This is in line with the results of interviews with FFB suppliers who attended the meeting which stated that their partners do not wish to take part in RSPO certification at this time.

**5.2.4**

The evidence exists that the certification unit trains smallholders on pesticide handling including minutes of letter Best Management Practice and OHS spraying included smallholders on 20 Mei 2020. Evaluation for the effectiveness of the training is carried out every year, if it is deemed ineffective, training will be carried out again in the following year.

Based on the results of interviews with spraying workers at KUD Agro Wira Masang, it is known that workers have understood pesticide handling well and this is because the certification unit provides routine training every year.

**Status: Comply**

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

**6.1  
Any form of discrimination is prohibited.**

**6.1.1, 6.1.2 & 6.1.3**

Unit certification have Equal Employment Opportunity Policy review on January 2018, explained that Wilmar International is committed to providing equality in employment opportunities to every employee. Our beliefs and labor standards confirm that we will not discriminate when making decision to employees, promotion or retire works/candidates based on race, color, sex, age, social class, religion, sexual orientation, politics, or disability-only subject to the conditions attached to the role to be performed. The fundamental aims is to ensure diverse and representative profiles of workers through the promotion equality of labor.

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

Procedure of recruitment is presented in document No. PRO-HRD-001 dated 01 October 2011. Meanwhile, procedure of employees' evaluation is presented in document No. PRO-HRD-03 dated 01 October 2011. Evaluation will be conducted quarterly. Both procedure mentioned that there were no discrimination on that subjects. Job opportunities were communicated and informed to the surrounding villages as priority. In recruitment process, the company has set the standard of competence that required in the position offers. Selection has include evaluation towards skills, performance and medical test result. Furthermore, promotion is conducted based on work period, annual evaluation result and availability of position. All workers are treated equally in accordance with company regulation including rights of worker as well. Records on manpower procedure has satisfactory documented, as verified randomly to the several documents, as follows:

- According to list of employee review, it was known that compisition of workers were varies in term of race/ethnic,

religion, gender, education background, etc. Moreover, it was noted that female workers has provided by the same opportunity and accepting equal rights.

- Recruitment information advertisement for Harvester and FFB Loader in PT AMP and PT PMJ. Advertisement informs several requirement uch as ID Card, Education Certificate, description of health condition and ages between 18 to 40 years old. Contact person from Human Resources Deptment is available.
- Promotion for Press Operator of AMP Mill from 2B to 2C level through Letter No. 28/AMP-HRR/SK-I/2019 dated 01 January 2019. One of promotion consideration is good evaluation on work performance with score 4.1 (Good category).
- Promotion of FFB Loader of PT PMJ after passed three months probation through Decree No. 105/SK-PGA/IV/2019 dated 01 April 2019, due to good performance with score 4.43.

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

**6.1.4**

A pregnancy test for workers is carried out every two month just to ensure that pregnant workers are not allowed to do work with chemicals, not as a basis for discriminating against these workers. If declared pregnant, the worker will be transferred to a safer job but still equal in terms of wages and other benefits, so that there is no discriminatory action. This is made clear by the results of interviews with women workers in the AMP 1 Estate, Primatama Mulia Jaya Estate and Agro Wira Masang Cooperative in spraying or manuring activities stating that female workers are required to have monthly pregnancy testing at the clinic to ensure that no female workers working with chemicals are pregnant / breastfeeding and testing the pregnancy is not a discriminatory measure given by the certification unit.

**6.1.5**

The unit of certification has Gender committee in all units that supported by HR Region of Sumatera Barat. Protection on gender has also mentioned in Internal Memorandum No. 026/WIP-HRD/Int-VIII/2009 dated 12 August 2009. Socialization on committee program has conducted in all units on February to March 2020. The workers also knew of the existence of the gender committee because it had been routinely socialized by its management, the last socialization related to the gender committee which was attended by female workers and housing residents.

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

**6.1.6**

Payment of salary has verify to upkeep worker as sample for male with and female worker in AMP1 Estate and PMJ Estate for period April 2020, for example to employee with ID No. AG/1AMP/0813/1321 and No. AG/1AMP/1004/1712 for male and female worker, respectively. In general, basic salary was in accordance with Decree of Sumatera Barat Governor No.562-827-2019 dated 29 October 2019, which was about IDR 2,484,050/month. Different ammount of salary obtained is only affected by number of attendance, year of service in company, work performance and debt, without taking gender into account.

Based on interviews with workers at AMP Mill (process operator), AMP 1 Estate (harvester, sprayer, and manuring worker), and KUD Agro Wira Masang (harvester and spayer), Every worker has been given equal wages according to attendance, years of work, performance and other. This can be clearly seen in the monthly salary slip so that workers can clearly know their income in accordance with the applicable wage regulations.

**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**

*Perjanjian Kerja Bersama* (PKB) or Collective Labour Agreement is presented as follows:

- Collective Labour Agreement of PT AMP Issued by Investment and manpower Agency of Agam District No. 02 TAHUN 2018 dated 17 May 2018, valid until 22 December 2019. Extension of this PKB is shown through document of Decree of Kepala *Dinas Penanaman Modal Pelayanan Terpadu Satu Pintu Dan Ketenagakerjaan* or Head of Investment and Manpower Agency of Agam District No. 3 TAHUN 2020 dated 05 February 2020 about extension of PKB between PT AMP Plantation and Labour Union PUK-SPPP-SPSI PT AMP Plantation. Extension of PKB will be valid until 02 February 2021. Agreement of PKB extension has been made by employer and employee in 02 January 2020.
- Collective Labour Agreement of PT Primatama Mulia Jaya Registration shows through Decree of Manpower Agency of Pasaman Barat District No. KEP.022/PP-PKB/DISNAKER/2019 dated 17 June 2019. This Collective Labour Agreement is valid until 17 June 2021.
- The Collective Labour Agreement was provided in Bahasa. Furthermore, work agreement with employees were available in premises.

The certification unit did not have workers with contract status for daily worker (BHL) or contract worker (PKWT), the current employee status is permanent workers who have Orientation Worker status (3 month orientation period), such as Regular Daily Workers (worker class 2A), Regular Monthly Workers (2B-2D) and Staff (worker class 3 and above). All the rights for each employment status has been distinguished.

The results of interviews with workers (harvesters, sprayers, manuring and mill operators) and labour union representatives know that workers have a sufficient understanding of their rights (wages, overtime, incentives, fines, etc.) listed in the Collective Labor Agreement and in accordance with routine socialization provided by the certification unit. Workers' wages in 2020 (August-October) have been above the minimum wage set by the government and there are no late payments every month.

A review of the August-October 2020 wage document for harvest workers, pesticides, sprayers and mill operators proves that the wages received are above the minimum wage and in accordance with the wage scale structure determined by the certification unit for 2020. Based on the above explanation it can be concluded that the workers have understood the work requirements that have been socialized by the certification unit in an understandable language.

### 6.2.2

The were Labour Union that registered to The Manpower Agency. Furthermore, as sighted to online sources, it was known that there were no issues related to manpower such as worker and gender discriminations, force labour, child labour under 18 years old, etc.

Decree of Sumatera Barat Governor No.562-827-2019 dated 29 October 2019 about minimum wages has responded through Internal Memorandum of HR Manager No. 001/WIP-HRR/Int-XII/2019 dated 17 December 2019. Those Memo also informed structure of salary scale, based on level and period of working for the company. Minimum wages for period 2020 was about IDR 2,484,041/month or IDR 99,362/day or IDR 14,359/hour. This figures used by the unit of certification for salary payment, includes for overtime calculation. Different amount of salary obtained is only affected by number of attendance, year of service in company, work performance and debt. As verified to contract of employees documents, for example as presented in document No. FORM-HRD-033 (Rev. 05) dated 27 September 2019 and 01 October 2019, it was known that Article 1 has mentioned about salary and BPJS. Furthermore for contractor workers, it was mentioned in Article 9, as verified to document Contract Agreement No. 01/AMP/TBS/II/2020 dated 02 January 2020.

Unit of certification has identify pregnant and breastfeeding worker that carried out by PT AMP Plantation Clinic and PT PMJ Clinic. During works, those identified were not allowed to works related to agrochemicals. Furthermore, maternity leaves has given to the pregnant and breastfeeding workers for three months.

Based on the results of the review of boiler operator and security overtime documents for the period of October 2020, it is known that the overtime calculation given to workers is consistent with the improvements in the previous assessment and still refers to the overtime calculation set by the government so that no worker experiences a shortage of overtime granting.

Unit certification has provisions related to deduction / penalty which have been stated in the Collective Labor Agreement and further explanation is set out in an internal memo.

In the payroll document, there is information that states the results of the worker's wages in one month according to the work performance of each worker. Payroll has also been accurate for each worker, for example the number of days worked in a month, premium payments, fines, deductions from workers' wages and other information that is in accordance with facts in the field.

Based on interviews with workers at AMP Mill (process operator), AMP 1 Estate (harvester, sprayer, and manuring worker), KUD Agro Wira Masang (harvester and spayer), and labour Unions (SERBUNDO and SPSI) know that workers have a sufficient understanding of their rights (wages, overtime, incentives, deductive, fines, etc.) listed in the Collective Labor Agreement and in accordance with routine socialization provided by the certification unit. Workers' wages in 2019 & 2020 have been above the minimum wage set by the government and there are no late payments every month, working hours is seven (7) hour a day with 6 days in a week and for the overtime has been paid in accordance with applicable regulations.

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

### **6.2.3**

The certification unit has Collective Labor Agreement are made in a Bahasa that explains the working conditions and rights / obligations of workers such as recruitment, selection, transfer, promotion, performance appraisal, remuneration, discipline, deduction, overtime, sick leaves, holiday entitlement, maternity leave and other provisions. In addition to being generally stated in Company Regulations, the certification unit also has a decree, policy, memorandum and work contract for workers in orientation period that specifically explain these matters. An example is:

- Payment of salary has verify to upkeep worker as sample for male with and female worker in AMP1 Estate and PMJ Estate for period April 2020, for example to employee with ID No. AG/1AMP/0813/1321 and No. AG/1AMP/1004/1712 for male and female worker, respectively. In general, basic salary was in accordance with Decree of Sumatera Barat Governor No.562-827-2019 dated 29 October 2019, which was about IDR 2,484,050/month. Different ammount of salary obtained is only affected by number of attendance, year of service in company, work performance and debt, without taking gender into account
- Maternal leave request for pregnat workers presented in Form No. FRM-EST-022 (Rev. 04), for example, as requested by employee with No. AG/AMP/0412/1168 dated 12 April 2020. The request is responded through doctor recommendation that presented in document Form No. FRM-KLK-003 (Rev. 03) dated 13 April 2020. Period of leave given was from 13 April to 13 July 2020.
- Mutation Letter of pregnant and breastfeeding is presented in document Form No. FRM-HRD-011 (Rev. 03), for example as shows through Decree No. 005/SK-PGA/IX/2019 dated 02 October 2019 for upkeep worker with recommendation from company doctor that presented in document Form No. FRM-KLK-023 (rev. 02) dated 02 October 2019.

Based on interviews with workers at AMP Mill (process operator), AMP 1 Estate (harvester, sprayer, and manuring worker), KUD Agro Wira Masang (harvester and spayer), and labour Unions (SERBUNDO and SPSI) know that workers have a sufficient understanding of their rights (wages, overtime, incentives, deductive, fines, etc.) listed in the Collective Labor Agreement and in accordance with routine socialization provided by the certification unit. Workers' wages in 2019 & 2020 have been above the minimum wage set by the government and there are no late payments every month, working hours is seven (7) hour a day with 6 days in a week and for the overtime has been paid in accordance with applicable regulations.

A review of the August-October 2020 wage document for harvest workers, pesticides, sprayers and mill operators proves that the wages received are above the minimum wage and in accordance with the wage scale structure determined by the certification unit for 2019. For example workers wages with the worker class 2A and 2B have a different based on wage scale structure 2020.

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

### **6.2.4**

The certification unit has provided welfare facilities to occupants in the form of housing, clinics, water supply, electricity, education, transportation and other facilities. The results of the field visit in the housing area revealed that workers were provided with adequate housing facilities with 2 bedrooms, 1 bathroom and there were daycare for children. The house is



inhabited by 1 family and specifically for workers who are not married then 1 house will be filled by 2 workers. This is in line with the results of interviews with housing residents stating that the facilities provided by the certification unit are houses, electricity, availability of clean water, transportation of school, elementary & middle school (for high schools located in Membalong - 30 minute travel), child daycare, places of worship, sport facilities and others. In general, the facilities provided by the certification unit are good / suitable for use by workers and their families.

Based on the interview with the labor union (SERBUNDO & SPSI), it is known that for the availability of water in each worker housing unit in the cooperative unit, it is available quite well and the amount is sufficient (for Tompek Tapian Kandis Cooperative there are 3 wells for clean water in the housing. ). This is reinforced by the absence of complaints regarding the availability of clean water in the cooperative unit (especially the housing section in Tompek Tapian Kandis Cooperative).

**6.2.5**

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

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

**6.2.6**

Since there is no Decent Living Wage standard in Indonesia, thus the unit of certification has implementing regulation of minimum wages of Sumatera Barat to its employees for period 2020, as mandated through Decree of Sumatera Barat Governor No.562-827-2019 dated 29 October 2019. Compay policy on wages in 2020 is presented on the Internal Memorandum of HR Manager No. 001/WIP-HRR/Int-XII/2019 dated 17 December 2019. Minimum wages for period 2020 was about IDR 2,484,050/month or IDR 99,362/day or IDR 14,359/hour. Unit of certification has listing and calculate prevailing wage and in-kind benefit for decent living wages. Component in prevailing wage has includes, food (rice), free electricity, housing, clean water, school, health facilities (polyclinic), child care, clothing, transportation, recreation, etc. In general, value of in-kind benefit (non cash) were bigger, ranged from 17 to 35 % from the basic salary.

**6.2.7**

The certification unit did not have workers with contract status for daily worker (BHL) or contract worker (PKWT), the current employee status is permanent workers who have Orientation Worker status (3 month orientation period), such as Regular Daily Workers (worker class 2A), Regular Monthly Workers (2B-2D) and Staff (worker class 3 and above). All the rights for each employment status has been distinguished.

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

**Status: Comply**

**6.3**

**The unit of certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.**

**6.3.1 & 6.3.3**

Internal Memorandum No. 026/WIP-HRD/Int-VIII/2009 dated 12 August 2009 has mentioned that the company has respect and allowed its employees/workers to express their freedom im making a labour union or association. This matter has approved through the existence of Labour Union, as follows:

- Registration of PUK-SPPP-SPSI PT AMP Plantation Structure Organization No. 002/SPSI-AMP/Ext-III/2020 dated 11 March 2020, that delivered to Agency Head of " *Dinas Penanaman Modal Pelayanan Terpadu Satu Pintu*" or One Door Investment and Service Board of Agam District. The Letter has responded by the Agency through Letter No.

<p>563/628/DPMPSTSP-Naker/2020 dated 18 March 2020 which mentioned that the new labour union structure has registered by the Agency. Number of members was 705 employees.</p> <ul style="list-style-type: none"> <li>• Registration of PUK-SPSI PT PMJ Organization Committee for period 2029 to 2024 is shows through Letter No. 01/PMJ-Ext/V/2019 dated 02 May 2019. Number of members was 560 employees.</li> <li>• <i>Serikat Buruh Perkebunan Indonesia</i> (SERBUNDO) or Indonesian Plantation Labour Union with Registration from Manpower and Investment Agency of Agam District No. 561/01/DPMPSTSP-Naker/2018. Number of members was 207 employees.</li> <li>• Bipartit of PT AMP has registered through Decree of DPMPSTSP Head No. 02.LKS/BP/DPMPSTSP-NAKER/2019 dated 07 May 2019. Bipartit is valid until 06 May 2021. Number of members was 22 employees.</li> </ul> <p>Collective Work Agreement (PKB) of PT AMP and PT PMJ stated that the company has recognized the existence of labour unions in the company and provided support to all workers who wish to associate. These policies are known by workers and all levels and status of workers whose can join as members of labour unions. These policies are available in Bahasa. Based on interview with labour union (SERBUNDO and SPSI) organization, it is known that certification unit did not interfere with organization activity. All worker has rights to be chosen as organization committee and there are no union members or administrators who serve as assistants or managers.</p> <p><b>6.3.2</b> The certification unit has records of meetings between labour unions (SPSI and SERBUNDO) and management representatives as well as with internal in labour union. The last meeting was on January 2, 2020 between the management of the labor union (SPSI and SERBUNDO) related to the PKB discussion for the 2021-2022 period which was attended by 7 participants. The other meeting was held on 14 October 2020 related to discussion about complaints/grivieance maintenance and SPSI board change. After the meeting, until the onsite audit was carried out, there was no meeting again and this was due to the COVID-19 pandemic that had occurred so that social restrictions by maintaining health protocols were carried out. The plan for the next meeting will see the development of the COVID-19 Pandemic until the following year.</p>	<p><b>Status: Comply</b></p>
<p><b>6.4</b> <b>Children are not employed or exploited.</b></p>	
<p><b>6.4.1, 6.4.2, 6.4.3 &amp; 6.4.4</b> Unit of certification policy towards child labour was issued by Group Plantation Head and Group CSR Head on September 2010. The policy has referred to ILO Convention No. 138. Furthermore, this policy also stated in Chapter 3 on the Collective Work Agreement (PKB). Socialization on this matter had conducted to employees and contractor on 22 January 2020 and 24-26 February 2020.</p> <p>For example, recruitment advertisement for Harvester and FFB Loader in PT AMP and PT PMJ for period 2020 mentioned that age requirement was ranged from 18 to 40 years old. Furthermore, according to list of employees 2020 review, it was known that nobody accepted as employees below 18 years old. Moreover, policy on minimum age has also implemented for contractors.</p> <p>Based on interviews with workers at AMP Mill (process operator), AMP 1 Estate (harvester, sprayer, and manuring worker), KUD Agro Wira Masang (harvester and spayer), and labour Unions (SERBUNDO and SPSI), it is known that the minimum age for work is 18 years, and no workers found below the minimum age specified. This is supported by the results of a review of company and contractor workers' document which proves that there are no workers under the age of 18 at the time of entering work, the youngest age of workers is 18 years 2 months when entering work.</p>	<p><b>Status: Comply</b></p>
<p><b>6.5</b> <b>There is no harassment or abuse in the workplace, and reproductive rights are protected.</b></p>	
<p><b>6.5.1</b> Unit of certification policy towards preventing sexual and other form of harassment and violence is presented in Company Policy issued by Group Plantation Head and Group CSR Head September 2010, and Internal Memorandum of HRD Head</p>	



No. 026/WIP-HRD/Int-VIII/2009 dated 12 August 2009. Both policy mentioned that employees are obliged to support morality and security in the work place, as well as to avoid any form of disexual harassment and violence objected to all workers. Socialization on this matter was carried out annually by Gender Committee which established since 2011.

Based on interview with workers and committee gender, the policy had disseminated to workers through gender committee meetings with workers and in the last year period, that hasn't any issue/incident related to sexual harassment, violence at work/reproductive rights.

**6.5.2**

Unit of certification policy towards women reproduction rights is presented in Internal Memorandum No. 026/WIP-HRD/Int-VIII/2009 dated 12 August 2009. These matter has communicate to womens employee by Gender Committee. Among reproductive rights are maternity leave for pregnant and breastfeeding workers, menstruation periode leave. Pregnant and breastfeeding workers is strictly prohibited to works related with agrochemicals. Those who identified will be mutated to another non-chemical works. Maternity leaves has given to the pregnant and breastfeeding workers for three months, as shows through several documents, for example as follows:

- Maternal leave request for pregnat workers presented in Form No. FRM-EST-022 (Rev. 04), for example, as requested by employee with No. AG/AMP/0412/1168 dated 12 April 2020. The request is responded through doctor recommendation that presented in document Form No. FRM-KLK-003 (Rev. 03) dated 13 April 2020. Period of leave given was from 13 April to 13 July 2020.
- Mutation Letter of pregnant and breastfeeding is presented in document Form No. FRM-HRD-011 (Rev. 03), for example as shows through Decree No. 005/SK-PGA/IX/2019 dated 02 October 2019 for upkeep worker with recommendation from company doctor that presented in document Form No. FRM-KLK-023 (rev. 02) dated 02 October 2019.

**6.5.3**

Based on interview with workers at the AMP 1 Estate and PMJ Estate daycare center, it is known that if the female employees who have just given birth will get posyandu facilities and get special time for breastfeeding. In addition, the certification unit has also conducted an assessment of the needs of postpartum young mothers which was held on 12 November 2020 in housing complex. Based on the results of the assessment, the needs of young mothers include postpartum health socialization activities that are routinely carried out by the health team to both working and non-working young mothers, providing breastfeeding time, and providing breastfeeding corner facilities in daycare centers.

**6.5.4**

The certification unit has an employee complaint and grievance procedure number PRO-HRD-005 revision 01 effective December 12, 2015. The procedure explains that, if requested by the company to guarantee the confidentiality of the reporter's identity by looking at the sensitivity of the problem, the impact if it is published or the risk of revenge .

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

**Status: Comply**

**6.6**

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

**6.6.1 & 6.6.2**

According to list of employees as per May 2020 review, it was known that there were no migrant workers in the unit of certification. Job description were presented in contract agreement which agreed by both parties (employer and employee) through signed and legal stamp. As looking to the several online sources, it was known that there were no negative case related to forced labour, debt bondage, contract substitution, involuntary overtime, lack of freedom of workers to resign, penalty for termination of employment, withholding of wages, etc in the unit of certification operational areas. Based on payment slip review of Security (Employee No. AG/1AMP/0212/1129) and Upkeep workers (employee No. AG/1AMP/1004/1712 ) for period April 2020, it was known that premium and/or overtime has been paid propotionally, in

accordance with manpower regulations.

Job description were presented in contract agreement which agreed by both parties (employer and employee) through signed and legal stamp. As looking to the several online sources, it was known that there were no negative case related to forced labour, debt bondage, contract substitution, involuntary overtime, lack of freedom of workers to resign, penalty for termination of employment, withholding of wages, etc in the unit of certification operational areas. However, this matter will be verified through interview with Manpower Agency of Agam District, Labour Union and several workers on the coming on-site visit audit.

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

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

**Status: Comply**

**6.7**

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

**6.7.1**

The company has OSH Committee (P2K3), as follows:

- PT AMP (Estate and Mill), TTK and BST Cooperative were under P2K3 of PT AMP as endorsed by Manpower Agency of Sumatera Barat Province No. 564/24/P2K3/Hi-Was/2020 dated 07 February 2020. The Secretary of P2K3 was an OSH Expert as shows through Minister of Manpower Decree No. KEP. P.1582/NAKER-BINWASK3/VI/2017 dated 05 June 2017, valid for 3 years. Extension process on OSH Expert License shows through Director of PT Arpindo Pratama Letter (safety training organizer) No. 425/AP/K3/VI/2020 dated 17 June 2020 which mentioned that the extension was still ongoing process.
- PT PMJ and AMP 4 were under P2K3 of PT PMJ as endorsed by Manpower Agency of Sumatera Barat Province No. 564/134/Hi-Was/2017 dated 19 June 2017. The Secretary of P2K3 was an OSH Expert as shows through Minister of Manpower Decree No. KEP. P.1579/NAKER-BINWASK3/VI/2017 dated 05 June 2017, valid for 3 years. Extension process on OSH Expert License shows through Director of PT Arpindo Pratama Letter (safety training organizer) No. 423/AP/K3/VI/2020 dated 17 June 2020 which mentioned that the extension was still ongoing process.
- The company has an OHS Committee that cover KUD Mutiara Sawit Jaya and KUD Agro Wira Masang.

OSH Committee has consistantly conducting monthly OSH meeting. For example, minutes of meeting, attendance list and picture documentation of the meeting for period January to March 2020 were presented in quarter P2K3 report which had delivered to the Manpower Agency of Agam District, Pasaman Barat District and Sumatera Barat Province, as shows through document No. 005/APM-P2K3L/Ext-I/2020 dated 27 April 2020 and No. .../PMJ-Ext/VI/2020 dated 15 May 2020 for PT AMP and PT PMJ, respectively. Based on interview with Labor Agency (Kabupaten Agam), it is known that the company has a OSH Committee (P2K3) and deliver the report periodically to the agency.

**6.7.2.**

**Emergency Procedure**

Unit of certification management mentioned that there is no revision of emergency procedure, which all provided in Bahasa and presented in several documents, as follows:

- Procedure No. PRO-GEN-008 (Rev. 02) dated 01 October 2013 about Identification Impact towards OSH and Environment Aspect.
- Procedure No. PRO-GEN-014 (Rev. 02) dated 01 October 2013 about Emergency Action, included fire incidence on the estate and mill, as well as housing complex area.
- Procedure No. PRO-GEN-015 (Rev. 02) dated 01 October 2013 about Investigation and Reporting of Accident and Environment Contamination, included trafic of estate operational areas.

- Procedure No. PRO-KLK-002 (Rev. 03) dated 01 October 2013 about Medical Check Up of Employees, included special check up, especially for workers affected/exposed by agrochemicals, high noisy level, pregnant monitoring, etc.
- Procedure No. PRO-KLK-004 (Rev. 01) dated 28 October 2016 about First Aid Training and Monitoring.

**First Aider and First Aid Kit**

The unit of certification has Hiperkes Certified Paramedics and doctor, i.e. doctor with Hiperkes Certificate No. 13.852/DH-VII/05 dated 25 February 2005 and 5 Paramedics with Certificate No. 14.518/PM-IV/12 dated 05 December 2012; No. 14.544/PM-IV/12 dated 05 December 2012; No. 19.545/PM-IV/15 dated 05 December 2012; No. 21.371/DBK3-PM/10/IV/2016 dated October 2016; and No. 21.372/DBK3-PM/10/IV/2016 dated October 2016. Furthermore, the unit has First Aider as required by Permenakertrans No. 15 in 2008, for example as shows through 19 First Aiders with Certificate No. 001/P3K/V/2020 to No. 019/P3K/V/2020. All First Aider Certificate were valid until 09 June 2022.

List of first aid items and monitoring is presented in document Form No. FRM-GEN-054 (Rev. 01) . Furthermore, inventory (location) of First Aid is presented in Form No. FRM-GEN-034 (Rev. 03). Permanent and Portable First Aid Box were consist of 23 and 13 items, respectively, as recommended by company doctor and refers to Minister of Manpower Regulation No. 15 in 2008.

**Training**

The unit of certification has conducting periodic training on First Aid which presented in document No. FRM-GEN-016 (Rev. 04). For example, training of First Aid and Socialization of Medical Check Up results, HIV AIDS and Drugs has conducted in PT AMP and PT AMP on 09 March 2019, attended by workers from Estates and Cooperatives (Plasma).

**Accident Record**

The unit of certification has monitor and evaluate any accident on the unit. Report of accident is presented in document Form No. FRM-KLK-009 (Rev. 03), which informed time and location of accident, affected employee (victim) data, type of accident, root of cause, accident category (first aid or Lost Time), Manday(s) lost and other information. Furthermore, incident notification and investigation is presented in document Form No. FRM-GEN-010 (Rev. 03). All sampled Estates and Mill are able to shows accident report, investigation form, medical certificate and doctor recommendation, Hospital Certificate, and BPJS covers, satisfactory. As informed by estate and mill workers, it was known that all accident were covered by the company. For example, as sighted to Harvester accident in 10 June 2019 that caused mandays lost for 4 days, BPJS report was available. Leave days were still paid by the company. Based on interview with harvesting foreman at PT PMJ, it is known that the worker had a training related First Aid Kit and can explain using the item of First Aid Kit.

Based on field observations in the mill area is known that the CH has provided an evacuation route in case of an emergency. Based on interviews with mill workers found that the CH had socialized the purpose of the evacuation route. Beside that, the company has complemented by first aid kit and the officer has trained.

**6.7.3**

Based on field observations and interviews with estate and mill employees found that the company had provided PPE storage facilities and work tools for employees so that PPE and work tools were not brought home after work. In addition, the company has also provided sanitation facilities for workers who use chemicals so that employees can take a shower before returning to their respective homes. Consistency has verified during field visit to the estates and mill as a real implementation. Auditor found that all PPE provided and wearied were in accordance with HIRAC and/or MSDS for chemicals products.

**6.7.4**

The company has shown recap payment of health and accident insurance and list of employee for PT AMP and PT PMJ. Based on that document there are some differences between employee list and the payment. Related of that matter, the company has a justification such as there are registration process and some of them are still registered with the contribution assistance recipients (*Penerima Bantuan Iuran*). The company has carried out a mapping and is showing the progress of completion and fulfillment of this matter.

The detail of payment such as:

Unit		Oktober 2020		Employee List	Difference
		BPJS Kesehatan	BPJS Ketenagakerjaan		
AMP 1	Monthly	37	37	37	-
	Daily	418	416	418	2
PMJ	Monthly	22	22	22	-
	Daily	266	266	266	-
AMPPOM	Monthly	51	51	51	-
	Daily	124	125	125	1

Based on document review there are differences related BPJS Ketenagakerjaan and BPJS Kesehatan on PMJ and AMP POM. Based on interview with management, it is cause of the worker out/resign. Beside that, results interviews with contractor workers (FFB & CPO transport) revealed that workers were registered in the BPJS program. This result is in line with the results of the document review which proves that the wages of contractor had a BPJS payments.

**6.7.5**

Lost Time Accident (LTA) monitoring and calculation has still consistently conducted by the unit of certification. The record informed number of employee on the particular monitoring months, number of working days, non effective working days, overtime, total employees man hours, number of lost days, lost time accident, number of accident, manday lost recapitulation, frequency rate (FR) and severity rate (SR). the report also informed the date of the incident, the time of occurrence, name, age, class, position / occupation, the body affected, the type of injury, the cause of injury, the location of the accident, the LT category, lost work days and information. In addition there are also records related to the results of accident investigations that have occurred. LTA report has prepared by OSH Committee Secretary and approved by Unit Manager. Summary of LTA calculation in all unit scope for period 2019 to May 2020 is presented in the following Table:

Unit	Period	First Aid Accident	LTA Accident	LTA (Mandays)	FR	SR
AMP	Jan-Dec 2019	25	110	287	10.56 – 31.95	19.41 – 117.51
	Jan-May 2020	3	40	54	12.68 – 15.78	17.50 – 41.54
PMJ	Jan-Dec 2019	12	1	40	3.79 – 11.30	3.85 – 41.44
	Jan-May 2020	1	-	4	3.72 – 11.19	0.00 – 11.15

Apart from LTA calculation, unit of certification has also able to shows record on every accident, as well as itf related follow up documents such as investigation report, accident report, management review, medical notes,leave recommendation, etc.

Based on interview with paramedic and doctor at PT PMJ, it is known that the company has a monitoring related accident and it is review periodically with OHS PIC. Beside that, the company has shown the accident monitoring book with detail such as date, time of accident, name of patient, age, job description, type of injury, cause of injury, accident site, category lost days, LTA and origin of work.

**Status: Comply**

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

**7.1**

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

**7.1.1**

The company has shown the results of the pest and disease census documents for each estate as part of the company's Early Warning System. An example is the recap of the AMP-1 pest census of the May 2020 period, as follows:

- Bagworm : 2.7%
- Netter caterpillar : 2.27%
- Ganoderma : 0%
- Termites : 0%
- Rat : 3.2%

- Oryctes : 6.24%

Based on the recap of the census results above, it is known that the P & D team made the following recommendations:

1. Ganoderma disease and termite pests in AMP-1 are still under control, no need to control them. The EWS census measures are carried out according to the program.
2. Control and census were carried out on blocks with high pests
3. Control and census in the block with high bagworm pests,
4. Control and census in blocks with high rat infestation,
5. On blocks that attack high oryctes do control

Based on field observation at PT PMJ, it is known that the company had a plan to reduce pest and disease such as planting the beneficial plant (*Turnera sp*) and Owl Nest.

**7.1.2**

The company planted *Turnera sp* and *Antigonon leptopus* as hosts for the biological enemies of netter caterpillars. Based on applicable regulations note that the two plants are not an invasive species.

**7.1.3**

Based on field visit, review of pest control documents and pest control procedures owned by the company, it is known that the company does not use fire in controlling pests. The company has a method to handle the pest and disease such as make an early warning system, cencus and IPM (*Turnera sp*, *Antigonon leptopus* and *Tyto alba*).

**Status: Comply**

**7.2**

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

**7.2.1 , 7.2.5, and 7.2.6**

According to record of pesticide application, list of pesticide used in 2020 by Company is presented in the following Table:

Pesticides	Active Substance	Target
<b>Herbicides</b>		
Garlon 670 EC	Triklopir Butoksi Etil Ester	Broadleaf and narrowleaf
Tiara 20 WG	Methyl Metsulfuron	Broadleaf
Becano	Indaziflam 500 g/l	Broadleaf
Supremo 490 SL	Isoprophyl Amine Glyphosate	Broadleaf and narrowleaf
Glinat 150 SL	Ammonium Glufosinat	Broadleaf
<b>Insecticide</b>		
Dipel SC	Bacillus thuringiensis	Netter caterpillar
Decis	Deltametrin 25 g/l	Netter caterpillar
Chepat	Asefat 75 %	Bagworm
Capture 50 EC	Cypermethrin 50 g/l	Insect
Marshal 5 GR	Karbosulfan 200 g/l	Oryctes
Racumin	Kumatetralil 0,0375 %	Rat
<b>Fungicide</b>		
Kencozeb 80 WP	Mankozeb 80 %	Leaf rot

All pesticides mentioned above were listed in www.pestisida.id by Department of Agriculture, Republic of Indonesia.

The company has shown the environmental policy POL \_ 001 \_ WIL Wilmar Environmental Policy which was revised on 1 June 2019. In this policy there is one point that explains the use of pesticides. Based on the pesticide list document used by the company, it is known that the company does not use class 1A and 1B pesticides.

Based on the pesticide use document presented by the company, it is known that there is no use of pesticides with active paraquat ingredients. The company has also shown a list of pesticide applicator workers. The company has shown documents related to the training given to employees, namely spraying training which was conducted on March 21, 2020 which was attended by 14 participants and also training and socialization of the EWS census, detailed census and IPM



which was conducted on February 5, 2020 which was attended by 11 participants.

**7.2.2**

The company conducts routine pesticide applications to control weeds in circles. The company shows documents regarding the use of pesticides in operational activities. The document is recorded product name, active ingredients, LD50, percentage of active ingredients, total application, total active ingredients, FFB production and pesticide unit/kg FFB. This document is constantly recorded and updated by Estate Sustainability Officer each month.

**7.2.3**

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

The company has program to reduce the pesticide usage (that covered at SOP Agronomy) 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 nettle caterpillar by planting beneficial plant such as *Turnera subulata* and *Casia cobanensis*. Moreover, the company has also conducted early detection routinely listed in the monthly report of early warning system.

Based on document verification and field visit to pesticide storage at PT AMP and PT PMJ, the company do not use pesticide with WHO 1A or 1B class.

**7.2.4**

There is no prophylactic way of using pesticides carried out by the company. The company controls using pesticides if the pest attack census shows results above the threshold. Whereas for weed control If the conditions of the circle and harvest pathway are still quite standard, weed control will be postponed. Based on observations of spraying activities, the application method is not a preventive application but is more selective for locations that have weeds.

**7.2.7**

The company has the SOP of storage of pesticides (SOP 17/EHS/(0)/0409, dated April 2009). In that procedure explaining the mechanism of the pesticide storage in special warehouses including the mixing place of pesticides to be used in the field in the isolated special place so that does not potentially expose to chemicals outside the warehouse.

Based on field observations to the company's pesticide storage warehouse, it is known that the storage of pesticides has been carried out according to existing procedures such as material safety data sheet, separate locations from other items and the floor does not have a channel to the soil body, there is a symbol of toxic hazardous

**7.2.8**

The company already has an SOP for Hazardous and Toxic Waste Control with document number SOP-GEN-006 Revision 06 dated 9 September 2019 which was endorsed by GEM PT AMP Plantation. This procedure describes the management and identification of hazardous and toxic waste materials, storage procedures for hazardous and toxic waste, health and safety considerations for work and the environment. Types of hazardous and toxic waste that must be managed based on their materials include used oil, used oil filters, used batteries, chemicals, rags, medical drugs, used litter packages or containers where these are dangerous and toxic.

The company has a hazardous and toxic waste control procedure with document number SOP-GEN-005 dated 23 April 2015. This procedure describes hazardous and toxic waste management which refers to Government Regulation no 101 of 20014, for example: administratively the management of hazardous and toxic waste is recorded and archived by type, characteristics, time generated etc. The building for storing hazardous and toxic waste must have an adequate air ventilation system and be made without a ceiling equipped with a lightning rod, a waterproof building floor with a maximum slope of 1% towards the reservoir. In addition, this procedure also explains that it is not justified to use used packaging of hazardous and toxic waste for other purposes than to accommodate dangerous and toxic types of packaging itself.



In addition, the company also has procedures for washing used toxic and used fertilizer packaging and waste water management used for washing number SOP-GEN-016 dated January 5, 2011. All waste water management activities from washing fertilizer sacks or used agrochemical packaging are carried out in special washing stations in each. -Each estate and carried out by a special officer who has been appointed, other than that the waste water from washing the poison packaging that has been collected can be reused for mixing the next chemical After the completion of the washing activity, the packages are stored, counted, recorded and there is evidence of monitoring which periodically and the amount accumulates. The company also demonstrated the socialization of the ban on the use of hazardous and toxic waste packaging, for example at PT AMP on February 18, 2020 and at PT PMJ on June 15, 2020, which was attended by 7 employees.

Based on a visit to the Temporary Storage of Hazardous and Toxic Wastes at PT AMP and PT PMJ, pesticide containers are stored in a licensed Temporary Storage for Hazardous and Toxic Wastes to be transported by licensed and licensed waste transport companies.

**7.2.9**

Based on documents on the use of pesticides and interviews with company management, it is known that the company does not spray by air.

**7.2.10**

Medical check up, included special medical check up has consistently conducted by every units annually. The testing in 2019 and 2020 is conducted by Manpower and Transmigration Agency of Sumatera Barat, *UPTD Balai Hiperkes dan Keselamatan Kerja*, summarized in the following Table:

Unit	Number of Employee Tested	Spirometry Results	Cholinesterase Result
AMP 1	73	All normal	All normal
Plasma AWM	21	All normal	All normal
PMJ	88	All normal	All normal

Tentative results for Cholinesterase result for 2020 period have just released for 72 workers from AMP1, 16 workers from Plasma AWM and 83 workers from PMJ. The results show that all workers were indicated normal and fit to works which may exposed to chemicals.

Based on interview with spraying operator at Block 1 Agro Wira Masang Cooperative, it is known that the worker already had a medical check up (2 times per year) such as Spirometri and Cholinestrace.

Beside that, there is a shift schedule for Medical Check Up with No. 564/43/UPTD.K3/2020 on September 3, 2020 from *UPTD Keselamatan dan Kesehatan Kerja Dinas tenaga Kerja dan Transmigrasi Sumatera Barat*. Based on that document, it is stated that cause of Pandemic Covid-19, *UPTD Keselamatan dan Kesehatan Kerja Dinas tenaga Kerja dan Transmigrasi Sumatera Barat* will reschedule the periodic medical check up such as Spirometri, Audiometri and Cholinestrace. The reschedule is waiting until Pandemic Covid -19 ended or normal situation.

**7.2.11**

The company has shown procedure (SOP-EST-002) dated September 09, 2019 regarding job substitution for workers of pregnant and lactating women. The contents of the policy include, "for pregnant women workers and female workers who are still breastfeeding so that they are not employed in the types of chemical material.

The company has shown monitoring records of pregnancy information for each female worker. Workers identified as pregnant will be transferred to jobs that do not contain chemicals.

Based on the results of document review and interviews with the spraying team in Block 1 Agro Wira Masang Cooperative, it was found that no spraying team had been pregnant or breastfeeding. Beside that, the operator telling that they are always had a check for pregnant and breastfeeding periodically.

**Status: Comply**

**7.3**

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

**7.3.1; 7.3.2**

Registry for waste (included toxic and hazardous waste) products produced from mill and estates are identified and listed on 2017 identification and evaluation of pollution source document for example mill waste water are managed at waste water treatment plant before it distributed as land applications, hazardous waste were kept at temporary hazardous waste storage, empty fruit bunch are reduce and reuse as nutrient cycles on estates.  
The company has a waste management procedure as stated in the SOP PRO-GEN-013 document dated April 26, 2010. This procedure describes the management procedure for each type of waste such as solid, liquid and hazardous waste.

**Realization of Liquid Waste Management**

The company has measured the discharge of liquid waste generated and flowed to the Land Application Area in accordance with the permit held. An example of recording liquid waste from January - April 2020 is as follows:

Month (2020)	Liquid Waste Production (m3)	Application Liquid Waste (m3)
January	19,357	21,840
February	20,303	23,271
March	20,309	23,821
April	22,710	19,920

**Realization of Hazardous and toxic waste Management from starting Hazardous and toxic waste recording until the last Hazardous and toxic waste manifest.**

The last Hazardous and toxic waste manifestation from PT AMP on January 28, 2020 which was transported by PT Shali Riau in a vehicle numbered BM 9356 JU.

- Used Oil 420 liters with manifest AAO0015383
- Used Oil 1636 liter with manifest AAO0015399
- Used Majun 55 kg with manifest AAO0015384
- Used Majun 101 kg with manifest AAO0015356
- Used filter 10 kg with manifest AAO0015411
- Used filter 190 kg with manifest AAO0015400
- Packaging hazardous waste 30 kg with manifest AAO0015448
- Packaging of 201.5 kg hazardous waste with manifest AAO0015430
- 317 kg of expired chemicals with manifest AAO0015432
- 28 kg used battery with manifest AAO0015449
- 72 kg used battery with manifest AAO0015431
- 19 kg of Medical Waste with manifest AAO0015141

**Stock to date Hazardous and toxic waste until May 2020 at PT AMP:**

- 22 kg of Medical Waste
- 0.22 tons of cloth Majun
- 0.3948 tons of Used jerry cans
- 0.012 ton used battery
- 0.188 ton used filters
- Used Oil 12.33 tons

The last Hazardous and toxic waste manifestation from PT PMJ on February 28, 2020 which was transported by PT Shali Riau in a vehicle numbered BM 9767 JU.

- Used battery 0.102 tons with manifest KLH-6330000005281UF
- 0.102 tones of used majun with KLH-6330000005280UF manifest
- 0.1168 ton B3 used packaging with KLH-6330000005283UF manifest
- 0.072 tons of medical waste with manifest KLH-6330000005285UF

Stock to date Hazardous and toxic waste until May 2020 at PT PMJ

- Used Oil 105 kg
- Used battery 24 kg
- Used filter 9 kg
- Used packaging B3 79.92 kg
- Used Rags 5 kg
- Medical waste 2.5 kg

The company has reported on hazardous waste management to relevant agencies, for the fourth quarter 2019 report it has been reported to the Agam Regency Environmental Service on February 15, 2020, and the 2020 Quarterly Report is reported on April 29, 2020.

In addition, the Company has carried out socialization related to the management of Hazardous and Toxic Waste to employees, for example on June 15, 2020 which was attended by 9 employees who worked at the location of the PT PMJ warehousing complex and socialization and training related to hazardous and toxic materials and hazardous waste and Toxic and how to overcome it in the event of a spill of Hazardous and Toxic Materials and Hazardous and Toxic Wastes on February 7, 2020 which was attended by fertilizer warehouse officers, chemical warehouse officers, fuel tank officers, officers in the generator room and PT AMP's Hazardous and Toxic Waste Temporary Storage Plantation.

Based on interviews with management and employees, they have understood and understood the management applied by the company. The manager has seen that it is related to the management of Hazardous and Toxic waste which is managed by first in a dangerous and toxic Temporary Storage, while for domestic waste, there is separation between organic and inorganic waste and carried out periodically for landfilling at a predetermined location.

**7.3.3**

Based on field visits, there was no evidence of using fire for waste disposal. For hazardous and toxic waste, it is stored in a temporary storage place for hazardous and toxic waste that has a license and is transported periodically in collaboration with companies that transport hazardous and toxic waste. As for domestic waste, the company has prepared trash bins throughout the housing by separating organic and inorganic waste and will be transported to a designated landfill location.

**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**

Procedure related to soil fertility is presented in document No. PRO-EST-008 dated 01 July 2013 about leaf and soil analysis; No. SOP-EST-001 (Rev. 04) dated 12 February 2015 about manuring; and No. SOP-EST-010 (Rev. 00) dated 01 April 2011 about EFB mulching. Procedure mentioned that type of fertilizer, dosage, frequency of application shall be recommended by Agronomist team from Research and Development Department of PT Tania Selatan in Palembang (Wilmar Group).

Based on the SOP it is known that leaf analysis is carried out once a year, where the results of the analysis will be part of fertilizer recommendations for the following year.

Based on field observation and interview with manuring operator at Block 15 AB (AMP 1 Estate), it is known that the workers get a training related manuring. Beside that, the worker has known the procedure related manuring such as banned manuring in riparian zone and perform fertilization according to the dose given.

**7.4.2**

The company has shown documents related to periodic soil and leaf sampling for each estate which is the basis for recommendation for fertilization, the examples are as follows:

**Soil Analysis**

- Soil analysis is presented in document No. 07 / Tanah / VI / 2015 / AMP dated 09 September 2015.
- Soil analysis is presented in document No. 049 / PSIT / ATA / 2018 dated 21 March 2018.

**Leaf Analysis**

- Result of leaf analysis No. 24 / PLANT MATERIAL / III / 2019 / AMP dated March 8, 2019  
 - Result of leaf analysis No. 29 / PLANT MATERIAL / III / 2019 / PNJ dated 23 March 2019  
 Parameters measured on leaf sampling analysis are dry matters content of macro (N, P, K, Mg, Ca) and micro (B, Cu, Zn) nutrients. Meanwhile parameters measured in soil sampling analysis are texture, density, pH, permeability class, pH, C-Organic, N-Total, C/N Ratio, Total and Available P, Cation Exchange Capacity (CEC) and nutrient content (Ca, Mg, K, Na, P, K, Fe, Cu, Zn and Mn).

**7.4.3**

The company has presented documents related to the use of POME and empty fresh bunch as a nutrient recycling strategy. The utilization of the period up to May 2020 is as follows:

**POME**

Plans: 107,787 M3  
 Realization: 112,594 M3

**Empty Bunch**

Plans: 35,929 tonnes  
 Realization: 32,748 tons

Based on field visit at PT AMP, it is known that the company to be applied EFB between the plant. Beside that the company has a POME application, there is no indication related leachate water on water bodies.

**7.4.4**

The company has recorded inorganic fertilization and organic fertilizing well during 2020 and recorded it in the fertilization month report. The urea fertilizer used by the company for AMP 1 period 2020 is 29,850 tons. Overall, the company has made efforts to maintain and improve soil fertility. Visually, there are no symptoms of nutritional deficiencies in the blocks that have been visited.

**Status: Comply**

**7.5**

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

**7.5.1; 7.5.2**

The company has shown a land type map and a land slash map for each Estate. The examples are as follows:

1. Map of AMP-1 soil survey with a scale of 1: 35000, based on the results of the Param Agricultural Soil Survey, it is known that the soil types contained there are Entisols, inceptisols, Ultisols Histosols, Oxisols, Alfisols, Spodosols.
2. Slope / Slope Map PMJ with a scale of 1: 50000, based on the map it is known that there is no area with a steep slope. PMJ estate is dominated by real estate with flat undulating arela.

Based on the above documents, the company has a map that identifies marginalized and fragile soils, including steep sulfuric areas. Beside that, based on field visit at Agro Wira Masang Cooperative, it is known that, there are no steep area. The topography was dominated with peat and mineral with flat/undulating area.

**7.5.3**

Based on the results of the document review of the statement area and interviews with company management, it was found that the company did not develop new oil palm plantations. Based on field visit at PT AMP and PT PMJ, it is known that, there are no new planting on peat/mineral area.

**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**

Based on the results of the document review of the statement area and interviews with company management, it was found that the company did not develop new oil palm plantations.

Based on soil survey report review, it could be concluded that in general soil feasibility were dominantly marginal for oil palm cultivation, but there is no fragile soils within sampled estates operational areas. However, there were several limitations on soil management, such as drainage problem (prone to flood area), loamy texture, prone to moisture stress and yield fluctuation, soil erosion on steeper slopes, low fertility, leaning palms on peat area and a presence of moderately deep to deep organic soils. Thus, to overcome those limitations factors, estate management has strategy which already implemented, as follows:

- Soil monitoring and mitigation: cover crop establishment, terracing on hilly area, proper frond stacking, EFB application.
- Good fertilizer program as recommended by Agronomist through leaf and soil sampling analysis.
- Initial drainage and delayed planting, compaction along planting line and adopting hole in hole planting.
- Additional fertilizer including Cu, Zn and B.
- Soil moisture conservation.

Erosion mitigation through planting of vertifer grass, selective weeding and establishing riparian zone.

Based on field visit and document review, it is known that the company has a replanting activity at AMP 1. The replanting activity conducted based on soil survey and topography map.

**7.6.3**

Based on the results of the document review of the statement area and interviews with company management, it was found that the company did not develop new oil palm plantations. Based on field visit at PT AMP and PT PMJ, it is known that, there are no new planting on peat/mineral area.

**Status: Comply**

**7.7**

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

**7.7.1**

Based on the results of the document review of the statement area and interviews with company management, it was found that the company did not develop new oil palm plantations. Based on field visit at PT AMP and PT PMJ, it is known that, there are no new planting on peat/mineral area.

**7.7.2**

Based on the identification of Param Agricultural Services, it is know there are a peat land in company. Meanwhile, the company has been communicating with the RSPO regarding peatland reporting. The company refers to government regulations regarding the distribution of peat in Indonesia, where the area of PT AMP and PT. PMJ are included in the identification.

The company has shown the peat inventory and already send to RSPO on November 5, 2019.

Detail of Peat Inventory

PT	Total Planted	Year of 1 <sup>st</sup> Planting	Planted Area (Ha) based on cycle of planting		Total area Planted (on Peat)
			1	2	
AMP	2873.66	1996	589.74	-	589.74
PMJ	1287.51	1997	1284.22	-	1284.22

The company has reported Peat inventory to the RSPO Secretariat and has been responded to by RSPO on 19 May 2020 with the statement "we acknowledge the receipt of the update of peat inventory and the submission of Drainability Assessment".

**7.7.3**

The company has shown a peat subsidence monitoring document for each estate. In the monitoring, it is explained about the coordinate points, stake numbers and locations, data collection dates, measurement data and the difference between the latest measurements and the previous measurements. The company management explained that monitoring was carried out every semester. as for example, data collection on May 25, 2020 on the M3 stake 600 (block 7C / PMJ) with coordinates S 0° 16'.477 E 99° 48'11.521, measurement data 11.50 and the difference with the previous measurement is 0.10 cm.

Based on field observation at Block 002 PT PMJ, it is known that the company has install the subsidence pole and water level.

**7.7.4**

The company has indicated documents related to the implementation of a water management program, namely monitoring the water level for each estate. Revitalization is done weekly. An example is monitoring water levels in PMJ for the period of May 2020 in block 9 A with the results of monitoring the first week of 57 cm, the second week of 58 cm, the third week of 59 cm and the fourth week of 62 cm.

Regarding land cover, it is carried out by planting land cover crops during replanting activities, selectively spraying weeds and applying empty bunches as natural mulch.

**7.7.5**

The company has shown the Drainability Assessment document of PT. AMP October 2019 following the RSPO Drainability Assessment Procedure. The method used is the RSPO Drainability Assessment Procedure version March 2019. Based on the company's drainability assessment, the conclusion is that "Based on the result on table above, it is shown that the depth to drainage base is more than peat thickness of peat - the drainage bases is in mineral. soil below the peat - then the DLT does not need to be calculated.

**7.7.6**

The company has a document that indicated Piezometer and Subsidence Estimation based on Drainability Assessment. Based on that document, it is known that the company need to added a piezometer according to the RSPO Peat Audit Guidance (P&C 2018). The company has a timebound plan to realize the program that stated on Fulfillment Piezometer & Subsidence Program. Based on the timeline, it is known that the fulfillment plan is carried out until March 2021 with details of the installation, namely 2 subsidence pole and 12 piezometers. The company has the opportunity to ensure that the number of subsidence stake and piezometer installations is in accordance with the plan and the 2018 RSPO Guidance for Peat (OFI).

**7.7.7**

Based on a document review and interview with management, the company does not have any reserves in the peat area.

**Status: Comply**

**7.8**

**Practices maintain the quality and availability of surface and ground water**

**7.8.1; 7.8.2**

Water sources identification and management plan are listed on 2019 water management document. These document describe the water source identification, POM and estates water usage monitoring & efficiency, and riparian area protections.

Company also conducted regularly water quality testing every semester for Batang Anggang, Masang Kanan and masang kiri river. based on the results of laboratory analysis for river water quality in the second semester of 2019, it is known that almost all parameters have met the quality standard. as for the COD & Nitrite parameters exceed the quality standard because the source in the Upstream has exceeded the quality standard.

River boundary management plan - riparian belt described in procedure SOP-GEN-018, Rev 01, effective date 12 February 2015 approved by GEM. For those with river and tributary status, they follow the law, namely the border width for the river is 100 meters and the tributary is 50 meters wide from the river lip. In addition, it is explained that for water flows other than rivers, the determination of the boundaries is as follows:



- Width <5 meters, minimum width of the border 5 meters either side of the river
- 5-10 meters wide, the minimum width of the border is 10 meters either side of the river
- 10-30 meters wide, the minimum width of the border is 50 meters either side of the river
- Width > 30 meters, the minimum width of the border is 100 meters either side of the river

The company has planted woody plants on the riverbank, in 2019 it is known that 1050 plants have been planted consisting of *Bayur*, Mahogany, bamboo and vertifer grass.

There are several activities that have been carried out by the company as a form of protection of river border areas based on field visits, such as:

- Installing prohibition of hunting, HCV area, prohibition of applying chemicals or fertilizers.
- Do not apply chemicals in HCV areas with a distance of  $\pm$  100 meters
- Marking the boundaries of the managed area (chemical applications) with a yellow mark on the principal
- Conduct enrichment by planting mahogany plants
- The company has also socialized the ban on sprayers on the edge of the trench on May 20, 2020 for spraying power for Phase II AMP I.

In 2019 and 2020 there will be no replanting activities. Based on a field visit in block 2 of the KUD Wira Masang area, the HCV area has been managed by installing a signboard and it is also seen that the river riparian area is filled with shrubs.

**7.8.3**

Mill effluent produced by AMP POM processed at waste water treatment plan based on procedure SOP-MILL-014, until it complying to standards before it discharged to AMP-1 estates as land applications based on decree of Capital investment and integrated licensed Agam regent No. 01 on April 6 2018

Waste water quality testing document review shown for January – May 2020 all of waste water testing parameters are compliant to the standards quality, and all of waste water management and monitoring has been reported to related institutions for regular basis per 3 month.

Based on the results of a visit to the location of the WWTP pond, it was found that there was no overflow of waste water, the flow meter was functioning and maintained and it was regularly recorded.

**7.8.4**

The company has a surface water utilization permit in accordance with Decree No. 611-441-2016 concerning the granting of permits for the use / utilization of water resources for the needs of palm oil processing factories and drinking water located in Nagari Saraleh Aia, Palembang District, district. Agam dated 26 April 2016 and is valid for 10 years. Based on the decree, the location for water extraction is on the Batang Anggang River, Tapian Kandis with a total usage of  $\pm$  50,000 m<sup>3</sup> / month.

The company shows records of water use for the period 2019, including:

Month (2019)	FFB Processed (Ton)	Water Consumption			Per Ton FFB
		Proses (m <sup>3</sup> )	Boiler (m <sup>3</sup> )	Total (m <sup>3</sup> )	
January	32,733	12,683	20,399	33,083	0.99
February	29,600	10,567	15,971	26,539	1.12
March	33,696	11,735	19,380	31,115	1.08
April	34,065	11,557	17,910	29,467	1.16
May	44,756	15,742	25,141	40,883	1.09
June	28,593	10,941	17,652	28,593	1.00
July	43,477	17,323	23,404	40,727	1.07
August	28,175	12,167	19,176	31,343	0.90
September	28,175	10,089	13,235	23,324	1.21
October	23,502	9,978	14,976	24,954	0.94
November	24255	10,759	14,511	25,271	0.96
December	24840	9,322	18,114	27,436	0.91

Total	375,867	142,863	219,869	362,735	0.97
<p>The average water use during 2019 for the FFB production process was 0.97 m<sup>3</sup> / ton FFB from the specified budget of 1.2 m<sup>3</sup> / ton FFB. In addition, the company can show proof of payment of surface water usage charges for the period May 2020 which was paid through the bank to the Provincial Treasury on June 16, 2020.</p>					
<b>Status: Comply</b>					
<b>7.9 Efficiency of fossil fuel use and the use of renewable energy is optimized.</b>					
<b>7.9.1</b>					
<p>The company has plans to increase the efficiency of the use of fossil fuels by substituting using renewable fuels and using methane capture. The calculation results for 2019 are as follows:</p>					
FFB processed	375,867 ton				
Fiber production	555,444 ton				
Shell Production	29,201 ton				
KWH for turbine	5,510,314 Kwh				
Steam for turbine	137,758 ton				
Total Calorie Value of Fiber	137,620,092 kkal				
Total Calorie Value of Shell	5,322,103 kkal				
Used Energy	4,712 kkal/ton FFB				
<p>The use of collidated fuels (fiber and shell) has saved the use of fossil fuels with a total of 88% of the total fossil fuel needs.</p> <p>Based on the results of field visits, the company has utilized the fiber and shells used for boiler fuel.</p>					
<b>Status: Comply</b>					
<b>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.</b>					
<b>7.10.1 &amp; 7.10.2</b>					
<p>Until the ASA 1.3 audit activity, there were no additional new areas in the scope of certification, it is still the same as the previous audit activities. The company also has conducted GHG emission calculations period 2019 use of Calculator Palm GHG version 4.0. Accurate data has been put into the RSPO PalmGHG Calculator (Palm GHG version 4.0) and has been verified. Summary of net GHG emissions from PalmGHG calculator of the audit report which calculation option is applied "Apply full Version".</p>					
Summary of Net GHG Emissions					
<b>Emissions per product</b>	<b>tCO<sub>2</sub>e/tProduct</b>				
CPO	8.60				
PK	8.60				
<b>Production</b>	<b>t/yr</b>				
FFB processed	346,897.32				
CPO produced	63,939.70				
PK produced	17,717.40				
<b>Extraction</b>	<b>%</b>				
OER	18.43				
KER	5.11				
<b>Land use</b>	<b>Ha</b>				
Planted area on mineral	7,785.08				

Planted on peat	1869.51
Total area planted	9654.59
Conservation Area (Forested)	3.96
Conservation Area (Non-Forested)	67.00
FFB Production per hectare	37.98

**Summary of field emission and Sinks**

Description	Own crop		Group	3rd	Total	
	tCO <sub>2</sub> e	tCO <sub>2</sub> e/ tFFB				
<b>Emissions Sources</b>						
Land conversion	82787.94	9.73	-79666.55	-9.36	0	82943.9
CO <sub>2</sub> emissions from fertilizer	8351.1	0.98	-36.31	0	0	8360.81
NO <sub>2</sub> emissions from peat	13994.7	1.64	135655.5	15.94	0	13994.7
N <sub>2</sub> O from Fertilizer	5746.67	0.68	-79666.55	-9.36	0	5752.33
Fuel consumption	2402.69	0.28	-36.31	0	0	2409.35
Peat oxidation	102075.24	12	135655.5	15.94	0	102075
<b>Sinks</b>						
Crop sequestration	-79666.55	-9.36	-147.85	-0.13	0	-79814
Sequestration in Conservation area	-36.31	0	0	0	0	-36.31
<b>Total</b>	<b>135655.5</b>	<b>15.94</b>	<b>30.16</b>	<b>0.03</b>	<b>591667</b>	<b>727353</b>

**Summary Oil Mill Emissions and Credits**

Remarks	tCO <sub>2</sub> e	tCO <sub>2</sub> e/t FFB
<b>Emissions sources</b>		
POME	21,340.94	0.06
Fuel consumption	661.43	
Grid electricity	0	0
<b>Credits</b>		
Export of grid electricity	0	0
Sales of PKS	-47047.84	-0.14
Sales of EFB	0	0
<b>Total</b>	<b>-25045.47</b>	<b>-0.08</b>

**Palm Oil Mill Effluent (POME) Treatment**

Divert to compost (%)	0
Divert to anaerobic digestion (%)	100

**POME Divert to Anaerobic Digestion**

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

**7.10.3**

To reduce pollution and emission, the company has identified the emissions source and the management steps which are described in FRM-GRN-033. In addition, company also identified GHG sources included mitigation plan for reducing it. All waste including emissions and pollutions sources from Mill and estate are identified and recorded on waste and pollution identification 2019 document. Fossil fuel reducing have been implemented by fiber and shell usage. Realization of renewable energy have been monitored on monthly report for fiber and shell usage. Waste water has been monitored every

months and monitoring periods January-May 2020 sighted that all of waste water testing parameters is compliant to the standards quality. Meanwhile company also conduct regular air emission and air ambient testing, results of monitoring for semester 2 2019 shown all parameters regarding air quality also comply with relevant standards.

**Status: Comply**

**7.11**

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

**7.11.1**

PT AMP and PT PMJ demonstrated the Land Clearing Procedure Without Burning (Document No. PRO-EST-002, Revision 04) which was approved by Senior GEM, which took effect on October 1, 2013. Land clearing procedures were carried out, including:

1. Doing land clearing by not burning but by doing the work of seeding, felling trees and clearing the path of planting holes.
2. It is prohibited to clear land in HCV areas, watersheds or land where there is a slope of > 40% or 25° slope.

In addition, Wilmar International Ltd as the parent of the Indonesian Wilmar Group also has a 2010 environmental policy by the Plantation Head Group which explains that the company will implement zero burning in all plantation development and waste disposal activities.

Based on the results of field visits and documentary studies, the last replanting activity in the AMP-1 area was carried out in 2018. In 2019 and 2020 there were no replanting activities.

**7.11.2**

The company already has SOP for land and forest fires number SOP-GEN-015 revision 03 dated 9 September 2019. Procedures for prevention and control of land and forest fires include planning, prevention of land forest fires, overcoming forest and land fires, handling after fires, alert status, corporate punishment, occupational safety and health.

The fire control and prevention program has been included in the PT AMP Environmental Occupational Health and Safety program, for example, among others, light fire extinguisher monitoring, fire fighting equipment monitoring and fire simulation. In the RKL RPL report for semester 1 of 2020, the Company has carried out management and monitoring of prevention and control of land and forest fires, including the following:

- Manage and monitor the source of the impact of fire by providing fire alert trenches on plantation land
- Carry out disposal isolation of former bunches
- Natural water reservoir in each block of oil palm trees.
- Construction of water reservoirs as water reserves around the PT AMP Plantation housing / office location for fire fighting
- The establishment of a fire fighting squad equipped with the necessary equipment
- Provision of fire fighting equipment such as fire trucks, shovels and other equipment.
- Fire fighting training

In addition, the Company has a list of fire suppression equipment, for example an inventory of fire suppression equipment owned by AMP 1, including 3 units of water pumps, 120 meter hoses, 5 pcs of nozzles, 1 unit of extinguishing tank, etc.

When the fire suppression simulation was carried out by the AMP-1 extinguishing team, it was found that the team already had skills related to fire control from engine operation to extinguishing techniques.

PT AMP and PT PMJ has also shown a report on monitoring of land and forest fires for the first semester of 2020 which has been reported to the Agam District Forestry and Plantation Service.

In an effort to monitor and prevent land and forest fires, the company has carried out activities such as the following:

- Mapping of fire prone areas
- Preparation of bund off in peatlands which is made in each collection trench to maintain the condition of the peat soil surface water.
- Establishment of an early detection system by analyzing the ecological, social and economic conditions of a land / area and monitoring data
- Socialization related to the prevention of land and forest fires

- Supervision and monitoring.

Based on a study of the fire monitoring checklist document during the January-June 2020 period, it was found that no fires had occurred in the company's area.

**7.11.3**

The company engages the surrounding community with fire prevention and control activities through outreach and joint training. The company has conducted outreach related to emergency response to the community of Anak Aia Kasing Nagari Bawan on August 7, 2020 which was attended by 9 community representatives and known to the Head of Jorong Anak Aia Kasing Nagari Bawan

In addition, the Company has also collaborated with BPBD Agam Regency for socialization and fire emergency response simulation activities on November 26, 2019 to employees of PT AMP and PMJ as well as the community around the company which was attended by 80 people.

**Status: Comply**

**7.12**

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

**7.12.1 & 7.12.2**

The company has sent the Liability Disclosure and LUCA of PT AMP and PMJ to the RSPO and it was received on January 26, 2017.

The company has shown approval for PT AMP's Disclosure Liability and PT PMJ LUCA which has been reviewed by RSPO on August 16, 2017 with a statement of zero liability.

Until the ASA 1.3 audit activity, there were no new openings in the company's operational area (still the same as ASA 1.2). PT AMP, PT PMJ, and the cooperatives estates shown HCV assessment for the entire area of operations which done by the RSPO Approve Assessor on 2010. The process of HCV identification conducted by using HCV identification guides in Indonesia on June 2008.

These identifications indicates there is HCV 1.2, 1.3, 3, 4.2, 4.3 presence on PT AMP covered for 220.51 ha areas and 1.20 ha for TTK cooperatives and 2.51 ha for BST cooperatives. All of indicates HCV areas was mapped by 1:35000 scale and this HCV identifications covered all estates/mill operational areas including surrounding landscape and RTE species. Meanwhile there is HCV attributes or RTE species presence on PT PMJ. Based on the results of re-measurement in 2019, it was found that there was an increase in the area of the HCV area to 255.74, this was influenced by changes in river boundaries, especially in the River Delta area.

**7.12.3**

Indicator 7.12.3. until now not relevant to Indonesia, until a further decision by the RSPO.

**7.12.4**

Based on the results of HCV identification, it is known that there is an HCV area within the company's Manage area of 255.74 Ha with several types of RTE species consisting of *mammals*, *aves* and *reptiles*, the company can show plans to Manage HCV for 2020 such as:

- Monitoring of areas that have been designated as HCV areas on a regular basis every 1 month
- Outreach to all employees and the surrounding community
- Conducting a rapid survey on the inventory of flora and fauna
- Creating and repairing yellow lines and replacing damaged stakes around the river border
- Monitoring and maintenance of signboards in designated conservation areas
- Patrol riparian areas to avoid damage, spraying or illegal fishing, cutting down trees once a month.

- The enrichment of woody plants in the riparian area uses local species.

Examples of realization of HCV management and monitoring activities that have been carried out include:

- Planting of woody plants on the riverbank, during 2019 it was found out that 1050 plants had been planted, consisting of *Bayur, Mahogany, bamboo* and vetiver grass.
- The construction of an embankment along the river block 03 has been carried out to avoid erosion.
- Outreach has been carried out to the public or company employees, such as the socialization on June 9 to employees attended by 20 employees. As well as outreach to the community which was held on June 15, 2020 to the Nagari Aia Barat community which was attended by 19 participants.
- Rapid Survey of Flora and Fauna conducted in March 2019.

Regarding the joint review with the community for HCV management, the Company carried out through outreach activities carried out on 18 December 2019 for Wali Nagari Kinali, Head of Jorong IV Koto, Head of Jorong IV Koto Barat, Head of Jorong Wonosari, Kpala Jorong MAndiangin, Head of Youth throughout Jorong in around the Company, Company Employees, Company Contractors, BPBD West Pasaman Regency, community leaders and farmers around the Company totaling 54 people.

Based on interviews with management and employees, it was found that they had understanding related to the management of HCV areas and the protection of flora and fauna.

Based on a field visit in block 2 of the KUD Wira Masang area, the HCV area has been managed by installing a signboard and it is also seen that the riverbank area is filled with shrubs.

#### **7.12.5**

For every monitoring / patrol activity, the Team made an agreement with the community located on the riverbank, an official report of the agreement on the supervision and maintenance of protected areas and animal habitats in the PT AMP HCV area on April 14 2016 for residents of Muara Binguang Jorong IV Koto Nagari Kinali, West Pasaman Regency. The agreement includes:

- The parties agree and agree to mutually protect and care for the Protected Area forest located in the HCV area
- The parties agree and agree not to destroy, cut and / or burn forests in Protected Areas in HCV areas
- The parties agree and agree not to destroy and hunt animal habitats in the protected area of the HCV area

#### **7.12.6**

To protect the existence of RTE species, the company has a policy contained in the SOP for the protection of endangered species with no. document SOP-GEN-020 revision 03 dated 23 April 2015. The purpose of the SOP is to minimize threats to the life of endangered species throughout the company's HGU areas. The procedure also explains that it is not permissible to capture, maintain or kill any animals protected by state regulations or those that are not protected without company permission. Besides that, it is not allowed to trade in these animals.

RTE animal protection is included in the management program planned by the company, including rapid surveys, periodic patrols, enrichment of river border areas which aim to continue to preserve the existence of RTE animals. In addition, the company regularly communicates the existence of HCV or RTE species protection policies to communities and employees. The last socialization was carried out to the public or company employees such as the socialization on June 9 to employees which was attended by 20 employees. As well as outreach to the community which was held on June 15, 2020 to the Nagari Aia Barat community which was attended by 19 participants.

Based on interviews with management and employees, it was found that they had understanding related to the management of HCV areas and the protection of flora and fauna.

#### **7.12.7**

The company has implemented the 2019 HCV management and monitoring as planned, this is shown by evidence, for example:

- Planting woody plants that are carried out on river riparian, during 2019 it was known that 1050 plantations had been planted, consisting of *Bayur, Mahogany, bamboo* and vetiver grass types.



- Construction of an earthen embankment along the river block 03 has been carried out with the aim of avoiding erosion.
- Socialization has been carried out to the public or company employees such as the socialization on June 9 to employees attended by 20 employees. As well as socialization to the community which was held on June 15, 2020 to the Nagari Salareh Aia Barat community which was attended by 19 participants.
- Rapid Suvey Flora and Fauna conducted in March 2019.

Based on the results of HCV management and monitoring in 2019, the Company has conducted a review as an evaluation for planning improvements, for example a recommendation to increase the HCV area in AMP 1 covering an area of 0.87 Ha.

The results of monitoring during the period 2019 and 2020 for the plantation areas of PT AMP and the Cooperative obtained the following conclusions:

- The 2019 and 2020 HCV management will proceed according to the 2019 management plan
- The HCV attributes installed in the plantation area are well maintained
- Protected species can still be found according to HCV identification
- Direct outreach activities for HCVs have been carried out to employees and the community
- River border rehabilitation activities have been carried out by planting woody plants.

The company has carried out the management and monitoring of HCV in 2019 and 2020 in accordance with the established management plan.

**7.12.8**

The Certificate Holder (PT AMP, PT PMJ) has performed the HCV identification on 2010 by RSPO Approved HCV Assessor. Management unit has shown confirmation from RSPO on August 16th 2017 related status of the Certificate Holder liability. Explanation from RSPO Secretariat that PT. AMP and PT PMJ has submit Disclosure of Liability on 26 January 2017 with status of Zero Liability. and has been approved from RSPO with zero liability status on 16 August 2017.

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

<b>1.</b>	<b>Evidence of permission or approval certificate and trademark from Certification Body which submitted by Client</b>	<b>X or√</b>
	There is no logo use	√
	<b>Status: Comply</b>	
<b>2.</b>	<b>Implementation of certificate and trademark used by Client comply with size and type (shape) against Guideline of Logo Use</b>	<b>X or√</b>
	There is no logo use	√
	<b>Status: Comply</b>	
<b>3.</b>	<b>Implementation of Certificate and Trademark is not used on product</b>	<b>X or√</b>
	There is no logo use	√
	<b>Status: Comply</b>	
<b>4.</b>	<b>Controlling of Certificate and Trademark, including withdrawing inappropriate logo.</b>	<b>X or√</b>
	There is no logo use	√
	<b>Status: Comply</b>	

**3.3 Summary of RSPO Partial Certification.**

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

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

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

MUTU Auditor has verified company partial certification and concludes that:

- There are no significant land conflicts which have not been declared above.
- The company has follow 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.

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
2.1.1	Did the company conduct an internal audit? If so, has a positive assurance statement been produced?	<p>Yes, and positive assurance is produced for these units.</p> <p><b>Auditor verification</b> Internal audit conducted on 17 &amp; 24 January 2020 for:</p> <ul style="list-style-type: none"> <li>- PT Agronusa Investama Pahauman</li> <li>- PT Agro Palindo Sakti 2</li> <li>- PT Musi Banyuasin Indah</li> <li>- PT Sinarsiak Dianpermai</li> <li>- PT Agroindo Indah Perkasa 2</li> <li>- PT Buluh Cawang Plantation</li> </ul> <p>There is some non-conformance find in internal audit and the company has produced the positive assurance for these units. Auditor conducted issue identification on internet. Based on verification, all issue in internet of uncertified unit has been covered in internal audit.</p>
2.1.2	No replacement of primary forest or any area identified as containing High Conservation Values (HCVs) or required to maintain or enhance HCVs in accordance with RSPO criterion 7.3 (it has changed be Criterion 7.12 in P&C 2018)	<p>Uncertified management units has conducted HCV assessment such as :</p> <ul style="list-style-type: none"> <li>• PT Sarana Titian Permata in June 2008,</li> <li>• 4 unit scheme smallholders under PT Kerry Sawit Indonesia in year 2008,</li> <li>• PT Agronusa Investama - Sambas and their scheme smallholders in year 2011,</li> <li>• PT Agronusa Investama - Landak/Pahauman in year 2011 (re-assessment in year 2014),</li> </ul>

	<ul style="list-style-type: none"> <li>• PT Buluh Cawang Plantation-West Kalimantan in year 2016,</li> <li>• PT Agro Palindo Sakti 2 in July 2009,</li> <li>• PT Indoresin Putra Mandiri in March 2009,</li> <li>• PT Daya Landak Plantation in July 2009,</li> <li>• PT Putra Indotropical in November 2008,</li> <li>• PT Putra Procentindo in December 2008,</li> <li>• PT Permata Hijau Plantation (block 22) in year 2012,</li> <li>• PT Kencana Sawit Indonesia in year 2010,</li> <li>• PT Murini Samsam in year 2014,</li> <li>• PT Musi Banyuasin Indah in year 2013,</li> <li>• PT Sinarsiak Dianpermai in year 2014,</li> <li>• PT Agro Indah Persada in year 2011 and</li> <li>• Biase Plantation Limited in year 2011 &amp; September 2014 (Calaro extension)</li> </ul> <p>Some management units has carried out land clearing activities since November 2005 without preceded by HCV identification/assessment. Based on RaCP tracker (per <b>November 2019</b>) in RSPO website and the result of correspondence with RSPO compensation panel that the management units under Wilmar International Limited have :</p> <ul style="list-style-type: none"> <li>• 24 management units with potential liability consist of 11 uncertified management units (2 uncertified management units still processing recertificatio) and 13 certified management units</li> <li>• RSPO member has submitted LUCA amount of 24 Management Units</li> <li>• LUCA of 20 management units has passed and 4 management units has reviewed and requiring clarification from RSPO member.</li> <li>• The 11 of 20 Management Units need/required Concept Note (CN). There are the 3 additional Management Units need Concept Note if compared with information of RaCP tracker per January 2019 (8 Management Units need Concept Note (3 uncertified management unit and 5 certified management unit)). Auditor has carried out clarification to the RSPO members and the RSPO secretariat. RSPO member do not know the name of the 3 additional management units because LUCA has been reviewed by RSPO but it is yet incomplete. Whereas, the result of clarification with the RSPO Secretariat that the compensation team is still updating the database so that the addition can occur due to duplicate. RSPO Secretariat will be informing to auditor again after updating finish.</li> <li>• 1 Management Units has submitted Concept Note (CN). Based on information from RSPO member that they has submitted Concept Note amount of 2 Management Units but the last of submit is January 2020 so that it not covered on RaCP tracker per November 2019.</li> </ul>
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	<p>Following up one of resolution from 35<sup>th</sup> BHCVWG meeting year 2017 are pushing certified management unit to submit annex 7 &amp; 8 (compensation concept note &amp; compensation plan) to RSPO compensation panel in annual surveillance audit by each certification body according time frame which has decided in meeting. The progress of the concept note approval can be saw in indicator of 7.12</p> <p>Information of LUCA for some uncertified management units as follow as :</p> <ol style="list-style-type: none"> <li>1. PT Agronusa Investama (Landak/Pahauman) : LUCA and disclosure of non-compliant land clearing was available and it has submit to RSPO secretariat year 2015 and LUCA has passed with the result of liability assessment is presence liability (per 27 February 2017 and total of liability areas is 53.50 ha). The concept note has developing by internal team so it has not been submitted to RSPO secretariat.</li> <li>2. PT Buluh Cawang Plantation in West Kalimantan : LUCA and disclosure of non-compliant land clearing was available and it has submit to RSPO secretariat year 2015 and LUCA has passed with the result of liability assessment is presence liability (per 13 March 2017 and total of liability areas is 46.62 ha). The concept note has been developing by internal team so that it has not been submitted to RSPO secretariat.</li> <li>3. PT Agro Palindo Sakti 2 : LUCA and disclosure of non-compliant land clearing was available and it has submit to RSPO secretariat year 2016 and LUCA has passed with the result of liability assessment is zero conservation liability.</li> <li>4. PT Indonesia Putra Mandiri &amp; PT Daya Landak Plantation : LUCA and disclosure of non-compliant land clearing was available and it has submit to RSPO secretariat year 2015 and LUCA has passed with the result of liability assessment is zero conservation liability.</li> <li>5. PT Putra Indotropical &amp; PT Pratama Procentindo : LUCA and disclosure of non-compliant land clearing was available and it has submit to RSPO secretariat year 2015 and LUCA has passed (date on 13 March 2017) with the result of liability assessment is zero conservation liability.</li> <li>6. PT Sarana Titian Permata : LUCA and disclosure of non-compliant land clearing was available and LUCA has passed with the result of liability assessment is zero conservation liability.</li> <li>7. Based on the result of communication with RSPO that LUCA on behalf remaining uncertified management units has submitted and passed with the result of liability assessment is zero liability (2 uncertified management units) so not concept note required and presence liability (1 uncertified management unit) so concept note required. It has submitted concept note before November 2019.</li> </ol>
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		<p>8. PT Musi Banyuasin Indah, PT Sinarsiak Dianpermai, PT Murini Samsam (466 ha) &amp; PT Permata Hijau Plantation (block 22) : There are no planting after 1 November 2005 so RaCP status is not applicable.</p> <p><b>Auditor verification</b> Auditor has verified the supporting evidence of above the company statement. The above statement in accordance with the supporting evidence provided.</p>
<p>2.1.3</p>	<p>Any new plantings since January 1<sup>st</sup> 2010 must comply with the RSPO New Plantings Procedure.</p>	<p>There are some newly developed plantation areas under Wilmar International and have undergone the New Planting Procedure (NPP). It has announced on RSPO website during 30 days with complete status such as in Jambi Province (PT Agrindo Indah Persada 2) &amp; West Kalimantan Province (PT Agro Nusa Investama (Sambas)) - Indonesia and Nigeria (Biase Plantation Limited &amp; Biase Plantation Limited (Calaro extension).</p> <p><b>Auditor verification</b> Auditor has verified the supporting evidence of above the company statement. The above statement in accordance with the supporting evidence provided.</p>
<p>2.1.4</p>	<p>Land conflicts, if any, are being resolved through a mutually agreed process, such as the RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO criteria 2.2, 6.4, 7.5 and 7.6 (it has changed be Criterion 4.8, 4.7 and 4.5 in P&amp;C 2018).</p>	<p>Uncertified management unit have technical procedure/guidance for land acquisition (SOP 001/WIP-KB/(0)/0610) and procedure of calculation &amp; compensation payments (SOP 01/WIP-KB/(1)/1215). The records and documents of land compensation was available such as list of recapitulation of land compensation/acquisition, minute of measurement and their maps, profile/identity of land ownership and minute of agreement/negotiation between company and land ownership regarding handover/release of land. Based on self assessment report that some uncertified management units (PT Daya Landak Plantation, PT Agronusa Investama – Pahuman, PT Putra Indotropical, PT Pratama Prosentindo, PT Agrindo Indah Persada 2 &amp; PT Sarana Titian Permata – POM 2) has carried out some activities in order land acquisition process such as socialization to stakeholder and land owner, verification of land owner identity, measuring land/area in field together land owner, negotiating and agreeing on the price of land compensation and their plants, paying land compensation appropriate with the result of agreeing together.</p> <p>Community who lose access and land right for plantation areas has given the opportunity to benefit (direct and indirect) from plantation development as sample in form of scheme smallholder areas, as employee, as contractor (transportation, supplier for daily food, etc), as FFB supplier, using infrastructure/road as access from village to town or vice versa, as trader while employee has got wage, etc.</p> <p>Refer to case tracker or status of complaints under Wilmar International Limited period of February 2011 to conducting audit that the object of complaint has dominated by certified management unit and the majority of cases has closed.</p>



		<p>There are 2 case of complaints still in investigation process (PT Permata Hijau Pasaman and PT AMP Plantation). Further details on this case are available here: <a href="http://www.rspo.org/members/complaints/status-of-complaints/view/26">http://www.rspo.org/members/complaints/status-of-complaints/view/26</a></p> <p>Based on self assessment that no land conflict in the location of uncertified management units</p> <p><b>Auditor verification</b> There is no information from public source and RSPO website on any land conflict for uncertified unit of the group subsidiaries.</p> <p>Based on the company record there is documentation on land compensation recapitulation updated on 1 October 2007, participatory mapping, agreement letter on compensation between company and land owner, land owner identity and procedure on compensation technical guidance SOP 001/WIP-KB/(0)/0610 dated June 2010.</p> <p><b>Auditor verification at ASA-1.1 PT DLI (4 August 2020)</b> There is information from social media regarding the land grabbing case at Biase Plantation Limited (<a href="https://ejatlas.org/conflict/wilmar-and-land-grab-in-cross-river-state">https://ejatlas.org/conflict/wilmar-and-land-grab-in-cross-river-state</a>), but the case has already been submitted to the RSPO complaint on 10 November 2012 and has been declared closed. (<a href="https://askrspo.force.com/Complaint/s/case/50090000028Es0LAAS/">https://askrspo.force.com/Complaint/s/case/50090000028Es0LAAS/</a>)</p>
2.1.5	<p>Labour disputes, if any, are being resolved through a mutually agreed process, in accordance with RSPO criterion 6.3 (it has changed be Criterion 4.2 in P&amp;C 2018).</p>	<p>There is a grievance and compliant form/procedure used by the company to collect and collate all complaints from communities and employee as sample in Indonesian is SOP 004/WIP-KB/(0)/0610, SOP 003/WIP-KB/(1)/0911, PRO-PGA-001 and Whistleblowing Policy (effective date on 5 August 2015). Procedure of grievance &amp; complaint from employee has not been dissemination to employee in PT ANI-Pahaman, Cooperative of Tuah Jubata (scheme smallholder), PT Daya Landak Plantation, PT Indoresins Putra Mandiri &amp; PT Putra Indotropical. It will be doing by auditee based on correction action plan.</p> <p>Based on self-assessment that uncertified management units has provided documentation of both the process which a dispute was resolved and the outcome and log book about handling grievance &amp; complaint from internal (employee) &amp; external. Based on log book that there are grievance &amp; complaint from employee but there is no identified labor disputes ongoing at subsidiary companies of Wilmar International Limited..</p> <p><b>Auditor verification</b></p>

		<p>There is no information from public source and RSPO website on any labour conflict for uncertified unit of the group subsidiaries.</p> <p>The company has mechanism to handle employee complaint and grievance that is stated in SOP 005/WIP-KB/(0)/0610 for communication and consultation with community and SOP 004/WIP-KB/(0)/ 0610 on complaint and grivance mechanism and solving any dispute out off court.</p> <p>There is no list of employee and stakeholder complaint and grievance.</p> <p><b>Auditor verification at ASA-1.1 PT DLI (4 August 2020)</b>          There is information from social media related to labor cases, namely regarding layoffs at PT Putra Indotropical Estate (<a href="https://www.suarakalbar.co.id/2020/02/karyawan-pt-pi-di-landak-unjuk-rasa.html">https://www.suarakalbar.co.id/2020/02/karyawan-pt-pi-di-landak-unjuk-rasa.html</a>) and at PT Agro Indah Persada (<a href="http://gerbangbengkulu.com/rekannya-dipecat-karyawan-pt-aip-seluma-gelar-aksi-mogok-kerja/">http://gerbangbengkulu.com/rekannya-dipecat-karyawan-pt-aip-seluma-gelar-aksi-mogok-kerja/</a> ).</p> <p>Based on the results of auditor verification during ASA-1.1 activities at PT DLI, it was known that PT Putra Indotropical Estate carried out an employee reduction program and had been implemented in accordance with the provisions of the labor law. This has also been recognized by the Manpower Agency of Landak Regency and Commission B of the Regional People's Representative Assembly (<i>Dewan Perwakilan Rakyat Daerah</i>) of Landak Regency and they can accept the reasons from the company. The latest information from the 20 employees who were laid off, 17 employees have accepted the decision and 3 employees still reject it.</p> <p>As for the case of layoffs at PT Agro Indah Persada in Lubuk Sandi Subdistrict, Seluma Regency, Bengkulu Province, the company explained that the unit was not included in the timebound plan, because the unit included in the timebound plan was PT Agro Indah Persada located in Bangko, Jambi. It was explained that PT Agro Indah Persada, which is located in Seluma Regency, is only a factory that receives FFB from outside suppliers and does not have its own plantation.</p>
2.1.6	<p>Legal non-compliance, if any, is being addressed through measures consistent with the requirements of RSPO P&amp;C criterion 2.1 (it has changed be Criterion 4.2 in P&amp;C 2018).</p>	<p>Uncertified management units have the list of laws &amp; regulations or law register relate of plantation, environment, man power and OSH issue. The result of evaluation law and regulation with implementation by company.</p> <p>The evidence of compliance to laws and regulations such as land use right or land title (except uncertified management units as below), location permit for the location of uncertified management units in Indonesia, environment document has approved by local government (especially in Indonesia),</p>

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

3.4.1. Identification of Findings, Corrective Actions and Observations at ASA 1.2 Certification Assessment

NCR No.	: 2019. 01	Issued by	: M. Amarullah
Date Issued	: 11 May 2019	Time Limit	: 10 August 2019
NC Grade	: Major	Date of Closing	: 09 August 2019
Standard Ref. & Requirement	<p>4.7.3  <b>Records of Occupational Health and Safety (OHS) program (see 4.8) and Personal Protective Equipment (PPE) training in accordance with the result of hazard identification and risk analysis shall be available to all workers.</b></p>		
<p><b>Evidence observed (filled by auditor):</b></p> <ul style="list-style-type: none"> <li>Based on observation to Clarification Station of APM POM, it was found that 2 internship workers were not equipped with earplug as required by Form No. FRM-EHS-009 dated 01 October 2011.</li> <li>The company has hazard identification risk analysis and control for all operational activities in the estate and mill, as well as its risk mitigation. However, based on field observation, it was noted several non conformity as follows: <ul style="list-style-type: none"> <li>As observed on manual field upkeep in Block 3A/B TTK Cooperative and Block 1B BST Cooperative, it was found that the workers were not wearing PPE Gloves.</li> <li>As observed on Weigh Bridge Station and Grading Station in AMP POM, it was found that driver and loading worker of FFB Supplier from <i>Pemuda Tuah Sakato</i> Organization were not wearing PPE Safety Boot.</li> </ul> </li> <li>Based on TTK Estate musterchit dated 08 May 2019 review, it was known that there is no agrochemical application activities in TTK Cooperative. However, based on observation to PPE Store of agrochemical applicators in AMP 1 Estate, the respective PPE were not available on the provided Store.</li> </ul>			
<p><b>Non-Conformance Description (filled by auditor):</b></p> <ul style="list-style-type: none"> <li>The company is not be able to ensure that all workers (included internship) has equipped with proper and complete PPE as required by HIRAC and Form No. FRM-EHS-009 dated 01 October 2011.</li> <li>The company is not be able to ensure that all PPE has been managed properly as arranged in procedure No. SOP-GEN-017 (Rev. 01) dated 01 October 2013 Point 6.1.1.1 and procedure No. SOP-EST-002 dated 25 April 2017 Point 5.4.3.</li> </ul>			
<p><b>Root Cause Analysis (filled by organization audited):</b></p> <ol style="list-style-type: none"> <li>Lack of control from the respective PIC towards company standard PPE usage (esp. on earplug) for internship workers.</li> <li>Regarding with PPE usage: <ol style="list-style-type: none"> <li>Lack of control from the respective PIC towards PPE usage (gloves) for upkeep workers in Smallholder Cooperative of TTK and BST.</li> <li>Safety requirement of foot protection for FFB-supplier driver and FFB loading worker from <i>Pemuda Tuah Sakato</i> Organization are not fixed yet.</li> </ol> </li> <li>Lack of control from the respective PIC towards monitoring of PPE and work equipment devices usage, as well as its storage management, especially for pesticide applicators from Smallholder Cooperative of TTK in AMP1 Storage.</li> </ol>			
<p><b>Correction (filled by organization audited):</b></p> <ol style="list-style-type: none"> <li>To conduct socialization towards PPE and its delivery to internship workers in AMP POM.</li> <li>Regarding PPE usage: <ol style="list-style-type: none"> <li>To conduct socialization towards PPE (especially gloves), as well as its delivery to upkeep workers from Smallholder Cooperatove from TTK and BST.</li> <li>To conduct socialization, to establish and make compulsory statement of PPE shoes usage for driverand FFB loading workers in AMP POM.</li> </ol> </li> </ol>			

3. To conduct socialization about pesticide application devices storage, as well as PPE storage management to Smallholder Cooperative of TTK in APM1 Storage facility.
4. Revision on PPE provisions/supply, included PIC and frequency of PPE usage monitoring in working area.

**Corrective Action** (filled by organization audited):

- To conduct monitoring on PPE usage to workers and visitors in POM unit.
- To conduct monitoring on PPE usage for Smallholder Cooperative workers, especially for TTK and BST.
- To conduct monitoring on working shoes usage for FFB supplier drivers and FFB loading workers in AMP POM.
- To conduct monitoring on pesticide applicator devices storage, as well as its PPE storage management for Smallholder Cooperative workers from TTK in AMP1 Storage facility.
- PIC of the above monitoring is carried out by POU AMP1, Mill Manager, Smallholder Cooperative (Plasma) Manager, EHS and FC Plasma.

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

**Verification dated 22 July 2019**

The company shows several correction evidence, as follows:

- Document No. PRO-GEN-020 (Rev. 01) dated 29 May 2019 about Personal Protective Equipment (PPE) provisions and supply. There is additional item which presented in Point 6.2, about arrangement of PPE distribution, PIC of PPE usage monitoring or inspection in working area, frequency of monitoring and follow-up of monitoring when non-compliance found during inspection.
- Document of PPE Matrix for POM No. FRM-EHS-009 (Rev. 00) dated 01 October 2011 which mentioned that PPE for foot protection purposes for driver and FFB loading workers was rubber boot or just working shoes. Picture documentation of PPE monitoring for those particular workers dated 03 July 2019 were available.
- Document Form No. FRM-EHS-095 (Rev. 00) about PPE condition monitoring and its implementation. The form has informed month of inspection, working unit, division/phase, PIC, list of checked workers, PPE compliance list checking, information of PPE condition and additional information, such as not wears and/or not brings PPE, etc. This monitoring form is signed by PIC, EHS and Unit Head. The company shows monitoring form for the 2<sup>nd</sup> and 4<sup>th</sup> week of June and July 2019 of PPE compliance for 7 internship workers in Maintenance Division. All PPE delivered were reported complete and in good condition.
- Document Form No. FRM-EHS-059 (Rev. 00) about PPE condition monitoring and its implementation. The form has informed month of inspection, working unit, division/phase, PIC, list of checked workers, PPE compliance list checking, information of PPE condition and additional information, such as not wears and/or not brings PPE, etc. This monitoring form is signed by PIC, EHS, Supervisor and Unit Head. The company shows monitoring form for the 2<sup>nd</sup> and 4<sup>th</sup> week of May, June and July 2019 of 20 workers from TTK Plasma, 11 workers from BST Plasma and 19 FFB loading workers. All PPE delivered were reported complete and in good condition.
- Delivery of PPE Gloves for 31 upkeep workers from TTK Plasma which presented in document Form No. FRM-GEN-033 (Rev. 00) dated 13 May 2019. The form is signed by Unit Head, Phase head and Staff Incharge.
- Minutes of meeting which presented in document Form No. FRM-GEN-016 (Rev. 00) about socialization to workers about understanding of RSPO and PPE usage and monitoring that conducted at PLS IV Bawan in 13 May 2019, attended by 30 workers.
- Minutes of meeting which presented in document Form No. FRM-GEN-016 (Rev. 00) about socialization to workers about understanding of RSPO and PPE usage and monitoring that conducted at Muster Ground Plasma 1 TTK in 13 May 2019, attended by 53 workers.
- Minutes of meeting which presented in document Form No. FRM-GEN-016 (Rev. 00) about socialization to workers about understanding of RSPO and PPE usage and monitoring that conducted at AMP POM Meeting Room at 14 May 2019, attended by all internship workers.
- Minutes of meeting which presented in document Form No. FRM-GEN-016 (Rev. 00) about socialization to workers about understanding of RSPO and PPE usage and monitoring that conducted at AMP POM Gate in 15 May 2019, attended by all drivers and FFB loading workers.
- Form No. FRM-GEN-033 (Rev. 03) about earplug delivery to 7 internship workers in AMP POM.
- Picture documentation about Divices and PPE storage for pesticide applicators from TTK Plasma.

**Auditor conclusion:**



Description of root of cause and corrective action, as well as several correction evidence given are considered acceptable. However, please explain several auditor questions which marked on yellow highlight. Thus, NCR No. 2019.1 is still remain **open** until satisfactory auditee respons has achieve.

**Verification dated 09 August 2019**

The company shows revision of document No. FRM-EHS-009 (Rev. 00) dated 01 October 2011 to become dated 15 May 2019. Regarding HIRAC, the company give explanation as follows:

- There is no change of PPE for foot protection for FFB driver supplier and FFB loading workers from Tuah Sakato Organization, which required only working/rubber shoes.
- Matrix of PPE No. FRM-EHS-009 is exclusively used for workers, not third parties or sullivan.
- The company shows matrix revision of PPE No. FRM-EHS-009 which differentiate from PPE matrix for internal workers.
- Monitoring of PPE usage for driver and FFB loading workers.

Based on explanation above, NCR No. 2019.1 is considered **closed**.

**Verified by** : **Mohamad Amarullah**

<b>NCR No.</b>	: 2019.02	<b>Issued by</b>	: Andi Pratama Pasaribu
<b>Date Issued</b>	: 11 May 2019	<b>Time Limit</b>	: ASA 1.3
<b>NC Grade</b>	: Minor	<b>Date of Closing</b>	: 09 August 2019
<b>Standard Ref. &amp; Requirement</b>	: 4.7.6 All workers shall be provided with medical care, and covered by accident insurance (see criterion 6.5.3).		
<b>Evidence observed</b> (filled by auditor): Based on the results of a document review, it is known that the company has shown evidence that contractor workers at PT AMP Plantations have been protected under the BPJS Employment program. However, it cannot be shown that contractor workers at PT PMJ have been protected under the BPJS Employment program.			
<b>Non-Conformance Description</b> (filled by auditor): The company has not been able to prove that all contractors have been protected by work accident insurance.			
<b>Root Cause Analysis</b> (filled by organization audited): <ul style="list-style-type: none"> <li>• There is no effective control to ensure “BPJS Ketenagakerjaan” is registered and paid by the contractor for its workforce.</li> </ul>			
<b>Correction</b> (filled by organization audited): <ul style="list-style-type: none"> <li>• Registering and paying “BPJS Ketenagakerjaan” for ongoing projects handled by the same contractor and “BPJS Ketenagakerjaan” payments for projects being undertaken by other ongoing contractors.</li> <li>• Request a list of members and proof of payment of the “BPJS Ketenagakerjaan” to the contractor before the company makes work payments.</li> </ul>			
<b>Corrective Action</b> (filled by organization audited): <ul style="list-style-type: none"> <li>• Make the first payment to the contractor now for the first month of project work by requesting proof of registration and paying “BPJS Ketenagakerjaan” as one of the conditions and attaching proof of payment of membership contributions to the contractor workers to “BPJS Ketenagakerjaan” when payment of the work of the contractor</li> <li>• Control the selection of contractors in accordance with established requirements</li> </ul>			

- Establish PIC to control “BPJS Ketenagakerjaan” registration from the Contractor is the Head of Operating Unit (POU) of PT PMJ

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

**Verification July 23, 2019**

The company has sent evidence of improvement in accordance with the root cause, the corrective and corrective actions given, namely:

- Cooperation Agreement Letter between PT PMJ and KUD Damai Sejahtera for TBS transportation activities.
- Proof of payment of the “BPJS Ketenagakerjaan” for the period June 2019 on June 24, 2019 for KUD Damai Sejahtera workers
- List of KUD Damai Sejahtera Workers along with their “BPJS Ketenagakerjaan” Card
- Proof of Payment of “BPJS Ketenagakerjaan” for the period June 2019 on June 15, 2019 for CV Cahaya Asia Negeri workers
- List of workers for CV Cahaya Asia Negeri along with their “BPJS Ketenagakerjaan” Card

Based on the evidence of the above improvements, there is still some information needed by the auditor team in relation to the corrective actions provided. Based on this, the non-conformity No. 2019.02 declared Unfulfilled.

**Verification on August 9, 2019**

The company has responded to requests for information needed by the auditor along with sending evidence of corrections, including:

- The control mechanism for fulfilling “BPJS Ketenagakerjaan” registration obligations for contractor workers through the addition and revision of work agreements to the “BPJS Ketenagakerjaan” compliance article.
- Evidence of a revision of the work agreement with the contractors as the application of the control mechanism that is owned.
- Monitoring list of local contractors along with proof of registration for the “BPJS Ketenagakerjaan” program

Based on the evidence of improvement and information that has been given, **the non-conformity No. 2019.02 has comply and will be observed in the next assessment.**

**Verified by** : **Andi Pratama Pasaribu**

<b>NCR No.</b>	: <b>2019.03</b>	<b>Issued by</b>	: <b>Andi Pratama Pasaribu</b>
<b>Date Issued</b>	: <b>11 May 2019</b>	<b>Time Limit</b>	: <b>10 August 2019</b>
<b>NC Grade</b>	: <b>Major</b>	<b>Date of Closing</b>	: <b>09 August 2019</b>
<b>Standard Ref. &amp; Requirement</b>	: <b>6.5.2 Collective Labor Agreement/Company Regulation, in accordance with the manpower regulations, shall be available in understandable language; and explained by the management or Labor Union to the workers.</b>		
<b>Evidence observed</b> (filled by auditor):			
There are several facts found by the auditor team during the audit as follows:			
<ul style="list-style-type: none"> <li>• Results of public consultations with the Office of PTSP (One-Stop Integrated Service) and Employment of Agam Regency, Pasaman Barat District Manpower Office and Regional Worker Supervisor II of the West Sumatra Province Manpower and Transmigration Office, found that there were reports of overtime payments that were not in accordance with regulations / legislation at PT AMP Plantation.</li> <li>• Based on a review of the security pick-up schedule documents in March and April 2019 in AMP I, AMP II, AMP III, and PT PMJ it is known that short days in one week are Saturday (working only 5 hours), picket security is 3</li> </ul>			

shifts (7 working hours and 1 hour break). Security who work on Saturdays only get 1 mandays salary and do not get 2 hours overtime.

**Non-Conformance Description** (filled by auditor):

The company has not been able to show evidence that all workers who work outside working hours (overtime) have received overtime wages in accordance with Decree of Manpower Minister No. 102/2004 about overtime work and wages for overtime.

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

- The absence of equality of perception of the information submitted by the Regional Office Chairman to the Operating unit regarding the shortest working hours (Saturday) for security working hours that work for 5 hours so there is an excess of 2 hours of work not yet paid according to applicable regulations.

**Correction** (filled by organization audited):

- The company will pay the shortage of security employee overtime wages on the shortest working day (Saturday) of 2 working hours in accordance with Decree of Manpower Ministry No. 102 of 2004 concerning overtime work and overtime wages.
- The company will also set the correct calculation for overtime payments the following month in accordance with applicable regulations.
- Disseminating information to security workers related to the lack of overtime payments made in the previous months and will apply overtime payments in accordance with the legislation for the following month.

**Corrective Action** (filled by organization audited):

- Make a circular letter to the Operation Head unit regarding security working hours from Monday-Sunday
- To socialize to the PIC (POU & HRD) of each Operating Unit related to the shortest working hours (Saturday) for security workers.

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

**Verification July 23, 2019**

The company has determined the root cause, corrective and corrective actions to be taken, but the company has not provided evidence of improvement in accordance with this matter. In addition, there is still some information needed by the auditor team regarding the determination of corrective and corrective actions given. Based on this, the non-conformity No. 2019.03 declared Not Yet Fulfilled.

**Verification on August 9, 2019**

The company has responded to requests for information needed by the auditor along with sending evidence of corrections, including:

- Socialization of lack of overtime payments to security
- Socialization of overtime calculations in accordance with government regulations to the PIC of each unit
- Calculation of overtime payments for all security workers in June 2019 according to regulations
- Proof of payment of wages and overtime in June 2019 to security workers

Based on the evidence of improvement and information that has been given, **the non-conformity No. 2019.03 is declared to have been fulfilled and will be re-observed at the time of the next assessment.**

**Verified by** : **Andi Pratama Pasaribu**

**3.4.2. Identification of Findings, Corrective Actions and Observations at Remote Audit ASA 1.3**

*There is no Non-conformity on Remote Audit of ASA 1.3*

**3.4.3. Identification of Findings, Corrective Actions and Observations at Onsite Audit ASA 1.3**

*There is no Non-conformity on On-site Audit of ASA 1.3*

**3.4.4. Opportunity for Improvement at Onsite Audit**

No	Ref. Std.	Description
1	2.3.2	The company has carried out an inventory and identification related to geolocation information, land ownership status and business permits for FFB sources from third parties. However, not all data on the legality of each source from these third parties have been identified. This is an opportunity for improvement for the company regarding the follow-up of the identification / inventory process until November 15, 2021 in accordance with the requirements for indicator 2.3.2.
2	3.4.2	<p>KUD Agro Wira Masang and KUD Mutiara Sawit Jaya have the following social and environmental impact assessment documents:</p> <ul style="list-style-type: none"> <li>- The 2011 PT AMP Plantation Social Impact Assessment document prepared by a third party with the scope of the AMP 1 Estate, AMP 2 Estate and AMP 3 Estate studies. In 2014, through evaluation and public consultation, the scope for PT AMP's plasma was expanded, consisting of Plasma Tompek Tapian Kandis, Plasma Bukit Sanding Tigo, Plasma Mutiara Sawit Jaya, and Plasma Agro Wira Masang.</li> <li>- The HCV Assessment Document prepared by a participatory third party through participatory mapping and public consultation which was conducted on April 29, 2010.</li> <li>- UKL UPL document prepared by a third party in 2014 for the Wira Masang Agro Plantation Cooperative covering an area of 810 hectares and the Mutiara Sawit Jaya Plantation Cooperative covering an area of 310 ha.</li> </ul> <p>All environmental and social impacts arising from plasma activities have been identified in the three documents. So that fundamentally the requirements in indicator 3.4.2 have been met.</p> <p>However, the UKL-UPL has not received approval from the Regional Government. The company has shown documentation of ratification since 2015, but is constrained by the fulfillment of the requirements for approval from the cooperative. In this regard, the company has the opportunity for improvement related to the ratification and issuance of UKL-UPL documents from the Regional Government, referring to Government Regulation No. 27 of 2012 concerning Environmental Permits.</p>
3	3.4.3	The company has evaluated the Social Management and Monitoring Plan (RKS / RPS) for the 2017-2019 period from 2019 to October 2020 and until now the process is still ongoing (constrained due to the COVID-19 Pandemic). This resulted in the participatory study of the Social Management and Monitoring Plan (RKS / RPS) for the period 2020-2022 being hampered and not

		<p>yet fully endorsed by the certification unit. So that there are still parties who have not been included in the study or identification of new social impacts that have emerged.</p> <p>The company has opportunities for improvement related to the completion of the evaluation of the previous study period and the follow-up study of the Social Management and Monitoring Plan (RKS / RPS) for the 2020-2022 period as a whole so that all social impacts can be identified, monitored and managed properly.</p>
4	3.8.5	Improvement opportunities for reviewing references in the Supply Chain procedure.
5	7.7.6	The company has a timebound plan to realize the program that stated on Fulfillment Piezometer & Subsidence Program. Based on the timeline, it is known that the fulfillment plan is carried out until March 2021 with details of the installation, namely 2 subsidence pole and 12 piezometers. The company has the opportunity to ensure that the number of subsidence stake and piezometer installations is in accordance with the plan and the 2018 RSPO Guidance for Peat.

**3.4.5. Noteworthy Positive Components at Remote Audit**

No	Description
1	The company's commitment to managing oil palm plantations in a sustainable manner.

**3.4.6. Noteworthy Positive Components at Onsite Audit**

No	Description
1	Award for the <i>Program Penilaian Kinerja Perusahaan</i> in Environmental Management for the Blue Rank for the 2018-2019 period.
2	The company has ISPO certificate
3	PT AMP Plantation has an ISCC certificate (certificate number EU-ISCC-CERT-ID218-20200041 valid until 25 April 2021)
4	The company has not used contract workers (PKWT / BHL) since the previous assessment.

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

Public Issues	Auditor Verification
<p><b>Labour Union (SERBUNDO)</b> The relationship between the certification unit and the union is well established, the certification unit supports the existence of the union and gives freedom to unionized employees and facilitates the union for meetings or other activities. In the past one year period there were no work relationship disputes found, all employee rights were fulfilled by the certification unit in accordance with applicable regulations. Currently the certification unit is using Collective Labor Agreement.</p>	<p>There are no negative issues that need further verification. The certification unit has ensure that the employee's rights have been fulfilled in accordance with the regulations.</p>
<p><b>Labour Union (SPSI)</b> The relationship between the certification unit and the union is well established, the certification unit supports the existence of the union and gives freedom to unionized employees and facilitates the union for meetings or other activities. In the past one year period there were no work relationship disputes found, all employee rights were fulfilled by the certification unit in accordance with applicable regulations. Currently the certification unit is using Collective Labor Agreement.</p>	<p>There are no negative issues that need further verification. The certification unit has ensre that the employee's rights have been fulfilled in accordance with the regulations.</p>
<p><b>KUD Agro Wira Masang and Nagari Kinali Local Community</b> There is no negative issue. <b>The FFB</b> payment has been made on time in accordance with the provisions in the agreement, based on pricing mechanism from Agriculture Agency. No obstacles related to cooperation with the unit of certification, because the UOC is open to consulting related work issues such as transparency in payments, loan and any cost.</p>	<p>There are no negative issue related the smallholder.</p>
<p><b>Environment Agency of Agam Regency</b> Certification unit has been complied with applicable regulations, among others has had license of hazardous temporary warehouse, license of POME Land Application, environment permit, and etc. Every mandatory reports related environmental has been reported to agency. There is no complaints from stakeholder related environmental issue.</p>	<p>There is no negative issue that need further verification. Based on document review and field observations, the certification unit has demonstrated legal compliance related environmental, and no indications of environmental pollution.</p>
<p><b>Ninik Mamak Nagari Bawan</b> The unit of certification has made efforts to develop the surrounding community through CSR programs in participatory manner, the usage of local labor and local contractor, as well as developed smallholders.  There is land disputes with claimant from KAN Tiku V Jorong and KAN Bawan for HGU (land title) Number 11</p>	<p>The government has formed a special team consisting of interested parties in accordance with the Decree of the Regent of Agam No. 422 of 2020 on 13 November 2020. The last meeting between parties was conducted in 16 November 2020 which discusses several things, namely: team meetings will be held regularly every 2 weeks, compensation for the use of customary land and the realization of plasma plantations in</p>



Public Issues	Auditor Verification
<p>(4,360 Ha). To resolve this dispute, the government has formed a special team consisting of interested parties such as Government of Agam Regency, Regency Police Organization, Regency Attorney Office, Ninik Mamak Nagari Bawan, Ninik Mamak Tiku V Jorong, and PT AMP Plantation.</p>	<p>HGU 11 with a composition of 70/30. The next meeting will be held on November 30, 2020 to further discuss the matters conveyed at the previous meeting. Based on the foregoing, it can be concluded that the certification unit has carried out a complaint / dispute resolution procedure by including the affected parties and has been well documented.</p>
<p><b>Investment and Manpower Agency of Agam Regency.</b> There are no negative issues related to labor, industrial relations and child labor. The labor reports for contract workers has been reported periodically. Certification unit has been implemented minimum wage, overtime and others labor standard in accordance with government regulation. Every labor union has been verified by agency and still active in certification unit.</p>	<p>There are no negative issues that need further verification. The company has paid minimum wages, overtime and others labor standard in accordance with the government regulations.</p>
<p><b>Local Contractor for Empty Bunch Transport.</b> The certification unit continues to improve business and empower local communities by cooperating with local contractors. Making a work agreement based on the agreement between the two parties and payment is made on time in accordance with the contents of the agreement. The certification unit always conducts socialization and evaluation related to the fulfillment of labor social assurance and the OHS aspects of contractor workers.</p>	<p>There was no negative issue that need further verification. The certification unit has demonstrated its commitment to develop local communities. In addition documentation has been shown that the payment of the contractor's results has been paid according to the agreement and on time.</p>
<p><b>Fresh Fruit Bunch Supplier.</b> The certification unit continues to improve business and empower local communities by cooperating with local supplier. Making a work agreement based on the agreement between the two parties and payment is made on time in accordance with the contents of the agreement. The certification unit always conducts socialization and evaluation related to the fulfillment of labor social assurance and the OHS aspects of contractor workers.</p>	<p>There was no negative issue that need further verification. The certification unit has demonstrated its commitment to develop local supplier. In addition documentation has been shown that the payment of the contractor's results has been paid according to the agreement and on time.</p>
<p><b>Agriculture Agency of Agam Regency.</b> The party appointed to be interviewed during the audit cannot be contacted for 2 days, so the auditor does not get further information from the agency.</p>	<p>N/A</p>
<p><b>Gender Committee of AMP POM</b>  The company has had a policy to protect female workers from sexual harassment in the workplace as well as a grievance mechanism. Have implemented regulations related to reproductive rights such as menstruation leave and childbirth. There are no reports regarding violations of decency.</p>	<p>There are no negative issues that need further verification. Related no gender discrimination has been verified in related indicator.</p>

Public Issues	Auditor Verification
<p><b>Worker Union of SPSI – AMP POM and PT PPMJ</b></p> <p>Labor Union have been registered in the labor Agency and there has been no change in management until this audit. The last meeting between company and the labor union discussed the agenda of Collective Labor Agreement. Salary implementation will be adjusted in accordance with the provincial minimum wage in 2020. In addition, payment of salaries has been in accordance with the specified time and through the transfer. There are no labor issues.</p>	<p>There are no negative issues that need further verification. Described in related criteria.</p>
<p><b>Local Contractor (Civil Engineering AMP POM)</b></p> <p>Based on the results of the interviews, it was found out that started cooperation in 2013 and collaborated in the field of building and mill maintenance. The worker has been equipped with PPE according to company regulations. Employees also have a <i>BPJS Kesehatan and BPJS Ketenagakerjaan</i>. The cooperation contract is renewed every three months and there are no problems with payment.</p>	<p>There was no negative issue that need further verification. he company has demonstrated its commitment to develop local communities. In addition documentation has been shown that the payment of the contractor's results has been paid according to the agreement and on time.</p>
<p><b>Gender Committee PT PMJ</b></p> <p>Gender committees have been established since 2011, for now the management has 2 management periods.</p> <ul style="list-style-type: none"> <li>• The current management is the management of the 2015-2020 period with the following management arrangements.</li> <li>• The routine activities of gender committees are labor socio-organizational activities, gender, worker complaints and women's related company policies.</li> <li>• During the last year there has never been a complaint regarding sexual harassment or domestic violence.</li> <li>• Issues related to child labor and human rights violations have not yet existed until now.</li> <li>• Gender committees and female workers are aware of the policies regarding maternity and childbirth leave and the prohibition for pregnant and lactating women to work in chemical-related work</li> </ul>	<p>There are no negative issues that need further verification. Related no gender discrimination has been verified in related indicator.</p>
<p><b>Gender Committee PT AMP</b></p> <ul style="list-style-type: none"> <li>• There are no negative issues such as discrimination and sexual abuse or child labor.</li> <li>• Management of the gender committee has the program associated with sexual harassment policies, protection of reproductive rights. Socialization also includes a ban on pregnant and lactating women to</li> </ul>	<p>There are no negative issues that need further verification. Related no gender discrimination has been verified in related indicator.</p>

<b>Public Issues</b>	<b>Auditor Verification</b>
spray. Socialization is delivered through meetings like recitation etc.	

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 data-bbox="341 777 925 1050"><p>AMP POM – PT AMP Plantation Sr. EHS &amp; Sustainability Manager</p><p><u>Donal Darwis</u> Friday, 11 December 2020</p></div> <div data-bbox="990 777 1364 1029"><p>Mutuagung Lestari Lead Auditor</p><p><u>Arif Faisal Simatupang</u> Friday, 11 December 2020</p></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	Local Contractor (Civil Engineering AMP POM)	Agam Regency, Sumatera Barat Province	-	Direct Interview	23 <sup>th</sup> November 2020	✓	
2	Serikat Pekerja Seluruh Indonesia (SPSI – AMP POM)	Agam Regency, Sumatera Barat Province	-	Direct Interview	23 <sup>th</sup> November 2020	✓	
3	Serikat Pekerja Seluruh Indonesia (SPSI – PMJ)	Pasaman Barat Regency, Sumatera Barat Province	-	Direct Interview	23 <sup>th</sup> November 2020	✓	
4	Gender Committee of AMP POM	Agam Regency, Sumatera Barat Province	-	Direct Interview	23 <sup>th</sup> November 2020	✓	
5	Gender Committee/Women on Working Group PT AMP	Agam Regency, Sumatera Barat Province	-	Direct Interview	24 September 2020	✓	-
6	Gender Committee/Women on Working Group PT PMJ	Pasaman Barat Regency, Sumatera Barat Province	-	Direct Interview	25 September 2020	✓	-
7	SERBUNDO (Labour Union) PT AMP Plantation.	PT AMP Plantation	-	Direct Interview	25 November 2020	✓	-
8	PUK-SPPP-SPSI (Labour Union) PT AMP Plantation	PT AMP Plantation	-	Direct Interview	25 November 2020	✓	-
9	Agro Wira Masang Cooperative (Scheme Smallholder) and Nagari Kinali Local Community.	Pasaman Barat Regency, Sumatera Barat Province	-	Phone Interview	25 November 2020	✓	-
10	Datuk Kando (Ninik Mamak Nagari Bawan)	Agam Regency, Sumatera Barat Province	-	Phone Interview	25 November 2020	✓	-
11	Local Contractor for Empty Bunch Transport.	Agam Regency, Sumatera Barat Province	-	Phone Interview	25 November 2020	✓	-
12	Fresh Fruit Bunch Supplier.	Agam Regency, Sumatera Barat Province	-	Phone Interview	25 November 2020	✓	-
13	Environment Agency of Agam Regency.	Agam Regency, Sumatera Barat Province	-	Phone Interview	25 November 2020	✓	-
14	Investment and Manpower Agency of Agam Regency.	Agam Regency, Sumatera Barat Province	-	Phone Interview	25 November 2020	✓	-
15	National Land Agency of Agam Regency.	Agam Regency, Sumatera Barat Province	-	Phone Interview	25 November 2020	✓	-
16	Agriculture Agency of Agam Regency.	Agam Regency, Sumatera Barat Province	-	Phone Interview	25 November 2020	-	✓
17	<b>AMP POM</b>	PT AMP Plantation	-	Field	23 November	✓	

	<ul style="list-style-type: none"> <li>- 2 security</li> <li>- 2 weghbridge operator</li> <li>- 1 WTP operator</li> <li>- 1 WWTP operator</li> <li>- 1 EFB Station worker</li> <li>- 2 warehouse workers</li> <li>- 3 mechanic</li> <li>- 5 process operators</li> <li>- 2 boiler operators</li> <li>- 1 engine room operator</li> </ul>			observation and direct interview	2020		
18	<p><b>AMP 1 Estate</b></p> <ul style="list-style-type: none"> <li>- 1 worker of HGU monitoring</li> <li>- 5 harvesters</li> <li>- 7 fertilizing workers</li> <li>- 9 spraying workers</li> <li>- 1 LA operator</li> <li>-</li> <li>- 1 warehouse officer</li> <li>- 1 generator room operator</li> <li>- 1 Hazardous waste temporary warehouse officer</li> <li>- 1 team fire fighting</li> <li>- 2 Mechanic Workshop</li> <li>- 1 Chemical warehouse</li> <li>- 1 Fertilizer warehouse</li> </ul>	PT AMP Plantation	-	Field observation and direct interview	24 November 2020	✓	
19	<p><b>PMJ Estate</b></p> <ul style="list-style-type: none"> <li>- 1 worker of HGU monitoring</li> <li>- 3 workers of EFB application</li> <li>- 3 harvesting operator</li> <li>- 1 foreman of harvesting</li> <li>- 1 operator of bunch counting</li> <li>- 7 worker of selective spraying</li> <li>- 1 warehouse officer</li> <li>- 2 Mechanic Workshop</li> <li>- 1 generator room operator</li> <li>- 1 Hazardous waste temporary warehouse officer</li> <li>- 1 Chemical warehouse</li> <li>- 1 Fertilizer warehouse</li> </ul>	PT AMP Plantation		Field observation and direct interview	25 November 2020	✓	
20	<p><b>KUD Agro Wira Masang</b></p> <ul style="list-style-type: none"> <li>- 3 harvesting worker</li> <li>- 6 spraying worker</li> </ul>	PT AMP Plantation	-	Field observation and direct interview	24 November 2020	✓	



21	Sawit Watch	Jakarta	<a href="mailto:info@sawitwatch.or.id">info@sawitwatch.or.id</a>	Email	17 <sup>th</sup> September 2020	-	✓
22	WWF	Jakarta	supporter-service@wwf.or.id	Email	17 <sup>th</sup> September 2020	-	✓
23	Walhi	Jakarta	informasi@walhi.or.id	Email	17 <sup>th</sup> September 2020	-	✓
24	AMAN	Jakarta		Email	17 <sup>th</sup> September 2020	-	✓

**Appendix 2. Assessment Program of Remote Audit**

Date	18 & 19 June 2020	
Audit Program	Clauses to Be Audited	Auditor
<b>Thursday, 18 June 2020</b>		
08.00 – 09.00	<b>Remote Audit Opening Meeting (recorded video conference)</b> <ul style="list-style-type: none"> <li>Opening speech and discussion of remote audit mechanism</li> <li>Presentation of audit objective, audit scope, audit plan discussion, audit sample, transparency and confidentiality clarification)</li> </ul>	<b>All Auditor</b>
09.00 – 10.30	<b>Zoom 1: Basic info, area statement</b>	<b>Faisal</b>
	<b>Zoom 2: OHS</b>	<b>Amar</b>
	<b>Zoom 3: Environment</b>	<b>Yoga</b>
	<b>Zoom 4: Transparency</b>	<b>Faisal – Johan</b>
10.30 – 12.00	<b>Zoom 1: legality</b>	<b>Faisal</b>
	<b>Zoom 2: Worker Welfare</b>	<b>Amar</b>
	<b>Zoom 3: Social</b>	<b>Yoga</b>
	<b>Zoom 4: Best Management Practices</b>	<b>Amar – Johan</b>
12.00 – 14.00	<b>Break</b>	<b>All Auditor</b>
14.00 – 16.30	<b>Zoom 1: Supply chain</b>	<b>Faisal</b>
	<b>Zoom 2: Worker Welfare / OHS</b>	<b>Amar</b>
	<b>Zoom 3: Environment/Social</b>	<b>Yoga</b>
	<b>Zoom 4: Best Management Practices/ Social</b>	<b>Yoga – Johan</b>
16.30 – 17.00	<b>Daily audit progress meeting</b>	<b>All Auditor</b>
<b>Friday, 19 June 2020</b>		
08.00 – 10.00	<b>Zoom 1: Basic info, area statement / Supply Chain</b>	<b>Faisal</b>
	<b>Zoom 2: Worker Welfare</b>	<b>Amar</b>
	<b>Zoom 3: Grievance</b>	<b>Yoga</b>
	<b>Zoom 4: Best Management Practices</b>	<b>Amar – Johan</b>
10.00 – 12.00	<b>Zoom 1: Legal / Supply Chain</b>	<b>Faisal</b>
	<b>Zoom 2: Worker Welfare / OHS</b>	<b>Amar</b>
	<b>Zoom 3: Environment/Social</b>	<b>Yoga</b>
	<b>Zoom 4: Best Management Practices/ Transparency</b>	<b>Amar – Johan</b>
12.00 – 16.00	<b>Break &amp; auditor internal discussion for closing meeting preparation</b>	<b>All Auditor</b>
16.00 – 17.00	<b>Remote Audit Closing Meeting (recorded Video Conference)</b> <ul style="list-style-type: none"> <li>Presentation of audit findings (noteworthy positive component, non-conformities, OFI, timeline of CAR's, conclusion)</li> <li>Comments, responses and questions</li> </ul>	<b>All Auditor</b>

**Appendix 2. Assessment Program of On-site Audit**

Date	23 – 27 November 2020	
Program	Clauses to be Audited	Auditor / PIC
<b>Monday, 23 November 2020</b>		
06.00 – 08.00 08.00 – 12.00	<b>Flight from Jakarta to Padang</b> <b>Traveling from Padang to PT AMP Plantation</b>	<b>All Auditor</b> <b>All Auditor</b>
12.00 – 14.00	<b>Break</b>	<b>All Auditor</b>
14.00 – 14.30	<b>Opening Meeting</b> <ul style="list-style-type: none"> <li>• Auditee speech (introduction of PIC, profile of Management Unit)</li> <li>• Auditor Team speech (introduction, audit objective, audit scope, audit plan discussion, determine of audit sample, transparency and confidentiality clarification)</li> </ul>	<b>Management Unit</b> <b>Faisal</b>
14.30 – 17.00	<b>Field Observation of AMP POM</b> <ul style="list-style-type: none"> <li>• Observation of supply chain (FFB receiving, weighbridge)</li> <li>• Observation of FFB grading, processing activity, product despatch</li> <li>• Observation of chemical storage, hazardous waste storage, fire control simulation, etc.</li> <li>• Observation of WWTP, WTP, EBA</li> </ul> <b>Stakeholder consultation of Local Contractors, FFB suppliers, Labor Union, Gender Committee, etc (direct or by telephone)</b>	<b>Faisal</b> <b>Rindu</b> <b>Rindu</b> <b>Nurdin</b> <b>Satria</b>
<b>Tuesday, 24 November 2020</b>		
08.00 – 12.00	<b>Field Observation of AMP 1 Estate</b>  <b>Field observation and consultation with internal stakeholder in their respective work locations (Gender Committee, Worker Union, Worker Cooperative, etc)</b> <ul style="list-style-type: none"> <li>• Observation of HGU poles, and land demarcation.</li> <li>• Observation the activity of harvesting &amp; transportation, manuring, pesticides application, road maintenance, IPM, EFB application, etc)</li> <li>• Observation of chemical storage, fertilizer storage, hazardous waste storage, fire control facilities, waste management, etc)</li> <li>• Observation of workers facilities (housing, school, worship place, domestic waste management, etc).</li> <li>• Observation of HCV area, POME Land Application.</li> </ul>	<b>Faisal</b> <b>Rindu</b> <b>Nurdin</b> <b>Nurdin</b> <b>Rindu</b>
08.00 – 12.00	<b>Field Observation of KUD Agro Wira Masang</b>  <b>Field observation and consultation with internal stakeholder in their respective work locations (Gender Committee, Worker Union, Worker Cooperative, etc)</b> <ul style="list-style-type: none"> <li>• Observation of HGU/SHM poles, and land demarcation.</li> <li>• Observation the activity of harvesting &amp; transportation, manuring, pesticides application, road maintenance, IPM, EFB application, etc)</li> </ul>	<b>Faisal</b> <b>Satria</b>

	<ul style="list-style-type: none"> <li>• Observation of chemical storage, fertilizer storage, hazardous waste storage, fire control facilities, waste management, etc)</li> <li>• Observation of workers facilities (housing, school, worship place, domestic waste management, etc).</li> <li>• Observation of HCV area</li> </ul>	<p align="center"><b>Satria</b></p> <p align="center"><b>Satria</b></p> <p align="center"><b>Faisal</b></p>
12.00 – 14.00	<b>Break</b>	<b>All Auditor</b>
14.00 – 17.00	<b>Stakeholder consultation of Local Contractors, FFB suppliers, Labor Union, Gender Committee, etc (direct or by telephone)</b> <b>Document review</b>	<b>All Auditor</b>
<b>Wednesday, 25 November 2020</b>		
08.00 – 12.00	<b>Stakeholder consultation of Local Communities &amp; Government Agencies: Labor Agency, Agrarian Agency, Plantation Agency, Environmental Agency etc (direct or by telephone)</b>	<b>Rindu</b>
08.00 – 12.00	<p><b>Field Observation of PMJ Estate</b></p> <p><b>Field observation and consultation with internal stakeholder in their respective work locations (Gender Committee, Worker Union, Worker Cooperative, etc)</b></p> <ul style="list-style-type: none"> <li>• Observation of HGU poles, and land demarcation.</li> <li>• Observation the activity of harvesting &amp; transportation, manuring, pesticides application, road maintenance, IPM, EFB application, etc)</li> <li>• Observation of chemical storage, fertilizer storage, hazardous waste storage, fire control facilities, waste management, etc)</li> <li>• Observation of workers facilities (housing, school, worship place, domestic waste management, etc).</li> <li>• Observation of HCV area, POME Land Application.</li> </ul>	<p align="center"><b>Faisal</b></p> <p align="center"><b>Satria</b></p> <p align="center"><b>Nurdin</b></p> <p align="center"><b>Nurdin</b></p> <p align="center"><b>Faisal</b></p>
12.00 – 14.00	<b>Break</b>	<b>All Auditor</b>
14.00 – 17.00	<b>Document review</b> <b>Continue the outstanding stakeholder consultation</b>	<b>All Auditor</b>
<b>Thursday, 26 November 2020</b>		
08.00 – 11.00	<b>Document review</b>	<b>All Auditor</b>
11.00	<b>Deadline of audit evidences/documents submission</b>	<b>Management Unit</b>
11.00 – 15.00	<b>Break and Auditor's internal discussion of closing meeting preparation</b>	<b>All Auditor</b>
15.00 – 17.00	<p><b>Closing Meeting</b></p> <ul style="list-style-type: none"> <li>• Presentation of audit findings (noteworthy positive component, non conformities, OFI, timeline of CAR's, conclusion)</li> <li>• Comments, responses and questions</li> </ul>	<b>All Auditor</b>
<b>Friday, 27 November 2020</b>		
06.00 – 09.30	<b>Traveling from PT AMP Plantation to Padang</b>	<b>All Auditor</b>
11.30 – 17.00	<b>Flight from Padang to Jakarta</b>	<b>All Auditor</b>