

*Roundtable on Sustainable Palm Oil Certification*  
**R S P O**

**[✓] Surveillance**

Name of Management : Bumi Pratama Khatulistiwa Palm Oil Mill, PT Bumi Pratama Khatulistiwa  
Organisation : Subsidiary of Wilmar International Ltd  
Plantation Name : PT Bumi Pratama Khatulistiwa : Bumi Pratama Khatulistiwa Estate  
Location : Sungai Tempayan/Mega Timur Village, Sub-District of Sungai Ambawang,  
Kubu Raya District, Kalimantan Barat Province, Indonesia  
Certificate Code : **MUTU-RSPO/100**  
Date of Certificate Issue : 18 October 2017      Date of License Issue : 04 April 2021  
Date of Certificate Expiry : 17 October 2022      Date of License Expiry : 17 October 2021

Assessment	Assessment Date	PT. Mutuagung Lestari Auditor	Reviewed by	Approved by
ASA-3	09 to 13 November 2020	Arif Faisal Simatupang (Lead Auditor), Satria Adi Putra, Radytio Puspanjana, & Nurdin Chaeriana	Ardiansyah	Octo H.P.N. Nainggolan

Assessment	Approved by MUTUAGUNG LESTARI on:
ASA-3	26 February 2021

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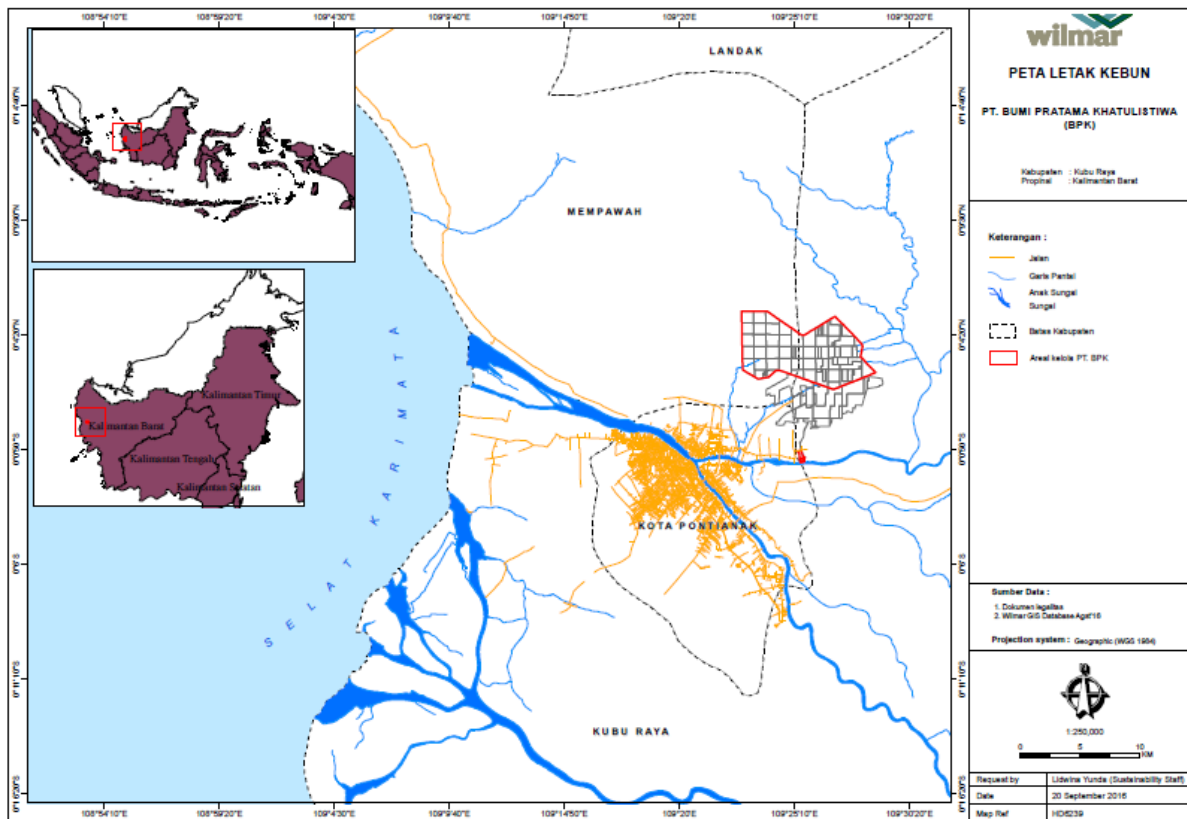
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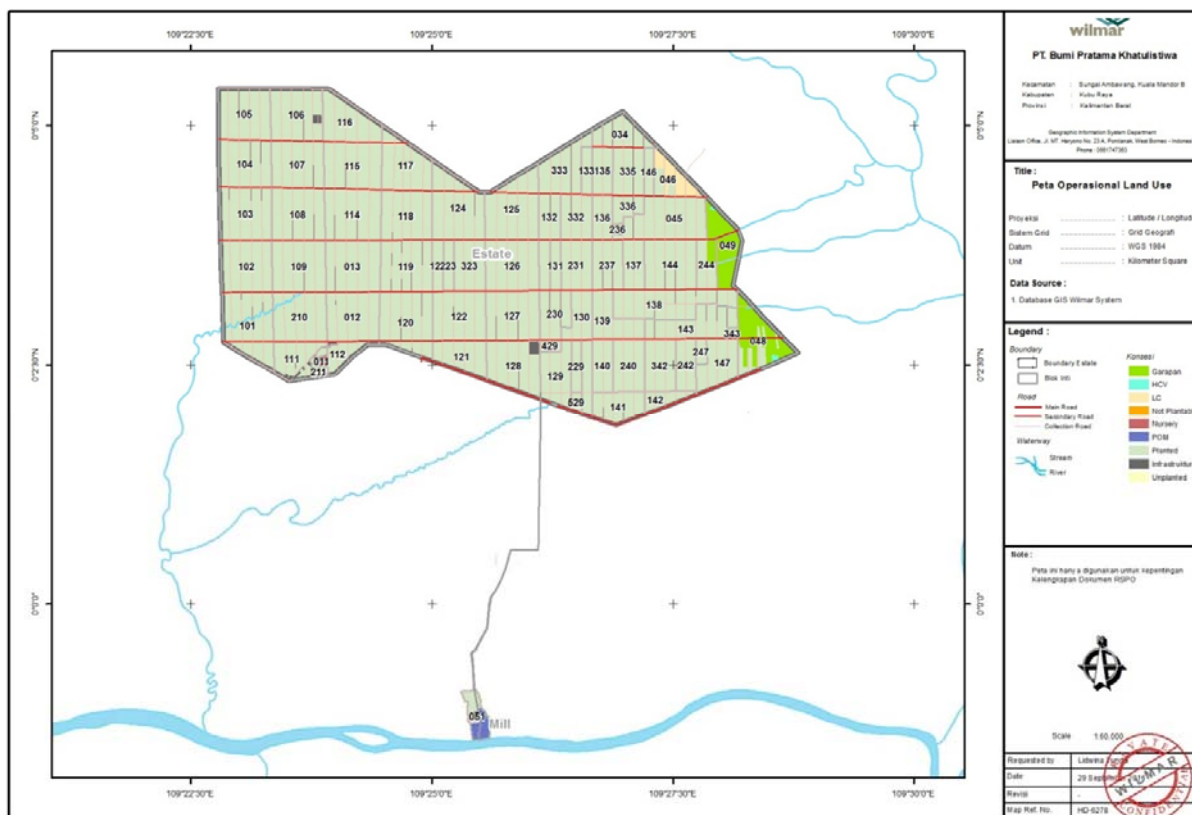
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Figure 1. Location Map of PT Bumi Pratama Khatulistiwa



**Figure 2. Operational Map of PT Bumi Pratama Khatulistiwa**



**Abbreviations Used**

ASA	:	Annual Surveillance Assessment
AMDAL	:	<i>Analisis Mengenai Dampak Lingkungan</i> / Environment Impact Assessment
BCP	:	Buluh Cawang Plantation
BPJS	:	<i>Badan Penyelenggara Jaminan Sosial</i> / Social Security Agency
BPK	:	Bumi Pratama Khatulistiwa
BPN	:	<i>Badan Pertanahan Nasional</i> (National Land Agency)
CB	:	Certification Body
CD	:	Community Development
CH	:	Certificate Holder
CPO	:	Crude Palm Oil
CSPK	:	Certified Sustainable Palm Kernel
CSPO	:	Certified Sustainable Palm Oil
CSR	:	Corporate Social Responsibility
DPRD	:	<i>Dewan Perwakilan Rakyat Daerah</i> /Regional People's Representative Assembly
EFB	:	Empty Fruit Bunch
EIA	:	Environment Impact Assessment
EMU	:	Ecological Management Unit
FFA	:	Free Fatty Acid
FFB	:	Fresh Fruit Bunch
HCV	:	High Conservation Value
HGU	:	<i>Hak Guna Usaha</i> / land title
HIRAC	:	Hazard Identification and Risk Assessment Control
HRR	:	Human Resource
ILO	:	International Labour Organization
IPM	:	Integrated Pest Management
IUP	:	<i>Izin Usaha Perkebunan</i> / Plantation Business Permit
KER	:	Kernel Extraction Rate
LKS	:	<i>Lembaga Kerja Sama</i> / Cooperation Institution
KUD	:	<i>Koperasi Unit Desa</i> (Village Cooperative Unit)
MPA	:	<i>Masyarakat Peduli Api</i> / Fire Care Society
MSDS	:	Material Safety Data Sheet
OER	:	Oil Extraction Rate
OHS	:	Occupational Health and Safety
PAUD	:	<i>Pendidikan Anak Usia Dini</i> /Early childhood education programs
P2K3	:	Panitia Pembina Keselamatan dan Kesehatan Kerja/OHS Committee
PK	:	Palm Kernel
POM	:	Palm Oil Mill
POME	:	Palm Oil Mill Effluent
PPE	:	Personal Protective Equipment
RKL RPL	:	<i>Rencana Pengelolaan Lingkungan – Rencana Pemantauan Lingkungan</i> /Environmental Management and Monitoring Plan
RSPO	:	Roundtable and Sustainable Palm Oil
SIA	:	Social Impact Assessment
SOP	:	Standard Operational Procedure
UPTD	:	<i>Unit Pelaksana Teknis Dinas</i> / Service Technical Implementing Unit
WTP	:	Water Treatment Plant
WWTP	:	Waste Water Treatment Plant

<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><i>Principles and Criteria for Sustainable Palm Oil Production 2018, The Indonesia National Interpretation, Endorsed by the RSPO Board of Governors on 20 April 2020.</i></li> <li><i>RSPO Certification System for Principles and Criteria, 14 June 2017</i></li> </ul>							
<b>1.2</b>	<b>Organisation Information</b>								
1.2.1	Organisation name listed in the certificate	PT BUMI PRATAMA KHATULISTIWA subsidiary of Wilmar International Ltd							
1.2.2	Contact person	Jules Parapat							
1.2.3	Organisation address and site address	Head Office: 56 Neil Road Singapore Singapore 088 030  Liaison office: Multivison Tower Lt. 15 Jl. Kuningan Mulya Blok B9, Kuningan, Jakarta, 12980, Indonesia							
1.2.4	Telephone	(62-21) 29380777							
1.2.5	Fax	(62-21) 29380115							
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 16 August 2005							
<b>1.3</b>	<b>Type of Assessment</b>								
1.3.1	Scope of Assessment and Number of Management Unit	Bumi Pratama Khatulistiwa POM and Bumi Pratama Khatulistiwa Estate							
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>	<table border="1"> <thead> <tr> <th colspan="2">Coordinate</th> </tr> <tr> <th>Latitude</th> <th>Longitude</th> </tr> </thead> <tbody> <tr> <td>S 00° 01' 19"</td> <td>E 109° 25' 28"</td> </tr> </tbody> </table>	Coordinate		Latitude	Longitude	S 00° 01' 19"	E 109° 25' 28"
Coordinate									
Latitude	Longitude								
S 00° 01' 19"	E 109° 25' 28"								
	Bumi Pratama Khatulistiwa POM	Sungai Tempayan/ Mega Timur Village, Sub District of Sungai Ambawang, Kubu Raya District, Province of Kalimantan Barat, Indonesia							
1.4.2	Location of Certification Scope of Supply Base								
	<b>Name of Supply Base</b>	<b>Location</b>	<table border="1"> <thead> <tr> <th colspan="2">Coordinate</th> </tr> <tr> <th>Latitude</th> <th>Longitude</th> </tr> </thead> <tbody> <tr> <td>S 00° 02' 32"</td> <td>E 109° 23' 36"</td> </tr> </tbody> </table>	Coordinate		Latitude	Longitude	S 00° 02' 32"	E 109° 23' 36"
Coordinate									
Latitude	Longitude								
S 00° 02' 32"	E 109° 23' 36"								
	Bumi Pratama Khatulistiwa Estate	Sungai Tempayan/ Mega Timur Village, Sub District of Sungai Ambawang, Kubu Raya District, Province of Kalimantan Barat, Indonesia							

1.5	Description of Area Statement						
1.5.1	Tenure						
	• State		4842.95 Ha				
	• Community		Ha				
1.5.2	Area Statement						
	• Total area		4842.95 Ha				
	• Mature area		4435.09 Ha				
	• Mill & Infrastructure		239.92 Ha				
	• Occupation/Arable Land		156.97 Ha				
	• Unplanted area		2.44 Ha				
	• HCV		8.53 Ha				
1.6	Planting Year and Cycles						
1.6.1	Age profile of planting year						
	Planting Year	Hectarage (Ha)					
		BPK ESTATE				Total	
	2000	12.12				12.12	
	2005	160.56				160.56	
	2006	25.47				25.47	
	2009	582.51				582.51	
	2010	1114.92				1114.92	
	2011	297.59				297.59	
	2012	688.72				688.72	
	2013	924.17				924.17	
	2014	332.71				332.71	
	2015	253.50				253.50	
	2016	42.82				42.82	
	TOTAL	4435.09				4435.09	
	1.6.2	New Planting area after January 2010		- Ha			
1.6.3	Planting Cycle		2 <sup>nd</sup> Cycle				
1.7	Description of Mill and Supply Base						
1.7.1	Description of Mill						
	Name of Mill	Capacity (tonnes/ hour)	FFB Processed (tonnes/year)	CPO		Palm Kernel	
				Out put (tonnes)	Extraction (%)	Out put (tonnes)	Extraction (%)
	BPK POM	30	132574.09	24024.82	18.11	5164.42	3.89
<i>*Production data source from 12 months before assessment (November 2019 – October 2020)</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)	%
	BPK ESTATE	4842.95	4435.09	74494.29	16.79	74494.29	100
<i>*Production data source from 12 months before assessment (November 2019 – October 2020)</i>							

1.7.3	FFB description from other source				
	<b>Name of sources/Organisation</b>	<b>Type of Organisation</b>	<b>number of smallholders</b>	<b>Production Area (Ha)</b>	<b>Supplied to Mill FFB (tonnes/year)</b>
	PT Buluh Cawang Plantation (Non certified)	Subsidiary of Wilmar International Ltd	-	1,615.73	4,926.36
	Plasma I-IV (PT BCP)	Non certified Associated smallholder of PT BCP	-	-	22,073.97
	KUD Mentibar Cemerlang	Non certified Associated smallholder of PT BCP	-	-	1,448.10
	KUD Sempurna	Non certified Associated smallholder of PT BCP	-	-	2,215.86
	KUD Sukma	Non certified Associated smallholder of PT BCP	-	-	2,705.19
	CV Bintang Borneo	Non certified Independent smallholder	-	1,048.00	21,880.38
	CV BNS	Non certified Independent smallholder	-	-	308.24
	PT Rajawali Jaya Perkasa	Non certified Independent smallholder	-	1,800.00	1,124.72
	CV Mekar Jaya	Non certified Independent smallholder	-	558.51	1,022.70
	PT Gusma Sukses Makmur	Non certified Independent smallholder		264.39	236.04
	Other (BBCPPPLSM)	Non certified Associated smallholder of PT BCP	-	-	138.24
	<b>TOTAL</b>				<b>58,079.80</b>
	<i>*Production data source from 12 months before assessment (November 2019 – October 2020)</i>				
1.7.4	Product categories		FFB, CPO, PK		
1.8	<b>Tonnage of Product</b>				
1.8.1	Past Annual Claim Certified Product		Last Year Projected Certified (MT)		Last Year Actual Certified Volume (MT)
	FFB Processed		103,600		74,494.29
	CPO Production		18,955		14,554.65
	Palm Kernel (PK) Production		4,204		2,947.59
1.8.2	Product selling				
	Type of selling product		Actual selling product for last year (MT)		
	CSPO sold as RSPO certified product		12,581.19		
	CSPK sold as RSPO certified product		2,723.60		
	CSPO sold under other scheme		0		
	CSPK sold under other scheme		0		
	CSPO sold as conventional		0		
	CSPK sold as conventional		0		



1.8.3	Estimate of Certified FFB Claim							
	Name of Estate		Total Area (Ha)	Production Area (Ha)		FFB (tonnes/year)		Yield (tonnes/ha/year)
	BPK POM		4,842.95	4,435.09		80,000		18
	*Projected FFB production for 12 months of certificate							
1.8.4	Estimate of Certified Palm Product Claim							
	Name of Mill	Capacity (tonnes/ hour)	FFB Processed (tonnes/year)	CPO		Palm Kernel		Supply Chain Module
				Out put (tonnes)	Extraction (%)	Out put (tonnes)	Extraction (%)	
	BPK POM	30	80,000	14,400	18.30	3,200	4,00	MB
	*Projected CSPO and CSPK production for 12 months of certificate							
1.9	Other Certifications							
	Others			-				
1.10	Time Bound Plan							
1.10.1	Time Bound Plan for Other Management Units							
	Management Unit		Estate (Supply Base)	Time Bound Plan	Location	Status		
	MILL	Time Bound Plan						
	Indonesia – Kalimantan Region							
	Mustika Sembuluh 1 POM Mustika Sembuluh POM 2 (PT Mustika Sembuluh)	2010	Mustika Sembuluh 1	2010	Central Kalimantan	Certified		
		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 Kerry Sawit Indonesia 2 POM (PT Kerry Sawit Indonesia)	2011  2015	Kerry Sawit Indonesia 1	2011	Central Kalimantan	Certified		
			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	-
Indonesia – Sumatera Region					
Pinang Awan POM (PT Perkebunan Milano)	2009	Sei Daun	2009	North Sumatra	Certified
		Batang Saponggol	2009	North Sumatra	Certified
		Marbau	2009	North Sumatra	Certified
Tania Selatan POM (PT Tania Selatan)	2010	Burnai Barat	2010	South Sumatra	Certified
		Burnai Timur	2010	South Sumatra	Certified
Kencana Sawit Indonesia POM	2020	Kencana Sawit Indonesia	2020	West Sumatra	Certified
		KUD Swamata	2023	West Sumatra	-

(PT Kencana Sawit Indonesia)					
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 Tapian 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	2023	-	2023	Bangko – Jambi	NPP Audit

(PT. Agroindo Indah Persada)					
<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>					
	2014	Adum Bansa	2014	Western Region, Ghana	Certified

BOPP POM, Biase Plantation Limited		Scheme Smallholder	2014	Western Region, Ghana	Certified
Biase Plantation Limited	2020	Calaro	2020	Cross River State, Nigeria	Mill under construction
Biase Plantation Limited	2022	Calaro extension	2022	Cross River State, Nigeria	Mill none planned
Biase Plantation Limited	2020	Ibiae	2020	Cross River State, Nigeria	Mill construction not started
Eyop Industries	2021	Ibad	2021	Cross River State, Nigeria	Mill construction not started
Eyop Industries	2020	Kwa Falls	2020	Cross River State, Nigeria	Mill none planned
Eyop Industries	2021	Oban	2021	Cross River State, Nigeria	Mill none planned

*Time bound plan on June 2020*

The revision of time bound plan because there is the change of certification time plan from year 2020 to year 2023 for some uncertified management units with reason is still in process to get land use right (Hak Guna Usaha). Some uncertified management units which changed from year 2020 to year 2023 are PT Agro Nusa Investama (Landak) and its supply based (PT Agronusa Investama 2 and PT Pratama Procentindo), PT Buluh Cawang Plantation in West Kalimantan (one of supply base from PT Bumipratama Khatulistiwa), PT Permata Hijau Pasaman (block 22), PT Agro Palindo Sakti in Sanggau District, West Kalimantan and its supply based (PT Agro Palindo Sakti, PT Putra Indotropical, PT Daya Landak Plantation and PT Indoresin Putra Mandiri), PT Sinarsiak Dian Permai in Riau and PT Musi Banyuasin Indah in South Sumatera.

The revision of time bound plan because some scheme smallholders has paid all costs relate of develop of scheme smallholder areas so that it has excluded from the time bound plan. It are KUD Damai Sejahtera (DASTRA) I & II (scheme smallholder under PT AMP Plantation and PT Primatama Mulia Jaya), KSU Mutiara Bosa Sikilang, KUD Permata Sawit Maligi, KUD Rantau Pasaman – Sasak and KUD Kapar (its supply based from PT Gersindo Minang Plantations POM)

The revision of time bound plan because two companies (PT Karya Agung Megah Utama & PT Perkebunan Anak Negeri Pasaman) has terminated the management agreement with PT AMP Plantation as stated in the termination agreement letter on 31 May 2019.

The result of internal discussion referring RSPO P&C Certification System, 2017 and communicating with auditee that Auditor has not accepted the revision of time bound plan for some cooperatives (KUD Karya Bersama, KUD Sejahtera Bersama, KUD Tabiku Makmur & KUD Kosudra) as supply base from PT Kerry Sawit Indonesia be year 2023 because it is not compliance with RSPO Certification System clause 4.1.3 so auditor has issued final decision as seen on table 8 above.

1.10.2

**Progress of Associated Smallholders and Outgrowers for Certifiable Standard**

There are 2 associated smallholder in PT BPK consist of KUD Mekar Lestari and KUD Tuah Jubah. Annual internal audits and self-assessments related to compliance with RSPO requirements in Mekar Lestari and Tuah Jubata plasma has been conducted in January 2020. Based on internal audit found that land title for plasma is not yet issued. PT Bumi Pratama Khatulistiwa submitted a letter of request for plotting of the main estate and plasma areas for revision of the 2019 PIPPIB on March 27, 2020 to the Head of the Regional Office of the Kalimantan Barat-National Land Agency. As for BPN's response, cadastral measurements of the plasma area should be carried out if it requires information from BPN regarding the plasma area of PT BPK.

<p>PT BPK submitted an application letter for plotting the plasma area of KUD Mekar Lestari to BPN in the Kubu Raya district in October 2020 as a condition for revising the PIPPIB for PT BPK's plasma area of <math>\pm 2,000</math> Ha. The follow-up to this was a plasma area survey by the Kubu Raya Regency BPN team on November 5, 2020, then from the results of the field survey a Land Use Analysis Letter would be issued for a plasma area of <math>\pm 2,000</math> hectares from BPN Kubu Raya Regency as a document of information as PIPPIB (Kadastral Substitute / HGU) requirements. The progress of its completion will be re-observed at the next audit (OFI).</p>
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<b>2.0</b>	<b>ASSESSMENT PROCESS</b>
<b>2.1</b>	<b>Assessment Team</b>
	<p>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. During this assessment he assess the aspects of employment, SCCS and OHS.</p> <p>2. <b>Satria Adi Putra (Auditor).</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 verify the aspect of legality, Transparency and Environment.</p> <p>3. <b>Radytio Puspanjana (Auditor).</b> Indonesian Citizen. Bachelor of agriculture, majoring in Soil Science. Agriculture Faculty. He was working as honorarium Officer at the Riau Province Plantation Agency in the division of huge estate for 1 year. The participated trainings are Survey and Mapping (GIS) Training which was held by National GMT, ISPO auditor training, ISO 9001/2008 auditor training, ISO 14001/2004 auditor training, IHT Geospatial Information System, IHT High Conservation Value, IHT Environmental Impact Assessment, IHT Green House Gas and RSPO Lead Auditor Course by Checkmark Training. Since 2015 has been following many audit as auditor base on Best Management Practice and Environment. During the audit, he verified Best Management Practices.</p> <p>4. <b>Nurdin Chaeriana (Auditor Trainee).</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 assesses the aspect environmental under supervision.</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>
	<p>Number of auditors: 3 auditors</p> <p>Number of days for <b>ASA-3</b> at site: 5 days</p> <p>Number of working days for <b>ASA-3</b> at site: 15 Working days.</p>
<b>2.2.2</b>	<b>Assessment Process</b>
	<p>The assessment was conducted by measuring the sufficiency of implementation with the consistency done by the PT Bumi Pratama Khatulistiwa 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>The assessment was conducted in three methods: (1) document review, aiming to observe the sufficiency of types or substances from required documents; (2) <i>interview</i> aiming to obtain more detailed information and cross check the information; and (3) field observation, aiming to observe directly the sufficiency of implementation on site.</p> <p>Some opportunities for improvement of the results <b>ASA-3</b> delivered by the MUTU auditor to the management unit and</p>



	<p>the results are the subject will be verified at the next assessment phase (<b>ASA-4</b>).</p> <p>Improvement of findings from <b>ASA-2</b> findings were observed by auditors at this <b>ASA-3</b> assessment. All information obtained was recorded in Check List of PT Mutuagung Lestari (MUTU) and part of <b>ASA-3</b>.</p> <p>The assessment program please find Appendix 2</p>
<b>2.2.3</b>	<p><b>Locations of Assessment</b></p> <p>Number of unit in this certification activity is 1 (one) Mill and 1 (one) Own Estates. The auditor team determined that the sampling locations are one palm oil mill (Bumi Pratama Khatulistiwa POM) and one estate (Bumi Pratama Khatulistiwa Estate).</p> <p><b>BPK POM:</b></p> <ul style="list-style-type: none"> <li>• <b>WTP</b> Observation of water treatment activities and the use of chemicals. Interview related to wages, implementation OHS and complaint mechanism.</li> <li>• <b>WWTP</b> Observations and interviews related to wastewater management, working hours, PPE, measuring instruments used liquid waste (flow meter),</li> <li>• <b>Empty Bunch Area</b> Observation related to waste management and OHS Implementation.</li> <li>• <b>Loading Ramp.</b> Observations and interviews with officers sorting FFB. Based on the interview, the officer can explain the criteria FFB decent though, demonstrating how sorting FFB, employment aspect, OHS aspect and working procedures specified.</li> <li>• <b>Sterilizer Station.</b> Observation and interviews with operator Sterilizer regarding employment aspect, OHS aspect and working procedures specified.</li> <li>• <b>Press Station.</b> Observation and interviews with operator Press regarding employment aspect, OHS aspect and working procedures specified.</li> <li>• <b>Boiler Station.</b> Observation and interviews with Boiler operator regarding employment aspect, OHS aspect and working procedures specified.</li> <li>• <b>Kernel Station.</b> Observation and interviews with kernel station operator regarding employment aspect, OHS aspect and working procedures specified.</li> <li>• <b>Engine Room.</b> Observation and interviews with engine room operator regarding employment aspect, OHS aspect and working procedures specified.</li> <li>• <b>Clarifier Station.</b> Observation and interview with operator related personnel understanding over the applicable SOP, infrastructure in mill, the implementation of occupational health and safety, medical examination, trainings from company and worker welfare.</li> <li>• <b>Chemical warehouse.</b> Field observations and interview related chemical management, OHS, and environmental aspect.</li> <li>• <b>Workshop.</b> Field observations and interview related workshop activity, OHS, environmental and worker welfare aspect</li> <li>• <b>Hazardous waste temporary warehouse.</b> Field observations related to the fulfillment of the attributes health and safety, recording, and the implementation of compliance requirements hazardous waste temporary warehouse.</li> <li>• <b>Security Post.</b> Observation and interview related FFB receipt, training and labor aspect.</li> <li>• <b>Weighbridge.</b> Observation and interview related SCCS implementation and employment.</li> </ul> <p><b>BPK Estate:</b></p> <ul style="list-style-type: none"> <li>• <b>Land demarcation and HGU stones No. P138A (Block 34E), No. T93B (Block 125A), No. P54B (Block 105C).</b> Observation of aspect of land demarcation and maintenance of HGU stone, and land dispute potency.</li> <li>• <b>Block 210C, Malaya River.</b> Observation the implementation of management in HCV of riparian area.</li> <li>• <b>Block 048 &amp; 049.</b> Observation of the area claimed by the community.</li> <li>• <b>Harvesting, Block 101 division 1.</b> Observation and interview related to work technic (based on company Procedure), PPE and labor aspect.</li> <li>• <b>Circle &amp; Path Spraying, Block 111 division 1.</b> Observation and interview related to work technic (based on company Procedure), PPE and labor aspect.</li> </ul>



	<ul style="list-style-type: none"> <li>• <b>Piezometer and Peat Subsidence Pole, Block 210 division 1.</b> Observation related to water level management, peat subsidence and water management.</li> <li>• <b>Barn Owl Box, Block 212.</b> Observation related to pest management with biological method.</li> <li>• <b>IPM census, Block 124.</b> Observation and interview related to IPM (based on company Procedure), PPE and labor.</li> <li>• <b>Fertilizer Applicator Block 375 Division 2.</b> Observation on safe working practices and interview with the fertilizer workers related type of fertilizer use according to the procedure and also worker welfare.</li> <li>• <b>Piezometer, Peat Subsidence Pole Block 127 division 1.</b> Observation related to water level management, peat subsidence and water management.</li> <li>• <b>Fire Fighting Facilities.</b> Observation and simulation the emergencies response facilities.</li> <li>• <b>Daycare.</b> Observation and interview with worker related labor aspect and OHS.</li> <li>• <b>Sparepart and PPE warehouse.</b> Observation minimum stock of PPE's.</li> <li>• <b>Diesel Tank.</b> Observation of OHS, environment aspect, emergency response and fire facilities.</li> <li>• <b>Lubricant and Agrochemicals Warehouse.</b> Observation related to management of oil and agrochemical material and waste, MSDS, emergency response facilities and the types of pesticides used.</li> <li>• <b>Hazardous Waste Warehouse (Temporary).</b> 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.</li> <li>• <b>Workshop.</b> Observations and interviews related to wages and overtime, waste management activities, OHS implementations and health inspections.</li> <li>• <b>Fertilizer warehouse.</b> Observation related to management of agrochemical material and waste, MSDS, emergency response facilities and the types of fertilizer used.</li> <li>• <b>Pesticide warehouse.</b> Observation related to management of agrochemical material and waste, MSDS, emergency response facilities and the types of fertilizer used.</li> <li>• <b>Housing Complex.</b> Observation and interview with residents about housing facilities, domestic waste management, and complaint mechanism.</li> <li>• <b>Clinic.</b> Observation related to medical facility and medical waste.</li> <li>• <b>Pesticide applicator PPE rinse room.</b> Observation related to management of agrochemical material and waste, MSDS, emergency response facilities and the types of fertilizer used.</li> </ul> <p><b>Consulted Stakeholder</b></p> <ul style="list-style-type: none"> <li>- LKS Bipartite and Worker Union of PT BPK</li> <li>- Gender Committee of PT BPK</li> <li>- Labor Agency, Land Agency and Plantation Agency of Kubu Raya 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>
	<p>Summary of stakeholder consultation process</p> <p>Consultation of stakeholders for PT Bumi Pratama Khatulistiwa was held by:</p> <ol style="list-style-type: none"> <li>1. Public Notification on website Mutuagung Website on October 26, 2020.</li> <li>2. Public consultation meeting with government institutions of Kubu Raya Regency (Land Agency or BPN, Plantation Agency, Labor Agency) November 10, 2020.</li> <li>3. Public consultation by phone with locals of the nearby village (Sungai Enau Village, Sungai Malaya Village), Cooperative and interview with local contractor on 10- 11 November 2020.</li> <li>4. Consultation with NGO (Walhi, Sawit Watch, AMAN &amp; WWF) via email on November 2, 2020.</li> <li>5. Consultation meeting and interview with internal stakeholder such as labor union, gender committee &amp; local contractor on November 11, 2020.</li> </ol> <p>Numbers of input from stakeholders were clarified by PT Bumi Pratama Khatulistiwa.</p>
<b>2.3.2</b>	<b>Stakeholder contacted</b>
	<i>Please find appendix 1</i>

<b>2.4</b>	<b>Determining Next Assessment</b>
	The next visit (ASA-4) will be conducted eight (8) months to twelve (12) months after the license issuance.

### 3.0 ASSESSMENT FINDINGS

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

MUTUAGUNG LESTARI has conducted an assessment of Bumi Pratama Khatulistiwa POM – PT Bumi Pratama Khatulistiwa, Wilmar Intl Ltd operation consisting of one (1) mill and one (1) oil palm estates.

During the assessment, there were two (2) Nonconformities were assigned against Major Compliance Indicators, two (2) nonconformities were assigned against Minor Compliance Indicators and six (6) opportunities for improvement were identified.

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

MUTUAGUNG LESTARI found that Bumi Pratama Khatulistiwa POM – PT Bumi Pratama Khatulistiwa, Wilmar Intl Ltd complied with the requirements of **Principles and Criteria for Sustainable Palm Oil Production 2018, The Indonesia National Interpretation, Endorsed by the RSPO Board of Governors on 20 April 2020 and RSPO Certification System for Principles and Criteria, 14 June 2017.**

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

Ref Std.	VERIFICATION RESULT of MUTU-Certification	
<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>	Company has list of document that can be accessed publicly that listed in Transparency Procedure (SOP 52/WIP-KB/(01)/1015) valid from 1 October 2015. The procedure sets public documents and documents with limited accessed. The public documents, such as legal document, environmental documents (environmental policy, environmental management and monitoring report, etc), social document, OHS policy and program, OHS committee report, annual employment report, and continuous improvement documents. These documents are available in estate and mill office.	
<b>1.1.2</b>	Mechanism for providing information is listed in Transparency Procedure (SOP 52/WIP-KB/(01)/1015) valid from 1 October 2015. The procedure explain that all the information request will be responded by company in 14 days after the incoming letter. Based on interview with Head of Sungai Enau Village, it is known that that they don't have any difficulty to communicate with the company for information request.	
	Documents with wide access include, for example, EIA documents, company annual reports, general company policies, permits covering HGU and operational permits for plantation business activities and reports on plantation business activities.	
	Meanwhile, documents that can be accessed with approval include deed of establishment and deed of company change, company financial reports, staff / employee wage policies, identity of shareholders and company management, identity of operational staff and employee leaders, list of company assets, data on land acquisition payments.	

**1.1.3**

Records of requests for information are recorded in the logbook of incoming mail records. Recapitulation of incoming and outgoing letters informing the date the letter was received, the sender of the letter, the letter summary, the disposition. From September 2019 to July May 2020 there were 30 letters requesting funding, outreach activities to companies, appeals, meeting invitations, service offers, approval of extensions, participation in activities. All letters have shown a response form by writing in direct mail. For example, a letter requesting funding assistance from PAUD Tunas Harapan Bangsa in Sungai Enau village which was received by the company on October 17, 2019 and responded with a grant of funds dated November 29, 2019.

**1.1.4**

Mechanism for providing information is listed in Transparency Procedure (SOP 52/WIP-KB/(01)/1015) valid from 1 October 2015. The procedure explain that all the information request will be responded by company in 14 days after the incoming letter. Based on interview with Head of Sungai Enau Village, , it is known that that they don't have any difficulty to communicate with the company for information request.

**1.1.5**

The company maintains a list of stakeholders for each unit, plantation and mill. Stakeholders for PT BPK's Palm Oil Plantation and Mill include Dusun Mega Blora, Dusun Mega Lestari, Dusun Selamat Jaya, Mega Timur Village Office and Sungai Melaya, West Kalimantan Provincial Health Laboratory, Baristand (Standardization Research Agency) Pontianak, Environmental Service of Kubu Raya Regency and West Kalimantan Province, Kubu Raya and West Kalimantan Provincial Manpower Office, Ambawang Sector Police, Kuala Mandor B Village, Suppliers, Social Security Administering Bodies (BPJS), All-Indonesian Labor Union (SBSI), Village Heads, Contractors, Camat, DPRD Kubu Raya, Kubu Raya District Plantation Office, Community Figures, West Kalimantan Provincial Government and Hospitals.

**Status: Comply**

**1.2**

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

**1.2.1**

Company has code of conduct document for all operational activities that listed on Document No 003/DIR-KP/IV/2016. Code of conduct explain Code of Conduct Principles, Conflict of Interest, Bribery and Illegal or Unethical Practices, Entertainment and Gifts, Misuse of Position, Insider Trading, Confidentiality, Restriction on Solicitation, Media Relations, Trade Union, Political and Social Activities, Installation of Illegal Computer Software, Anti Money Laundering, Trade Compliance & Export Controls and Sanctions, and Commitment to Human Rights.

This policy has been disseminated and understood by the workers in the Mill and Estates, as well as contractors based on interview. This policy is available in Indonesian Language. Based on interview with worker in estate and mill, it is known that they understand about the code of conduct. And also, contractor knew and understand about the ethical conduct.

**1.2.2**

The mechanism in implementation of code of conduct policy such as by due diligence in selection of third-party contractor/supplier, also stated at the agreement that the parties have to be meet the applied regulation such as no force and child labor. Also, the involvement of the stakeholders monitoring in this implementation. Every local contractor has received a dissemination regarding the policy of the code of ethics.

**Status: Comply**

**PRINCIPLE #2 OPERATE LEGALLY AND RESPECT RIGHTS**

**2.1**

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

**2.1.1.**

The company has list of regulations of 2020 that includes local regulations and national regulation updated annually. List of laws/regulations listed has covers several aspects such as land permit and legality, manpower, occupational health and safety, best management practices and environment.

The company has shown evidence of compliance in the environmental field for example as follows:

- Environmental Impact Analysis (AMDAL) document which has received approval from the Amdal Commission of Pontianak Regency and the Regent of Pontianak in accordance with Letter No. 660.1 / 024.a / IV / DLHESDM-B dated April 8, 2004 with a project area of 6,814.96 ha consisting of 4,814.96 ha and 40 ha for processing areas as nucleus company estates and 2,000 ha for plasma plantations. The capacity of the Palm Oil Mill which is the scope of the study is 30 tons of FFB / hour which is planned to be built outside the plantation area.
- The company has a permit for the Temporary Storage of Hazardous and Toxic Wastes issued by the Kubu Raya Regency Investment and One Stop Services (DPMPT) No. 503/002 / BPMPT-E / B3 / 2015 dated 28 August 2015 valid until 28 August 2020 (Permit renewal progress is described in indicator 7.3.1)
- For the Temporary Storage of Hazardous and Toxic Wastes in Palm Oil Mill, PT BPK has a permit issued by the Kubu Raya Regency Investment and One Stop Services Office (DPMPT). 503/006 / BPMPT-E / B3 / 2016 dated 15 August 2016 and valid until 15 August 2021.
- The company has a waste water disposal permit No. 503/008 / DPMPTSP-E / IPLC / 2017 dated 23 November 2017 with a validity period of up to 5 years.

In addition, the Company has also carried out routine reports, for example the Environmental Management and Monitoring Plan (RKL RPL) report for semester 1 of 2020 which has been submitted to the government with proof of receipt of PT Bumi Pratama Khatulistiwa's report for semester 1 of 2020 by the Plantation Office of West Kalimantan Province and Regency Kubu Raya, the Environment and Forestry Service of West Kalimantan Province and the Environmental Service of Kubu Raya Regency on November 5, 2020 and reports regularly every 3 months regarding the management of liquid, solid and hazardous and toxic wastes with a document receipt number 109 / BPK -PKS / X / 2020 dated 26 October 2020 by the Plantation Service of West Kalimantan Province, the Plantation Service of Kubu Raya Regency, the Environmental Service of the Kubu Raya Regency and West Kalimantan Province.

In term of best management practices, it was known that estate and mill management has implementing several pursuance with Indonesia laws and regulations, for example has conducting mechanical or zero burning method during land clearing, palms planted were derived from seeds (DxP) producers, recognized by the government of Indonesia. Furthermore, estate (each unit management) has implementing integrated pest management, biological control and only used pesticides listed on government website pesticide.id.

Regarding OHS aspect, the company conducted annual inspection of heavy vehicle and engine by Labor Agency has been regularly conducted, for instance in estate has been inspected on 7 December 2019 of 5 excavator, electricity installation, and diesel engine.

#### Legal Aspect

The list of law or regulations is explained in the regulatory list document (law register) which already update on 2020. Law registers are available in soft and hard copy. The company can demonstrate compliance with these law and regulations, for example: have HGU, Estate Class Assessment, location permit, suitability of spatial layout and Plantation Business Permit.

Regarding the Plantation Business Permit, there is still progress in resolving the lack of permit area, namely 27,987 Ha. The company has opportunities for improvement in the process of completing the revised Plantation Business Permit (OFI).

#### **2.1.2**

Procedure of legal requirement which presented in document FRM 02/SOP 02/WIP-KB/0610 dated 1 May 2016. The procedure explaining personnel who have responsibility to update the regulation and law, identification and inventory, evaluation and monitoring Information of regulation from national, provincial and district regulatory bodies, and renewal of any changes to prevailing laws and regulations and monitoring of expired regulations/licenses.

List of Rules such as:

- List of rules for PT BPK related Labor on November 1, 2020 (No Document FRM02/SOP02/WIP-KB/0610 Rev 4. The list was included 72 rules.

- List of rules for PT BPK related Plantation/Legal on November 1, 2020 (No Document FRM02/SOP02/WIP-KB/0610 Rev 4. The list was included 41 rules.
- List of rules for PT BPK related Environment on November 1, 2020 (No Document FRM02/SOP02/WIP-KB/0610 Rev 5. The list was included 90 rules.
- List of rules for PT BPK related OHS on November 1, 2020 (No Document FRM02/SOP02/WIP-KB/0610 Rev 00. The list was included 38 rules.

The rules was update such as:

- Decree of the Governor of Kalimantan Barat No. 1382 / Disnakertrans / 2019 concerning Determination of the Minimum Wage for Kubu Raya Regency in 2020.
- Minister of Environment and Forestry Regulation No. P.94/MENLHK/SETJEN/KUM.1/12/2016 concerning Invasive Species

Based on the results of document review and interviews, it is known that:

- There is a work agreement for transporting FFB, namely CV Sabitah Sukses Jaya with PT Bumi Pratama Khatulistiwa with No. 101 / BPK-EST / SPK / Angkutan-TBS / X-2020. No. 008 / CV.SJJ / Angkutan-TBS / X / 2020 article 10 paragraph 9 states that each head of the contractor registers worker members to participate in occupational health / safety insurance.
- Presidential Regulation of the Republic of Indonesia Number 82 of 2018 concerning Health Insurance, in Article 13 states that Employers are required to register themselves and their workers as Participants of Health Insurance to *BPJS Kesehatan* by paying contributions. In the event that an employer has not registered and paid contributions for its workers to *BPJS Kesehatan*, the employer is obliged to be responsible when the workers need health services in accordance with the benefits provided by *BPJS Kesehatan*.
- Sampling documents of the 2 FFB transport contractor workers, it is known that workers do not have health and employment insurance.

The company has not been able to demonstrate that there is a system that ensures legal compliance with third parties it contracts with, for example in the aspect of fulfilling health and employment insurance. It is **non-conformity No. 2020.01 non-critical category**.

### 2.1.3

The company has a procedure maintenance and monitoring of HGU poles number 001/SOP/GIS/2014 on July 1, 2014, the monitoring and maintenance was conducted every year by Surveyor and *Bina Mitra*. There are land title map with scale 1:40,000, the latest poles monitoring was conducted on June 2020. There are 27 HGU poles on BPK Mill and 68 HGU poles on PT BPK (Estate).

Based on HGU poles monitoring, it is known that, there are 68 HGU poles with good condition on BPK (Estate). Beside that, there are 21 HGU poles with good condition, 3 HGU poles was need to maintain and 3 HGU poles was loss. Related of the HGU poles was loss, the company has improved to change HGU poles with the new one.

Based on field observation to BPK Estate at Block 34E with poles number P138A, Block 34E with poles number T93B and Block P54B with poles number 105C. It was sighted that each pole well maintenance and demarcated, and also each pole in accordance to GPS coordinate.

### 2.1.2 Status: Nonconformity No. 2020.01 with non-critical category

## 2.2

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

### 2.2.1, 2.2.2, 2.2.3

The company has shown the list and agreement of contracted 8 contractors of Mill and Estate operational activities. Based on agreement sampled such as agreement with FFB transporting contractor of CV. Sabitah Sukses Jaya (No. 088/BPK-EST/SPK/ANGKUTAN-TBS/IX-2020 dated 30 September 2020), has been stated the clauses of contractor's obligation to comply the relevant employment and OHS regulations, such as in the aspects of no child and force labor, working contract, employment and OHS insurance, FFBs from legal sources, etc.



The company can demonstrated the monitoring system to ensure these contractor's implementation of regulatory compliance, such as by showing Membership Certificates of Employment Insurance (BPJS *Ketenagakerjaan*). Moreover, also has shown the sample of the temporary working contract stated that the worker will be paid in accordance with the government minimum wage.

**Status: Comply**

### 2.3

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

#### 2.3.1

Records of the origins of all third-party FFB sourced are available on computerized system at BPK POM. The certificate holder already has the RSPO Supply Chain Procedure (SOP/BPK-ADM/007/0218 dated Febuary 2018) which regulates the acceptance of the FFB of third parties, and regulate the acceptance of certified and uncertified FFB. BPK POM has record the origins of all third-party sourced FFB. The result of filed visit, document review and interview with the management, known that there are FFB's sourced from third party.

The company has list of FFB's suppliers such as: CV Bintang Borneo, CV Mekar Jaya, PT Artha Unggul Lestari and etc. Based on field observation at loading ramp and interview with grading officer, sighted that outside FFB's were graded tighter.

#### 2.3.2

The company can presented FFB from third parties are from legal source, for Instance FFB (CV Mekar Jaya) with initial farmer name P (Sertifikat Hak Milik No. 1668 on December 18, 2006) and initial farmer name K with information on geo location of FFB origins is 109.52645 and 0.22127.

**Status: Comply**

### **PRINCIPLE #3 OPTIMISE PRODUCTIVITY, EFFICIENCY, POSITIVE IMPACTS AND RESILIENCE**

### 3.1

**There is an implemented management plan for the unit of certification that aims to achieve long-term economic and financial viability.**

#### 3.1.1

The company has documents on the long-term plan contained in the Financial Projection period 2021 - 2023 which contains:

- Financials (FFB production, total FFB processed, OER, KER, CPO production, PK production, own FFB sales to related-co, FFB price (Rp/mt), CPO price (Rp/mt), PK price (Rp/mt), CPO revenue, PK revenue, Gross operating profit, Profit after and before taxation, total operating cash surplus (deficit), Taxation, servicing of finance and cumulative cash after servicing of finance).
- Area Statement (mature, immature, total plantable area, unplanted group, total area, FFB production).
- Planning for management of smallholders
- Crop and Estate Cost (Maintenance, harvesting, and total cost).
- Plantation Development Cost.
- Capital Expenditure Estate and Mill (Processing cost, direct labour, factory overheads and, indirect labour, general and admin).
- Sustainability Implementation Costs (Environment, Social, Health and Safety also Other Related Compliance Expenses.
- The plan for management of scheme smallholders / Cooperative.

#### 3.1.2

The company has a replanting program for the next 5 year projections described in the 2021-2025 budget report prepared by the estate manager, coordinator of System Development Control and Assistant General Manager. Based on the report, the replanting plan for the own estate will begin in 2021 with an area of 160 hectares, in 2022 an area of 200 hectares, in 2023 an area of 200, and in 2024 an area of 40 hectares. For plasma, it also starting on 2021 with an area of 815.09 hectares, in 2022 1,316.59 hectares, in 2023 an area of 1,382.58 hectares, in 2024 an area of 1,164.89 hectares and in 2025 an area of 663.39 hectares. The replanting program is reviewed annually on management review activities, the last review was on.

**3.1.3**

Annual planning also evaluated at the end of year and compared with realization. It annual planning can be adjusted based on field condition, financial condition or another reason. Based on information from representative management (estate manager), the long-term plan has been planned well with top management (company directors) and sufficient or feasible as a management plan for achieving the long term economic and financial.

<b>Status: Comply</b>
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**3.2**

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

**3.2.1**

The company has conducted an internal RSPO audit on April 16, 2020 with the result that there are 29 non-conformities and 5 Opportunity for Improvement (OFI).

The company conducted a management review on September 23, 2020. In the management review, it was discussed regarding the fulfilment of the findings during the internal RSPO audit that was carried out and discussion of the findings of the RSPO Audit by the certification body during the Surveillance 2 audit. In relation to the 29 indicators of non-conformity when the RSPO internal audit was conducted, 13 indicators had been fulfilled and 6 indicators were still in progress.

**3.2.2**

As long as the RSPO template has not available this indicator is not applicable. Company has submit ACOP to RSPO annually.

<b>Status: Comply</b>
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**3.3**

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

**3.3.1**

There is no change on procedure by the certified unit since the last assessment until this assessment (ASA-3) covered in "Agricultural Manual and Standard Operating Procedure For Oil Palm". The document contains about the procedure for pre-development survey, assessment and planting, nurseries, land clearing and preparation, legume cover crop, oil palm planting, upkeep and maintenance of oil palm, harvesting of Fresh Fruit Bunches, plant protection, pest, and disease management, oil palm to oil palm replanting, EFB mulching, quantitative agro management system (QAMS) and oil palm thinning technique.

Meanwhile, with regard to the processing in the mill, the company has had the document of processing job execution procedures (SOP of mills). The SOP consists of: Volume I (FFB Grading, Laboratory Sampling and testing procedures, general and security, weighbridge, loading ramp, sterilization station, threshing station, pressing station, clarification station, kernel recovery station and boiler house). Volume II consists of power plant, water treatment plant, waste management, land application and solid waste, EFB utilization, workshops, electricity system, quality, storage and delivery of CPO and kernel, laboratory, procedure for producing CPO with low FFA.

Interviews were conducted to harvester, pesticides applicator, and manuring worker in BPK Estate. Based on the results of interviews can be concluded that the workers understand the duties and responsibilities of their work in accordance with the applicable SOP.

**3.3.2**

To ensure consistency of procedures implementation, the company has a monitoring inspection mechanism that was carried out regularly through internal audit activities. An internal audit conducted twice a year or if needed which the scope of the inspection includes estate and mill operational activities. There are several types of audits that are conducted routinely by the company. For example:

- QAMS Audit (Quantitative Agronomy Management System). Carried out routinely once every two weeks by the Department of Ecological Management Unit (EMU) to monitor the activities of best management practice. Some of the findings among others relating to the rotten loose fruits in the path and circle of the plant.
- SDC Audit (System Development Control) which is aimed to audit the administration of the estate. Conducted every 6 months. All non-compliance records of internal audits have corrected and verified by the company. Also, there is an



internal audit from the company to check and monitoring the performance of contractors related to compliance to company procedures.

- Harvest inspection activities to maintain harvest quality, namely for indicators of loose fruit, OHS, pruning (under / over), and red fruit by EMU departement.
- Inspection activities for detection and census of EWS for IPM every week.

Each unit has documented the operations of the estate and mill products such as daily reports, supervisor workbooks, etc. The field visit at the mill shows that the unit has been documenting the daily activities in a daily production report that documented by using computerized systems.

### 3.3.3

Meanwhile, consistency of procedures implementation, the company has a management and evaluation regularly internally involve all level key management.

<b>Status: Comply</b>	
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### 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

PT Bumi Pratama Khatulistiwa already has an Environmental document in the form of an Environmental Impact Analysis Document (AMDAL) which consists of a Main Report Document, an Environmental Management Plan (RKL), an Environmental Monitoring Plan (RPL) and an Executive Summary.

This document has received approval from the Pontianak Regency AMDAL Commission and the Pontianak Regent in accordance with Letter No. 660.1 / 024.a / IV / DLHESDM-B dated April 8, 2004 with a project area of 6,814.96 hectares consisting of 4,814.96 hectares and 40 hectares for processing areas as core plantation and 2,000 hectares for plasma plantations. The capacity of the Palm Oil Mill which is the scope of the study is 30 tons of FFB / hour which is planned to be built outside the plantation area.

Evidence of having conducted consultations with the parties is that an assessment was carried out by the AMDAL Assessment Commission which was carried out on March 29, 2004 based on letter no 660.1 / 021 / III / DLHESDM-B in the Pontianak district. These activities have involved related stakeholders such as the plantation office, Bapeldalda, the forestry office, the National Land Agency (BPN) and representatives of the local community.

The company has a Social Impact Assessment (SIA) document prepared by the company on April 13-18 2015 in collaboration with a consultant with the scope of study is the Management Unit of PT. BPK and 4 villages around the plantation, as well as PT BPK's partner Plasma Cooperative. The 2015 Social Impact Assessment (SIA) document review had involved 122 speakers, 7 stakeholders, held 5 Focus Group Discussion (FGD) meetings and in-depth interviews. Proof of participation of the parties is available in the form of attendance lists and photos of the meeting.

Based on the Environmental Impact Analysis that has been prepared, a plan has been developed in the Environmental Impact Management Plan (RKL) document as a guide for the implementation of Environmental Management in company operations.

The Environmental Impact Management Plan in accordance with this document is:

- Social unrest, managed by providing social assistance
- Flood, managed by maintaining vegetation on the riverbank
- Flora and fauna habitat, managed by creating a conservation area
- Land fires, managed by clearing land without burning
- Increasing community income, managed by providing business opportunities
- Decreasing river water quality is managed by doing house keeping and building WWTPs.
- Community health, managed by socializing clean life and understanding the temporary mill operation if there is a health problem.

The company has carried out a management review related to the management and monitoring of environmental and social impacts of PT Bumi Pratama Khatulistiwa on January 20, 2020 which was attended by 24 participants. This activity is an evaluation of the environmental and social management and monitoring programs that have been carried out in 2019.

### **3.4.3**

The company has implemented environmental management and monitoring in the first semester of 2020. Environmental management and monitoring that have been carried out, among others.

- Changes in air quality and noise
- Wastewater quality
- Surface water quality
- Land fires
- Flood
- Diversity of vegetation and wildlife
- Reducing the use of chemicals
- Garbage / waste
- Health
- Increase in community income
- Question unrest
- Peat ecosystem

The company has implemented environmental management and monitoring in accordance with the management and monitoring matrix stipulated in the environmental documents it has. Related to water and air quality. The company has also conducted evaluations related to the results of this management and monitoring, namely critical level evaluation, trend evaluation and compliance evaluation. All monitoring results have been included in the report and have been submitted to the government with proof of receipt of PT Bumi Pratama Khatulistiwa environmental management and monitoring plan (RKL RPL) for semester 1 of 2020 by the Plantation Office of West Kalimantan Province and Kubu Raya Regency, Environment and Forestry Service West Kalimantan Province and the Environmental Service of Kubu Raya Regency on November 5, 2020.

The company has also demonstrated social impact monitoring that has been carried out based on the social management plan compiled in conjunction with the 2-year review conducted on July 26 2018. This plan was prepared based on the participation of several villages, such as Sungai Malaya Village, Sungai Enau, Mega Timur. A management and monitoring plan has been prepared with an implementation period and a person in charge of implementing it.

The company has shown a social aspect management and monitoring plan for 2020. The impacts that are managed and monitored are as follows:

- Employment opportunities with management objectives increase the proportion of the local population for company workforce recruitment and transparent recruitment mechanisms
- Consultation and communication
- Perceptions of the company with the aim of increasing positive public perceptions of the company

In the 2020 social impact management and monitoring plan, the company has identified operational impacts that have the potential to cause community unrest, including improving road access and washing trenches in community locations to prevent flooding in community settlements and plantations.

Regarding the complaints regarding the request for drainage improvement on the Enau and Rasau rivers, a meeting was held between the company and the community of Enau Village on August 1, 2020. Several things discussed at this meeting were:

- Based on information from the community that the ditches on the Enau and Rasau rivers were repaired in 2016. Currently the condition is already a lot of sediment so that if it rains it causes flooding in several hamlets
- The flood that occurred resulted in the submerging of residents' residential areas and plantations.

- Based on the results of the meeting, the Company has asked the Village government and several community representatives to be able to hold a meeting again to discuss together technically the channel / ditch that will be repaired along with the costs required

As an effort to involve the community in a participatory manner in the 2020 social aspect management and monitoring plan, the Company has submitted a letter to the Kuala Mandor B Village Government, Sungai Malaya Village, Sungai Enau Village and Mega Timur Village. on November 11, 2020 regarding requests for responses and input to the 2020 social management plan that has been compiled.

The company has opportunities for improvement to ensure the implementation of the 2020 Social Aspects of Management and Monitoring Plan and Realization. (OFI)

**Status: Comply**

### 3.5

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

##### **3.5.1, 3.5.2**

The company has a policy regarding employee recruitment (No. 023/DIR-KP/IV/2015 dated 1 April 2015). The needed of employee must be approved by management. This process is shall free from discrimination, therefore each prospective employee should be a trial period (probation) for three months.

Moreover, employment regulation has been set in the Collective Labor Agreement (CLA) period of 2018 – 2020. The agreement is ratified by Manpower and Transmigration Agency of Kubu Raya Regency through decree No KEP/840/HI/XI/2017 on 12 October 2018. The company and Labor Union has an agreement to extend this CLA until 5 November 2021 and has been reported to Labor Agency based on letter on 6 November 2020.

These documents are regulated about company and worker responsibilities, recruitment process, promotion and demotion, work time management, payment system, social insurance, contract termination, and so on. Based on interview with the workers, it is known that they understood about worker's rights and obligation as written in agreement.

Based on document review, the employment procedure has been implemented and documented. For instance, the company has a personal file for each employee. Each personal file covering the detail of recruitment and appointment letter, Medical Check Up, Employee Data, Employee Record Maintenance, Employee Biography, Work Agreement/Contract Worker, Job Description and OHS Requirement for employee.

**Status: Comply**

### 3.6

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

##### **3.6.1.**

The company has had a policy of occupational safety and health available in Indonesian language. The policy has been legalized and updated on 2010 by Head of Group Plantation Indonesia. The company's commitment on the implementation of occupational health and safety within company's operation. This policy is designed to control hazards in every activity that is in the working environment to prevent accidents and occupational diseases. Management have annual program of occupational health safety.

The company also has had the document of hazard identification, risk assessment and risk control that has been reviews annually, and also will be reviewed if any occupational accident happen. The document describes the description/activity, potential hazards, risk assessment and risk control.

Risk mitigation has been implemented properly in Mill and Estate. For instance, based on field observation and interview, known that the company has provide personal protective equipments (PPE) for workers, in accordance with risk analysis assessment. For example, PPE for chemicals applicators has refers to material safety data sheet (MSDS) of product. Furthermore, in housing complex area, it was known that estate management has provide a building room for pesticide mixing and storage. MSDS of products and emergency facilities such as alarm, shower, eyewash, first aid kit, fire retardant and suitable hazardous symbols were available onsite.

**3.6.2**

Realization of the OHS mitigation program has been monitored through regular meetings Guiding Committee of Occupational Safety & Health every month. This work program applies generally to all workers in the workplace. If the plans have been made yet on target then will be evaluated in the management review to assess effectiveness.

**Status: Comply**

**3.7**

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

**3.7.1.**

The company has set annual training program of 2020 for Mill and Estate, including scheme smallholders and contractors. The training program covered all operational and RSPO aspects, such as agronomy best practices, chemical/pesticide handling, OHS, and environmental. There is no gender discrimination in the program but based on the operational and previous evaluation. Moreover, the gender specific need training has been handled by the Gender Committee. Moreover, mandatory operator training has been identified and conducted, as well as for its extension.

**3.7.2, 3.7.3**

The company has maintained the training documents for its workers, among others:

- certificate of occupational paramedic (HIPERKES) initial PI (No. 21.188/DBK3-PM/9/XIV/2016 dated 1 September 2016).
- 15 licensed operators of hydraulic truck (valid until 30 August 2024).
- 1 licensed operators of motor grader (valid until 30 August 2024).
- 1 licensed operators of backhoe loader (valid until 26 September 2019).
- 5 licensed operators of excavator (valid until 26 September 2019).
- 22 licensed operators of farm tractor and mini tractor (valid until 26 September 2019 and 30 August 2024 respectively).
- SCCS training on 6 July 2020.

Based on interview with weighbridge operator, it is known that the worker has already get a training related the SCCS. Besides that, the worker can show the simulation related FFB receiving. Interview with Local Contractor, stated they has understood the awareness of using PPE for all workers, so that the contractor has prepared PPE for the workers

**Status: Comply**

**3.8**

**Supply Chain Requirements for Mills**

**3.8.1**

BPK POM applied SCCS Module MB since its received and processing the FFB from certified and uncertified sources, verification are done through field observation and interview to security and weigh-bridge operator as well as management representative. The mill claim only the volume of oil palm products produced from certified FFB as MB.

**3.8.2**

Sighted the FFB supplier list of BPK POM on 2020, in the following table:

Name of Sources	Organization	Certified	Uncert
PT BPK (its own estate, scope of certification)	Wilmar	✓	-
PT BPK (out of scope – Blok 151 and Blok 051)	Wilmar	-	✓
KUD Mekar Lestari (1979.98 Ha; 21 farmer group and 590 members.	Associated Smallholder Scheme of PT BPK	-	✓
PT Buluh Cawang Plantation	Outgrower	-	✓
Plasma IV PT Buluh Cawang Plantation	Outgrower	-	✓
PT BCP Buluh Sukma	Outgrower	-	✓

PT BCP Mentibar Cemerlang	Outgrower	-	✓
PT BCP Buluh Sempurna	Outgrower	-	✓
CV Bintang Borneo	Independent Smallholder	-	✓
PT Artha Unggul Lestari	Independent Smallholder	-	✓
PT Rajawali Jaya Perkasa	Outgrower	-	✓
CV Mekar Jaya	Independent Smallholder	-	✓

### 3.8.3

The Organization has estimated the amount of tonnage from FFB, CSPO & CSPK produced during the 12 months for the period November 2019 - October 2020 with details:

Item	License volume (Tonnes) Oct 18, 2019 – January 17 <sup>th</sup> 2021.	Actual production (November 1, 2019 – October 31, 2020)	Estimate Production 12 months (MT) November 1 2020 – October 31 2021
CPO	18,955	13,500.81	19,838
PK	4,204	2,903.16	4,361

### 3.8.4

BPK POM has been registered and met the requirements of reporting supply chain through the RSPO supply chain managing organization (palm-trace), which describing below:

Sub License ID	CB91227
Member Name	Bumi Pratama Khatulistiwa
Member ID	RSPO_PO1000004335
RSPO Membership Number	2-0017-05-000-00 (PT Bumi Pratama Khatulistiwa)
Issued On	27/09/2019
Issued By	PT Mutuagung Lestari
Start Date	18-10-2019
End Date	17-01-2021
Total Certified Area (Ha)	4,843.93

### 3.8.5

The procedures established and covering all elements of the supply chain model requirements, records and reports of compliance with supply chain requirements including training records. The procedure is according to RSPO SCCS 21 November 2014, revised 14 June 2017.

The Mill has the documents of supply chain procedures for Mass Balance models No. document SOP/BPK-ADM/007/0218 Rev 2 dated February 2018, describes the responsible PIC, references, the reception process of FFB (separating record keeping of certified and non-certified), processing of FFB and CPO/PK production (recorded in the 3 monthly basis with appropriate ratio calculation), shipment of CPO certified and PK certified (should be of positive stock, specify RSPO certificate number on the sales documents) and palmtrace data entry.

The procedures also identified role of implementation responsibility persons that trained. Responsible person in the whole process of supply chain: Security (registrar of all FFB expeditions and dispatch of CSPO/CPO), Weigh operators (weighing in all received FFB and shipping products), Logistics (calculation results of CSPO/CPO production, dispatch, reports of the products delivery and traceability report), Head of Administrator (acceptance control of FFB and CSPO/CPO, FFB acceptance report, dispatch, product delivery reports and traceability reports),

Based on observation and interview to the PIC in specific activities (i.e security/receiving FFB, weighbridge, and mass balance data PIC), they have been provide SCCS training and able to demonstrate awareness of the procedures related SCCS implementation.

The company has shown the training record of SCCS to the PIC such as training SCCS on 17 April 2020 that attended by 9 people (including sustainability staff, security, weighbridge operator, administration, assistant mill and etc).

### 3.8.6

Internal Audit of SCCS will be conducted annually, described in Work Instruction of Traceability of CPO, PK and PKO in MB Model (SOP/BPK-EHS/018/0818 Rev 01 on August 2018). The latest internal audit SCCS are conducted in 16 – 17 April 2020. There is one NC related SCCS implementation and already fix.

### 3.8.7

The company has to verify and monitoring related FFB source & tonnage for Certified FFB and Non Certified FFB such as:

Months	FFB Received (MT)		Total
	Certified	Non-certified	
November 2019	5,058.60	5,291.98	10,350.58
December 2019	6,002.03	5,855.99	11,858.02
January 2020	5,654.93	5,419.50	11,074.43
February 2020	4,208.74	4,577.30	8,786.04
March 2020	4,669.92	3,223.96	7,893.88
April 2020	4,486.75	3,024.23	7,510.98
May 2020	4,552.69	2,901.97	7,454.66
June 2020	7,370.34	5,420.93	12,791.27
July 2020	8,575.83	5,487.22	14,063.05
August 2020	8,727.70	6,984.89	15,712.59
September 2020	8,816.22	5,464.58	14,280.80
October 2020	6,370.54	4,427.20	10,797.74
<b>TOTAL</b>	<b>74,494.29</b>	<b>58,079.80</b>	<b>132,574.09</b>

Estimated certified product recorded in the certificate, actual certified produced has been verified during this assessment (ASA-3), that describes in the following table:

Product	Estimate Production 12 months (MT) Oct 18, 2019 – January 17 2021. (it is include with extension volume)	Actual Production 12 months (MT) November 1, 2019 – October 31, 2020
FFB	103,600	74,494.29
CSPO	18,955	13,500.81
CSPK	4,204	2,903.16

The company has produce Based on table above there is no over production of CSPO and CSPK. Beside that, the SCCS



Procedure No. SOP/BPK-ADM/0070218 on February, 2018, it is mentioned that the handling of inappropriate products.

### 3.8.8

Information for RSPO certified products is available in the delivery order document, the information including: name and address of the buyer, name and address of the seller, delivery date, date of documents issued, volume of product, identification number, certificate number, applicable supply chain model, and transport information. Example:

#### PK

The company shows Delivery orders for PK on 01 November 2020 with DO number 3852107230 with a commodity of 50 MT RSPO MB to Wilmar Cahaya Indonesia Tbk (contract number 3831102083).

#### CPO.

The company shows Delivery orders for CPO on 19 October 2020 with DO number No: 3852107223 with a commodity of 300 MT to Wilmar Cahaya Indonesia Tbk.

### 3.8.9

Bumi Pratama Khatulistiwa Mill are not outsourced activities to independent third parties. CPO and PK transporter are under contract with buyer (PT. Wilmar Cahaya Indonesia, Tbk – Pontianak). Besides that, the company has a Supply Chain Product CPO and PK Procedure No. SOP/BPK-ADM/0070218 on February, 2018, describe that sustainability PIC has a responsible to make a SCCS training for staff and employee related SCCS and the training was conducting every once a year. The last SCCS training was conducted on April 17, 2020.

### 3.8.10; 3.8.11

There are no contractors used for the processing or physical handling of RSPO certified oil palm products.

### 3.8.12

BPK POM has maintain, complete and up-to-date for the FFB receives, process and CPO & PK production from its supply bases.

The record keeping saves in "Mass Balance Report" for example periods May 2019 - March 2020. Within this record, the certificate holders maintain the FFB's sources based on monthly bases.

Months	FFB Received (Kg)		Total (Kg)
	Certified	Non-certified	
November 2019	5,058,600	5,291,987	10,350,587
December 2019	6,002,030	5,855,997	11,858,027
January 2020	5,654,930	5,419,504	11,074,434
<b>Subtotal</b>	<b>16,715,560</b>	<b>16,567,488</b>	<b>33,283,048</b>
February 2020	4,208,740	4,577,308	8,786,048
March 2020	4,669,920	3,223,964	7,893,884
April 2020	4,486,750	3,024,235	7,510,985
<b>Subtotal</b>	<b>13,365,410</b>	<b>10,825,507</b>	<b>24,190,917</b>
May 2020	4,552,690	2,901,976	7,454,666
June 2020	7,370,340	5,420,932	12,791,272
July 2020	8,575,830	5,487,224	14,063,054
<b>Subtotal</b>	<b>20,498,860</b>	<b>13,810,132</b>	<b>34,308,992</b>
August 2020	8,727,700	6,984,893	15,712,593
September 2020	8,816,220	5,464,589	14,280,809
October 2020	6,370,540	4,427,200	10,797,740
<b>Subtotal</b>	<b>23,914,460</b>	<b>16,876,682</b>	<b>40,791,142</b>
<b>TOTAL</b>	<b>74,494,290</b>	<b>58,079,809</b>	<b>132,574,099</b>

Furthermore, Mill has record and balance of all RSPO CSPO and CSPK, non-certified products produced, as well as its dispatch on a monthly and three monthly basis, presented in the Table bellows:

**CPO production and Dispatch for BPK POM**

DATE	CPO Production (Kg)		Total	DISPATCH CPO (Kg)		Total
	certified	non-certified		Conventional	RSPO	
Stock in the tank	1,043,846	577,711	1,621,557	-	-	-
Nov-19	868,596	918,440	1,787,036	1,253,998	1,750,000	3,003,998
Dec-19	1,044,698	1,031,067	2,075,765	750,960	750,000	1,500,960
Jan-20	1,015,720	947,983	1,963,703	751,865	750,000	1,501,865
Feb-20	711,469	789,169	1,500,638	955,001	1,050,000	2,005,001
Mar-20	863,827	593,213	1,457,040	945,890	1,050,000	1,995,890
Apr-20	856,869	578,223	1,435,092	351,808	650,000	1,001,808
May-20	819,295	519,311	1,338,606	717,923	985,000	1,702,923
Jun-20	1,381,326	1,007,444	2,388,770	840,274	1,165,000	2,005,274
Jul-20	1,565,958	1,006,730	2,572,688	1,245,422	1,756,452	3,001,874
Aug-20	1,622,663	1,290,624	2,913,287	1,066,386	1,443,548	2,509,934
Sep-20	1,605,205	971,880	2,577,085	1,183,614	1,319,713	2,503,327
Oct-20	1,145,177	869,935	2,015,112	850,000	1,654,049	2,504,049
<b>TOTAL</b>	<b>14,554,649</b>	<b>11,101,730</b>	<b>25,646,379</b>	<b>10,913,141</b>	<b>14,323,762</b>	<b>25,236,903</b>

**PK production and Dispatch for BPK POM**

Dated	PK Production		Total	Dispatch CSPK	
	certified	non-certified		Volume	Transaction ID
Stock in the tank	44,420	37,266	81,686	-	-
Nov-19	182,258	194,204	376,462	173,880	TR-d9d344ac-9445
Dec-19	230,500	226,218	456,718	253,850	TR-c8bfad93-8e1b
Jan-20	218,369	204,110	422,479	199,370	TR-4e71d051-e35b
Feb-20	155,520	173,591	329,111	161,580	TR-4639ad5a-2231/TR-8bc5a15a-b358
Mar-20	158,813	113,326	272,139	142,870	TR-7413eb65-2eaa
Apr-20	169,295	114,119	283,414	201,440	TR-c3233f3f-1f82
May-20	180,198	116,504	296,702	163,590	TR-70f45d66-86d8
Jun-20	292,569	211,145	503,714	298,510	TR-e22773cd-4536
Jul-20	318,975	200,410	519,385	306,480	TR-10551b1b-2e7f
Aug-20	361,888	287,894	649,781	321,850	TR-66f4ee33-808f
Sep-20	378,987	227,840	606,827	388,550	TR-3cb34134-eb7d
Oct-20	255,797	191,889	447,686	293,720	-
<b>TOTAL</b>	<b>2,947,589</b>	<b>2,298,515</b>	<b>5,246,104</b>	<b>2,905,690</b>	<b>-</b>



**3.8.13; 3.8.14**

BPK POM only conduct FFB processing up to CPO and PK. Based on RSPO SCCS Manual, it is explained that the conversion factors of CPO and PK are based on actual extraction.

**3.8.15**

BPK POM applied SCCS – modul E (MB) since its received and processing the FFB from certified and uncertified sources, verification are done trough field observation and interview to security and weigh-bridge operator as well as management representative. The mill claim only the volume of oil palm products produced from certified FFB as MB.

**3.8.16**

Trading transaction registration for BPK POM such as:

Item	License Update After Extension Volume	Actual Production (November 1 <sup>st</sup> , 2019 – October 31 <sup>st</sup> , 2020)	Announced Volume (MT)	Volume sold as RSPO (MT)	Remaining Certified Volume (MT)
FFB	103,600	74,494.29	-	-	29,105.71
CSPO	18,955	13,500.81	2,645.45	9,935.94	6,373.81
CSPK	4,204	2,903.16	733.72	1,989.88	1,480.40

Based on delivery and transaction document review, it was known that the announcement was carried out regularly. 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.

**3.8.17**

Unit management did not using logo during communication with stakeholders / customer.

**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**

Company has policy on human rights issued in June 2014. The policy explains that the company will adhere to the principles related to respecting and protecting human rights. It has been disseminated and understood by the workers, worker union, gender committee, external stakeholder including contractor based on interview. As for contractor, it is written in contractual agreement. It is known that there is no complaint related to human rights violation. There is no paramilitary uses for all company operational. If there was a complaint, the complaint can still be resolved by amicable way between employees.

**Status: Comply**

**4.2**

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

**4.2.1**

The company has a mechanism of complaint and grievance handling in *Prosedur Pengelolaan/Penanganan Keluhan dan Atau Pengaduan* (SOP 60/WIP-KB/(0)). Complain from worker can be submitted to worker's supervisor or Bipartite cooperative and complaint from external stakeholders can be submitted to public relation department. CH will protect the identity of complainant as written in Whistleblowing Policy (No. KP: 042/DIR-KP/VII/2015). Based on interview with worker in POM and estate, it is known that workers understand how to deliver their complaint if any. Based on interview with representative of Sungai Enau and Sungai Malaya Village, it is known that they understand the mechanism to deliver their complaint if any.

**4.2.2**

The company has a complaint handling procedure and dissemination as follows:

- Minutes of dissemination of SOP for Management or Handling of Complaints and / or Complaints to community representatives of Mega Timur Village and Sungai Malaya Village on June 5, 2015 with procedural material referring to SOP04 / WIP-KB / (0) / 0610 Rev 0 in June 2010.
- Minutes of dissemination of SOP for Management or Handling of Complaints and / or Complaints to representatives of the community of Sungai Enau and Kubu Padi Villages on June 4, 2015 with material procedures referring to SOP04 / WIP-KB / (0) / 0610 Rev 0 in June 2010.
- Procedures for Acceptance of Complaints and Dispute Resolution, especially Out of Court Disputes (SOP04 / WIP-KB / (0) / 0610 Rev 0 as of June 2010).
- Procedure for Management / Handling of Complaints and / or Complaints with Document Number SOP60 / WIP-KB / (0) / 0915 Rev 0 dated 01 September 2015 and Document Number SOP60 / WIP-KB / (0) / 0915 Rev 01 dated 01 June 2020 Where the procedure has stipulated regarding submission to the RSPO Complaints System if the complaint does not reach consensus.

The company has not been able to demonstrate that the procedure has not regulated, but is not limited to a system that ensures that the complaint handling clause is understood by affected parties, including those who cannot read and write. It is non conformity No. 2020.02 with non-critical category.

#### **4.2.3; 4.2.4**

The company has a document procedure that was state on *Prosedur Pengelolaan/Penanganan Keluhan dan Atau Pengaduan* (SOP 60/WIP-KB/(0)). The procedure explains that the delivery is done verbally and in writing. In addition, employees cooperate with work representatives in the *worker union* or gender committee to socialize the communication and consultation system that applies in the company, including the handling of employee complaints.

The CH already has officers who are responsible for handling complaints so that they continue to get further information related to the progress of complaint resolution, in this case the Assistant Public Relations/CSR. The procedure also explained that the response time related to complaints was 2 weeks after the complaint was submitted.

Based on interviews with employees and stakeholders, it is known that they have understood the person responsible and the grievance mechanism in which the complainant's identity is protected.

**Status: Comply**

### **4.3**

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

#### **4.3.1**

The company held a meeting with the village governments of Sungai Malaya, Mega Timur, and Sungai Enau from 26-27 July 2018 to optimize and remain the target of the community development program that will be carried out.

The company has shown the realization of CSR activities and documented it in the CSR CD realization report for 2019 and 2020. Activities that have been carried out for the period 2019 to July 2020, for example

- Assistance for the construction of the middle trench bridge for Sungai Malaya Village on February 28, 2020.
- Assistance of 10 water tank units in Bebetang village, Sungai Enau Village, Kuala Mandor B District, Kubu Raya district on April 12, 2020.
- Funding for the traditional rituals of Nabo 'Padagi Ne' antanik Parit Ampaning, Enau river, Kuala Mandor B District, Kubu Raya Regency on July 29, 2020.

Based on the results of interviews with Bina Mitra staff, that CSR programs are carried out based on requests from the community. Regarding public consultations or meetings, because the Covid 19 pandemic is still happening, until this ASA 3 audit, the company has not done it.

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

PT. BPK has managed totaling area for about 4,842.95 Ha as scope of certification. The corporate area originates from state land with other usage area status, in which there are several community's land. The acquisition process began with

obtaining a location permit from head of land agency of Pontianak District in 1996. The next process is land acquisition from community's area by providing compensation since 1998. The Document of land use right (HGU) on an area of 4,842.95 Ha can be shown by PT BPK, consisting of:

- HGU for an area of 4,814.96 Ha based on Minister of Agrarian / Head of BPN Decree No. 18/HGU/BPN/96 dated 31 May 1996. 30-year concession valid until 21 July 2026 (HGU Certificate No. 59 of 1996 dated 29 July 1996).
- There are 3 HGB, namely:
  1. HGB certificate No. 00078 dated 2 July 2020 covering an area of **4.427 Ha**
  2. HGB certificate No. 00079 dated 3 July 2020 covering an area of **106,700 m<sup>2</sup>**
  3. HGB certificate No. 00080 dated 3 July 2020 covering an area of **128,900 m<sup>2</sup>**

The company already has an FPIC SOP as stated in the SOP for the Technical Guidelines for Land / Land Acquisition Document No SOP01 / WIP-KB / (1) / 1215 on the effective date of January 1, 2015, legalized by GM PT BPK. In part E it is explained that the principle of carrying out land acquisition is in accordance with the principles of RSPO, HCVF and FPIC, namely land acquisition is carried out based on a decision that was born from a deliberation process to reach a consensus for investment interests freely without pressure (free) and the community has the right to agree or refuse (consent).

The Company has no new land acquisition and the entire compensation process was completed in 2006. The results of compensation documents verification and interview with communities is known that landowners are given the freedom to release their land without coercion. The process of FPIC is done by setting the Team, preparing work plan, preliminary study, FPIC agreement, meeting with the community/affected parties and recording.

The procedure was made in 2015 while the compensation process was completed before 2006. So that the SOP was not made participatively with the community, but the compensation process carried out by the company was generally in accordance with existing procedures and the compensation process was understood by the land owner. , as the results of interviews with the previous land owner.

Based on the document review (area statement), interviews with the village head and Plantation Agency of Kubu Raya, it was found that there were no new land acquisitions in the company so there were no land compensation activities. Land compensation activities at the beginning of land clearing / dispute have been described in the previous assessment.

<b>Status: Comply</b>	
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#### 4.5

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

##### 4.5.1 to 4.5.8

Based on the document review (area statement), filed observation, interviews with the village head and Plantation Agency of Kubu Raya, it was found that there were no new land acquisitions/new planting in the company so there were no land compensation activities.

<b>Status: Comply</b>	
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#### 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 to 4.6.4

The Company has compiled a procedure of Land Compensation (SOP 01/WIP-KB/(0)/0610 dated 1 June 2010). The procedure is covered the process of identifying legal, customary or user rights, and a procedure for identifying people entitled to 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. The Company has no new land acquisition and the entire compensation process was completed in 2006.

The results of compensation documents verification and interview with communities is known that landowners are given the freedom to release their land without coercion. The process of FPIC is done by setting the Team, preparing work plan,

preliminary study, FPIC agreement, meeting with the community/affected parties and recording.		
Based on the document review (area statement), filed observation, interviews with the village head and Plantation Agency of Kubu Raya, it was found that there were no new land acquisitions/new planting in the company so there were no land compensation activities.		
	<b>Status: Comply</b>	
<b>4.7</b>		
<b>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.</b>		
<b>4.7.1 to 4.7.3</b>		
The Company has compiled a procedure of Land Compensation (SOP 01/WIP-KB/(0)/0610 dated 1 June 2010). The procedure is covered the process of identifying legal, customary or user rights, and a procedure for identifying people entitled to 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. The Company has no new land acquisition and the entire compensation process was completed in 2006.		
The results of compensation documents verification and interview with communities is known that landowners are given the freedom to release their land without coercion. The process of FPIC is done by setting the Team, preparing work plan, preliminary study, FPIC agreement, meeting with the community/affected parties and recording.		
	<b>Status: Comply</b>	
<b>4.8</b>		
<b>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.</b>		
<b>4.8.1 to 4.8.4</b>		
The results of compensation documents verification and interview with communities is known that landowners are given the freedom to release their land without coercion. The process of FPIC is done by setting the Team, preparing work plan, preliminary study, FPIC agreement, meeting with the community/affected parties and recording.		
Based on the document review (area statement), filed observation, interviews with the village head and Plantation Agency of Kubu Raya, it was found that there were no new land acquisitions/new planting in the company so there were no land compensation activities.		
	<b>Status: Comply</b>	
<b>PRINCIPLE #5 SUPPORT SMALLHOLDER INCLUSION</b>		
<b>5.1</b>		
<b>The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.</b>		
<b>5.1.1; 5.1.2; 5.1.3</b>		
The government of the Kubu Raya Regency and West Kalimantan Province, the FFB price fixing, is always followed by the company and the head of the cooperative, so that the plasma cooperative can directly determine the stipulated price for the FFB. In addition, based on interviews with the cooperatives Mekar Lestari and Tuah Jubata, the price of FFB always follows the price set by the West Kalimantan Provincial Plantation Office every month.		
The FFB price fixing is in accordance with the price set by the West Kalimantan Provincial Plantation Office, which is published in the minutes of the meeting on determining the K index and the price of palm oil FFB produced by West Kalimantan planters. The price of FFB is determined based on the age of the plant. For example, the official report for the first period of October 2020 decides that the CPO price is IDR 9,071.56 (excluding VAT), the PK price is IDR 4,362.96 (excluding VAT) and the price of FFB, for example those from mature area aged 10-20 years is IDR 1,980.32 / kg. Proof of payment of FFB to the plasma of the Tuah Jubata Cooperative and KUD Mekar Lestari shows that it is in accordance with the minutes of the meeting on the determination of the K index and the price of palm oil FFB produced by West Kalimantan province farmers		

Based on an interview with the management of the Mekar Lestari KUD, it was informed that the management knew the price of FFB because they participated in the determination meeting.

**5.1.4; 5.1.5**

The government of the Kubu Raya Regency and West Kalimantan Province, the FFB price fixing, is always followed by the company and the head of the cooperative, so that the plasma cooperative can directly determine the stipulated price for the FFB. In addition, based on interviews with the cooperatives Mekar Lestari and Tuah Jubata, the price of FFB always follows the price set by the West Kalimantan Provincial Plantation Office every month.

The price of FFB is in accordance with the price set by PT. BPK collaborates with plasma plantations, namely KUD Mekar Lestari (SPK No. 23 / BPK-DIR / PK-II / 98 dated February 12, 1998) and KUD Tuah Jubata (SPK dated February 25, 2015). These cooperation agreements start from the development of plantation and the sale and purchase of FFB during one crop cycle (until the plant productivity runs out =  $\pm$  25 years). In terms of operational management carried out by the company as long as the farmer's credit has not been paid off. For KUD Mekar Lestari, currently the management has been handed back to the farmers because the credit has been paid off as indicated in letter No. 162 / MBB / HEB / 2010 dated 11 May 2010 from Bank CIMB Niaga and letter No. 057 / PLM-Ext / XI / 12 dated 16 November 2012 from PT. CPC. For KUD Tuah Jubata, currently it is still managed by PT. BPK because the credit has not been paid off.

The Cooperation Agreement was signed by the company and the cooperative and acknowledged by government agencies including the West Kalimantan Provincial Plantation Office, the Regent of Pontianak City, the Kubu Raya District Plantation Service, the Kubu Raya Cooperatives and UMKM Office and the Kubu Raya Regent.

**5.1.6**

The mechanism related to the price, weight of FFB paid and the number of farmers paid is always the preparation of a Final Report for Calculation of the proceeds from the sale of Fresh Fruit Bunches for Plasma Plantation every month. Minutes are made according to the agreement between the company and the plasma cooperative. The Minutes contain the calculation of the net results and also explain in detail the deductions and the amount paid. For example as follows:

- Minutes of the completion of the calculation of the results of the sale of plasma FFB for the period of September 2020 from the Tuah Jubata cooperative. The calculation of the net result in the period of September 2020 is IDR 122,915,028 with details that the overall result of production is IDR 216,123,269 (120.01 tons) after deducting the costs, harvesting and transportation costs, maintenance and over-head of IDR 93,208,241. net of FFB sales is Rp. 122,915,028. The Minutes have been signed by the cooperative and the company.

In accordance with the partnership agreement regarding the distribution and / or payment of the net proceeds from the sale of plasma plantation production FFB before conversion, it is stipulated that 50% of the net sales proceeds will be paid to the cooperative, while 50% will be paid for instalments / return of investment costs for plasma plantation development to PT BPK. So that in the period of September 2020, the Tuah Jubata Cooperative received a net result of Rp. 61,457,514. The company has made a payment according to the agreement amounting to Rp. 61,457,514 through Bank Mandiri on October 14, 2020.

Based on the Minutes of the agreement to break the Tuah Jubata production cooperative block on April 28, 2018, the Tuah Jubata Cooperative is divided into 2 farmer groups, namely the Dian Kasih Farmers Group with block number 907 covering an area of 63.22 Ha and the Batuah Raya Farmer group with block number 908 covering an area of 35.03 Ha

- Minutes of the completion of the calculation of the sale of plasma FFB for the period of September 2020 from the Mekar Lestari cooperative. The calculation of net income for the period September 2020 is IDR 3,698,316,843 after deductions for taxes, harvesting, transportation, maintenance and overhead costs. The Minutes have been signed by the cooperative and the company and farmer groups.

The company has made payments according to the agreement through Bank Mandiri on October 14, 2020.

**5.1.7**

The company has tested weigh bridges carried out by the Office of Cooperatives for Micro-enterprises and Industry, UPTD Legal Metrology, Kubu Raya Regency with the following evidence:



- Certificate of Test Results Number 510.3 / 072 / MET-B / SKHP / TU / TIMB / IV / 2020 for the electronic Scales Avery Sustainable brand, serial number 30280196, nominal mass 50000Kg / 10 Kg, class III, testing was carried out on the date April 22, 2020 and has been approved by the Head of Legal Metrology UPTD Kubu Raya Regency on April 22, 2020 and is valid until April 22, 2021. The test results can be seen that the electronic weigh bridge is still in good condition.
- Test Result Certificate Number 510.3 / 071 / MET-B / SKHP / TU / TIMB / IV / 2020 for Avery Weight Tronik brand electronic bridge scales, serial number 124151242, nominal mass 50000Kg / 10 Kg, class III, testing has been carried out on April 22, 2020 and has been approved by the Head of Legal Metrology UPTD Kubu Raya Regency on April 22, 2020 and is valid until April 22, 2021. The test results can be seen that the electronic weigh bridge is still in good condition.

**5.1.8**

The company has carried out socialization related to RSPO and best practice training to plasma cooperatives as indicated by the Minutes of November 2, 2020.

**5.1.9**

The handling of complaints from all parties is described in the Procedure for Management / Handling of Complaints and / or Complaints Document No. SOP 60 / WIP-KB / (0) / 0915 which was approved by the General Manager effective from 01 September 2015. The objective of this procedure is to make complaints / The complaints received by the company are in the form of identifying complaints / complaints for finding alternative solutions, selecting solutions, implementing and resolving those that arise or occur due to the presence or existence of the company with all forms of business activities. This SOP explains the principles of handling complaints / complaints, namely, confidentiality of the perpetrator, tiered, transparency, accountability, objective, speed, accuracy and record.

Based on the logbook and interviews with the plasma cooperative, there have been no complaints during the 2019-2020 period.

<b>Status: Comply</b>
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**5.2**

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

**5.2.1; 5.2.2; 5.2.3; 5.2.4**

The company has carried out socialization related to RSPO and best practice training to plasma cooperatives as indicated by the Minutes of November 2, 2020.

**5.2.5**

The company shows reports related to the realization of production and sales value of FFB for Mekar Lestari Plasma Plantation and Tuah Jubata Cooperative for the period 2020. The report contains related to FFB production, prices, as well as deductions of income from taxes, maintenance, wages, transportation harvest and general.

<b>Status: Comply</b>
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**PRINCIPLE #6 RESPECT WORKERS' RIGHTS AND CONDITIONS**
**6.1**

**Any form of discrimination is prohibited.**

**6.1.1.**

The company has policy related to nondiscrimination and equal opportunity (September 2010) which explained that Wilmar did not discriminate against gender, race or ethnicity, disability, sexual orientation, age, or belief. This policy also explains the recruitment process starting from job vacancy announcements, recruitment and selection, training, career development, and service conditions, and personnel records.

**6.1.2.**

Based on review of worker list, field observation and interview with spraying and manuring female worker, as well as gender committee, it is known that there is no issue or complain from worker regarding discrimination. Also, information

from committee of worker union stated that there is no issue related discrimination. The workers that have been interviewed is came from various social origin, race, and religion.

### 6.1.3.

Company kept the personal file of each worker in estate office. Based on interview with management, the recruitment is conducted through the company requirement. The new recruitment is conducted in accordance with the procedure. It is based on skill, capabilities, and health condition for all workers. Worker promotion, mutation or demotion is done through the employee performance assessment. Company showed documentation of employee promotion, such as appointment decree from temporary daily worker to permanent worker of initials name MH No 032/BPK-HRR/SK/X/2020 dated 1 October 2020. Information about wages received, leave, and social insurance is explained in attachment of the decree.

### 6.1.4

Based on review of recruitment procedure, recruitment file, and interview with women workers in estate and mill as well as gender committees/woman working group revealed that there is no pregnancy test for recruitment. The pregnancy tests were only conducted for pesticide applicators to avoid the employees being exposed to pesticides. Furthermore explained that so far there had never been a pregnancy test which was a discriminatory measure.

### 6.1.5.

The company has formed a gender committee/woman on working group in management unit. Based on interviews with the gender committee/woman on working group and female workers known that breastfeeding workers are not permitted to work using chemicals. Workers who are breastfeeding are also given the opportunity to breastfeed their children.

### 6.1.6.

Based on document review of payment list and slip, it is known for workers who have the same working scope has been paid with the same wage without discrimination. For instance, for upkeep workers paid Rp. 97,320/day according to the minimum wage of 2020 regulation.

Status: Comply

## 6.2

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

### 6.2.1.

The working condition including payment has been set in the Collective Labor Agreement (CLA) period of 2018 – 2020 that have been made in Indonesian language. The CLA is ratified by Manpower and Transmigration Agency of Kubu Raya Regency through decree No KEP/840/HI/XI/2017 on 12 October 2018. The company and Labor Union has an agreement to extend this CLA until 5 November 2021 and has been reported to Labor Agency based on letter on 6 November 2020.

The CLA regulated about company and worker responsibilities, recruitment process, promotion and demotion, work time management, payment system, social insurance, contract termination, and so on. Based on interview with the workers, it is known that they understood about worker's rights and obligation as written in agreement.

The certification unit shown the regulation of minimum wage, based on Decree of the Governor of West Kalimantan on 21 November 2019 regarding minimum wage of Kubu Raya Regency of 2020, that is Rp. 2,433,000.00 /month (Rp. 97,320/day).

However, based on the results of a study of the harvester's wage payment documents (permanent and temporary workers) with the unit-based payment system in Division 2 Phase 4 in October 2020, it is known that of the 40 harvesters, only 13 harvesters (33%) get the average wage per day according to/exceed the minimum payment (Rp. 97,320 /day), while the remaining 27 harvesters (68%) received an average wage per day below the minimum wage.

The implementation of the harvester payment by unit-based payment system is still not in accordance with Government Regulation No. 78 of 2015 concerning wages. Where in Article 35 letter b, it is stated that the average income per day for workers in the unit of yield system must not be less than the provincial or district / city minimum wage. **This is become Major Non-Conformity No. 2020.03.**

#### 6.2.2.

All workers in the Mill and Estates, including permanent and temporary have been made and given the contractual agreement. For instance the agreement with the initials name MD No. 035/BPK-HRR/SK/X/2020 dated 1 October 2020, has been set the company and worker responsibilities, recruitment process, promotion and demotion, work time management, payment system, social insurance, contract termination, and so on. Based on interview with the workers, it is known that they understood about worker's rights and obligation as written in agreement.

Employee pay slips inform the wages paid if they exceed work hours, exceed work targets and work on holidays.

#### 6.2.3.

Based on the review of the employee attendance documents on night security from January to October 2020, there were 5 employees with the initials AM, IR, ID, IW, IY (employee numbers BX/BPK/0415/1531, BX/BPK/1009/1054, BX/BPK/0309/964, BX/BPK/0310/1087, BX/BPK/0309/920) who work more than 21 working days in each month and more than three months consecutively.

The implementation of the company's manpower system is still not in accordance with the Labor Minister Lay No. 100 of 2004 concerning the provisions for the implementation of a specified time work agreement, Article 10 explains that if a worker works 21 days or more for 3 consecutive months or more, then the casual/temporary daily work agreement shall be changed to permanent worker. **It is become Major Non-conformity No. 2020.04.**

#### 6.2.4, 6.2.5

Based on field observation in housing complex, it is known that company has been providing housing facilities, lighting and water, places of worship, school buses, clinics and educational facilities (kindergarten, elementary). Based on interview with the residents, it is known that there is no complaint related to housing facilities. The facilities provided by the company is adequate. And it is known that one house is occupied by one family and the condition of housing is still in good shape. Adequate food supply can be accessed by the worker from nearest market, about 30 minutes from the housing area.

#### 6.2.6.

The certification unit has conducted prevailing wage calculation in accordance to RSPO formula, such as for Mill additional Rp. 716.020/month/worker; and for Estate additional Rp. 894.694/month/worker

#### 6.2.7

Based on document review and field observation, known that for permanent working scope has been filled by permanent workers. And for temporary workers have been worked in the temporary working scope. However, there are some temporary workers that worked in the inappropriate working scope, that has been raised to Major non-conformity in indicator 6.2.3.

6.2.1	Status: Non-Conformity No. 2020.03 with Major category.
6.2.3	Status: Non-Conformity No. 2020.04 with Major category.

#### 6.3

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

#### 6.3.1.

The policy related to form and join worker union is listed Human Rights Policy which states that the company gives the right to associate to all workers. The policy is written in Indonesian language. This policy has been disseminated and understood by the workers.

#### 6.3.2

The company has opportunity for improvement related to increasing the routine of meetings with workers representatives (Workers' Unions and Bipartite Institutions). Due to in the period of January - November 2020, meetings with worker representatives were only held twice, namely in March and September. **OFI.**



<b>6.3.3</b>	Based on interview with the Labor Union, it is known that the company did not interfere the formation or operation of the Labor Union. The selection of organization structure conducted independently.	
	<b>Status: Comply</b>	
<b>6.4</b>	<b>Children are not employed or exploited.</b>	
<b>6.4.1.</b>	The company has child protection policy signed by Chief Sustainability Officer of Wilmar International in November 2017. Based on the policy, the minimum age for new worker recruitment is 18 years old. The anti-child labor policy also has been set in the contractual agreement for third-party contractors.	
<b>6.4.2, 6.4.3</b>	Based on document review of workers list and field observation, there are no workers under 18 years old. Based on public consultation with Labor and Transmigration Agency of Kubu Raya Regency and field observation in estate and POM, there is no issue regarding child labor.	
<b>6.4.4.</b>	Based on document review, field observation, and interview with the workers, supervisors, and staff, also external stakeholders, it is known that the no child labor policy has been disseminated and understood by the workers, supervisors, staff, including third party contractors. On the contractual agreement with the contractors also have been set the clause of no child labor policy.	
	<b>Status: Comply</b>	
<b>6.5</b>	<b>There is no harassment or abuse in the workplace, and reproductive rights are protected.</b>	
<b>6.5.1, 6.5.2</b>	Policies to maintain morality are included in the Sexual Harassment Policy, Violence and Reproductive Rights signed by the Plantation Head Group and CSR Head Group in June, 2014. The policy states that Wilmar will take appropriate steps to prevent incidents of sexual harassment, acts violence, and violation of reproductive rights and will be responsive and fair to reports of sexual harassment by maintaining their confidentiality. Based on interview with female worker in Estate, it is known that they understand the policy. It is also known that they understand the mechanism of complaint submission. Also, interview with committee of Gender Committee, it is known that there is no issue or complaint related to sexual harassment on the workplace.	
<b>6.5.3</b>	Based on interview with female workers and Gender Committee, it is known that female employees who have just given birth will get <i>posyandu</i> facilities and get special time for breastfeeding. The company has an implementation related of reproductive right such as giving the leave (paid leave) for pregnant worker, beside that if there is worker who detected as pregnant, a work mutation will be carried out.	
	Based on the results of the assessment, the needs of young mothers include postpartum health support 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 child care centre.	
<b>6.5.4.</b>	Company has formed gender committee for handling the harassment issue around female workers. Complaint can be submitted to board of bipartite cooperation, gender committee, or their foreman. Based on interview with the board of gender committee, the company provides the female worker with menstrual leave, pregnant and nursing leave for about 3 months. Pregnant and nursing female worker is prohibited to work related to chemical. And also, Company give special breast feeding time for female worker, but prohibit the worker from working with chemical material.	
	<b>Status: Comply</b>	
<b>6.6</b>	<b>No forms of forced or trafficked labour are used.</b>	

**6.6.1, 6.6.2**

Based on document review, field observation, and interviews with worker and stakeholders, it is known that there is no migrant labor, including forced labor and illegal labor. However, there are still casual or temporary workers, that the recruitment and working condition made according to the company's procedure. All temporary workers have work agreement that explained about the obligation and rights of the worker, and other provision. They work based on the contract and work order. Based on field observation and interviews with the workers in Estate and Mill, it is known that there is no discrimination among them. They came from local and nonlocal worker. Based on field observation in estate, auditors did not sighted any harvester accompanied by their wife or children. Based on interview bipartite cooperation member, there is no issue related to force labor.

<b>Status: Comply</b>
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**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 established the OHS Committee (P2K3) covering for Mill and Estate which served as the persons in charge of the OHS identification, program, and implementation. The OHS Committee has been registered by Employment Agency (Decree No. 78/NT.WASKER.1/2020 dated 07 February 2020).

The Secretary of OHS Committee has been complied with Employment Minister Law No. 4 of 1987, that is the OHS expert who initial name FO. However during the audit, the OHS expert license has been expired. The correspondence letter of extension progress between the company and Labor Agency has been shown.

The OHS Committee regularly conduct monthly meetings on OHS issues in the workplace. The documentation of the meeting were recorded and stored well. The meeting commonly discussed the consistency of PPE usage, work accident report, fire simulation, checking of emergency response equipment, OHS sign board, cleanliness of work area, as well as the mitigation of Covid-19.

**6.7.2.**

The company has had sort of OHS policy and procedures. These policy and procedures stated the company's commitment on the implementation of occupational health and safety within company's operation. These procedures designed to control the hazards in every activity that is in the working environment to prevent accidents and occupational diseases. Management have work program of occupational health safety every year. Realization of the program of work will be monitored through regular meetings of OHS Committee in every month.

BPK Estate has had three licensed first aid officer (e.g initial PI with license No. 807/P3K/XII/13, dated 1 December 2013), while BPK Mill has had one licensed first aid officer (initial MO with license No. 1550/POHS-P3K/IV/2015, dated 20 August 2015). These first aid officers then giving annual first aid training to the supervisors in the Mill and Estate. Based on field observation, the supervisor has been given first aid kit and can demonstrate the first aid handling. The accidents happen has been recorded well and using the LTA calculation. Described in more detail in indicator 6.7.5.

**6.7.3**

PPE provided to the workers without any charge based on HIRAC and PPE Procedure (No. 31/WIP-KB/(0)/2011). Has been shown evidences of regular PPE provision especially for high risk workplace such as chemical storage, pesticide application, mill's machineries, harvesting, etc.

Based on field observation in the high risk workplace in the Mill and Estate, known that the workers provided proper PPE in accordance with the HIRAC. Sanitation facilities and PPE storage for pesticide applicator provided in the Division Offices, therefore the PPE washed and stored in the special place and prohibited to placed in worker's houses.

Interview with the workers and Labor Union, the PPE has been provided, exchanged regularly or anytime if broken without any charge.

**6.7.4**

The company established the company's clinic, as well as its licensed company's doctor and paramedics. All workers including contractor's workers can use this facility.

For further or un-handled medical care covered in government employment and health insurance (*BPJS Ketenagakerjaan & BPJS Kesehatan*). This insurance has been paid monthly based on document review according to the applicable rule.

Based on interview with the workers and Labor Union, there is no issue related medical care. If the clinic can not handle the medical care, the patient will be brought to the partner hospital in the city.

For contractor's workers, based on document review and interview with contractor representative, it is known that the accident insurance for workers is covered by the contractors.

#### 6.7.5.

The Mill and Estate has calculated the monthly occupational accident referring to the Lost Time Accident (LTA) metric. This document informs among others the accident grade, total workers, lost time, FR and SR. For instance, to date October 2020 in BPK Estate, there are eight cases, with total 68 hours lost time, 331 FR and 563 SR.

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

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

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

According to IPM activity records for October 2020 such as program and realization of rat census, leaf-eating caterpillar census, and *ganoderma* census, it could be concluded that all the census results were still under its economic threshold. There is no invasive species attack. This may lead to zero use of pesticides for pests and disease control. It could be concluded that IPM techniques implemented by biological methods is effective to control pests and diseases, and also to minimize the use of chemicals. Furthermore, according to the pesticides used to record in 2020, agrochemical uses were only implemented for weeds control purposes.

The company has a good commitment to improve the use of pest natural predator as part of integrated pest control. One of natural predator development is the reproduction and the construction of barn owl box as a mechanism to control rat. The company monitoring barn owl box occupation at least once a month. The monitored parameter are the existing of barn owl in the boxes, left food, and sign of reproduction such chick, as egg or owl. Currently, there are total 20 barn owl boxes in BPK Estate. Based on field observation on harvesting, spraying and manuring activities, it was concluded that there were no significant pest attacks. This is in accordance with the result of the census.

The company shows planting data for beneficial plants period 2020 on BPK Estate, explained *Turnera subulata* on July 2020 is 150 Ha, *Casia cobanensis* on July 2020 is 450 Ha and *vertifiver grass* on May 2020 is 250 Ha.

### 7.1.2

Based on document review and field observations, the company applies several biological control practices to suppress pest and disease attacks such as *Antigonon leptopus* and *barn owls (Tyto alba)* and is well managed for example there are poles at the crossroads of the paths where *Turnera subulate* and *vertiver grass*. The results of verification on the cabi.org website is known that the species was declared not invasive in Indonesia.

The company also conducted socialization on the management and control of invasive species October 2020, which explained types of invasive species in the company's operational areas.

### 7.1.3

Based on document reviews, field observations, and interviews with workers and stakeholders, it is known that the company does not use fire to control pests.

Status: Comply

## 7.2

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

### 7.2.1

The company has a procedure in using pesticides contained in Agronomy guidance and SOP of oil palm plantation on 2015 ratified by Group Head of Plantation. In the SOP showed the rotation of circle spraying and harvesting path, weed controls spot/selective weeding as other special grass and weeds by using pesticides in accordance with the target in the field for example grass controls by selective using *glyphosate*. In the SOP also not allowed using pesticide with active ingredient of *paraquat*.

Based on field visits and interviews with 4 pesticide applicators in block 201 E BPK estate, it was concluded that workers knew about the function of the chemical used and selective when doing the spraying activity, as for example for glyphosate material used to spray the circle and harvesting path only while the weeds in inter row not sprayed. The company used *Isopropil amina glyphosate*, *Metil metsulfuron*, and *triclophyr*, which have received permission from the government.

The company uses registered chemicals which are permitted by the Government and can be seen on the website [www.pesticide.id](http://www.pesticide.id)

### 7.2.2; 7.2.3; 7.2.4

The company has documented records of pesticide toxicity in the document of Monthly Pesticide Toxicity Data. The document is recorded product name, active ingredients, LD50, 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.

The company has program to reduce the pesticide usage that covered at SOP Agronomy (No.SA11/EMU/0/1014) 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 eater 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.

The plan minimized pesticide the company apply *Pheromontrap* for reduce *oryctes rhinoceros* population, there is 33 Pheromontrap on BPK estate on division block 201A is 10 pcs, block 212A is 10 pcs, block `113A is 10 pcs and 128A is 3 pcs, base on last monitoring on 5 November 2020 the *oryctes rhinoceros* trapped is 11 male and 9 females on block 210A.

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.

### 7.2.5

Based on 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."*

Based on document verification and field visit to pesticide storage, BKP Estate do not use pesticide with WHO 1A or 1B class.

#### 7.2.6

The company also provided information materials of periodic training on pesticide handling to pesticide applicator and foreman as evidenced by the minutes of best practice spraying that was held on 6 October 2020 and was attended by 19 people.

The pesticide applicator also using personal protective equipment in accordance with specified hazard identification and material safety data sheet such as respirator mask, gloves, safety shoes, apron and goggles. In addition, employees are also informed about the steps of secure work in each roll call in the morning before work. Meanwhile, the spraying workers interviewed also claimed that after spraying they will be washing up and drying up the PPE and spraying tools (sprayer tank, jerry, etc), and taking shower/changing clothes in special place near pesticide store of the division office. Therefore, based on field observation to mixing area in BPK estate, that known there are storage for keeping all PPE's and spraying tools after use.

#### 7.2.7

The company has SOP for pesticide storage facilities and ways of working in pesticide storage places with no. document 14 / WIP-KB / (0) / 0610 revised 0 effective date January 2011. The procedure describes the procedure for making pesticide storage places, mixing places, storage rules, work procedures in pesticide storage warehouses and OHS provisions.

As a result of visits to chemical storage warehouses, it was known that chemicals were stored in accordance with applicable regulation. It was found a complete series of MSDS, in accordance to the current stock. Specific pesticides mixing site has also available. Water which had used for sprayer washing and pesticides mixing process was properly reused. The storage has also equipped with pesticide flows records, proper risk symbols, PPE, first aid and fire extinguisher. Based on the visit and interviews with chemical officers, ex chemical was sent to hazardous waste storage.

#### 7.2.8

The company has an SOP for the manufacture of pesticide storage areas and how to work in the pesticide storage area with no. document 14 / WIP-KB / (0) / 0610 revision 0 on January 2011. The procedure describes the procedures for making pesticides storage, mixing places, storage rules, working procedures in the pesticide storage warehouse and OHS provisions. As a result of visits to chemical storage warehouses, it was found that chemicals were stored according to recognized practices. Based on interviews with chemical officers and visits, the used pesticide packaging was sent to a temporary storage area for hazardous and toxic waste and some of it was used for mixing pesticides and transporting chemicals. Based on visits to residential areas, there was no use of used pesticide packaging for other purposes. Based on observations of temporary storage places for hazardous and toxic waste in Estate and Mill, it is shown that the used pesticide packaging is stored in licensed temporary storage places for hazardous and toxic waste. Meanwhile, all pesticides are stored in a special warehouse. Then, based on observations in the housing of estate employees, there was no use of used pesticide packaging for household needs, such as trash cans, water containers and flower pots. Records of hazardous waste management including used pesticide packaging are described in Indicator 7.3.2

#### 7.2.9

The sprayers workers on circles and path using selective pesticides three times a year. Based on field observations in BPK estate, it is known if the workers already know the method of selective spraying, for example, only spraying the circle or the existing weeds and if there is no weed, no spraying is carried out. The company also does not apply pesticides by air.

#### 7.2.10

Specific medical check-up (*Cholinestrase*) for pesticide operator has been conducted annually in the accredited Labor



Agency Laboratory of West Kalimantan Province. The check-up of 2020 has been conducted based on report on 3 March 2020. The result of medical examination is informed to the workers and all pesticide operators are in a healthy condition (normal result). Moreover, based on interview with the workers, it is known that they are never get experience of occupational injury which caused by chemical such as irritation.

#### 7.2.11

The company has had an internal memorandum (No. 058/HRR/INT/V/2012, date 31 May 2012) that prohibits pregnant and breastfeeding personnel working with chemical material. Based on interview with female spraying personnel, it is known that there was neither pregnant nor lactating female personnel who work with pesticide. Moreover, the company conducts pregnancy test and examination every three months. Audit team also got information that the personnel have understood that female personnel cannot work with chemical material if they are pregnant or lactating.

Status: Comply

#### 7.3

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

##### 7.3.1; 7.3.2

The company has identified waste both from plantation operations and from palm oil mill operations. The resulting waste is classified into hazardous and toxic waste and non hazardous and toxic waste. The company has identified waste both from plantation operations and from palm oil mill operations.

For domestic waste identification, it has been regulated in the SOP for Residential Solid Waste Management document. Waste separation is separated based on the type of wet and dry waste, garbage transportation is carried out routinely, waste separation organic and inorganic are adjusted to the appropriate tub then put into the final waste disposal and closed periodically.

The company also has an SOP for the management of waste and waste of hazardous and toxic materials with document no. SOP 19 / WIP-KB / (0) / 0610 in effect in January 2016 which has been approved by the General Manager. In the document, it is explained that all Hazardous and toxic wastes are stored in a temporary storage place for hazardous and toxic wastes which are then moved / transported / reused or managed by other parties who have a permit from the environmental agency.

The company already has a Temporary Storage Permit issued by the Kubu Raya Regency No. Investment and One Stop Integrated Service (DPMPT). 503/002 / BPMPT-E / B3 / 2015 dated 28 August 2015 valid until 28 August 2020, with the allowable storage period for waste is 90 days. In relation to the expiry of the license period, the Company has extended the operational permit for the management of Hazardous and Toxic waste for producers with documents that have been shown as follows:

- The OSS system which explains that the operational permit for the management of Hazardous and Toxic Waste management has been approved by PT Bumi Abadi Khatulistiwa which was issued on August 31, 2020 by the Regent of Kubu Raya, West Kalimantan Province based on technical considerations issued by the Environmental Office of the Kubu Raya Regency
- Minutes of Field Verification of the Issuance of B3 Waste Temporary Storage Permit (TPS) number 660.1 / BA-TPSLB3 / DLH-C on August 24, 2020 from the Environmental Office of the Kubu Raya Regency with the result of the verification recommends PT BPK to obtain an extension of the Temporary Storage Permit Hazardous and Toxic Waste in accordance with the provisions of the applicable laws.

In addition, for the Temporary Storage of Hazardous and Toxic Waste at the Palm Oil Mill, PT BPK has a permit in accordance with the Decree of the Head of the Kubu Raya Regency Investment and One Stop Integrated Service Number 503/006 / BPMPT-E / B3 / 2016 dated 15 August 2016. and valid until 15 August 2021.

The company already has a partnership with a company that transports hazardous and toxic waste that has a permit from the government. Cooperation Agreement for the Transportation and Management of Hazardous and Toxic Waste between PT Bumi Pratama Khatulistiwa POM and PT Prinmaru Jaya (Number 002 / BPK-POM-SPK / Transportation Services - B3 / II / 2020 Waste and this agreement is valid for 1 year from the date of February 21, 2020 to February 21, 2021. Meanwhile,

in the Plantation, there is a Cooperation Agreement for the Transportation and Management of Hazardous and Toxic Waste between Prinmaru Jaya and PT Bumipratama Khatulistiwa (Estate) number 056 / LGL / MOU / PMJ-BPKE / II / 2020 dated and valid until March 2, 2021.

The company has also carried out documentation related to waste management for both plantation and mill operations by showing records of handling hazardous and toxic waste, for example:

- Logbook / balance with the following details:

Stock of Hazardous and Toxic Wastes based on a review of the Logbook of hazardous and toxic waste in factories up to September 2020

- Used Oil as much as 1.05 tons
- Used filters as much as 0.074 Tons
- Used gloves as much as 0.107 tons
- 0.054 tons of used cloth rags
- Used jerry cans 0.096 tons

Stock of hazardous and toxic materials based on a study of the Logbook of Hazardous and Toxic Waste in Plantation until August 2020:

- Used Oil 0.68 tons
- Used filters 0.14 tons
- Used battery 0.09 tons
- Used cloth rags 0.037 tons
- 0.442 tonnes contaminated packaging

- Minutes of Handover of Hazardous and Toxic Waste on October 14, 2020 from PT BPK to PT Prinmaru Jaya with types of waste including 1.05 tons of used oil, 0.074 tons of used gloves, 0.107 tons of used gloves, 0.054 tons of rags 0.096 Tons used

- Report on the management of hazardous and toxic waste for the 3rd quarter of 2020 to the Environmental Service of West Kalimantan Province, Environmental Service of Kubu Raya Regency, West Kalimantan Provincial Plantation Service and Kubu Raya Regency Forestry Service on November 5, 2020.

The company has also conducted training related to Hazardous and Toxic Waste control, including training on hazardous and toxic waste control at the 1st and 2nd division workshops on February 8 and July 21 2020.

Based on interviews with workers, they have learned about the management of Hazardous and Toxic waste, namely by storing the former packaging of Hazardous and Toxic Wastes in the Temporary Storage of Hazardous and Toxic Wastes in the company.

### 7.3.3

The company already has an SOP for the management of hazardous and toxic waste and waste with document number SOP 19 / WIP-KB / (0) / 0610 in effect in January 2016 which has been approved by the General Manager. In the document, it is explained that all hazardous and toxic wastes are stored in temporary hazardous and toxic waste storage places which are then moved / transported / reused or managed by other parties who have a permit from the environmental agency. Based on the results of visits to plantations, palm oil mills and housing estates, there were no indications of burning waste.

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

The management of soil fertility is regulated in the SOP Estate manuring section. Meanwhile there is procedure for soil sampling (SA 12/EMU/2/0916, rev 02) as a guidance for soil sampling analysis.

The company shown the program and the realization of fertilization application for period January until October 2020.



Based on document review and interview with the staff, the realization of fertilization in BPK Estate is in accordance to the program. Fertilization programs are ongoing and the company continues to target completion based on fertilizer recommendations. The auditor conducted an interview with the fertilizer workers at BPK Estate, fertilization is done manually by workers. The workers can also explain the fertilization procedure well, which is in accordance with the dosage determined based on the recommendations.

#### 7.4.2

To find out the soil fertility, the company conducting of soil and leaf analysis periodically that conducted by Ecological Management Unit (EMU) as follows:

- **Soil Analysis Activities** - Laboratory analysis about the condition and soil nutrient content in the soil samples to determine the fertilizer recommendation in maintaining and improving the balance of nutrients in the soil. The soil analysis is conducted every 5 year, meanwhile LSU is conducted annually. The last Soil Analysis (number report 17/Tanah/XI/2014/BPK) result was issued on September 2014. Parameters measured among others: Texture, acidity (pH), content of C, N, P, K, Mg, Ca, and CEC. The company has also carried out soil sampling for 2020 on 23 October 2020 by the Ecological Management Unit Laboratory, for 6 samples of land in BPK's estate, until the audit process takes place the Soil Analysis report is still awaiting publish by the Ecological Management Unit Laboratory.
- **Leaf Analysis Activities** - The results of leaf analysis annually published the recommendations of fertilizer dosage to produce the optimal palm fruit. The principle of fertilization is the provision of treatment on the soil to produce the nutrients required by the palm oil with optimum results. The last result leaf analysis on 12 March 2020 (number report 28/BAHAN TANAMAN/III/2020/BPK for Indicator Major elements namely N, P, K, Mg and Ca and Indicator Minor elements namely B, Cu, Zn and Fe.

#### 7.4.3

The company does not carry out EFB, POME, ash or fiber applications to the estate. Nutrient recycling is derived from the accumulation of oil palm plant biomass at the time of replanting, frond stacking from former harvesting activities, and planting of legume cover crop (LCC).

#### 7.4.4

The company has recorded inorganic fertilization and organic fertilizing well during 2020 and recorded it in the fertilization month report. The fertilizer NPK used by the company for BPK period 2020 is 1,501 tons. The Fertilizer used less compared period 2020 is 99% for BPK estate. 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 and 7.5.3

The entire area of PT Bumi Pratama Khatulistiwa is peat. Maps of soil types are found in semi-detail land survey documents. The map scale used is 1:50,000. Based on the semi-detail soil survey map report in September 2014, it was informed that the slope of the land in the company's operational area is in the flat category (0-2° or 0-4%). Thus, the company does not have a sloping area management strategy. Base on document verification buged period 2021-2025, the replanting will be starting on 2021. Base on field visit during ASA-3 audit known no replanting on operation area and no planting on sloping 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 and 7.6.3

The entire area of PT Bumi Pratama Khatulistiwa is peat. Maps of soil types are found in semi-detail land survey documents. The map scale used is 1:50,000. Based on the semi-detail soil survey map report in September 2014, it was informed that the slope of the land in the company's operational area is in the flat category (0-2° or 0-4%). Thus, the company does not have a sloping area management strategy. The development of operation area reference to soil survey semi-detail documents and soil suitable document on 2014. Base on field visit during ASA-3 audit known no replanting on

operation area and no planting on sloping area. Meanwhile, planting on peat soil will be explained on indicator **7.7.1**.

**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

Base on interview and document verification of areal statement on 2020 is known the planting year of 1996 and above is replanting, no planting above 15 November 2018.

### 7.7.2

The company shows peat inventory reporting data for PT BPK to RSPO on 19 May 2020 including Shapefiles and areal statements of PT BPK. The peat inventory report refers to the RSPO Peat Inventory guidance template. Based on the peat inventory report, the peat area in the core area was 4437.93 ha while for the plasma area was 2075.44 ha.

### 7.7.3

In order to reduce the rate of decline in peat land subsidence, the company carries out water management activities, which refers to procedure No. SA 02 / WIP-KB / 0/2010 revision 1 March 2020 concerning the management of peat areas. The procedure states that the company must manage and monitor the height of the peat water level, by carrying out water level recording and monitoring, the water table that is read through the piezometer and the reduction of subsidence poles. Measurement of water level and water table is carried out every day, while subsidence is carried out once a year. According to document reviews, it could be concluded that the company procedures has adopt RSPO manual on BMPs for existing oil palm cultivation on peat 2013, Moreover, Indonesian regulations related to peat management such as Indonesia Government law number 57 tahun 2016 related management and protection peat ecosystem.

The procedure explained, the company makes a water level record every day, if the water level is <70 cm from the surface water of the land during the dry season, and the height is 50 cm during normal weather conditions. Meanwhile, 1 stake per 240 ha is installed for subsidence and must be monitored periodically (every 3 months).

The company has recorded peatland subsidence in the Peat Subsidence Data document, base on that document known the company install 5 peat subsidence unit. Base on the explanation above, the subsidence stake is installed 1 stake per 240 Ha when compared to the operational area of 4437.93 hectares. The company needs to install 16 peat subsidence units, in this regard the company shows an additional program for making peat subsidence units carried out in 2020, at In November 2020, the company added 3 peat subsidence units in blocks 111E, 129E and 142A division 1, based on interviews the company will complete the peat subsidence unit creation program by the end of 2020. **OFI**.

### 7.7.4

The company shows the following documents related to the regulation of groundwater levels to inhibit carbon emissions from peatlands as follows:

#### 1. Monitoring water lever.

The types of water management activities carried out by the company include:

- Making and installing a wiers. The wiers is monitored for 55 weirs unit by designated officers in each division / estate regularly every day. Water level is maintained between 50 - 70 cm below the surface of the land. The example last monitoring on October 2020 consist of:

No	Block	No. Weirs	Result on 22 October (cm)
1	101 D	50	40
2	210 C	51	50
3	137 A	52	40
4	137 B	53	50
5	137 C	54	40
6	111 B	55	50

- Maintenance and mechanical washing of trenches. Performed routinely once a year using heavy equipment (excavators).

**2. Monitoring subsidence**

The company has recorded peatland subsidence in the Peat Subsidence Data document for the period 2020 (pole subsidence install on 22 December 2016) with the following documents:

No	Block	March	June	September
1	201 A	0.0	0.0	0.0
2	114 A	0.5	0.5	0.5
3	121 E	0.0	0.5	0.5
4	124 E	0.0	0.0	0.0
5	127 E	0.5	0.2	0.3

Based on field visits on subsidence pole it is known that the company has taken measurements using subsidence stakes. Stakes have been restricted by using fences and are not treated with the aim of decreasing peat soils naturally occurring / no disturbance. At the time of the visit, land subsidence from the initial installation limit was around 4.5 cm (installation was carried out in 22 December 2016).

**7.7.5**

The company has Drainability assessments are carried out on plantations planted on peatland following the RSPO Drainability Assessment Procedure on October 2019. The drainability assessment method accordance drainability assessment procedure version March 2019, the scope assessment on peat area 4655.59 ha. The source data for Drainability Assessment consist of:

- Semi detailed soil maps (Param Agriculture Soil Survey 2014) included peat thickness.
- DEMNAS, citra landsat stereoplotting (i.e avarage elevation).
- GPS on site monitoring 2019 (water level elevation)
- Subsidence rate monitoring (subsidence rate)
- Topography survey 2009 (centroid point, drainage zone, nearest water body).

The conclusion of summary drainability limit assessment report is the depth to drainage base is more than peat thickness of the peat – the drainage base is in the mineral soil below the peat – the drainability limit time does not need to be calculated. The drainability assessment report also submitted to RSPO coincide with peat inventory reporting data 19 May 2020.

**7.7.6**

Based on field observations in the area of peatland PT BPK, following the best farming practices peat areas the company has done:

- There is a Fire Danger Rating System 15 unit in several places in PT BPK that inform potential fire hazards in the area of peatland. Currently on standby.
- PT BPK has had an emergency response structure. For the structure of the fire department consists of 1 coordinator, support, deputy coordinator, support & equipment section, medical section, consumption section, communication & security section, transport section and mechanics, and 29 team's unit. Fire extinguisher simulation results show that the emergency response team and equipment can function properly.
- The company already has stakes monitoring water levels in each channel, such as the collection drain, drain and the main drain field.
- The company has demonstrated record of water level monitoring in each peg that had been installed.
- Emergency response procedures include:
  - SOP Prevention and Fire Fighting.
  - Land fire emergency response procedures.
  - Emergency response procedures earthquake.
  - Emergency Response Procedures Fuel Spill.
  - Natural Disaster Emergency Response Procedures - Flood.

**7.7.7**

Based on PT BPK's hectares of statements and peat inventory reporting to RSPO shown, from the entire area of the company's management, it is known that the planting area is be found in the peat area. There is an area not planted with

oil palm plants consisting of canals, roads, buildings, factories, air strips, and enclave areas. There is no peatland reserves and for peat area's not planted is HCV area.

**Status: Comply**

## 7.8

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

#### 7.8.1

The company has a water management plan for the period 2020 which explains the source and quality of water, including the decrease in water quality and quantity due to plantation and factory activities. In addition, it has been explained related to the estimation of water demand and use for plantation and mill operations, as well as water conservation and control systems (distribution inspection, detection, leakage and repair systems, water recycling, emergency management, dry season emergency plans, and integrated planning).

The identification of water sources is also contained in the HCV identification document. The identification of water sources includes:

- Malaya River
- Parit Ampening
- Parit Kongs
- Parit Gotong Royong
- Landak river
- Tempayan river

In the HCV document, it is known that the buffer for the water source is 5 - 100 m wide. The details of the buffer zone for the water catchment areas include:

- Malaya river with a buffer of 5 - 10 m
- Parit Ampening with a buffer of 5 m
- Parit Kongs with a buffer zone of 5 m
- Parit Gotong Royong with buffer zone 5 m
- Landak river buffer zone 100 m
- Tempayan river with a buffer zone of 5 m.

#### 7.8.2

SOP of the company related to river riparian management document No SOP17 / WIP-KB / (01) / 2015 dated October 2015. The SOP explains that the river riparian width for river widths 10-30 m is 50 meters while the river riparian width for river widths > 30 m is 100 m.

The company also has SOP for Watershed Management with document no: SOP 18 / WIP-KB / (01) / 0515 revision 1 on May 2015. This SOP aims to ensure the preservation of the functions of the watershed in the activity location.

The results of field visits and document verification show that the company has implemented several water source quality management and monitoring plans, such as:

- Testing the quality of clean water for employee consumption needs
- Marking the management boundary for river boundaries / ditches in accordance with the recommended HCV identification documents
- Conducting river quality testing periodically / every 6 months.

The company has tested the water quality of Landak river, Malaya river, Parit Gotong Royong, Parit Kongs, Ampening river and Tempayan river. Examples of river water quality test results for the upstream and downstream areas of the Landak River for the 1st semester of 2020 :

Parameter	Unit	threshold value	Result	
			Upstream	Downstream
TSS	mg/l	50	25	29
Ammonia	mg/l	0.5	1.09	1.05
pH		6-9	5.91	5.97
COD	mg/l	25	52	54

BOD	mg/l	3	31	31
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The Threshold Value used is Government Regulation 82/2001 for Class 2 rivers.

From the results of testing the surface water quality of the Landak river, it is known that the test results on several parameters in the upstream river have indeed exceeded the quality standard. This is because there are several other factories and the activities of residents around the upstream of the river, thus increasing several test parameters at the upstream. This affects the downstream river test results that exceed the quality standard. The company shows the results of testing the quality of wastewater before it is discharged into the water body and it is in accordance with the permitted quality standards before being discharged into the water body. PT BPK is also located in the peat area, thus affecting the quality of surface water.

Based on the results of the visit of block 210 in the Malaya river, the company has carried out management of the river riparian area by planting trees on the river riparian and installing signboards related to the protection of the riverbank area and also prohibiting activities including prohibiting the use of chemicals around the river riparian and disposing of garbage in the river.

### 7.8.3

The following are the results of monitoring the quality of liquid waste carried out by an accredited laboratory in the period January-September 2020:

Parameter	Unit	Threshold Value	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep
BOD	mg/l	100	83	86	82	91	93	90	25.5	60.08	77.89
COD	mg/l	350	166	172	163	154	172	168	64.9	277.2	336
TSS	mg/l	250	152	164	159	103	139	134	122	88	232
Oil & Grease	mg/l	25	5.9	6.3	5.8	8.6	9.1	8.2	1.5	21.4	25
Nitrogen Total	mg/l	50	17.3	18.4	16.2	11.2	14.6	13.4	48.5	47.69	48.64
pH	-	6-9	7.70	7.88	7.71	7.8	7.95	7.91	8.22	8.09	7.75

The Threshold Value refers to the Decree of the Minister of Environment Number 5 of 2014.

Based on the data shown, the average discharge of liquid waste that comes out of the WWTP outlet is still below the maximum limit stipulated in the permit, which is 308 m<sup>3</sup> / day. For example, in July 2020 the average was 296.45 m<sup>3</sup>, August 2020 was 297.47 m<sup>3</sup> and September 2020 was 306.47 m<sup>3</sup>.

The company has a permit for disposal of palm oil mill wastewater based on the Decree of the Head of the Kubu Raya Regency Investment and One Stop Investment Service (DPMPTSP) number 503/008 / DPMPTSP-E / IPLC / 2017 dated 23 November 2017 with a validity period of up to 5 years.

Based on the field visit to the WWTP, all of the waste ponds are in good condition and no overflow of waste water was found. In the last pool there is a digital flowmeter which is still functioning properly.

### 7.8.4

The company has a water management plan, one of which is the management plan to record water usage.

The results of the visit to the WTP station show that there is a water use meter (flow meter), namely for process water, boiler water and domestic. All flowmeters are in good working order. Water use monitoring is carried out every day and recapitulated every month.

The following is a record of water usage for the period January-May 2020:

Month	FFB process (MT)	Water process (M <sup>3</sup> )	Water Boiler (M <sup>3</sup> )	Water consumption per tonne of FFB (M <sup>3</sup> / MT)	Budget (M <sup>3</sup> / MT)
Januari	17,440.47	2,599	14,942	1.16	1.62
Februari	12,704.79	2,155	12,498	1.34	1.62

Maret	11,588.28	1,901	9,676	1.22	1.62
April	11,834.46	1,714	9,502	1.16	1.62
Mei	11,663.45	2,269	9,881	1.26	1.62

The company has a surface water extraction permit issued by the Regent of Kubu Raya through Decree number 169 / Bunhuttamb / 2014 dated May 28, 2014, with the provision that the amount of water extracted is 30 tonnes per hour. This permit is valid for 5 years. Based on the results of the interview, it is known that for the work system in the WTP, the water source obtained is from the Hedgehog River which is pumped to the WTP. And the discharge of water requirements determined by the mill laboratory, the officer will get the information on the dosage of chemicals needed.

Currently, the process of extending the surface water utilization permit is in the process of working on a consultant's review. The company has shown a cooperation contract between PT BPK and PT Trias Erisko Konsultan concerning hydrological studies for oil palm plantations and processing factories with number 11 / BPK POM-SPK / JASA-HYDROLOGY STUDY / X-2020 and number SPK 02 / SPK.BPK / TEK / X / 2020 dated 21 October 2020. PT Trias Eriskobert tasked with carrying out hydrological studies for submitting a Surface Water Resources Concession Permit (SIPA) and assistance until its release. Technical recommendations from the Kalimantan River Basin Agency I for surface water utilization activities in the Landak River for the PT Bumi Pratama Khatulistiwa Palm Oil Mill located in Sei Tempayan, Mega Timur Village, Sungai Ambawang District, Kubu Raya Regency, West Kalimantan Province. The document contains the agreed time period. that the work is started within 2 m at the latest weeks after the Cooperation Agreement is signed and all work must be completed within 45 days. The company also demonstrated the results of communication between the company and the consultant regarding the hydrological study work. **(OFI)**.

**Status: Comply**

## 7.9

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

### 7.9.1

The company has made records related to the use of shells and fibers. The following is the use of shells and fibers for the period January-September 2020:

Month	FFB Process	Shells (ton)	Fiber (ton)	Shells/ ton TBS	Fiber / ton TBS
January	10991.844	486.652	1098.883	0.0442739	0.100
February	8871.418	511.333	984.617	0.0576382	0.111
March	7860.644	449.056	755.706	0.0571271	0.096
April	7507.515	434.519	810.715	0.0578779	0.108
May	7169.362	453.608	908.487	0.0632703	0.127
June	13007.456	735.608	1262.327	0.0565528	0.097
July	14051.324	623.149	1214.477	0.0443481	0.086
Augustus	15662.793	817.641	1679.353	0.0522028	0.107
September	14117.689	768.529	1656.34	0.0544373	0.117

The following is the energy efficiency of PT BPK POM for the period January - September 2020 :

Month	FFB Process (MT)	Total diesel consumption (liter)	liter of diesel / ton of FFB
January	10991.844	6850	0.623
February	8871.418	7239	0.816



March	7860.644	10001	1.272
April	7507.515	7328	0.976
May	7169.362	8602	1.200
June	13007.456	5912	0.455
July	14051.324	5487	0.390
Augustus	15662.793	4319	0.276
September	14117.689	5788	0.410

Based on the results of visits to the PT BPK Palm Oil Mill, the shell and fiber are reused as boiler fuel.

**Status: Comply**

#### 7.10

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

##### 7.10.1

Based on the management and monitoring plan document, it is known that the company has an obligation to monitor the quality of air produced per semester. The plan has been implemented by the company by conducting air quality tests per semester at an accredited laboratory. The test results are still in accordance with the regulations.

The company shows identification documents of activities that produce emissions for the period January-December 2019 for Mill and Estate. Sighted the result of identification of emissions and pollution as well as its sources, such as in estate emissions sources are from fossil fuel usage for transportation and generator, emission from fertilizer usage, pesticide usage and electricity usage. Identified the sources of emission and pollution from mill such as fossil fuel usage, electricity usage and WWTP.

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

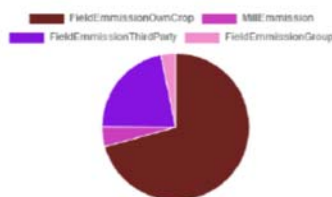
GHG calculation on 2018 shown net emission of GHG are decreasing compared to 2019. The net GHG is 22.47 tCO<sub>2</sub>e/t Product for year 2018 meanwhile period 2019 is 18.14 tCO<sub>2</sub>e/t Product and this indicates reduction. The company has implemented well plan to reduce emission.

GHG emission calculated using RSPO palm GHG calculator 4.0 Summary of GHG emission for Bumi Pratama Khatulistiwa POM - 2019 Summary and its supply base are listed as follows:

Summary Emission

Product	tCO <sub>2</sub> e / tProduct	Action
CPO	18.14	
PK	18.14	
PKO	0.00	
PKE	0.00	

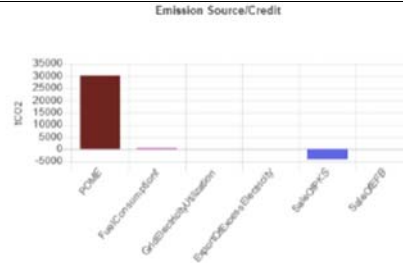
Description	Unit	Value	Action
Oil palm planted on mineral soil	Ha	1445.32	✓
Oil palm planted area on peat	Ha	6617.68	✓
Total oil palm planted area	Ha	8063.20	✓
Conservation area (Forested)	Ha	0.00	✓
Conservation area (Non-Forested)	Ha	6.82	✓
FFB Production per hectare	t/ha	19.79	✓
OER	%	17.75	✓
KER	%	4.06	✓





### Mill Emissions and Credits

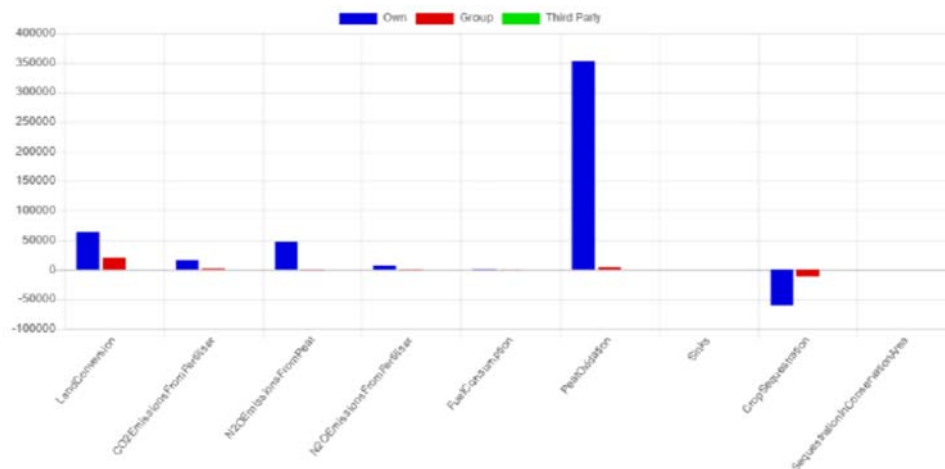
Description	tCO2	tCO2e/t FFB	Action
<b>Emission Sources</b>			
POME	30348.03	0.20	
Fuel Consumption	609.57	0.00	
Grid Electricity Utilisation	0.00	0.00	
<b>Credits</b>			
Export of Excess Electricity to Housing & Grid	0.00	0.00	
Sale of PKS	-4178.51	-0.03	
Sale of EFB	0.00	0.00	
<b>Total</b>	<b>26779.39</b>	<b>0.17</b>	



### Estate/Plantation field emissions and sinks

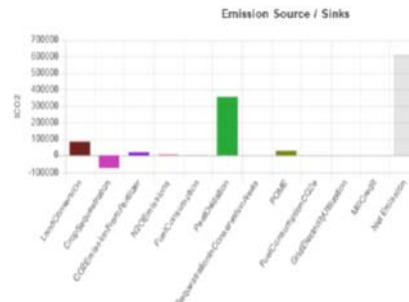
	Own			Group			3rd Party			
Description	tCO2e	tCO2e/ha	tCO2e/t FFB	tCO2e	tCO2e/ha	tCO2e/t FFB	tCO2e	tCO2e/ha	tCO2e/t FFB	Total
Emission Source										
Land Conversion	65206.86	10.01	0.65	20988.20	13.54	1.01	0.00	0.00	0.00	86195.06
CO2 Emissions from Fertiliser	17417.67	2.67	0.17	3061.73	1.98	0.15	0.00	0.00	0.00	20479.40
N2O Emissions from Peat	48567.96	7.46	0.48	733.68	0.47	0.04	0.00	0.00	0.00	49291.64
N2O Emissions from Fertiliser	7391.77	1.13	0.07	1053.43	0.68	0.05	0.00	0.00	0.00	8445.19
Fuel Consumption	1477.77	0.23	0.01	351.23	0.23	0.02	0.00	0.00	0.00	1829.01
Peat Oxidation	354174.36	54.36	3.51	5351.36	3.45	0.26	0.00	0.00	0.00	359525.72
Sinks										
Crop Sequestration	-60976.23	-9.36	-0.60	-11764.11	-7.59	-0.57	0.00	0.00	0.00	-72740.34
Sequestration in Conservation Area	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	433250.17	66.82	4.30	19775.63	12.76	0.96	132731.24	0.00	0.00	585756.96

### Field Emission and Sinks



### Emissions from Palm Kernel Crusher

Emission Source	tCO2e
PK from own mill	0.00
PK from other sources	0.00
Fuel Consumption	0.00
<b>Total Crusher Emissions</b>	<b>0.00</b>



Based on the data above, it is known that there is a description of oil palm planted on mineral soil covering an area of

1445.32 Ha, oil palm planted on peat 8063.20 Ha, this is because to the BPK POM GHG calculation period January - December 2020 supplied by non-certified group plantations, namely PT BCP Inti and plasma. For PT BCP's inti describe oil palm planted on mineral soil 1014.90 Ha and oil palm planted on peat 131.17 total oil palm planted area 1146.07 Ha. PT BCP plasma oil palm planted on mineral soil is 403.78 Ha.

### 7.10.2

During the Surveillance 3 audit, the company did not develop any new areas. The company has calculated GHG emissions using the RSPO PalmGHG calculator for 2019 as stated in indicator 7.10.1

### 7.10.3

The company has a plan to reduce or minimize GHG emissions. This is contained in the Mitigation document and efforts to reduce GHG emissions, such as:

- Provide training to workers in appropriate spraying techniques
- Planting beneficial plants (cassia cobanensis, tunera spp and antigonon spp) in vacant areas.
- Implementation of empty bunk applications
- Perform routine service on vehicles and generators
- Planting trees around the generator house and riparian belt area.
- Do not fertilize the river riparian location
- Perform leaf analysis to determine the type and dose of fertilizer
- Monitoring land / plantation that have the potential to be prone to fire

The company has also tested the emission quality of the company's operational machines on a regular basis every 6 months. The results of the testing have been included in the PT Bumi Pratama Khatulistiwa Management and Monitoring Plan (RKL RPL) report. The following are the results of emissions testing in semester 1 of 2020 conducted by the Pontianak Regional Health Laboratory, for example:

#### Boiler Emissions

Parameter	Threshold Value	Result
Particulate	300	133
Sulfurdioksida	600	218
Nitrogen Oksida	800	237
Hidrogen klorida	5	2.8
Gas klorin	5	2.1
Amonia	1	0.04
Hidrogen Florida	8	3.1
Opacity	30	21

The Threshold Value refers to the Regulation of the Minister of Environment number 7 of 2007.

#### Genset Emissions

Parameter	Threshold Value	Result	
		Genset 1 (80kW)	Genset 2 (200 kW)
Karbon Monoksida	600	97	68
Nitrogen dioksida	1000	108	93

The Threshold Value refers to the Regulation of the Minister of Environment number 13 of 2009.

Based on the test results, no parameter exceeds the predetermined threshold value.

	<b>Status: Comply</b>	
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### 7.11

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

**7.11.1**

The commitment to prohibit burning in all of the company's operational activities has been stipulated in the No Deforestation, No Peat, No exploitation policy, issued on December 5, 2013. In this document it is stated that the Wilmar Group implements a no-burning policy, where burning activities are not allowed during land preparation. for new planting, replanting and or all other activities.

The company has a replanting SOP listed in the agronomic guidance document and the 2015 WILMAR oil palm plantation SOP, which explains that replanting is carried out by mechanical means and avoids burning. The company does not clear land or replanting by burning the land. Results Field visits to riparian areas, harvest areas and areas where no indication of land burning was found. In addition, the company also has SOP for Mitigation and management of forest and land fires document number 001 / SUS-SOP / I / 2019 which took effect September 9, 2019. The scope of the SOP includes planning, prevention, suppression, management and post-fire reporting and coordination of work for fire fighting.

Based on the field visit, there was no indication of burning.

**7.11.2**

The company has demonstrated the program and realization of forest and land fire prevention and control in 2020. In the plan, the types of activities include maintenance of extinguishing equipment, fire patrols, simulations of forest and land fire prevention, manufacture of fire prohibition signboards, construction of drilling wells, construction of water reservoirs, normalization of trenches, additional fire facilities and infrastructure, training for local village communities.

The dissemination related to the prevention and control of forest and land fires that has been carried out is as follows, for example:

- Dissemination of forest and land fires prevention with the Ambawang police to the people of Parit Kongsu Hamlet, Sungai Enau Village on September 12, 2019
- Dissemination of forest and land fire prevention with the Ambawang sector police to the community of the Malaya river village farmer group on March 6 2020 at the desa Malaya office
- Dissemination of forest and land fire prevention with the Ambawang sector police to the community of the Sungai Enau village farmer group on March 6 2020 at the Sungai Enau village office

The company already has a structure for prevention and control of forest and land fires and has fire facilities and infrastructure, for example personal equipment for extinguishing teams, fire pump machines, manual equipment, etc. The company has also conducted regular training to extinguish forest and land fires. This is indicated by the Minutes of the fire simulation and emergency response activities on February 19, 2020, which was attended by 21 employees.

The company shows a fire prevention and control report for semester 1 of 2020 that has been submitted to the Kubu Raya district government with evidence of the PT Bumi Pratama Khatulistiwa fire prevention and control report to the Kubu Raya Regency Plantation Office on November 5, 2020. In the report contains data on preparedness, systems, facilities and infrastructure for controlling forest and land fires, staff structures and data on facilities and infrastructure of PT BPK.

Based on the results of public consultations with the Plantation Office of Kubu Raya Regency, there have never been any forest and land fires in the company's area during 2019-2020.

**7.11.3**

The company has entered into an agreement related to the prevention and control of forest and land fires through the MOU for the formation of the Fire Concern Community (MPA) on November 19, 2020 with the people of Enau Village.

In addition, as an effort to anticipate fires in neighbouring villages, the Company always borrows fire fighting equipment to nearby villages during the dry season, this is evidenced, for example, with the Minutes of borrowing equipment for extinguishing fire in Sungai Enau Village, the equipment is 1 unit pump, 4 rolls of canvas hose, 1 pcs nozzle and 1 unit spiral hose.

Dissemination has also been carried out to the surrounding community, for example:

- Dissemination of forest and land fires prevention with the Ambawang police to the people of Parit Kongsu Hamlet, Sungai Enau Village on September 12, 2019

- Dissemination of forest and land fires prevention with the Ambawang sector police to the community of the Malaya River Village farmer group on March 6 2020 at the Malaya village office
- Dissemination of forest and land fire prevention with the Ambawang sector police to the community of the Sungai Enau village farmer group on March 6 2020 at the Sungai Enau village office.

**Status: Comply**

#### **7.12**

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

##### **7.12.1; 7.12.8**

There is no new planting since 1 January 2010, the planting year of 2010 and above is replanting. During the Surveillance 1 audit, the company did not develop new areas. Based on previous assessments, it has been explained that reporting template for disclosure of areas cleared without prior HCV Assessment since November 2005 has been submitted to RSPO on 8 Dec 2015 (directly). In the summary of raw liability described that total area of raw liability as 23.02 Ha, time clearance November 2005 – 30 November 2007. LUC Analysis has been conducted in collaboration with AKSENTA on August 2015, the total area of raw liability Ha 23.02 Ha and the total area of conservation liability 0 Ha.

Analysis of land cover changes conducted using landsat imaginary with 30m spectral resolution of Oct 2005, Sept 2007, Jan 2010, August 2014 and August 2015. The land cover is reclassified into vegetation coefficients as coefficient 0 (according to the RaCP document).

PT BPK has sent and reported the LUCA to the RSPO and has been addressed by the RSPO (rspocompensation@rspo.org) on August 9, 2016 that explains that the LUCA is marked as Pass with Clarification. On 29 September 2016 has been declared that the LUC Analysis has been endorsed by the RSPO, and described in the email (rspocompensation@rspo.org) that the final liability for PT BPK is 0 Ha, no compensation plan is needed.

##### **7.12.2**

The company has identified the HCV identification contained in the High Conservation Value Assessment Report at PT. Bumi Pratama Khatulistiwa, Kubu Raya Regency, West Kalimantan Province. Identification is carried out in collaboration with PT. Asia Remark which took place in March - July 2015. The HCV document was reviewed on 13 February 2016. The company has carried out a public consultation activity on April 17 2015 which was attended by 29 participants from surrounding villages such as Kubu Padi village, East Melaya village, traditional leaders, Sungai Enau village, with a total number of 29 participants.

Preparation of documents HCV done with reference to the Guide Identification of HCV (HCV Toolkit Indonesia Consortium Revised 2008). Implementation of field surveys conducted in March-July 2015 with the implementation of public consultation on 17 April 2015 followed by 29 participants. Document of HCV Identification has reviewed on february 13, 2016. Based on the HCV assessment results it is known that the HCV area is 13.86 Ha including the plasma plantation area. while the total HCV area within the scope of the audit is 8.53 Ha.

The company did not clear any new land after November 15 2018.

##### **7.12.3**

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

##### **7.12.4**

The Company has established a Management and monitoring of HCV PT BPK year 2016-2020 which the goal is to become a reference in the implementation of HCV management areas in PT BPK as well as reference document in the implementation of the management and monitoring of HCV Area.

The company has carried out the realization of the HCV area management and monitoring plan contained in the HCV plan realization report and management program for 2019-2020, for example as follows:

- Socialization of HCV to company employees
- Socialization of HCV to the people of Enau Village, for example around Parit Ampening which was held on 19 July

2019 and 13 September 2019 for Parit Kongsu residents.

- Installation of signboards related to HCV and land fires in HCV areas and plantations on 13 July 2020 at block 49, block 244, block 34
- Maintenance and maintenance of riparian boundary stakes at the location of 29 blocks 101a, 101b, 101c on 5 August 2020
- The patrol of the HCV Area is carried out and recapitulated every month into the HCV monitoring report, for example in July 2020, from the results of the patrol it was found that there was a damaged signboard in block 148 and it was replaced on July 13, 2020.
- Taking water samples for testing the quality of river water
- Normalization of the flow of the Malayan tributaries in July-August 2019
- Planting trees on the riverbanks of block 101 a, 101b, 101 c, 210a on July 30, 2020 tree species such as laban trees, medang perawas trees, rambutan and Mahang trees with a total number of 100 seeds
- Renovation of the Padagi traditional house in Block 022B for a place of worship for indigenous people in July 2019

Regarding the review of the HCV monitoring and management program, together with the community, the Company shows the following implementation documents:

- Attendance list of meeting to discuss HCV management with landowning communities on 18 July 2019 which was attended by 7 representatives of land tenure communities from Parit Salam, Parit Ampaning and Parit Kongsu villages.
- Minutes of agreement on HCV area management with the Community dated 18 July 2019 which contain several points of agreement such as:
  - Willing to manage and maintain river riparian by not applying pesticides at a distance of 5 meters from the edge of the ditch.
  - Willing not to clear land by burning
  - The company is allowed to monitor HCV areas in areas that are cultivated by the community.
  - Communities are not yet willing not to clear forested areas, for reasons of livelihoods.
  - Minutes of agreement on HCV management in areas cultivated by the community made by PT Bumi Pratama Khatulistiwa, dated July 20, 2019 made by HCV Staff, acknowledged by Bina Mitra and approved by the Estate Manager of PT BPK.

#### **7.12.5**

From previous activities, it is known that the Company has acquired land for community land which is a plantation area including customary land

Based on the results of HCV identification, there is HCV 6 in the PT BPK area in the form of the Padagi site which is used as a place of prayer. The company shows the Padagi HCV 6 Agreement between the company and Adrianus Adam Tekod's Chief of Customs to acknowledge that Padagi is blocked 22. The agreement was made on July 4 2018. The company also shows the HCV Management Statement Letter No. 026 / BPK / IX / 2016 which are committed to protecting the areas that have been designated as HCV. The letter was stipulated on September 5, 2016.

Regarding the management of the HCV area in the community's Garapan location, the Company shows the following documents :

- Attendance list of meeting to discuss HCV management with landowning communities on 18 July 2019 which was attended by 7 representatives of land tenure communities from Parit Salam, Parit Ampaning and Parit Kongsu villages.
- Minutes of agreement on HCV area management with the Community dated 18 July 2019 which contain several points of agreement such as:
  - Willing to manage and maintain river riparian by not applying pesticides at a distance of 5 meters from the edge of the ditch.
  - Willing not to clear land by burning
  - The company is allowed to monitor HCV areas in areas that are cultivated by the community.
  - Communities are not yet willing not to clear forested areas, for reasons of livelihoods.
  - Minutes of agreement on HCV management in areas cultivated by the community made by PT Bumi Pratama Khatulistiwa, dated July 20, 2019 made by HCV Staff, acknowledged by Bina Mitra and approved by the Estate Manager of PT BPK.

The company shows evidence of improvement in the form of a 2019-2024 HCV management and monitoring plan (Garapan area). In the management & monitoring plan, it is explained that the HCV block 048 & 049 area in the form of secondary forest is socialized once a year, animal patrol & signboard maintenance is done every 6 months and the installation of warning boards is carried out in December 2019. For HCV block 244, 048, 049 in the form of a natural river that has turned into a ditch, socialization is carried out every 1 year, monitoring of water quality & monitoring of the boundaries of the spray area is carried out every 6 months. As for the evaluation of the effectiveness of the protection of the HCV function in the Garapan area, it will be carried out every 2 years.

Based on the results of field visits in blocks 048 and 049, the areas claimed by the community, the company has carried out management by installing HCV-related signboards in these locations.

#### 7.12.6

Related to RTE species, CH has a policy to protect species of wildlife protection RTE SOP SOP No. 15 / WIP- KB / (01) / 2015 in the SOP consists of :

- Not allowed to maintain or kill animals that are protected by state regulations or those that are not protected without company permission
- Not allowed to trade in wildlife protected and unprotected
- Not allowed to catch fish using poisons and electricity (stun equipment)
- Sanctions that apply if the employee is proven to do things that are prohibited such as the explanation above for protected animals in accordance with the provisions of the government regulation and company regulation in a row are subject to sanctions and termination of employment.

The company has also disseminated to employees regarding the presence of flora and fauna in the HCV area, for example as follows:

- Dissemination regarding HCV on November 2, 2020 for spray and harvest employees in Block R3 which was attended by 13 employees
- Dissemination of HCV to the people of Enau Village, for example around Parit ampeneh which was held on 19 July 2019 and 13 September 2019 for Parit Kongsu residents
- Dissemination regarding HCV to Phase 2 employees on January 7, 2020
- Dissemination regarding HCV to Phase 3 employees on April 9, 2020
- Dissemination regarding HCV to Phase 3 Division 2 employees on March 24, 2020

Based on interviews with workers, they already know about the management and monitoring policies of HCV areas in the company.

#### 7.12.7

The company has carried out a management review related to the management and monitoring of the HCV area of PT Bumi Pratama Khatulistiwa on January 20, 2020 which was attended by 24 participants. This activity is an evaluation of the HCV program that has been carried out in 2019. The company has conducted evaluations, for example related to the management of tributaries in the company's area. For corrective / improved actions related to the management and monitoring of HCV areas, among others, by increasing regular water quality monitoring and also conducting patrols in HCV areas to ensure there is no environmental pollution. In addition, there was also socialization to employees regarding the prohibition of using chemicals in the riparian area. At present, tree planting has been carried out on the river riparian, but there are still many trees that die due to flooding / inundation in the river riparian area, for this reason it is necessary to add them by replanting using tree species that are resistant to standing water.

**Status: Comply**



**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>
	BPK POM do not use RSPO Trademark and CB Logo on its product (on-product) and non-product (off-product).	
	<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 trademark Use</b>	<b>X or √</b>
	BPK POM do not use RSPO Trademark and CB Logo on its product (on-product) and non-product (off-product).	
	<b>Status: Comply</b>	
<b>3.</b>	<b>Implementation of Certificate and Trademark is not used on product</b>	<b>X or √</b>
	BPK POM do not use RSPO Trademark and CB Logo on its product (on-product) and non-product (off-product).	
	<b>Status: Comply</b>	
<b>4.</b>	<b>Controlling of Certificate and Trademark, including withdrawing inappropriate trademark.</b>	<b>X or √</b>
	BPK POM do not use RSPO Trademark and CB Logo on its product (on-product) and non-product (off-product).	
	<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 June 2020.

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

MUTU Auditor has verified company partial certification and concludes that:

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

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
2.1.1	Did the company conduct an internal audit? If so, has a positive assurance statement been produced?	<p>Yes, and positive assurance is produced for these units.</p> <p><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.</p>
2.1.2	<p>No replacement after dates defined in Nis Criterion 7.3 of:</p> <ul style="list-style-type: none"> <li>• Primary forest.</li> <li>• Any area identified as containing High Conservation Values (HCVs).</li> <li>• Any area required to maintain or enhance HCVs in accordance with RSPO criterion 7.3.</li> </ul>	<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> <li>• PT Buluh Cawang Plantation-West Kalimantan in year 2016,</li> </ul>

	<ul style="list-style-type: none"> <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> </ul>
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	<ul style="list-style-type: none"> <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> <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-</li> </ol>
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		<p>compliant land clearing was available and it has submit to RSPO secretariat year 2015 and LUCA has passed (date on 13 March 2017) with the result of liability assessment is zero conservation liability.</p> <p>6. PT Sarana Titian Permata : LUCA and disclosure of non-compliant land clearing was available and LUCA has passed with the result of liability assessment is zero conservation liability.</p> <p>7. Based on the result of communication with RSPO that LUCA on behalf remaining uncertified management units has submitted and passed with the result of liability assessment is zero liability (2 uncertified management units) so not concept note required and presence liability (1 uncertified management unit) so concept note required. It has submitted concept note before November 2019.</p> <p>8. PT Musi Banyuasin Indah, PT Sinarsiak Dianpermai, PT Murini Samsam (466 ha) &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>
2.1.3	Any new plantings since January 1 <sup>st</sup> 2010 must comply with the RSPO New Plantings Procedure.	<p>There are some newly developed plantation areas under Wilmar International and have undergone the New Planting Procedure (NPP). It has announced on RSPO website during 30 days with complete status such as in Jambi Province (PT Agrindo Indah Persada 2) &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>
2.1.4	Any Land conflicts are being resolved through a mutually agreed process, e.g. RSPO Grievance procedure or Dispute Settlement Facility, in accordance with RSPO criteria 6.4, 7.5 and 7.6.	<p>Uncertified management unit have technical procedure/guidance for land acquisition (SOP 001/WIP-KB/(0)/0610) and procedure of calculation &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</p>

	<p>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. Community who lose access and land right for plantation areas has given the opportunity to benefit (direct and indirect) from plantation development as sample in form of scheme smallholder areas, as employee, as contractor (transportation, supplier for daily food, etc), as FFB supplier, using infrastructure/road as access from village to town or vice versa, as trader while employee has got wage, etc.</p> <p>Refer to case tracker or status of complaints under Wilmar International Limited period of February 2011 to conducting audit that the object of complaint has dominated by certified management unit and the majority of cases has closed. There are 2 case of complaints still in investigation process (PT Permata Hijau Pasaman and PT AMP Plantation). Further details on this case are available here: <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></p> <p>There is no information from public source and RSPO website on any land conflict for uncertified unit of the group subsidiaries.</p> <p>Based on the company record there is documentation on land compensation recapitulation updated on 1 October 2007, participatory mapping, agreement letter on compensation between company and land owner, land owner identity and procedure on</p>
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		compensation technical guidance SOP 001/WIP-KB/(0)/0610 dated June 2010.
2.1.5	Any Labour disputes are being resolved through a mutually agreed process, in accordance with RSPO criterion 6.3.	<p>There is a grievance and complaint form/procedure used by the company to collect and collate all complaints from communities and employee as sample in Indonesian is SOP 004/WIP-KB/(0)/0610, SOP 003/WIP-KB/(1)/0911, PRO-PGA-001 and Whistleblowing Policy (effective date on 5 August 2015). Procedure of grievance &amp; complaint from employee has not been dissemination to employee in PT ANI-Pahuman, Cooperative of Tuah Jubata (scheme smallholder), PT Daya Landak Plantation, PT Indoresins Putra Mandiri &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> There is no information from public source and RSPO website on any labour conflict for uncertified unit of the group subsidiaries.</p> <p>The company has mechanism to handle employee complaint and grievance that is stated in SOP 005/WIP-KB/(0)/0610 for communication and consultation with community and SOP 004/WIP-KB/(0)/0610 on complaint and grivance mechanism and solving any dispute out off court.</p> <p>There is no list of employee and stakeholder complaint and grievance.</p>
2.1.6	Any Legal non-compliance is being resolved in accordance with the legal requirements, with reference to RSPO criteria 2.1 and 2.2.	<p>Uncertified management units have the list of laws &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), minimum wage,</p>



	<p>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 Bupati Sanggau Decree No. 137 year 2011 dated 25 March 2011 for 623 ha</li> </ul>
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		<p>of smallholder scheme for 2 koperasi of Batu Ceramin and and Maju Bersama. Later, koperasi Maju Bersama split into Koperasi Maju Bersama and Koperasi Harapan Baru. And Koperasi Harapan Baru wants to take about 136 ha within company proposed HGU area. The company needs to resolve this issue first before be able to continue HGU process.</p> <p>PT Musi Banyuasin Indah</p> <ul style="list-style-type: none"> <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 not been land use right (Hak Guna Usaha). The result of clarification from auditee that they are still in the process of completing the requirements in other ministries.</p>
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		This is one of requirements to apply for land use right at National Land Agency.
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### 3.4 Identification of Findings, Corrective Action, Observations, Opportunity for Improvement and Noteworthy Positive Components.

#### 3.4.1. Identification of outstanding Findings, Corrective Actions and Observations at ASA-2 Assessment

NCR No.	:	2019.01	Issued by	:	Hasiholan Sihombing
Date Issued	:	28 June 2019	Time Limit	:	26 September 2019
NC Grade	:	MAJOR	Date of Closing	:	20 August 2019
Standard Ref. & Requirement	:	4.7.3 Records of training in Occupational Safety and Health (K3) programs (see 4.8) and Personal Protective Equipment (PPE) according to the results of hazard identification and risk analysis must be available to all workers.			
<b>Evidence observed</b> (filled by auditor): The company has a document Risk Analysis and Hazard Identification (HIRAC) and PPE Procedure (31 / WIP-KB / (0) / 2011) which explains that harvesting activity is equipped with PPE such as helmets, shoes, glasses and gloves. The company also conducts OHS monitoring / inspection, one of which is related to the use of PPE regularly every month. However, based on field observations in block 51 (near the mill security post), it was found that 2 harvesters did not use PPE (helmets, shoes, glasses and gloves) when harvesting. Based on that evidence, the company has not been able to effectively ensure that PPE is used by workers in the field					
<b>Non-Conformance Description</b> (filled by auditor): Based on this evidence, the company has not been able to effectively ensure that PPE is used by workers in the field.					
<b>Root Cause Analysis</b> (filled by organization audited): <ul style="list-style-type: none"><li>- Lack of awareness and concern of workers regarding PPE functions.</li><li>- Lack of company commitment in carrying out the rules in the use of PPE that has been agreed, especially regarding the application of sanctions.</li><li>- There are no definitive sanctions set by companies for those who do not use PPE which has implications for the lack of awareness and concern of workers for the use of PPE.</li><li>- Sanctions given when violating not applying the use of PPE are: giving a letter of reprimand, not being allowed to work on that day, and giving a warning letter (I, II, and III) up to termination of employment if always violating the procedure for applying PPE.</li></ul>					
<b>Correction</b> (filled by organization audited): <ul style="list-style-type: none"><li>- Issues an internal memorandum regarding rules and sanctions regarding the use of PPE</li><li>- Re-socialization of the rules on the use of PPE to all employees, including socialization regarding internal memorandum</li><li>- Periodic PPE monitoring to employees by each foreman.</li><li>- With the establishment and application of sanctions so that it is expected to EFFECTIVE be able to discipline workers for the use of PPE, in addition to the implementation of monitoring continues to be carried out continuously.</li></ul>					
<b>Corrective Action</b> (filled by organization audited): Evaluate the effectiveness of using PPE (in the P2K3 report). Evaluation of: <ul style="list-style-type: none"><li>- Number of findings of PPE violations / monitoring of PPE usage,</li><li>- Number of sanctions against PPE violators,</li><li>- Number of work accidents related to negligence in using PPE</li><li>- Check the minimum PPE stock in the warehouse</li><li>- Analyzing the points above and seeing the correlation, it is expected that the correlation is positive, which means there is a decrease in violations of the use of PPE especially after applying sanctions to violators of PPE usage.</li></ul>					

**Assessor Evaluation and Conclusion** *(filled by auditor):*
**Verification on August 4, 2019**

The company sends evidences of correction in the form of:

- An internal memorandum from the Estate Manager of PT BPK dated July 22, 2019, which reaffirmed the application / implementation of employee PPE when working.
- Minutes, attendance list and documentation on PPE internal memorandum policy to harvesters division 2 on 30 July 2019 and to harvesters division 1 on 28 July 2019.

**Verification on August 20, 2019**

The company has provided further explanations regarding the root cause analysis of non-conformities that arise as well as corrective actions so that the same non-conformities do not recur in the future. Based on this explanation, then this non-conformities has been closed and will be re-observed in the next assessment.

**Verified by** : **Hasiholan Sihombing**

<b>NCR No.</b>	<b>: 2019.02</b>	<b>Issued by</b>	<b>: Leonada</b>
<b>Date Issued</b>	<b>: 28 June 2019</b>	<b>Time Limit</b>	<b>: ASA-3</b>
<b>NC Grade</b>	<b>: Minor</b>	<b>Date of Closing</b>	<b>: 12 November 2020</b>
<b>Standard Ref. &amp; Requirement</b>	<b>RSPO Certification System Clause 4.1.3</b> <b>The mill shall develop and implement a plan to ensure that 100% of scheme smallholders and scheme outgrowers are compliant with the standard within three years of the mill's initial certification. In monitoring compliance with this timeline, the CB shall raise an observation after one year where 100% of the scheme smallholders and scheme outgrowers are not in compliance, a minor NC after two years, and a major NC if this requirement is not met after three years.</b>		

**Evidence observed** *(filled by auditor):*

PT. BPK collaborates with plasma plantations, namely KUD Mekar Lestari (SPK No. 23 / BPK-DIR / PK-II / 98 dated February 12, 1998) and KUD Buah Jubata (SPK dated February 25, 2015). These cooperation agreements start from the development of estates and the sale and purchase of FFB with a validity period of one crop cycle (until plant productivity runs out = ± 25 years). In terms of operational management carried out by the company as long as the farmer's credit has not been paid off.

For KUD Mekar Lestari, currently the management has been handed back to the farmers because the credit has been paid off as indicated in letter No. 162 / MBB / HEB / 2010 dated 11 May 2010 from Bank CIMB Niaga and letter No. 057 / PLM-Ext / XI / 12 dated 16 November 2012 from PT. CPC. For KUD Buah Jubata, currently it is still managed by PT. BPK because the credit has not been paid off. The FFB from both cooperatives has been sent to PKS PT. BPK has since received the RSPO certificate on October 18 2017 until now.

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

In ASA-2, the company has not been able to show evidence of the implementation of compliance with RSPO standards for PT. BPK, so that the ASA-2 is a non-conformance with the Minor grade.

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

There is a circular from RSPO stating that the fulfillment of HGU / other ownership rights requirements is absolute for plantations / mills that will be certified by RSPO for the first time. This requires a long process of fulfillment for the plasma Mekar Lestari and Buah Jubata.

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

Carry out the process of managing land ownership rights for the plasma farmers of Mekar Lestari and Tuah Jubata

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

- Continuously monitoring the issuance of these ownership rights (full support from PT BPK)
- Conduct annual routine internal audits and self-assessments to determine the extent of compliance with RSPO requirements in Mekar Lestari and Tuah Jubata plasma

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

**Verification 12 November 2020**

The company has shown improvement documents, including:

1. Results of routine annual internal audits and self-assessments related to compliance with RSPO requirements in Mekar Lestari and Tuah Jubata plasma in January 2020
2. Progress documents on the management of land ownership rights include:
  - Area map and map of request for plotting of plasma oil palm plantation areas
  - Overlay of plantation and plasma operations with *Peta Indikatif Penghentian Pemberian Izin Baru (PIPIB) 2020 Period II*.
  - Request for revision of the Indicative Map for the *Peta Indikatif Penghentian Pemberian Izin Baru (PIPIB)* on March 2, 2020 to the Director General of Planning and Environmental Management of the Ministry of Environment and Forestry with a core area of  $\pm 4,814.96$  Ha and a plasma area of  $\pm 2,000$  Ha. There was a response from the Director General that the revised PIPPIB could only be processed for the nucleus while the plasma could not be processed because it did not have cadastral data from BPN.
  - PT Bumi Pratama Khatulistiwa submitted a letter of request for plotting of the main estate and plasma areas for revision of the 2019 PIPPIB on March 27, 2020 to the Head of the Regional Office of the Kalimantan Barat-National Land Agency. As for BPN's response, cadastral measurements of the plasma area should be carried out if it requires information from BPN regarding the plasma area of PT BPK.
  - PT BPK submitted an application letter for plotting the plasma area of KUD Mekar Lestari to BPN in the Kubu Raya district in October 2020 as a condition for revising the PIPPIB for PT BPK's plasma area of  $\pm 2,000$  Ha. The follow-up to this was a plasma area survey by the Kubu Raya Regency BPN team on November 5, 2020, then from the results of the field survey a Land Use Analysis Letter would be issued for a plasma area of  $\pm 2,000$  hectares from BPN Kubu Raya Regency as a document of information as PIPPIB (Kadastral Substitute / HGU) requirements.
  - The company has also included PT BPK plasma in the timebound plan with an update on August 4, 2020.

Based on the evidence of improvement provided, the non-conformity No.2019.02 has been fulfilled, which is an opportunity for improvement for the company and the progress of its completion will be re-observed at the next audit.

Verified by : Satria Adi Putra



**3.4.2. Identification of Findings, Corrective Actions and Observations at ASA-3 Assessment**

<b>NCR No.</b>	<b>:</b>	<b>2020.01</b>	<b>Issued by</b>	<b>:</b>	<b>Satria Adi Putra</b>
<b>Date Issued</b>	<b>:</b>	<b>13 November 2020</b>	<b>Time Limit</b>	<b>:</b>	<b>Next Surveillance (ASA-4)</b>
<b>NC Grade</b>	<b>:</b>	<b>Non-Critical</b>	<b>Date of Closing</b>	<b>:</b>	<b>-</b>
<b>Standard Ref. &amp; Requirement</b>	<b>:</b>	<b>2.1.2</b> <b>There is a documented system to ensure legal compliance of the certification unit and the third parties it contracts with. This system must also track / monitor changes to the applicable law</b>			
<b>Evidence observed (filled by auditor):</b> Based on the results of document review and interviews, it is known that: <ul style="list-style-type: none"> <li>• There is a work agreement for transporting FFB, namely CV Sabitah Sukses Jaya with PT Bumi Pratama Khatulistiwa with No. 101 / BPK-EST / SPK / Angkutan-TBS / X-2020. No. 008 / CV.SJJ / Angkutan-TBS / X / 2020 article 10 paragraph 9 states that each head of the contractor registers worker members to participate in occupational health / safety insurance.</li> <li>• Presidential Regulation of the Republic of Indonesia Number 82 of 2018 concerning Health Insurance, in Article 13 states that Employers are required to register themselves and their workers as Participants of Health Insurance to <i>BPJS Kesehatan</i> by paying contributions. In the event that an employer has not registered and paid contributions for its workers to <i>BPJS Kesehatan</i>, the employer is obliged to be responsible when the workers need health services in accordance with the benefits provided by <i>BPJS Kesehatan</i>.</li> <li>• Sampling documents of the 2 FFB transport contractor workers, it is known that workers do not have health and employment insurance.</li> </ul>					
<b>Non-Conformance Description (filled by auditor):</b> The company has not been able to demonstrate that there is a system that ensures legal compliance with third parties it contracts with, for example in the aspect of fulfilling health and employment insurance.					
<b>Root Cause Analysis (filled by organization audited):</b>					
<b>Correction (filled by organization audited):</b>					
<b>Corrective Action (filled by organization audited):</b>					
<b>Assessor Evaluation and Conclusion (filled by auditor):</b>					
<b>Verified by</b>	<b>:</b>	<b>-</b>			

<b>NCR No.</b>	<b>:</b>	<b>2020.02</b>	<b>Issued by</b>	<b>:</b>	<b>Satria Adi Putra</b>
<b>Date Issued</b>	<b>:</b>	<b>13 November 2020</b>	<b>Time Limit</b>	<b>:</b>	<b>Next Surveillance (ASA-4)</b>
<b>NC Grade</b>	<b>:</b>	<b>Non-Critical</b>	<b>Date of Closing</b>	<b>:</b>	<b>-</b>

<b>Standard Ref. &amp; Requirement</b>	<b>4.2.2</b> <b>Procedures are in place to ensure that the system is understood by affected parties, including those who cannot read and write.</b>
<b>Evidence observed (filled by auditor):</b> The company has a complaint handling procedure and dissemination as follows: <ul style="list-style-type: none"> <li>- Minutes of dissemination of SOP for Management or Handling of Complaints and / or Complaints to community representatives of Mega Timur Village and Sungai Malaya Village on June 5, 2015 with procedural material referring to SOP04 / WIP-KB / (0) / 0610 Rev 0 in June 2010.</li> <li>- Minutes of dissemination of SOP for Management or Handling of Complaints and / or Complaints to representatives of the community of Sungai Enau and Kubu Padi Villages on June 4, 2015 with material procedures referring to SOP04 / WIP-KB / (0) / 0610 Rev 0 in June 2010.</li> <li>- Procedures for Acceptance of Complaints and Dispute Resolution, especially Out of Court Disputes (SOP04 / WIP-KB / (0) / 0610 Rev 0 as of June 2010).</li> <li>- Procedure for Management / Handling of Complaints and / or Complaints with Document Number SOP60 / WIP-KB / (0) / 0915 Rev 0 dated 01 September 2015 and Document Number SOP60 / WIP-KB / (0) / 0915 Rev 01 dated 01 June 2020 Where the procedure has stipulated regarding submission to the RSPO Complaints System if the complaint does not reach consensus.</li> </ul>	
<b>Non-Conformance Description (filled by auditor):</b> The company has not been able to demonstrate that the procedure has not regulated, but is not limited to: <ul style="list-style-type: none"> <li>- A system that ensures that the complaint handling clause is understood by affected parties, including those who cannot read and write.</li> </ul>	
<b>Root Cause Analysis (filled by organization audited):</b>	
<b>Correction (filled by organization audited):</b>	
<b>Corrective Action (filled by organization audited):</b>	
<b>Assessor Evaluation and Conclusion (filled by auditor):</b>	
<b>Verified by</b>	<b>:</b> -

<b>NCR No.</b>	<b>:</b> 2020.03	<b>Issued by</b>	<b>:</b> Arif Faisal Simatupang
<b>Date Issued</b>	<b>:</b> 13 November 2020	<b>Time Limit</b>	<b>:</b> 11 February 2021
<b>NC Grade</b>	<b>:</b> Major	<b>Date of Closing</b>	<b>:</b> 11 February 2021
<b>Standard Ref. &amp; Requirement</b>	<b>6.2.1</b> <b>Documentation of pay and working conditions in accordance with applicable labour laws are available to the workers in national languages and explained to them in language they understand.</b>		
<b>Evidence observed (filled by auditor):</b> Based on the results of a study of the harvester's wage payment documents (permanent and temporary workers) with the unit-based payment system in Division 2 Phase 4 in October 2020, it is known that of the 40 harvesters, only 13 harvesters (33%) get the average wage per day according to/exceed the minimum payment (Rp. 97,320 /day), while the remaining 27 harvesters (68%) received an average wage per day below the minimum payment (UMK).			

<b>Non-Conformance Description (filled by auditor):</b> The implementation of the harvester payment by unit-based payment system is still not in accordance with Government Regulation No. 78 of 2015 concerning wages. Where in Article 35 letter b, it is stated that the average income per day for workers in the unit of yield system must not be less than the provincial or district / city minimum wage.	
<b>Root Cause Analysis (filled by organization audited):</b> Harvesters who receive wages below the UMK are workers who work less than 7 hours of work, and lack of monitoring in employee working hours.	
<b>Correction (filled by organization audited):</b> Attach the attendance of harvesting workers who earn less than the UMK.	
<b>Corrective Action (filled by organization audited):</b> <ul style="list-style-type: none"> <li>- Create manual attendance for all harvesting workers, enforce recording of hours of work in and after harvest work.</li> <li>- Monitoring attendance for workers, so that harvesters work according to working hours and harvest results, to ensure that the number of results and work hours of harvesters are appropriate</li> </ul>	
<b>Assessor Evaluation and Conclusion (filled by auditor):</b> <b>Verification on 11 February 2021:</b> The company conducts a root cause analysis which states that workers who earn less than the UMK are due to being less productive in working hours, namely working less than 7 hours per day. The company shows evidence of the absence of harvest workers who earn less than the UMK in the period 17-30 November 2020, with an overview that there are still many workers who work less than 7 hours (up to only 3 hours of work). This nonconformity is declared as comply and will be evaluated for the implementation of corrective action, namely monitoring employee working hours so that they can work optimally 7 hours per day.	
<b>Verified by</b>	<b>: Arif Faisal Simatupang</b>

<b>NCR No.</b>	<b>: 2020.04</b>	<b>Issued by</b>	<b>: Arif Faisal Simatupang</b>
<b>Date Issued</b>	<b>: 13 November 2020</b>	<b>Time Limit</b>	<b>: 11 February 2021</b>
<b>NC Grade</b>	<b>: Major</b>	<b>Date of Closing</b>	<b>: 11 February 2021</b>
<b>Standard Ref. &amp; Requirement</b>	<b>6.2.3</b> <b>There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, and other legal labour requirements.</b>		
<b>Evidence observed (filled by auditor):</b> Based on the review of the employee attendance documents on night security from January to October 2020, there were 5 casual/temporary daily work with the initials AM, IR, ID, IW, IY (employee numbers BX/BPK/0415/1531, BX/BPK/1009/1054, BX/BPK/0309/964, BX/BPK/0310/1087, BX/BPK/0309/920) who work more than 21 working days in each month and more than three months consecutively.			
<b>Non-Conformance Description (filled by auditor):</b>			

The implementation of the company's manpower system is still not in accordance with the Labor Minister Lay No. 100 of 2004 concerning the provisions for the implementation of a specified time work agreement, Article 10 explains that if a worker works 21 days or more for 3 consecutive months or more, then the casual/temporary daily work agreement shall be changed to permanent worker

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

Lack of evaluation of casual employees who have worked 3 months for 21 working days or more. Some of the workers who have not been appointed as PKWTT are workers who are considered ineffective working for 7 hours of work.

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

- Evaluate casual employees who have worked for 3 consecutive months
- Appointment of employees to PKWTT (KHT) employees for employees / workers who work 21 days or more consecutively and have met the requirements according to the evaluation results

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

- Make monitoring of the list of casual workers who work in the company
- Assessing the performance of all casual workers who work in the company after a 3 month work period

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

**Verification on 11 February 2021:**

The company evaluates casual employees who work more than 21 days a month for three months or more. The five employees have been appointed as permanent employees with the following letters of appointment:

- Appointment letter of initials name IY No. 001/BPK-HRR/SK/I/2021 dated 23 December 2020.
- Appointment letter of initials name ID No. 002/BPK-HRR/SK/I/2021 dated 23 December 2020.
- Appointment letter of initials name IW No. 003/BPK-HRR/SK/I/2021 dated 23 December 2020.
- Appointment letter of initials name AM No. 004/BPK-HRR/SK/I/2021 dated 23 December 2020.
- Appointment letter of initials name IR No. 005/BPK-HRR/SK/I/2021 dated 23 December 2020.

Based on the root cause analysis, corrections, and corrective actions submitted, this non-conformity is declared as comply.

<b>Verified by</b>	<b>:</b>	<b>Arif Faisal Simatupang</b>
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**3.4.3. Opportunity for Improvement**

No	Ref. Std.	Description
1	2.1.1	The company has opportunities for improvement in the process of completing the revised <i>Izin Usaha Perkebunan</i> (IUP).
2	3.4.3	<p>The company has shown a social aspect management and monitoring plan for 2020. The impacts that are managed and monitored are as follows:</p> <ul style="list-style-type: none"> <li>- Employment opportunities with management objectives increase the proportion of the local population for company workforce recruitment and transparent recruitment mechanisms</li> <li>- Consultation and communication</li> <li>- Perceptions of the company with the aim of increasing positive public perceptions of the company</li> </ul> <p>In the 2020 social impact management and monitoring plan, the company has identified operational impacts that have the potential to cause community unrest, including improving road access and washing trenches in community locations to prevent flooding in community settlements and plantations.</p> <p>As an effort to involve the community in a participatory manner in the 2020 social aspect management and monitoring plan, the Company has submitted a letter to the Kuala Mandor B Village Government, Sungai Malaya Village, Sungai Enau Village and Mega Timur Village. on November 11, 2020 regarding requests for responses and input to the 2020 social management plan that has been compiled.</p> <p>The company has opportunities for improvement to ensure the implementation of the 2020 Social Aspects of Management and Monitoring Plan and Realization.</p>
3	6.3.2	The company has opportunity for improvement related to increasing the routine of meetings with workers representatives (Workers' Unions and Bipartite Institutions). Due to in the period of January - November 2020, meetings with worker representatives were only held twice, namely in March and September.
4	7.7.3	<p>Stake subsidence</p> <ul style="list-style-type: none"> <li>- Procedure No. SA 02 / WIP-KB / 0/2010 concerning the management of peat areas explains that the subsidence stake is set at 1 stake per 240 Ha (referring to the RSPO manual on BMPs for existing oil palm cultivation on peat) and must be monitored regularly (once every 3 months).</li> <li>- The area of the 2020 statement explains that the operational area is 4,437.93 hectares, so the company needs to install 16 peat subsidence units.</li> <li>- The 2020 peat subsidence monitoring document (installation of stakes on 22 December 2016) explains that the company already has 5 stakes and has been monitored every 3 months.</li> <li>- The program for adding peat subsidence in 2020, explained that in November 2020 the company added 3 peat subsidence units in blocks 111E, 129E and 142A Division 1.</li> <li>- Based on the interview, the company will complete the peat subsidence unit creation program by the end of 2020.</li> </ul> <p>The company has a chance for improvement to complete the peat subsidence peg development program in accordance with its SOP.</p>
5	7.8.4	PT Bumi Pratama Khatulistiwa extraction permit issued by the Regent of Kubu Raya through Decree No. 169 / Bunhuttamb / 2014 dated 28 May 2014 has expired in May 2019.

		<p>The company has shown a cooperation contract between PT Bumi Pratama Khatulistiwa and PT Trias Erisko Konsultan with SPKBPK number: 11 / BPK POM-SPK / JASA-KAJIAN HIDROLOGI / X-2020 SPK TEK number: 02 / SPK.BPK / TEK / X / 2020 date 21 October 2020 concerning hydrological studies for oil palm plantations and processing factories for submission of Surface Water Resources Concession Permits (SIPA) and assistance until the issuance of a Technical Recommendation from the Kalimantan River Basin Agency I for surface water utilization activities in the Landak River for Palm Oil Mill PT Bumi Pratama Khatulistiwa, located in Sei Tempayan, Mega Timur Village, Sungai Ambawang District, Kubu Raya Regency, West Kalimantan Province.</p> <p>The company can ensure the process of extending the surface water use permit.</p>
6	RSPO Certification System Clause 4.1.3	The company has opportunities for improvement in completing the fulfillment of the RSPO certification for the PT BPK smallholder scheme.

#### 3.4.4. Noteworthy Positive Components

No	Ref. Std.	Description
1		Barcode system (electronic bunch count chip) in recording production results
2		Has had a partnership with a plasma plantation
3		Do not use pesticides with active paraquat ingredients
4		Have "Biru" PROPER for the 2018-2019 period.

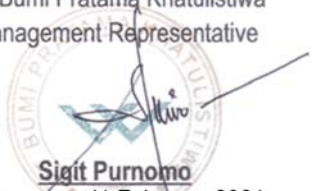



**3.5 Summary of Arising Issues from Public and Auditor Verification**

Public Issues (Institution/ NGO/Community)	Auditor Verification
<p><b>Sungai Enau Village Head</b></p> <p>The existence of the company has a positive impact on the community, including opening access roads for the community and also improving the economy of the village community through community involvement in the company's business activities, both as a worker and as a contractor. However, there were 2 complaints submitted by the community regarding requests to wash the canals that cross the village considering that there had been floods due to shallow ditches. Apart from that, the Village Government also asked about the application for fire suppression facilities and infrastructure that the company had not yet realized.</p>	<p>Regarding the complaints regarding the request for drainage improvement on the Enau and Rasau rivers, a meeting was held between the company and the community of Enau Village on August 1, 2020. Several things discussed at this meeting were:</p> <ul style="list-style-type: none"> <li>- Based on information from the community that the ditches on the Enau and Rasau rivers were repaired in 2016. Currently the condition is already a lot of sediment so that if it rains it will cause flooding in several hamlets</li> <li>- The flood that occurred resulted in the submerging of residents' residential areas and plantations.</li> <li>- Based on the results of the meeting as Bina Mitra representing PT BPK, it has asked the village government and several community representatives to be able to hold a meeting again to discuss together technically the canals / ditches that will be repaired along with the costs required.</li> </ul> <p>Based on the results of interviews with the company, the company management has agreed to wash the trenches, but gradually starting in 2020. However, the community does not accept it if the implementation is carried out in stages. In this regard, the Company continues to coordinate with the village government in order to obtain the best solution for the company and the community. This has been included in indicator 3.4.3.</p> <p>Meanwhile, in relation to requests from the community for blackout equipment, the Company did not approve of this because the company already had blackout equipment prepared to help with blackout operations in community areas if needed, and the company during dry season always prepared 1 set of fire equipment in each village as a anticipation efforts if there is a fire in the community area.</p>
<p><b>Local Contractor</b></p> <p>The EFB transport contractors come from the local residents of Sungai Enau Village.</p> <p>The contractor has understood the awareness of using PPE for all workers, so that the contractor has prepared PPE for the workers.</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>

Public Issues (Institution/ NGO/Community)	Auditor Verification
Regarding BPJS health, it is known that because the workers are from the surrounding community, and have been included in the BPJS participation in Sungai Enau Village. So far, there have been no complaints regarding the payments made by the company.	
<b>Committee Gender of BPK Estate</b>  Based on interview with committee gender, there is no complaint and report related sexual harassment. The gender committee has been socializing mechanism of sexual harassment handling. The informant has been protected by the gender committee (anonym). Beside that there is a reproduction policy related menstruation for 2 days and Pregnancy from 1 ½ month before and after giving birth. Program gender committee for 2021 such as religious and immunization for baby. Every division has represented of gender committee. So, if there is case, they can report to the gender committee representative.	There is no issues related committee gender.
<b>Worker Union</b> <ul style="list-style-type: none"> <li>- The lack of meeting between workers representative with the company's management. The management has a tendency of not transparent.</li> <li>- Still there are some Division or location, that the harvester can not achieve minimum payment, with the output-based payment system. The company should evaluate the rate value.</li> <li>- There are several casual/temporary worker of night security that worked over 21 days in a month, for 3 months and more consecutively.</li> </ul>	<ul style="list-style-type: none"> <li>- The management shown justification that the lack of meeting due to Covid 19 pandemic. This is become opportunity for improvement related to increasing the routine of meetings with workers representatives (Workers' Unions and Bipartite Institutions). Due to in the period of January - November 2020, meetings with worker representatives were only held twice, namely in March and September.</li> <li>- The second issue become NC No. 2020.03 in indicator 6.2.1. The management will evaluate this matter.</li> <li>- The third issue become NC No. 2020.04 in indicator 6.2.3. The management will evaluate this matter.</li> </ul>
<b>Plantation Agency of Kubu Raya Regency</b>  The company has a good relationship with the agency, besides that the company has also complied with applicable regulations, among others: already has a location permit, plantation business permit (IUP), and has routinely sent plantation business reports. Further explained that until now there has never been a land dispute involving the agency or fire incident in certification unit operational area.	There was no negative issue that need further verification. Based on document review and field observations, the company has demonstrated legal compliance regarding plantation legality, and no indications of land disputes or fire incident.
<b>National Land Agency of Kubu Raya Regency</b>  Certification unit has been complied with applicable regulations related land legality, among others has had location permit, plantation business permit (IUP), land title (HGU), and has routinely sent land use reports. There is no complaints from stakeholder related land disputes.	There is no negative issue that need further verification. Based on document review and field observations, the certification unit has demonstrated legal compliance related land legality, and no indications of land disputes.

Public Issues (Institution/ NGO/Community)	Auditor Verification
<p><b>Labor Agency of Kubu Raya Regency.</b></p> <ul style="list-style-type: none"> <li>• The companies have implemented the payment of wages for employees refers to West Kalimantan Governor Decree.</li> <li>• The company has a company regulation between the company and the Executive Board of Workers Union. The company regulation has been registered to Labor Agency of Kubu Raya District.</li> <li>• All mandatory reports related to employment have reported well.</li> <li>• There are no issues of migrant workers, no child workers, no substitution contracts, no labor trade or forced labor forms.</li> </ul>	<p>It has been verified and stated in the report and considering the results of interviews with Bipartite Institutions and worker unions</p>
<p><b>Head of Sungai Malaya Village</b></p> <ul style="list-style-type: none"> <li>- The company has CSR program, it has been realized on the last year.</li> <li>- The company has giving job opportunities, but need improving recruit and receive to staff level</li> <li>- The company has giving opportunity to the local contractor</li> <li>- There are no environment pollution issues.</li> <li>- There are no land dispute issues.</li> <li>- The company has socialized about HCV area</li> <li>- When the dry season, the road (village area) is dusty while during the rainy season there is flood.</li> </ul> <p><b>Previous Land Owners (Sungai Enau Village)</b></p> <ul style="list-style-type: none"> <li>- The company has been conducted FPIC process on the land compensation.</li> <li>- Field mapping were conducted with involving community leaders, land owner and boundaries land owners as witnesses.</li> <li>- The price of land compensation in accordance to negotiation process.</li> <li>- The land compensation in accordance to negotiation process no under pressure by company.</li> <li>- Providing plasma to the community so that it can be distributed evenly.</li> <li>- communication with the public relations department is currently experiencing difficulties.</li> </ul>	<p>The company has a programme and realization related road and ditch cleaning. The realization has also touched village areas but not all programs have been finish.</p> <p>Plasma has been given in accordance with the agreement at the beginning of the clearing of the area. Regarding the public relations department, there is a high employee turnover and there is no replacement for the old public relations officer who is currently in quarantine regarding Covid-19.</p>

<b>4.0</b>	<b>CERTIFIED ORGANISATION'S ACKNOWLEDGEMENT OF INTERNAL RESPONSIBILITY</b>
<b>4.1</b>	<b>Formal Sign-off of Assessment Findings</b>
	<p>Hereunder sign by management representative from inspected company to acknowledge a field assessment and agree for all content explained in this assessment report, included of non-compliance findings.</p> <p>Signed on behalf of:</p> <div style="display: flex; justify-content: space-around; align-items: flex-end;"> <div style="text-align: center;"> <p>PT Bumi Pratama Khatulistiwa Management Representative</p>  <p><b>Sigit Purnomo</b> Thursday, 11 February 2021</p> </div> <div style="text-align: center;"> <p>Mutuagung Lestari Lead Auditor</p>  <p><b>Arif Faisal Simatupang</b> Thursday, 11 February 2021</p> </div> </div>

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

No	Institution/ NGO/ Community	Address	Phone/ Email	Form of Communication	Date of Contact	Response	
						Yes	No
1	<b>BPK POM</b> - 1 WTP operator - 1 workers of Land Application - 1 WWTP operator - 1 Hazardous waste temporary warehouse officer - 1 Boiler Operators. - 1 Engine Operator - 1 Grading Workers. - 1 Loading ramp Workers. - 1 Sterilizer Workers - 1 Kernel station worker. - 1 Pressing Station Operators. - 1 Clarifier Station Operators. - 1 storage PIC - 4 workshop workers - 2 security worker - 2 weighbridge operator	PT Bumi Pratama Khatulistiwa	-	Field observation and direct interview	9 Nov 2020	✓	
2	<b>BPK Estate:</b> - 6 Spraying Workers. - 6 Harvester Workers. - 6 Manuring Workers. - 1 storage PIC - 4 workshop workers - 4 housing residences -	PT Bumi Pratama Khatulistiwa	-	Field observation and direct interview	10 Nov 2020	✓	
3	Committee Gender of BPK Estate	PT Bumi Pratama Khatulistiwa	-	Direct interview	10 Nov 2020	✓	
4	Labor Union	PT Bumi Pratama Khatulistiwa	-	Direct interview	10 Nov 2020	✓	
5	Land Agency of Kubu Raya Regency	Kubu Raya Regency	-	Direct Interview	10 Nov 2020	✓	
6	Plantation Agency of Kubu Raya Regency	Kubu Raya Regency	-	Direct Interview	10 Nov 2020	✓	

7	Labor Agency of Kubu Raya Regency	Kubu Raya Regency	-	Phone Interview	10 Nov 2020	✓	
8	Village Official & Previous Land Owner of Sungai Enau and Sungai Malaya	Kubu Raya Regency	-	Direct Interview	10-11 Nov 2020	✓	
9	Sawit watch	Bogor, Indonesia	<a href="mailto:info@sawitwatch.or.id">info@sawitwatch.or.id</a>	Email	2 Nov 2020	-	✓
10	WWF	Jakarta, Indonesia	<a href="mailto:wwf-indonesia@wwf.or.id">wwf-indonesia@wwf.or.id</a>	Email	2 Nov 2020	-	✓
11	WALHI	Jakarta, Indonesia	<a href="mailto:informasi@walhi.or.id">informasi@walhi.or.id</a>	Email	2 Nov 2020	-	✓
12	AMAN	Jakarta, Indonesia	<a href="mailto:rumahaman@cbn.net.id">rumahaman@cbn.net.id</a>	Email	2 Nov 2020	-	✓



**Appendix 2. Assessment Program**

Date	09 – 13 November 2020	
Program	Clauses To Be Audited	Auditor / PIC
<b>Monday, 09 November 2020</b>		
06.00 – 09.00 09.00 – 12.00	<b>Flight from Jakarta to Pontianak</b> <b>Traveling from Padang to PT Bumi Pratama Khatulistiwa</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 Bumi Pratama Khatulistiwa 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>Satria</b> <b>Tyo</b> <b>Faisal/ Nurdin</b>  <b>Faisal/ Nurdin</b>
<b>Tuesday, 10 November 2020</b>		
08.00 – 12.00	<b>Document review of legal aspect in Pontianak Office</b>	<b>Satria</b>
08.00 – 12.00	<b>Field Observation of Bumi Pratama Khatulistiwa 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/ Nurdin</b> <b>Tyo</b>  <b>Faisal/ Nurdin</b>  <b>Faisal/ Nurdin</b>  <b>Faisal/ Nurdin</b>
12.00 – 14.00	<b>Break</b>	<b>All Auditor</b>

14.00 – 17.00	<b>Village and Agency Consultation (via telephone)</b>  <b>Stakeholder consultation of Local Contractors, FFB suppliers, etc (via telephone)</b>  <b>Document review</b>	<b>All Auditor</b>
<b>Wednesday, 11 November 2020</b>		
08.00 – 12.00	<b>Document review</b>  <b>Continue the outstanding stakeholder consultation</b>	<b>All Auditor</b>
12.00 – 14.00	<b>Break</b>	<b>All Auditor</b>
14.00 – 17.00	<b>Document review</b>	<b>All Auditor</b>
<b>Thursday, 12 November 2020</b>		
08.00 – 12.00	<b>Document review</b>	<b>All Auditor</b>
12.00 – 14.00	<b>Break</b>	<b>All Auditor</b>
15.00	<b>Deadline of audit evidences/documents submission</b>	<b>Management Unit</b>
14.00 – 17.00	<b>Auditor's internal discussion of closing meeting preparation</b>	<b>All Auditor</b>
<b>Friday, 13 November 2020</b>		
08.00 – 10.00	<b>Closing Meeting</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>
10.00 – 13.00	<b>Traveling from PT Bumi Pratama Khatulistiwa to Pontianak</b>	<b>All Auditor</b>
15.00 – 17.00	<b>Flight from Pontianak to Jakarta</b>	<b>All Auditor</b>