

**Roundtable on Sustainable Palm Oil Certification
R S P O****[✓] Surveillance**

Name of Management : Selapan Jaya Mill subsidiary of PT Sampoerna Agro, Tbk
Organisation

Plantation Name : Hikmah Dua Estate (PT Telaga Hikmah) and 12 smallholders: KUD Bina Sejahtera, KUD Madya Karya Bhakti, KUD Maju Lancar, KUD Permata Bunda, KUD Jaya Makmur, KUD Sedia Mukti, KUD Bina Tani Mulya, KUD Sumber Sentosa, KUD Serba Usaha, KUD Intan, KUD Marga Mulya, KUD Jadi Mandiri

Location : Kerta Mukti Village, Mesuji Raya Sub-district, Ogan Komering Ilir District, Sumatera Selatan Province, Indonesia

Certificate Code : MUTU-RSPO/142

Date of Certificate Issue : 25 January 2017

Date of License Issue : 15 March 2021

Date of Certificate Expiry : 24 January 2022

Date of License Expiry : 24 January 2022

Assessment	Assessment Date	PT. Mutuagung Lestari Auditor	Reviewed by	Approved by
ASA-4	23 to 27 November 2020	Ardiansyah (Lead Auditor), Radytio Puspajana, Briyogi Shadiwa, Johannes Pandiangan	M. Rinaldi	Octo HPN Nainggolan

Assessment	Approved by MUTUAGUNG LESTARI on:
ASA-4	26 January 2021

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Figure 1. Location Map of Selapan Jaya Mill- PT Sampoerna Agro

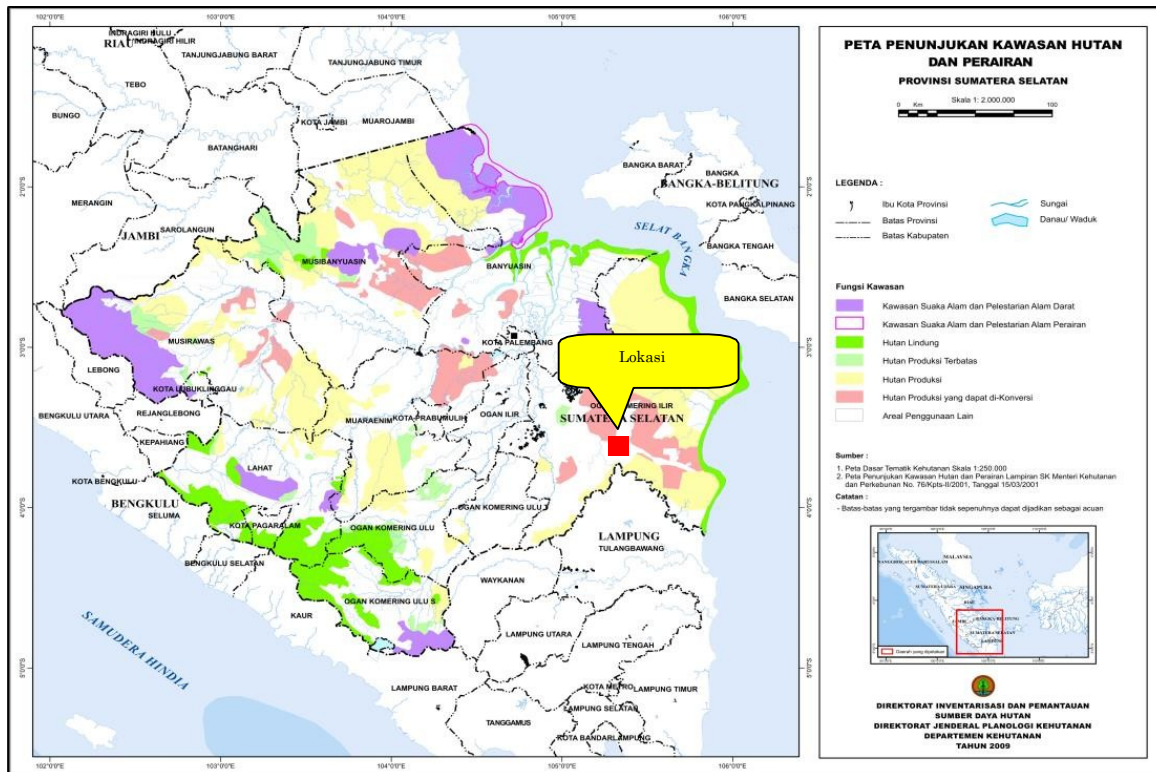
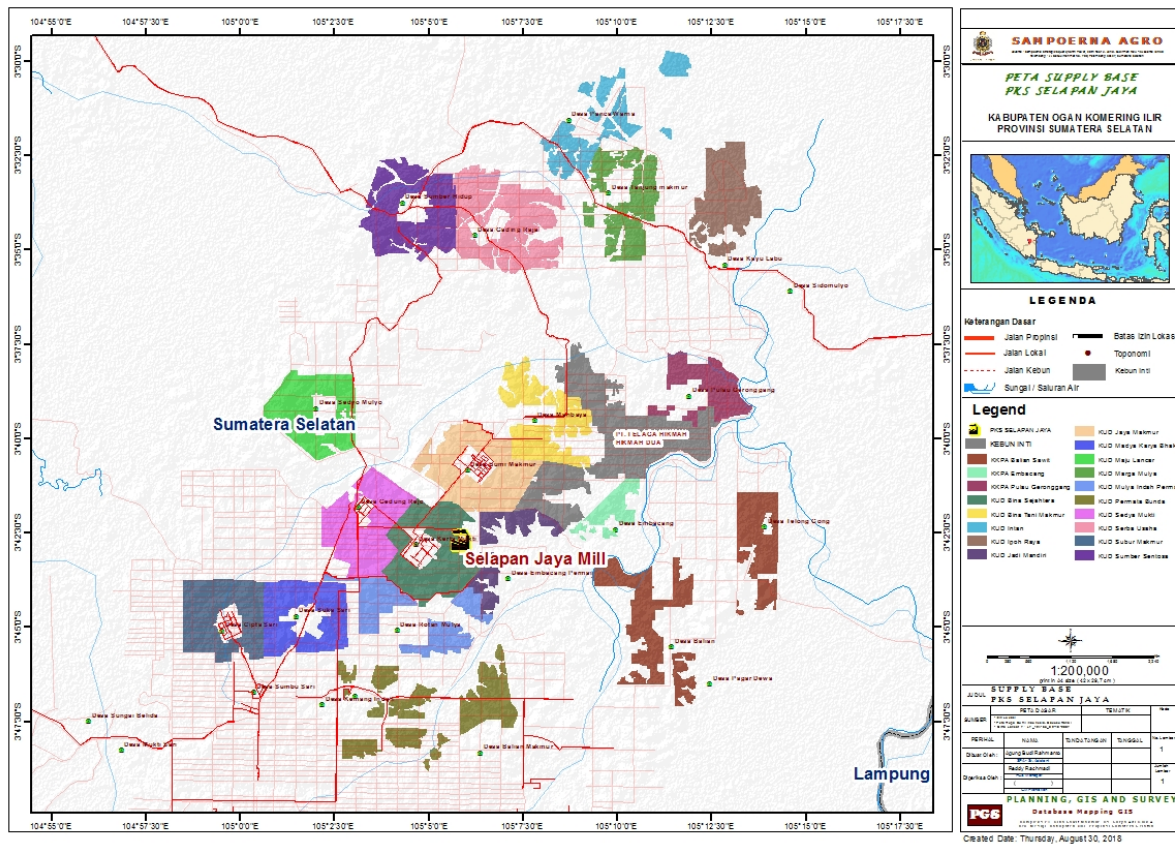


Figure 2. Operational Map of Selapan Jaya Mill- PT Sampoerna Agro



Abbreviations Used

ASA	: Annual Surveillance Assessment
BMP	: Best Management Practices
BPJS	: Badan Penyelenggara Jaminan Sosial (Health and Employment Workers Social Security Agency)
CA&L	: Corporate affair & Legal
CH	: Certificate Holder
CLA	: Collective Labor Agreement
CPO	: Crude Palm Oil
CSPK	: Certified Sustainable Palm Kernel
CSPO	: Certified Sustainable Palm Oil
CSR	: Corporate Social Responsible
EIA	: Environmental Impact Assessment
FFA	: Free Fatty Acid
FFB	: Fresh Fruit Bunch
FPIC	: Free Prior Inform and Consent
GHG	: Green House Gases
HCV	: High Conservation Value
ISCC	: International Sustainability & Carbon Certification
KER	: Kernel Extraction Rate
KUD	: <i>Koperasi Unit Desa</i> / Village Cooperative Unit
OER	: Oil Extraction Rate
OHS	: Occupational Health and Safety
OKI	: <i>Ogan Komerang Ilir</i>
P2K3	: Panitia Pembina Keselamatan dan Kesehatan Kerja/OHS Committee
PIC	: Person In Charge
PK	: Palm Kernel
POM	: Palm Oil Mill
POME	: Palm Oil Mill Effluent
PPE	: Personal Protection Equipment
RSPO	: Roundtable on Sustainable Palm Oil
SCCS	: Supply Chain Certification Standard
SIA	: Social Impact Assessment
SOP	: Standard Operational Procedure
SPSA	: <i>Serikat Pekerja Sampoerna Agro</i>

1.0	SCOPE of the CERTIFICATION ASSESSMENT		
1.1	Assessment Standard Used	<ul style="list-style-type: none">Principles and Criteria for Sustainable Palm Oil Production 2018, The Indonesia National Interpretation, Endorsed by the RSPO Board of Governors on 20 April 2020.RSPO Certification System for Principles and Criteria, 14 June 2017	
1.2	Organization Information		
1.2.1	Organization name listed in the certificate	Selapan Jaya Palm Oil Mill subsidiary of PT Sampoerna Agro, Tbk	
1.2.2	Contact person	Yusi Rosalina	
1.2.3	Organization address and site address	<ul style="list-style-type: none">RSPO registered company: Jln. Basuki Rachmat 788. Palembang 30127, Sumatra Selatan, IndonesiaLiaison Office: Sampoerna Strategic Square, North Tower, 28/F. Jln. Jenderal Sudirman Kav. 45, Jakarta. Indonesia	
1.2.4	Telephone	0711-813388	
1.2.5	Fax	0711-811585, 813188	
1.2.6	E-mail	yusi.rosalina@sampoernaagro.com	
1.2.7	Web page address	http://www.sampoernaagro.com	
1.2.8	Management Representative who completed the application for certification	Yusi Rosalina	
1.2.9	Registered as RSPO member	1-0031-07-000-00 (9 January 2007)	
1.3	Type of Assessment		
1.3.1	Scope of Assessment and Number of Management Unit	Palm Oil Mill and supply base: 1 (one) palm oil mill (Selapan Jaya POM under PT Sampoerna Agro), 1 (one) estate under PT Telaga Hikmah (Hikmah Dua Estate) and 12 (twelve) smallholder's estates are Village Cooperative Unit (KUD) of Bina Sejahtera, Madya Karya Bhakti, Subur Makmur, Sedia Mukti, Maju Lancar, Permata Bunda, Jaya Makmur, Sumber Sentosa, Serba Usaha, Intan, Marga Mulya, Bina Tani Mulya.	
1.3.2	Type of certificate	Single	
1.4	Locations of Mill and Plantation		
1.4.1	Location of Mill		
	Name of Mill	Location	Coordinate
			LatitudeLongitude
	Selapan Jaya	Kerta Mukti Village, Mesuji Raya Sub-district, Ogan Komering Ilir District, Sumatera Selatan Province, Indonesia	S 3° 42' 27.37"E 105° 05' 49.51"
1.4.2	Location of Certification Scope of Supply Base		
	Name of Supply Base	Location	Coordinate
			LatitudeLongitude
	Hikmah Dua Estate	Pulau Geronggang Village, Pedamaran Timur Sub-district, Ogan Komering Ilir District, Sumatera Selatan Province,	S 3° 39' 20.55"E 105° 09' 42.43"

1 2 3 4 5 6 7 8 9 10 11 12		Indonesia			
	KUD Madya Karya Bhakti (475 SH)	Suka Sari Village, Mesuji Raya Sub-district, Ogan Komering Ilir District, Sumatera Selatan Province, Indonesia	S 3° 44' 39.3"	E 105° 01' 40.9"	
	KUD Bina Sejahtera (670 SH)	Kerta Mukti Village, Mesuji Raya Sub-district, Ogan Komering Ilir District, Sumatera Selatan Province, Indonesia	S 3° 42' 50.5"	E 105° 04' 50.05"	
	KUD Sedia Mukti (584 SH)	Gedung Rejo Village, Mesuji Raya Sub-district, Ogan Komering Ilir District, Sumatera Selatan Province, Indonesia	S 3° 41' 44.3"	E 105° 03' 17.1"	
	KUD Maju Lancar (571 SH)	Sedyo Mulyo Village, Mesuji Raya Sub-district, Ogan Komering Ilir District, Sumatera Selatan Province, Indonesia	S 3° 39' 06.6"	E 105° 02' 10.8"	
	KUD Permata Bunda (600 SH)	Mataram Jaya Village, Mesuji Raya Sub-district, Ogan Komering Ilir District, Sumatera Selatan Province, Indonesia.	S 3° 46' 45.8"	E 105° 03' 11.7"	
	KUD Jaya Makmur (736 SH)	Bumi Makmur Village, Mesuji Raya Sub-district, Ogan Komering Ilir District, Sumatera Selatan Province, Indonesia.	S 3° 40' 45.2"	E 105° 06' 12.0"	
	KUD Sumber Sentosa (783 SH)	Sumber Hidup Village, Pedamaran Timur Sub-district, Ogan Komering Ilir District, Sumatera Selatan Province, Indonesia	S 3° 33' 40.7"	E 105° 04' 00.2"	
	KUD Serba Usaha (655 SH)	Gading Raja Village, Pedamaran Timur Sub-district, Ogan Komering Ilir District, Sumatera Selatan Province, Indonesia	S 3° 34' 31.7"	E 105° 06' 23.2"	
	KUD Intan (591 SH)	Panca Warna Village, Pedamaran Timur Sub-district, Ogan Komering Ilir District, Sumatera Selatan Province, Indonesia	S 3° 31' 27.9"	E 105° 08' 48.6"	
	KUD Marga Mulya (364 SH)	Tanjung Makmur Village, Pedamaran Timur Sub-district, Ogan Komering Ilir District, Sumatera Selatan Province, Indonesia	S 3° 54' 03.6"	E 105° 06' 27.8"	
	KUD Jadi Mandiri (243 SH)	Embacang Permai Village, Mesuji Raya Sub-district, Ogan Komering Ilir District, Sumatera Selatan Province, Indonesia	S 3° 43' 37.6"	E 105° 06' 53.8"	
KUD Bina Tani Mulya (566 SH)	Maribaya Village, Kec. Pedamaran Timur Sub-district, Ogan Komering Ilir District, Sumatera Selatan Province, Indonesia	S 3° 39' 25.8"	E 105° 07' 26.3"		
1.5	Description of Area Statement				
1.5.1	Tenure				
	• HGU		3120.00 Ha		
	• HGB		118.59 Ha		
	• Community		12629.45 Ha		
1.5.2	Area Statement				
		Hikmah Dua Estate (Ha)	Selapan Jaya Mill (Ha)	Associate Smallholders (Ha)	Total (Ha)
	• Total area	3120.00	118.59	12629.45	15868.04
	• Mature area	2350.79	-	12589.74	14940.53

	• Immature area	-	-	-	-			
	• Mill	-	118.59	-	118.59			
	• Road	130.08	-	-	130.08			
	• Building	13.70	-	-	13.70			
	• Drain, Swamp, River	540.21	-		579.92			
	• Nursery	31.40	-	-	31.40			
	• HCV	53.82	-	39.71	53.82			
1.6	Planting Year and Cycles							
1.6.1	Age profile of planting year (part 1)							
	Planting Year	Hectarage (Ha)						
		Hikmah Dua Estate	KUD Madya Karya Bakti	KUD Bina Sejahtera	KUD Sedia Mukti	KUD Maju Lancar	KUD Permata Bunda	KUD Jaya Makmur
	1992	-	-	-	-	-	-	-
	1994	-	167.09	246.85	932.12	981.41	577.74	172.28
	1995	1655.56	362.77	433.17	153.34	-	432.60	1064.00
	1996	249.11	495.36	567.95	-	-	114.39	191.23
	1997	94.52	-	-	-	-	-	-
	2000	-	-	-	-	-	-	-
	2001	-	-	-	-	-	-	-
	2002	15.00	-	-	-	-	-	-
	2005	229.90	-	-	-	-	-	-
	2006	43.90	-	-	-	-	-	-
	2008	24.00	-	-	-	-	-	-
	2011	34.80	-	-	-	-	-	-
	2012	4.00	-	-	-	-	-	-
	TOTAL	2350.79	1025.22	1247.97	1085.46	981.41	1124.73	1427.51
Age profile of planting year (part 2)								
	Planting Year	Hectarage (Ha)						
		KUD Sumber Sentosa	KUD Serba Usaha	KUD Intan	KUD Marga Mulya	KUD Jadi Mandiri	KUD Bina Tani Mulya	Total
	1992	-	-	-	-	614.30	-	614.30
	1994	232.52	-	-	-	-	927.11	4237.12
	1995	727.67	904.56	533.70	135.31	-	211.34	6614.02
	1996	267.89	249.71	-	97.45	-	-	2233.09
	1997	-	-	251.70	249.94	-	-	596.16
	2000	-	-	-	86.19	-	-	86.19
	2001	-	-	50.70	38.05	-	-	88.75
	2002	-	-	119.30		-	-	134.30
	2005	-	-	-	-	-	-	229.90
	2006	-	-	-	-	-	-	43.90
	2008	-	-	-	-	-	-	24.00

	2011	-	-	-	-	-	34.80	
	2012	-	-	-	-	-	4.00	
	TOTAL	1228.08	1154.27	955.40	606.94	614.30	1138.45	14940.53
1.6.2	New Planting area after January 2010			38.8 Ha				
1.6.3	Planting Cycle			1 st 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 (%)	
	Selapan Jaya	120	235184.74	50501.90	21.5	11946.50	5.1	
	<i>*Production data source from November 2019 to October 2020</i>							
	<i>*The difference between FFB processed and FFB received because the FFB is left for processing the next day.</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)	%	
	Hikmah Dua Estate	3,238.59	2350.79	40800.48	17.4	40376.17	99.0	
	KUD Madya Karya Bhakti (475 SH)	1026.59	1025.22	16790.14	16.4	16723.31	99.6	
	KUD Bina Sejahtera (670 SH)	1247.97	1247.97	19206.82	15.4	19110.95	99.5	
	KUD Sedia Mukti (584 SH)	1106.63	1085.46	11318.44	10.5	11318.44	100.0	
	KUD Maju Lancar (571 SH)	990.26	981.41	8862.56	9.0	8862.56	100.0	
	KUD Permata Bunda (600 SH)	1128.27	1124.73	13788.39	12.3	11407.14	82.7	
	KUD Jaya Makmur (736 SH)	1427.74	1427.51	25568.34	17.9	25539.85	99.9	
	KUD Sumber Sentosa (783 SH)	1228.99	1228.08	8925.23	7.3	7362.05	82.5	
	KUD Serba Usaha (655 SH)	1157.44	1154.27	11792.34	10.2	10358.54	87.8	
	KUD Intan (591 SH)	955.40	955.40	9373.12	9.8	8037.54	85.8	
	KUD Marga Mulya (364 SH)	607.41	606.94	5631.79	9.3	5410.00	96.1	
	KUD Jadi Mandiri (243 SH)	614.30	614.30	5157.34	8.4	2434.64	47.2	
	KUD Bina Tani Mulya (566 SH)	1138.45	1138.45	17967.50	15.8	17916.56	99.7	
	TOTAL	15868.04	14940.53	195182.49	13.1	184857.75	94.7	
	<i>*Production data source from November 2019 to October 2020</i>							
	<i>*Other FFB has been sent to other Certified RSPO Mill (Telaga Hikmah Mill & Sumber Sawit Mill)</i>							
1.7.3	FFB description from other source							
	Name of sources/Organisation	Type of Organisation	Number of smallholders	Production Area (Ha)	Supplied to Mill			
					FFB (tonnes/year)			
	KUD Harapan Jaya Mandiri (RSPO non-certified)	Associate Smallholders under PT Sampoerna Agro	170	289	1673.17			
	KUD Ipoh Raya (RSPO non-certified)		517	1000.95	5075.30			

KUD Balian Sejahtera Abadi (RSPO non-certified)		759	1364.40	2017.68
KUD Puger Mulya (RSPO non-certified)		248	446.40	1277.73
Megaterang Estate (RSPO non-certified)	PT Telaga Hikmah subsidiary of PT Sampoerna Agro Tbk	-	-	61.74
Tanjung Sari Estate (RSPO non-certified)		-	-	203.47
Gading Jaya Estate (RSPO non-certified)		-	-	277.97
Hikmah Satu Estate (Certified RSPO)		-	-	1589.04
Hikmah Empat Estate (Certified RSPO)		-	-	235.22
Hikmah Tiga Estate (Certified RSPO)		-	-	347.02
Hikmah Lima Estate (Certified RSPO)	PT Gunung Tua Abadi subsidiary of PT Sampoerna Agro Tbk	-	-	229.91
Limau Kesturi Estate (RSPO non-certified)		-	-	26.61
Jaya Permai Estate (RSPO non-certified)		-	-	11.46
Nawa Surya Estate (RSPO non-certified)		-	-	23.47
Plasma Rantau Durian (RSPO non-certified)	Independent Smallholders	-	-	42.78
Plasma Pagar Dewa (Certified RSPO)	Independent Smallholders	-	-	43.93
Nawa Surya Puncak Terang Plasma (RSPO non-certified)	Independent Smallholders	-	-	8.12
Telaga Hikmah 3 Pra Konversi	Independent Smallholders	-	-	5.01
KUD Jaya Mandiri (RSPO non-certified)	PT Sampoerna Agro (non Certified)	-	-	2722.69
Hikmah Dua Estate (RSPO non-certified)		-	-	191.76
Third party and others (RSPO non-certified)	Independent Supplier	-	-	34264.96
TOTAL				50329.04

**Production data source from November 2019 – October 2020*

**Hikmah Dua Estate NPP sanction cannot claim certified RSPO product until 25 January 2020.*

**KUD Jaya Mandiri non-certified product before 25 January 2020 (New License).*

**CH not claim all FFB from RSPO certified source as RSPO certified FFB (Only from Hikmah Tiga and Hikmah Lima Estate).*

1.7.4	Product categories	FFB, CPO, PK	
1.8	Tonnage of Product		
1.8.1	Past Annual Claim Certified Product	Last Year Projected Certified Volume (MT) (25 Jan 2020 – 24 Jan 2021)	Actual certified product for last year (MT)
	FFB Processed	294600	185434
	CPO Production	63500	42139.327

	Palm Kernel (PK) Production		14800		9939.889			
1.8.2	Product selling							
	Type of selling product		Actual selling product period for last year (MT)					
	CSPO sold as RSPO certified product		0					
	CSPK sold as RSPO certified product		4889.20					
	CSPO sold under other scheme		3575.00					
	CSPK sold under other scheme		0					
	CSPO sold as conventional		37730.90					
	CSPK sold as conventional		4316.65					
1.8.3	Estimate of Certified FFB Claim							
	Name of Estates		Total Area (Ha)	Production Area (Ha)	FFB (tonnes/year)	Yield (tonnes/ha/year)		
	Hikmah Dua Estate		3238.59	2350.79	42000	17.87		
	KUD Madya Karya Bhakti (475 SH)		1026.59	1025.22	17000	16.58		
	KUD Bina Sejahtera (670 SH)		1247.97	1247.97	19000	15.22		
	KUD Sedia Mukti (584 SH)		1106.63	1085.46	12000	11.06		
	KUD Maju Lancar (571 SH)		990.26	981.41	9000	9.17		
	KUD Permata Bunda (600 SH)		1128.27	1124.73	14000	12.45		
	KUD Jaya Makmur (736 SH)		1427.74	1427.51	25000	17.51		
	KUD Sumber Sentosa (783 SH)		1228.99	1228.08	10000	8.14		
	KUD Serba Usaha (655 SH)		1157.44	1154.27	12000	10.40		
	KUD Intan (591 SH)		955.40	955.40	10000	10.47		
	KUD Marga Mulya (364 SH)		607.41	606.94	6000	9.89		
	KUD Jadi Mandiri (243 SH)		614.30	614.30	6000	9.77		
	KUD Bina Tani Mulya (566 SH)		1138.45	1138.45	18000	15.81		
	TOTAL		15868.04	14940.53	200000	13.39		
	*Projected FFB production for 25 January 2021 to 24 January 2022							
1.8.4	Estimate of Certified Palm Product Claim							
	Name of Mill	Capacity (tonnes/ hour)	FFB Processed (tonnes/year)	CPO Out put (tonnes)	Extraction (%)	Palm Kernel Out put (tonnes)	Extraction (%)	Supply Chain Module
	Selapan Jaya	120	200000	43000	21.5	10200	5.1	MB
	*Projected CSPO and CSPK production for 25 January 2021 to 24 January 2022							
1.9	Other Certifications							
	ISCC			EU-ISCC-Cert-ID215-23190101				
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						
	Belinda Mill (PT Aek Tarum)		2011		Belida Estate	2011	South Sumatera	Certified
					Permata Bunda Satu Estate	2016	South Sumatera	Certified

			Belida Estate Smallholder (KUD Panca Sawit Makmur)	2016	South Sumatera	Certified
			Limau Sundai Smallholder			
			• KUD Rahayu Bhakti	2017	South Sumatera	Certified
			• KUD Mulya Jaya	2017	South Sumatera	Certified
			• KUD Mekar Sari	2017	South Sumatera	Certified
			• KUD Sumber Rezeki	2017	South Sumatera	Certified
			Sari Indah Smallholder			
			• KUD Karya Makmur	2017	South Sumatera	Certified
			• KUD Subur Makmur	2018	South Sumatera	Certified
	Permata Bunda Jaya Mill (PT Mutiara Bunda Jaya)	2016	Mesuji Estate	2016	South Sumatera	Certified
			Surya Adi Estate	2016	South Sumatera	Certified
			Mesuji Smallholder (KUD Citra Sawit Mandiri)	2018	South Sumatera	Certified
			Permata Bunda Smallholder			
			• KUD Marga Mulya	2018	South Sumatera	Certified
			• KUD Surya Bhakti	2018	South Sumatera	Certified
			Harapan Bunda Smallholder			
			• KUD Surya Adi	2018	South Sumatera	Certified
			• KUD Sinar Jaya	2018	South Sumatera	Certified
			Surya Karta Smallholder (KUD Tunas Harapan)	2018	South Sumatera	Certified
	Sumber Sawit Mill (PT Gunung Tua Abadi)	2016	Sumber Sawit Estate	2016	South Sumatera	Certified
			Inti Permata Bunda Dua Estate	2016	South Sumatera	Certified
			Hikmah Tiga Estate	2017	South Sumatera	Certified
			Hikmah Lima Estate	2017	South Sumatera	Certified
			Hikmah Lima Estate (extension HGU 2019)	2021	South Sumatera	-
			Hikmah Lima Estate Smallholder (KUD Dewa Makmur)	2017	South Sumatera	Certified
			Sumber Sawit Estate Smallholder (KUD Makmur Bersama)	2022	South Sumatera	-
			Limau Kesturi Estate	2022	South Sumatera	-
			Jaya Permai Estate	2022	South Sumatera	-
			Nawa Surya	2022	South Sumatera	-
			Puncak Terang Estate	2022	South Sumatera	-
			Nawa Surya Estate Smallholder	2022	South Sumatera	-
			Limau Kesturi Estate Smallholder	2022	South Sumatera	-
	Selapan Jaya Mill (PT Sampoerna Agro)	2017	Hikmah Dua Estate	2017	South Sumatera	Certified
			Belida Estate Smallholder			
			• KUD Mulya Indah Permai	2020	South Sumatera	Certified
			• KUD Jadi Mandiri	2020	South Sumatera	Certified
			• KUD Bina Sejahtera	2018	South Sumatera	Certified
			Gading Jaya Estate Smallholder / Limau Manis Smallholder			

			<ul style="list-style-type: none"> KUD Maju Lancar KUD Madya Karya Bhakti KUD Sedya Mukti KUD Jaya Makmur KUD Intan KUD Marga Mulya 	2018	South Sumatera	Certified
				2018	South Sumatera	Certified
				2018	South Sumatera	Certified
				2018	South Sumatera	Certified
				2018	South Sumatera	Certified
				2018	South Sumatera	Certified
			Gading Jaya Estate Smallholder (KUD Karya Makmur, KUD Subur Makmur)			
			KUD Permata Bunda	2018	South Sumatera	Certified
			KUD Bina Tani Mulya	2018	South Sumatera	Certified
			Gading Jaya Estate Small holder / Sungai Pangeran Smallholder			
			KUD Sumber Sentosa	2018	South Sumatera	Certified
			KUD Serba Usaha	2018	South Sumatera	Certified
			Gading Jaya Smallholder			
			KUD Puger Mulya	2022	South Sumatera	-
			KUD Harapan Jaya Mandiri	2022	South Sumatera	-
			KUD Balian Sejahtera Abadi	2022	South Sumatera	-
			KUD Ipoh Raya	2022	South Sumatera	-
	Telaga Hikmah Mill (PT Telaga Hikmah)	2018	Hikmah Satu Estate	2018	South Sumatera	Certified
			Hikmah Empat Estate	2019	South Sumatera	Certified
			Gading Jaya Estate	2021	South Sumatera	-
			Mega Terang Estate	2021	South Sumatera	-
			Tanjung Sari Estate	2021	South Sumatera	-
			Sepucuk Estate	2021	South Sumatera	-
			Mega Terang Smallholders	2024	South Sumatera	-
			Tanjung Sari Estate Smallholder/ Rantau Durian Smallholder			
			KUD Tanjung Mesayu	2023	South Sumatera	-
			KUD Sumber Makmur	2023	South Sumatera	-
			KUD Sari Makmur	2023	South Sumatera	-
	Sungai Rangit Mill (PT Sungai Rangit)	2022	Baboti Estate	2022	Central Kalimantan	-
			Rauk Naga Estate	2022	Central Kalimantan	-
			Waringin Estate	2022	Central Kalimantan	-
			Sukamara Estate	2022	Central Kalimantan	-
			Telaga Bintang Estate	2022	Central Kalimantan	-
			Sungai Sagu Estate	2022	Central Kalimantan	-
			Sungai Rangit Smallholder	2025	Central Kalimantan	-
	Usaha Agro Indonesia Mill (PT Usaha Agro Indonesia)	2018	Ulin Agro Estate	2018	West Kalimantan	Certified
			Kruing Agro Estate	2018	West Kalimantan	Certified
			Meranti Agro Estate	2018	West Kalimantan	Certified
			Izin lokasi kedua 2500 Ha	2022	West Kalimantan	-
			Izin lokasi ketiga 2283 Ha	2022	West Kalimantan	-

Usaha Agro Indonesia Smallholder						
			KOBGUN Jambi Mekar Jaya Sempurna (JMJS)	2022	West Kalimantan	-
			KOBGUN Sempurna Mandiri (SM)	2022	West Kalimantan	-
			KOBGUN Sempurna Bersatu (SB)	2022	West Kalimantan	-
			PT Anugerah Palm Indonesia Estate (Gaharu Palm Estate)	2022	West Kalimantan	-
			PT Anugerah Palm Indonesia Smallholder	2025	West Kalimantan	-
	Lanang Agro Bersatu Mill (PT Lanang Agro Bersatu)	2022	Bukit Subur Estate	2022	West Kalimantan	-
			Bukti Makmur Estate	2022	West Kalimantan	-
			Lanang Agro Bersatu Smallholders	2023	West Kalimantan	-
	Landak Area – Wilayah 1	-	PT Tebar Tandan Tenerah Estate (Gunung Tenerah Estate)	2022	West Kalimantan	-
			PT Tebar Tandan Tenerah Smallholders	2025	West Kalimantan	-
			PT Nusantara Sarana Alam Estate (Gunung Alam Estate)	2022	West Kalimantan	-
			PT Nusantara Sarana Alam Estate Smallholders	2025	West Kalimantan	-
			PT Kedurang Prakarsa Nabati Estate	2022	West Kalimantan	-
			PT Kedurang Prakarsa Nabati Smallholders	2025	West Kalimantan	-
	Landak Area – Wilayah 2		PT Pertiwi Agro Sejahtera Estate (Gunung Sejahtera Estate)	2022	West Kalimantan	-
			PT Pertiwi Agro Sejahtera Estate Smallholders	2025	West Kalimantan	-
			PT Kusuma Mentari Makmur (Gunung Mentari Estate)	2022	West Kalimantan	-
			PT Kusuma Mentari Makmur Smallholders	2025	West Kalimantan	-
			PT Agro Planindo Utama (Gunung Utama Estate)	2022	West Kalimantan	-
			PT Agro Planindo Utama Smallholders	2025	West Kalimantan	-
Time bound plan on 9 July 2020						
The revision of time bound plan because there is the change of certification time plan for uncertified management units, reduction of supply base and extension of supply base with details:						
1. Reduction of supply base: KUD Mulya Indah Permai because has terminate the agreement.						
2. Add estate name in subsidiaries:						
a) Gaharu Palm Estate, supply to PT Anugrah Palm Indonesia Estate						
b) Gunung Tenerah Estate, supply to PT Tebar Tanda Tenerah Estate						
c) Gunung Alam Estate, supply to PT Nusantara Sarana Alam Estate						

- d) Gunung Sejahtera Estate, supply to PT Pertiwi Agro Sejahtera Estate
e) Gunung Mentari Estate, supply to PT Kusuma Mentari Makmur Estate
f) Gunung Utama Estate, supply to PT Agro Planindo Utama Estate
3. Change of time line for uncertified unit:

Unit	Previous TBP	Revision TBP	Justification	Mill
KUD Bina Sawit Utama	-	2024	New agreement	Permata Bunda Mill
Hikmah Lima Estate (HGU extension in 2019)	2020	2021	On process to install HGU boundaries	Sumber Sawit Mill
KUD Makmur Bersama	2020	2022	Infrastructure not yet appropriate LUCA process	
Limau Kesturi Estate	2020	2022	LUCA process	
Jaya Permai Estate	2020	2022	LUCA process	
Nawa Surya Estate	2020	2022	LUCA process	
Puncak Terang Estate	2020	2022	LUCA process	
KUD Mulya Indah Permai	2020	-	Terminate agreement	Selapan Jaya Mill
KUD Puger Mulya	2020	2022	- KUD Financial not yet stable - LUCA process	
KUD Harapan Jaya Mandiri	2020	2022		
KUD Balian Sejahtera Abadi	2020	2022		
KUD Ipoh Raya	2020	2022		
Gading Jaya Estate	2019	2021	LUCA process	Telaga Hikmah Mill
Megaterang Estate	2021	2021		
Tanjung Sari Estate	2019	2021		
Mega Terang Smallholder	2021	2024		
KUD Tanjung Mesayu	2020	2023		
KUD Sumber Makmur	2020	2023		
KUD Sari Makmur	2020	2023	LUCA process and legality issue	Sungai Rangit Mill
Sungai Rangit POM	2021	2022		
Baboti Estate	2021	2022		
Rauk Naga Estate	2021	2022		
Waringin Estate	2021	2022		
Sukamara Estat	2021	2022		
Telaga Bintang Estate	2021	2022		
Sungai Sagu Estate	2021	2022		
Sungai Rangit Smallholder	2021	2025		
Location permit 2,283 Ha	2020	2022	Land title still on process	Usaha Agro Indonesia Mill
Kopbun Sempurna Bersatu	2020	2022		
Lanang Agro bersatu Mill	2020	2022	LUCA process	Lanang Agro Bersatu Mill
Bukit Subur Estate	2020	2022		
Bukit Makmur Estate	2020	2022		
Lanang Agro Bersatu	2022	2023		

1.10.2 Progress of Associated Smallholders and Outgrowers for Certifiable Standard

The smallholders associated with PT Sampoerna Agro has been include as Certification Scope and the others smallholder are in progress to certification

2.0	ASSESSMENT PROCESS
2.1	Assessment Team
ASA-4	<p>1. Ardiansyah (Lead Auditor). Indonesian citizen, Bachelor of Forest Resources Conservation, Department of Forestry. Had work experience in Environmental NGO for 6 month (2007) and consultant for making EIA Document and Strategic Environmental Assessment (SEA) for 3 years (2009 – 2012). Had attend training such as RSPO Lead Auditor course, Lead Auditor ISPO, OHSAS (SIO 18001 – 2007), land cover crop mapping and Management System Certification (ISO 9001-2008), Environmental Management System Certification (ISO 14001-2004), Social Auditing and Conflict Resolution. Had many times following audit activities related to sustainable palm oil certification system which is ISPO as an auditor since 2012 for legal, environmental aspect, conservation and social. Fluent in Bahasa and Malay. During this audit, he assigned to verify legal aspect and land dispute, social aspect, worker welfare, partial certification and TBP.</p> <p>2. Radytio Puspanjana (Auditor). Indonesian Citizen. Bachelor of agriculture, majoring in Soil Science. Agriculture Faculty. He was working as honorarium Officer at the Riau Province Plantation Agency in the division of huge estate for 1 year. The participated trainings are Survey and Mapping (GIS) Training which was held by National 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 audits as auditor base on Best Management Practice and Environment. During the audit, he verified environment aspect.</p> <p>3. Briyogi Shadiwa (Auditor). Indonesian citizens. Associate Degree of Oil Palm Plantation, Bogor Agricultural University. He has work experience since 2009 in several private oil palm plantation companies in Indonesia as Assistant Agronomy and Agronomy Quality Control. The trainings that have been attended include: RSPO Lead Auditor Course by Checkmark, ISPO Auditor Training by LPP, Lead Auditor ISO 9001: 2015, RSPO Supply Chain Certification Training Course by Checkmark, Lead Auditor ISO 14001: 2015, SMK3 Awareness, OHSAS 18001 Awareness: 2007, SA 8000 Awareness, ISO 45001: 2018 Awareness and General OHS Expert Training. In this audit, he verified the OHS, Best Management Practices and SCCS aspect.</p> <p>4. Johannes Pandiangan (Auditor Trainee). Bachelor of Agriculture, Department of Agricultural Social-Economics, Faculty of Agriculture. Has 7 years of experience working as operational staff in one of the leading private oil palm plantation companies in Indonesia. The training that has been attended includes: Forest and land fire emergency response training by BKSDA Riau Province, IHT ISPO P&C Certification System, IHT Awareness ISO 17021 and 17065, IHT Awareness RSPO, ISO 14001: 2015 Lead Auditor Training, and ISO 9001:2015 Lead Auditor Training. During this audit he support to verify Best Management Practices.</p>
2.2	Assessment Methodology, Assessment Process and Locations of Assessment
2.2.1	Figure of person days to implement assessment
ASA-4	<p>Number of auditors : 3 auditors and 1 trainee</p> <p>Number of days for ASA-4 at site : 5 days</p> <p>Number of working days for ASA-4 at site : 15 Working days</p>
2.2.2	Assessment Process
ASA-4	<p>The assessment was conducted by measuring the sufficiency of implementation with the consistency done by the PT Samoperna Agro Tbk – Selapan Jaya Mill to the requirements of Principles and Criteria for Sustainable Palm Oil Production 2018, The Indonesia National Interpretation, Endorsed by the RSPO Board of Governors on 20 April 2020 and RSPO Certification System for Principles and Criteria, 14 June 2017.</p> <p>The assessment was conducted in three methods: (1) document review, aiming to observe the sufficiency of types or substances from required documents; (2) interview, aiming to obtain more detailed information and cross check the information; and (3) field observation, aiming to observe directly the sufficiency of implementation on site.</p> <p>Some opportunities for improvement of the results ASA-4 delivered by the MUTU auditor to the management unit and the results are the subject will be verified at the next assessment phase (RC).</p> <p>Improvement of findings from previous audit findings were observed by auditors at this ASA-4 assessment. All</p>

	<p>information obtained was recorded in Check List of PT Mutuagung Lestari (MUTU) and part of ASA-4.</p> <p>The opening meeting was held on Monday 23 November 2020 in client area through a teleconference (zoom). As for the participants who attended the opening meeting included the Estate Manager, Mill Manager, GM for smallholder area, sustainability department and other relevant staff. while the closing meeting will take place on 28 November 2020. The auditor team cannot conduct field observation for 2 days and field observation is conducted in Wednesday due to mitigate the pandemic Covid-19. In general, the audit activities went smoothly with good support from the unit management and there is no grievance or appeal during the audit. The presentation of documents is presented quite well using email or google drive.</p> <p>The assessment program please find Appendix 2</p>
2.2.3	Locations of Assessment
ASA-4	<p>Number of units in this certification activity is 1 (one) Mill, 1 (one) Own Estates and 12 KUD (6838 smallholders/ SH). The auditor team used the $(0.8\sqrt{y}) \times (z)$ formula to determine the units sampling to be focused on and also considered the issues raised by stakeholder, (y) is the number of estate and (z) multiplier defined by the risk assessment. The risk for this assessment is low due to the area is geographic locations, distance of estate, complexity of labour, landscape setting, presence of HCV, number of communities/ conflicts and legality. Based on this formula, the auditor team determined that the sampling locations are one palm oil mill (Selapan Jaya POM), one estate (Telaga Hikmah Dua Estate) and 83 SH (28 SH in KUD Permata Bunda, 28 SH in KUD Serba Usaha and 27 SH in KUD Jaya Makmur).</p> <p>Location that visited consist of:</p> <p>Selapan Jaya Mill</p> <ul style="list-style-type: none"> • Loading Ramp. 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. • Security. Observation and interview related SCCS implementation, OHS and worker welfare implementation. • Weigh bridge. Observation and interview related SCCS implementation, OHS and worker welfare implementation. • FFB processing stations (sterilizer, thresher, digester, press). Observations and interviews related to the processing of FFB, yield quality, losses, OSH aspects and employment. • Hazardous Waste Warehouse. 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. • Boiler Station. Observations and interviews related to operations, understanding of emergency response, OSH aspects and employment. • Engine room. Observations and interviews related to operations, understanding of emergency response, OSH aspects and employment. • Hydrant simulation. Observation related emergency response, readiness of fire fighting equipment. • WTP. Observations and interviews related to water management, recording of water use, health checks, PPE and waste management. • WWTP (outlet for POME disposal). Field observations and interview related POME management, recording, OHS and environmental. • Biogas. Observation related POME utilization for biogas. <p>Hikmah Dua Estate</p> <ul style="list-style-type: none"> • Boundary Pole No. 86 & 87. Observation related to boundary pole maintenance and land dispute potency. • Harvesting, block 30A. Field observation and interview with 3 harvest workers related to harvesting, worker welfare and OHS implementation. • HCV Area, Block 33B. Observation related to HCV management in form of swamp area and buffer zone. • EFB Application, Block 22A. Observation related to organic fertilization implementation and environment aspect. • Nursery Area. Observation related to nursery management.

- **Fire Fighting Facilities.** Observation and simulation the emergencies response facilities.
- **Diesel Tank.** Observation of OHS, environment aspect, emergency response and fire facilities.
- **Spare part and PPE warehouse.** Observation minimum stock of PPE's.
- **Workshop.** Observations and interviews with workers related to the management and implementation of health safety, and social worker.
- **Room rinse of pesticide applicators.** Observation related to management of agrochemical material and waste, MSDS, emergency response facilities and the types of pesticides used.
- **Fertilizer and pesticide warehouse.** Observation related to management of agrochemical material and waste, MSDS, emergency response facilities and the types of fertilizer used.
- **Landfill.** Observation related domestic waste management.
- **Block 21.** Field observation related to occupation area.

KUD Jaya Makmur

- **Farmer Group 50 (20 plots, number 1186-1205) and group 49 (27 plots, number 1159-1185).** Field observation and interview with 3 harvest workers related to harvesting, IPM, legal boundaries, worker welfare and OHS implementation.
- **Fertilizer and pesticide warehouse.** Observation related to management of agrochemical material and waste, MSDS, emergency response facilities and the types of fertilizer used.
- **Hazardous Waste Warehouse (Temporary).** Field observations related to the fulfillment of the attribute's health and safety, recording, and the implementation of compliance requirements hazardous waste temporary warehouse, wages and complaint mechanism.
- **Fire Fighting Facilities.** Observation and simulation the emergencies response facilities.
- **Room rinse of pesticide applicators.** Observation related to management of agrochemical material and waste, MSDS, emergency response facilities and the types of pesticides used.

KUD Maju Lancar

- **Fertilizer and pesticide warehouse.** Observation related to management of agrochemical material and waste, MSDS, emergency response facilities and the types of fertilizer used.
- **Room rinse of pesticide applicators.** Observation related to management of agrochemical material and waste, MSDS, emergency response facilities and the types of pesticides used.
- **Hazardous Waste Warehouse.** 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.

KUD Serba Usaha

- **Cooperative Unit boundary road. Farmer Group 43 (14 plots with number 1285-1298), Farmer Group 39 (14 plots with number 940-953), and Farmer Group 71 (9 plots with number 1724-1732).** Observation related to boundary road maintenance and land dispute potency.
- **Harvesting and FFB transport, Farmer Group 43 (27 Plots with numbers 1285-1311).** Field observation and interview with 2 harvest workers and 1 supervisor related to harvesting, FFB transport, worker welfare and OHS implementation.
- **HCV Area plots number 1324-1325.** Observation related to HCV management.
- **Pest and disease, Farmer Group 47 (16 plots with numbers 1324-1331 and 1342-1350).** Observations related to pest and disease attacks
- **Room rinse of pesticide applicators.** Observation related to management of agrochemical material and waste, MSDS, emergency response facilities and the types of pesticides used.
- **Hazardous Waste Warehouse.** Field observations related to the fulfillment of the attributes health and safety, recording, and the implementation of compliance requirements hazardous waste temporary warehouse, wages and complaint mechanism.

KUD Permata Bunda

	<ul style="list-style-type: none"> • Harvesting and FFB transport, Farmer Group 76 (21 Plots with numbers 1967-1987). Field observation and interview with 2 harvest workers and 1 supervisor related to harvesting, FFB transport, worker welfare and OHS implementation. • HCV Area plot number 2037. Observation related to HCV management. • Pest and disease, Farmer Group 77 (25 plots with numbers 1324-1331 and 1342-1350). Observations related to pest and disease attacks and observations of owl cages and beneficial plants. • Agronomy Best Management Practice. Farmer Groups 78 (30 plots with numbers 2013-2042). observations of best agronomic cultivation practices. • Room rinse of pesticide applicators. Observation related to management of agrochemical material and waste, MSDS, emergency response facilities and the types of pesticides used. • Fertilizer and pesticide warehouse. Observation related to management of agrochemical material and waste, MSDS, emergency response facilities and the types of fertilizer used. • Hazardous Waste Warehouse. Field observations related to the fulfillment of the attributes health and safety, recording, and the implementation of compliance requirements hazardous waste temporary warehouse, wages and complaint mechanism.
2.3	Stakeholder Consultation and Stakeholders Contacted
2.3.1	Summary of stakeholder consultation process.
ASA-4	<p>Summary of stakeholder consultation process</p> <p>Consultation of stakeholders for PT Sampoerna Agro was held by:</p> <ul style="list-style-type: none"> • Public Notification on website Mutucertification.com (9 November 2020) • Public consultation by phone with government institution (24 November 2020) • Public consultation by phone with communities including previous land owner (24 November 2020) • Public consultation by phone with internal stakeholders and contractor (24 November 2020) • Public consultation by email with NGO (16 November 2020)
2.3.2	Stakeholder contacted
	Please find appendix 1
2.4	Determining Next Assessment
	The next visit (RC) will be conducted eight (8) month to twelve (12) month after date of annual license.

3.0 ASSESSMENT FINDINGS

3.1 Summary of Assessment Report of the RSPO Certification

MUTUAGUNG LESTARI has conducted an assessment of Selapan Jaya POM – PT Sampoerna Agro Tbk operation consisting of one (1) mill, one (1) oil palm estate and 12 KUD (6838 SH).

During the assessment, there were two (2) Nonconformities were assigned against Minor Compliance Indicators and three (3) opportunities for improvement were identified.

Further explanation of the non-conformities raised and corrective actions taken by the company are provided in section 3.5. The company has already prepared and implemented the corrective action 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) Minor non-conformities had been closed out shall be verified during next assessment.

MUTUAGUNG LESTARI found that Selapan Jaya POM – PT Sampoerna Agro Tbk complied with the requirements of **Principles and Criteria for Sustainable Palm Oil Production 2018, The Indonesia National Interpretation, Endorsed by the RSPO Board of Governors on 20 April 2020 and RSPO Certification System for Principles and Criteria, 14 June 2017.**

Therefore MUTUAGUNG LESTARI Recommends RSPO Certification of compliance is Continued.

Ref Std.	VERIFICATION RESULT of MUTU-Certification	
PRINCIPLE #1 BEHAVE ETHICALLY AND TRANSPARENTLY		
1.1	The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.	
1.1.1	Based on the SOP for Communication, Participation and Consultation, it is explained that there are types of information that are open to the public, but not limited to land use rights / certificates, OHS plans, EIA, HCV documentation, pollution reduction and prevention plans, complaint details and complaints, negotiation procedures, continual improvement plans, public summaries of certification assessment reports, human rights policies. Publicly document also inform in CH website such as sustainability policy, company commitment and code of ethics.	
Environment	The company has shown the relevant environmental monitoring and management reporting documents to the competent authority, including:	
	<ul style="list-style-type: none"> - The Report on the Implementation of POME management, Environmental Monitoring and Management of Hazardous Waste, program and realization CSR report to the Environmental Agency Ogan Komering Ilir Regency and Sumatera Selatan Province. - Land preparation without burning and has the infrastructure in fire anticipation, according to Permentan Number. 26 of 2007 section 15. - The Report on the calculation of GHG to RSPO for period year 2019. - Report of management and monitoring HCV & SIA to government. 	
1.1.2 and 1.1.4	The company has SOP Communication, participation, and consultation No. P-SAG-HA-CA & L document that regulates procedures for communication and consultation with external and internal stakeholders. This SOP also regulates the timeframe for responding to requests for information. Based on the Communication, Participation and Consultation SOP,	

it is known that the responsibility for communication and consultation is the management of the Plantation (Estate and Mill), the CA & L (Corporate affair & Legal) department, the sustainability unit, and human resources & services.

KUD shows SOP Communication, Participation, and Complaints No. SA-PLASMA-PP-CA & L-01 effective April 1, 2017. Based on these documents, external communication can be carried out in writing and orally. Stakeholder communication responses are carried out at least 14 days after the information is received

Based on the results of document review of incoming and outgoing letters that have been shown by the company, it is known that both the provision of information and responses to requests for information are carried out in Indonesian.

Based on the results of interviews with several OKI district government agencies, contractors and village officials, it is known that the company has conducted outreach to stakeholders regarding its communication SOPs.

1.1.3

The company has a record of requests for information and responses given which are contained in the Stakeholder Logbook and have been shown by each unit to be the sample. The logbook explains the name of the sender, agency, date of incoming letter, initials, and responses. The examples of letters that go to companies and KUD are as follows:

- The incoming letter on September 11, 2020 from OKI youth organization (*GP Ansoi*) was in the form of a proposal and was responded to by KUD Permata Bunda with the provision of financial assistance.
- Hikmah Dua estate Entrance Letter with letter number 04.004 / BM / VII / 2020 dated July 14, 2020 regarding requests for funds and has been followed up by outgoing letter number 0983 / HD / VII / 2020 and has been approved.

1.1.5

The company has an updated list of contacts and detailed stakeholder information for the period 2020. The stakeholder list explains the name of the agency, personal name, telephone number and address and explains the status of the stakeholder (internal or external). The number of stakeholders of each KUD and Estate are as follows:

- KUD Jaya Makmur: 48 stakeholders
- KUD Permata Bunda: 47 Stakeholders
- KUD Serba Usaha: 31 stakeholders
- KUD Maju Lancar: 48 stakeholders
- Hikmah Dua Estate: 77 stakeholders
- Selapan Jaya POM: 109 stakeholders

Status: Comply

1.2

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

1.2.1

The company has a PT Sampoerna Agro Tbk Sustainability Policy which was signed by the CEO on October 1, 2019. The policy describes the company's commitments, namely:

1. To act with integrity and ethical behaviour in all transactions and business operations in accordance with The Sampoerna Way. Comply with fair and proper business practices, prohibit all forms of corruption and other violations, and ensure transparency of information in accordance with applicable regulations.
2. To fulfill all customer requests, as well as legal and regulatory requirements, which have been ratified and applicable in all levels: local, national, and international.
3. To uphold safety, orderliness, and harmonious relationships in all plantation business activities, by putting forward consultation with stakeholders, as well as prohibiting all illegal forms of intimidation, and violence.
4. To respect and uphold human rights, including the right of employees to form labor unions and discuss issues collectively. We neither discriminate based on race, ethnicity, nationality, religion, physical disabilities, gender, sexual orientation, membership in labor unions, political affiliations, nor age. No forced nor illegal labor. To respect human rights activists.
5. To protect female employees at workplace by strongly prohibiting any sexual harassment and violence towards them, as well as protecting their reproduction rights. We do not employ underaged children and we do facilitate child care.
6. To consistently deliver superior and environmentally friendly products while promoting customer satisfaction.
7. To strive in preventing pollution to the environment.

8. To prevent occupational accidents and sicknesses that may result from unsafe working conditions and activities.
9. To fulfill SNI standards in laboratory management system under ISO/IEC 17025:2017 as well as ensure laboratory facilities are adequate.
10. To enforce zero burning in our land clearing activities and prohibit land clearing activities in environmentally protected areas, High Conservation Value (HCV) areas, peatlands, and forest with High Carbon Stock (HCS).
11. To carry out continuous improvement in terms of quality, environment, occupational health and safety, as well as product security.

The company has socialized the code of ethics policy within the company. The socialization was given to all KUD and estate which are the supply base of Selapan Jaya POM. One example is the Policy Socialization Report and commitment to employees of KUD Jaya Makmur which was held on February 4, 2020, located at KUD Jaya Makmur, where there is also a socialization regarding the code of ethics policy. The socialization activity was attended by 23 participants.

1.2.2

The company has a violation reporting policy of PT Sampoerna Agro Tbk which was ratified by the President Director on September 27, 2013. The purpose of this policy is as a concrete manifestation that the company group upholds accountability and transparency as well as a concrete effort to improve the quality of plantation company governance, which is good for supporting the business activities of the group company. This policy explains the Whistle Blowing System (WBS), which is a violation reporting system that is part of the group's internal control system in preventing violation and fraudulent practices and to strengthen the implementation of good corporate governance.

All reports must be submitted to the WBS team by electronic mail or written letter:

- If submitted by electronic mail or email, the report is addressed to: complaints@sampoernaagro.com
- If submitted by mail (in a closed envelope), which is marked as Private and strictly confidential: complaint from SGRO PT Sampoerna Agro Tbk. Sampoerna Strategic Square North Tower, 28th floor Jl. Jend. Sudirman Kav. 45 Jakarta 12930, Indonesia.

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 and cooperative have 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.

Legal aspect

The company shows that the permits related to the legal aspect it owns such as:

- Land title for operation area
- Business permit
- Pay tax

Regarding to STBD progress, 4 KUDs consist of KUD Bina Sejahtera, KUD Jadi Mandiri, KUD Maju Lancar and KUD Sedia Mukti that received a letter from the Plantation and Animal Husbandry Office explaining that the STDB all members of the village unit cooperative are still in process and will be completed within 24 months. While for other KUD, STDB is still in the process of completing administrative documents.

Environment

The company shows that the permits related to the environment it owns include:

1. The company already has EIA and RKL / RPL (Environmental Management / Monitoring Plan) compliance with regulation of Minister of Environment Regulation number 5 year 2012 and Minister of Environment Regulation number P.24 year 2018.
2. The company already has a permit for the disposal of POME to PT Sampoerna Agro based on the decision of the

- Regent of Ogan Komering Ilir number: 370/KEP/DLH/2017 dated June 19, 2017 which is valid for 5 years. Wastewater is discharged into the Dabok Hitam river, with the highest discharge of 2.5 M2 per ton of CPO Palm Oil Product.
3. Permit of Hazardous Storage compliance with regulation of Minister of Government Regulation number 101 year 2014.
 4. The company has a surface water extraction permit published Ogan Komering Ilir Regency from the One-Stop Investment and Integrated Service Office of South Sumatra Province Number: 0406/DPMPSTSP.V/X/2020 dated 2 October 2020 which is valid for 2 years.

BMP

In terms of best management practices, it is known that plantation and mill management has implemented several compliances with Indonesian laws and regulations, for example not using the burning method in the land clearing process, oil palm planted are from seed producers (DxP) which are recognized by the Indonesian government. Each unit of the Unit of Certification has implemented integrated pest management, biological control and only uses pesticides that are listed on the pesticide government website.

Labor aspect

In terms of labor, it is known that plantation and mill management has implemented several compliances with Indonesian laws and regulations, for example provide PPE to workers, workers assurance in term of BPJS, relevant training, routine medical surveillance, pay minimum wage and no forced nor illegal labor.

2.1.2

The company has a procedure of legal requirement which presented in document P-SAG-HO-SUS-06, dated 1 September 2017 mentioned that the sustainability officer has the responsibility to arranged and monitored legal-related laws and/or regulations. The procedure mentioned that in order to monitor and update laws and/or regulations, the sustainability officer required to actively check and make coordination with Government Agencies or Institutions.

The system to ensure the legal compliance for third party/contractors, the company has had monitoring and questioner every 3 month, for example, monitoring of work progress FFB transporter PT Telaga Hikmah and CV Anton Putra has monitored on 14 April 2020. The item for monitoring such as payment, work progress, compliance to OHS, deed (*akta pendirian perusahaan*), the license of management signing the contract (deed of management, appointment letter), and all regulation in Indonesia.

2.1.3

The company has a procedure maintenance and monitoring of HGU poles, the monitoring and maintenance was conducted every year. Based on field observation to poles number 86, 87 and 89 Hikmah Dua Estate the poles sighted that each pole well maintenance and demarcated, and also each poles in accordance to GPS coordinate.

The Work instruction number Plasma (WI-PLASMA-PP-CA&L-0201) date 1 December 2018 conducted every year by Head of Division, for example result of monitoring boundaries pole on KUD Serba Usaha period 2020 known all boundaries pole are available. Field visit in KUD Serba Usaha, KUD Jaya Makmur and KUD Permata Bunda, sighted that boundaries poles is visible between smallholder's area.

Status: Comply

2.2

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

2.2.1
Selapan Jaya Mill

The company shows a list of contractors at Selapan Jaya Mill is 5 contractors, for example PT Techindo Contromatra and CV Bangun Bersama. The list of contractors indicated by the company contained the PIC, contact number, company address and email address of each company.

Hikmah Dua Estate

The company shows a list of contractors is 16 for work in Hikmah Dua Estate for example CV Anton Putra and Cooperative Mandir Hikmah Dua. All of these companies are for FFB Transport, EFB application, nursery security. In the list of

contractors there is PIC information, contact numbers, number of workers, company addresses and email addresses of each company.

2.2.2

The company shows work contracts with contractors at the Mill and Estate, for example Work contract Number: 20 / XI/ 242/SA/CAL dated 2 November 2020 concerning Work Contracts for civil construction of G3 emplacement in Selapan Jaya Mill between PT Sampoerna Agro and CV Bangun Bersama.

The system to ensure the legal compliance for third party/contractors, the company has had monitoring and questioner every 3 month. The item for monitoring such as payment, work progress, compliance to OHS, the establishment (akta pendirian perusahaan), the license of management signing the contract (deed of management, appointment letter), and all regulation in Indonesia.

Selapan Jaya POM and Hikmah Dua estate already have a Work Contracts with a third party which explains that service providers comply with and implement regulations in the health and safety sector. However, the company can't show fulfillment of legal compliance by third parties, related to occupational health and safety insurance. **Non-conformity No. 2020.01 with minor category.**

2.2.3

Based on the document's verifications, interview with management and local contractors the unit of certification can be demonstrate if all contracts containing specific clauses on meeting applicable legal requirements and this can be demonstrated. On agreement letter CPO transporter PT Sampoerna Agro between PT Maju Bersama Anggiat Miduk number agreement 011/CPO/SA/MBA/II/2020 date 1 February 2020 article number 6 related workers are fulfillments to Minimum Wages, Participate in the Insurance and Social Security program (BPJS), no child labor, PPE provision, Anti-corruption, bribery and fraud and etc.

The results of field observation and interviews with contractor workers can be concluded that workers had been the use of PPE, no force labor, human trafficking and there is no child labor.

Status: Non-conformity No. 2020.01 with minor category

2.3

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

2.3.1 & 2.3.2

The Mill receive FFB directly from Associate Smallholders under PT Sampoerna Agro, the collection centers or agents. The company has had document of identification cover the information of the name of suppliers, address, geo coordinate, land title status, plantation permit, certification status, and management representative and contact number. For example FFB supplied by PT Sentosa Agri Prima Mandiri (the collection centers or agents), geo coordinate on 3,33293 Latitude and Longitude 105,15346. The FFB supplier can be seen in the report part 1.7.3 FFB description from other sources and report part 1.4.2 for FFB from Certification Scope.

Records of the origins of all third-party FFB sourced are available on computerized system at head office. Implementation of traceability FFB sources started from an SOP for third party suppliers are available on. This procedure is required for all purchasing material should be based on contract and the document of FFB supplier identification, including FFB purchasing from third parties.

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 shown the long-term plan documents owned by both the Selapan Jaya Palm Oil Mill, Hikmah Dua Estate and the KUD as samples. The long-term plan documents are separate based on each entity. An example of a long-term plan is as follows:

PT Telaga Hikmah - Hikmah Dua Estate has a five-year production projection which is contained in the 5-year Long Term Plan for the 2020-2024 period. The document contains projected area statements, production projections (FFB), oil (CPO), nucleus (Kernel), plantation costs, factory costs, oil prices, core prices, revenue from oil sales and core sales, expenses (production costs) and revenues. profit / loss (income vs expenses).

PT Sampoerna Agro - Selapan Jaya POM has a five-year production projection contained in the 5-year Long-Term Plan for the 2020-2024 period. The document contains projected area statements, production projections (FFB), oil (CPO), nucleus (Kernel), plantation costs, factory costs, oil prices, core prices, revenue from oil sales and core sales, expenses (production costs) and revenues. profit / loss (income vs expenses).

The Permata Bunda KUD has a five-year production projection which is contained in the 5-year Long Term Plan for the 2020-2024 period. The document contains projections of FFB and projections of FFB per hectare.

3.1.2

The company has shown plans to replant oil palm owned by the company. Based on these documents, it is known that the plan to replant oil palm is only done for plasma, while Hikmah Dua Estate does not have any plans for replanting oil palm. The plans for replanting oil palm are as follows:

	2020	2021	2022	2023	2024
KUD Maju Lancar (Ha)	-	1,056.70	-	-	
KUD Permata Bunda (Ha)	-	-	1,277.88	-	
KUD Jaya Makmur (Ha)	-	-	-	1430.66	
KUD Serba Usaha (Ha)	-	-	-		1,344.49

Based on the results of interviews with company management, it was found that an evaluation of the palm oil replanting plan had not yet been carried out because the program was still running.

3.1.3

The company has reviewed the company's management regarding the Management Review Meeting of PT Sampoerna Agro's IMS, RSPO, ISPO and ISCC which was held on 20 November 2020 in accordance with memorandum number 102 / SUS / XI / 2020 from the Head of Sustainability dated 7 November 2020. The agenda for the management review meeting is:

- Internal audit results;
- Feedback from customers;
- Process performance and product suitability;
- Status of preventive and corrective actions;
- Follow-up results resulting from management reviews;
- Changes that may affect the management system; and
- Recommendations for improvement.

The management review meeting was attended by 65 participants from estate management to top management

Status: Comply

3.2

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

3.2.1

The company has shown documents for the 2020 period of continuous improvement programs for each of KUD, Hikmah Dua Estate, and Selapan Jaya POM. The examples are as follows:

1. Reducing the use of chemicals (inorganic fertilizers and pesticides) with the aim of minimizing environmental impacts.
2. Installing barn owl for the entire KUD area to control rats naturally.

In addition, the company has also conducted an RSPO Internal Audit as an implementation of sustainability improvements. The results of the RSPO internal audit are as follows:

- Internal audit of RSPO KUD Permata Bunda was carried out on 31 August 2020 and there were 9 findings of non-

conformities and had been fulfilled on 10 November 2020

- The RSPO KUD Maju Lancar internal audit was carried out on 31 August 2020 and there were 18 findings of non-conformities and had been fulfilled on 10 November 2020
- RSPO KUD Jaya Makmur internal audit was carried out on September 1, 2020 and there were 14 findings of non-conformities and had been fulfilled on November 10, 2020
- RSPO KUD Serba Usaha internal audit was carried out on September 5, 2020 and there were 10 findings of non-conformities and had been fulfilled on November 10, 2020
- The RSPO Hikmah Dua Estate internal audit was carried out on 12 August 2020 and there were 19 findings of non-conformities and had been fulfilled on 21 November 2020
- RSPO Selapan Jaya POM internal audit was carried out on August 10, 2020 and there were 6 findings of non-conformities and had been fulfilled on November 20, 2020.

For environment Aspects

- Utilizing organic waste from households for composting.
- Contribution in local economic development through the development associate smallholder's plantation.
- The company on development a biogas plan.

3.2.2

the company routinely submits ACOP reports on an annual basis. The last ACOP report was conducted in 2019 and can be seen on the website rspo.org

Status: Comply

3.3

Operating procedures are appropriately documented, consistently implemented and monitored.

3.3.1

The mill and estate has Standard Operating Procedures (SOPs) that covers all aspects of oil palm planting and management as documented on Integrated Management System Procedures for Sampoerna Agro contains the following SOPs that cover all estate operations such as Nursery Practice, Land Clearing, Preparation and Planting, Soil Conservation and Terracing, Road Construction and Maintenance, Establishment and Maintenance of Legume Covers, Planting Density and Planting Technique, Palm Replacement During Immaturity and Supplying, Upkeep of Immature Oil Palms, Upkeep of Mature Oil Palms, Pests & Diseases, Manuring, EFB Application, Harvesting, Bunch Census and Palm Thinning. KUD Bina Sejahtera (cooperative) has Standard Operating Procedures (SOPs) that covers all aspects of oil palm planting and management as documented on list of procedures, issued date April 1, 2016.

The Oil Mill has SOPs covering all mill operations such as FFB Grading, Sterilization Station, Press Station, Threshing Station, Oil Room, Kernel Plant, Laboratory, CPO & PK despatch, Engine Room, Boiler Room, Electrical, Workshop as well as Raw and Boiler Water Treatment Plant. E.g. document No. P-SAG-PKS- 14, Revision 1, issued date April 1, 2016, procedure of Traceability and mass balance, P-SAG-PRS-02, Revision 1, issued date September 1, 2009, procedure of loading ramp, P-SAG-PRS-62, Revision 1, issued date September 1, 2009, procedure of clarification.

3.3.2

In order to ensure consistent implementation of the SOPs among all levels of the workforce in the field, the following mechanisms are utilized internal audit. For Mill and Estate, Internal audit as determined on SOP of internal audit, No. Doc. P-SAG-RO-SUS-03, Rev1, Effective date June 1, 12. For KUD, Internal audit as determined on SOP of internal audit, SA-Plasma-PP-SUST-01, Rev: 0, Issued Date April, 2016. In the procedure has regulated that audit schedule once time audits per year.

Based on the Internal Audit SOP, it is explained that audits are carried out to evaluate and examine all aspects of the quality management system and the environment. The SOP also describes mechanisms regarding non-conformities, remedies and continuous corrective actions. The company has the opportunity to ensure that the implementation as guided by the KUD is fully implemented. **OFI**

3.3.3

The company has also conducted an RSPO Internal Audit as an implementation of sustainability improvements. The

results of the RSPO internal audit are as follows:

- Internal audit of RSPO KUD Permata Bunda was carried out on 31 August 2020 and there were 9 findings of non-conformities and had been fulfilled on 10 November 2020
- The RSPO KUD Maju Lancar internal audit was carried out on 31 August 2020 and there were 18 findings of non-conformities and had been fulfilled on 10 November 2020
- RSPO KUD Jaya Makmur internal audit was carried out on September 1, 2020 and there were 14 findings of non-conformities and had been fulfilled on November 10, 2020
- RSPO KUD Serba Usaha internal audit was carried out on September 5, 2020 and there were 10 findings of non-conformities and had been fulfilled on November 10, 2020
- RSPO Hikmah Dua Estate internal audit was carried out on 12 August 2020 and there were 19 findings of non-conformities and had been fulfilled on 21 November 2020
- RSPO Selapan Jaya POM internal audit was carried out on August 10, 2020 and there were 6 findings of non-conformities and had been fulfilled on November 20, 2020.

Based on the results of interviews with the contractor, it is known that the company always monitors the contractor's compliance in carrying out its work in accordance with the procedures owned by the company. One example is compliance with the use of appropriate PPE.

Status: Comply

3.4

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

3.4.1

Environmental document.

PT Telaga Hikmah (Hikmah Dua Estate)

The company (Hikmah Dua Estate) has EIA document (ANDAL) year 1996. The EIA document has approved by Department of Agriculture No. 142/BA.5/IV/1996 dated 18 June 1996. The EIA document covering activity such as pra construction (legal land), construction including estate activity (land clearing, road building, land cover crop, drainage, nursery, planting) and infrastructure (emplacement, office building, mill, general facility), operational activity (labor recruitment, fertilizing, circle weeding, harvesting, pest and disease, pruning) and pasca construction (harvesting, FFB transportation, mill processing). Then in 2004, estate revised their EIA document, approved by Environmental Official Government of Ogan Komering Ilir. This revised because Land application program plan was changed from Hikmah Dua estate to Hikmah 1 estate

The cooperative and Selapan Jaya POM has EIA document including in the EIA document of PT Selapan Jaya. The EIA document has approved by Minister of Agriculture No.025/ANDAL/RKL-RPL/3A/XII/1997 dated 31 December 1997. The EIA document has conducted according to government regulation (PP No. 51 year 1983).

SIA

Social Impact Assessment for PT SA Telaga Hikmah Dua estate and Selapan Jaya POM were carried out on 2014. The assessment includes details of positive and negative social effects that may be caused by plantations and mills and documents participation of affected parties and local communities. The SIA was conducted through participatory method involving all relevant affected parties and stakeholder.

KUD Bina Sejahtera, KUD Sumber Sentosa, KUD Subur Makmur KUD Sedia Mukti and KUD Bina Tani Mulya SIA Assessments conducted by PT Sono Keling in Februari 2019. There were 2 assessors sent to assess the impacts of All PT SA 17 scheme smallholder and KUD Bina Sejahtera, KUD Sedia Mukti, KUD Sumber Sentosa, KUD Subur Makmur and KUD Bina Tani Mulya have included in the scope. There are list of attendance of SIA process such as FGD, HCVA, SIA and CSA stakeholder consultation at Kerta Mukti Villages, conducted at February 16th 2017 attended by 11 local community leaders (cooperative, traditional and local leader).

3.4.2

The company (Hikmah Dua) and cooperative has environmental plan stated in the environmental monitoring plan (RPL)

and environmental management plan (RKL). The management plan explained about source of impact, environmental parameter to monitoring, aim of environmental monitoring plan, monitoring method of environmental (method of collecting and data analysis, location of monitoring, due date and monitoring frequent) and person in charge. The program EIA has conduct consultation with relevant stakeholder to identify and to develop mitigation measure. The consultation, interview and evaluation with local community of Padamaran Sub District and Mesuji Sub District for PT Telaga Hikmah every 6 month.

The SIA Action Plans for avoidance or mitigation of negative impacts and promotion of the positive ones as well as monitoring of impacts has developed in consultation with the affected parties. It was well documented and timetabled, including responsibilities for implementing all the program and has explained period Social Impact Management and monitoring Plan 2020 included external stakeholder and internal stakeholder, for internal stakeholder such as mill and estate workers, gender committee, worker unions, and cooperative group manager. Meanwhile for external stakeholder for example Kerta Mukti Villages, Mataram Jaya Village, and Muara Padang Village. The forum group discussion for plan of management and monitoring social impact period 2020 date 5 November 2019 by involving the village community and internal stakeholder.

3.4.3

The implementation of environmental management plan explained in the report of environmental monitoring plan and environmental management plan period 1st semester 2020. The implementation of the monitoring and management consists of labor recruitment, fertilizing, circle weeding, harvesting, pest and disease, pruning, erosion and sedimentation level, water and air quality, aquatic biota, economy and culture, land fire, and waste. Based on monitoring result, there is no non-conformance raised. The implementation of EIA program has evaluated every 6 months, with questionnaire method to nearest community such as Kerta Mukti village, Mataram Jaya village and Muara Padang village. The report has been distributed to environmental agency of Ogan Komering Ilir District.

The impact identified in SIA has been managed and monitored through SIA Management and Monitoring Plan. The plan describes monitoring indicator, monitoring method, PIC and frequency. Compiled based on the results of reviews of management plan on 5 November 2019, which conducted in a participatory manner. In the SIA Management and Monitoring Plan, there are 5 social impacts for external stakeholder and 6 social impacts for internal stakeholder to be monitored during 2019 including the impacts to for replanting activity. The next review SIA planned on 2021.

Based on interview with Geronggang Island Community Figures known that SIA, as well as management and monitoring plan has been conducted in participatory manner with all affected Village with questioner method. All social impacts and issue had been identified and managed, among others in aspects of livelihood, health, land tenure, employment, education, economy, social, cultural and religious.

No negative issues raised during interviews with communities surround the plantation such as interviews with community leaders, women's communities, local contractors, and Village Official of Geronggang Island Community Figures

Status: Comply

3.5

A system for managing human resources is in place.

3.5.1

The certificate holder also has a Collective Labor Agreement Document, especially in Clause II concerning work acceptance. This clause discusses the process of hiring, hiring workers, status and position of workers, workers mutation, workers obligations, suspension, absence, and termination of employment.

For cooperation unit, each unit has procedures related to the recruitment of employees which are contained in the Mechanism Policy for New Employee Admissions which is signed by each cooperation unit chairman. The policy describes the following:

- The process of hiring employees free of charge.
- Workers are required to attach Health test results.
- New workers will run a probationary period in accordance with the direction of the Village Cooperation Unit.

3.5.2

The certificate holder shows records related to the application of manpower, including:

- Records of work agreements for Cooperation Unit workers.
- Monthly Manpower Report that contains information related to employee turnover.
- Letter of approval for the appointment of daily worker to permanent worker for 10 employees of Kebun Hikmah Estate 2 on August 31, 2020 (No. : 0241 / HRS / VIII / 2020).

The records are managed by each business unit, be it a company or a cooperative unit, by each staff responsible for the sustainability aspect.

Status: Comply

3.6

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

3.6.1

PT Sampoerna Agro has an OSH policy which is stated in one of the points of the Sustainability Policy which is written in Indonesian: "preventing occupational accidents and occupational diseases caused by unsafe conditions and actions". The policy was signed by the Chief Executive Officer on October 1, 2019.

Each cooperative unit also has policies related to OHS, for example in the Policy Document and Joint Commitment of KUD Jaya Makmur Mesra which states that optimally prevent occupational accidents and occupational diseases caused by unsafe conditions and actions. The policy was signed by the Chairman of KUD, the Secretary and the Treasurer of KUD in 2019.

The management unit has had document of risk analysis on Document of Risk Assessment on the Identification and Evaluation of Aspects of Environmental Impact and Potential Hazards and OHS in 2020. The document is composed to conduct identification and analysis of potential hazards that is probably happened at workplace and the recommendation to reduce the potential of work accident. According to the result of document review and field visit to mill, estate and KUD, the management unit has socialized the risk analysis document to all workers. Based on interview with the employees in Selapan Jaya Mill, Hikmah Dua Estate and KUD, obtained information that the employee has known the potential of hazards that could occurred at workplace. The risk control that has been done is to conduct regular medical check-up, safe working practices, availability first aid kit and use of PPE accordance to MSDS.

3.6.2

The company carries out activities to monitor the effectiveness of the OSH plan such as:

- Conducting socialization to all stakeholders through the installation of signs / banners related to PPE / Occupational Safety and Health signs in each business unit on October 30, 2020.
- The company monitors PPE for each employee. The management is contained in the Personal Protective Equipment Monitoring Record. Monitoring is carried out every 3 months.
- Business units carry out routine annual emergency response simulation activities. (newest in March 2020).
- Records of fire extinguisher checklist.
- Records of inspections of the contents of the first aid kit carried out every week.
- Have a licensed first aid officer, for example on behalf of Winarno (KUD Permata Bunda) and Joko Susilo (KUD Maju Lancar).

Status: Comply

3.7

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

3.7.1 & 3.7.2

Company and KUD have training program for workers for period of 2020 for operational training. The aspect in the training program are such as environment, labor best management practice aspect, and others. The training program for contractor's worker, it follows training program for company's worker and will be adjusted with the type of work for each contractor. The program was based on identification needs.

The company also shows realization of training records, including:

- Socialization of harvest SOPs on February 6, 2020 for 26 KUD Permata Bunda workers.

- Socialization of the RSPO, ISCC, HCV, AMDAL, SIA, SOP, Gender Committee, Legislation on 25 July 2019 for 45 employees of KUD Maju Lancar.
- First aid socialization on February 19, 2020, totaling 211 employees of the KUD Serba Usaha.
- Socialization of OHS, Vision and Mission, Company policies, Whistle Blowing, Communication Procedures and Use and Maintenance of Personal Protective Equipment on January 15, 2020 to 152 employees of Selapan Jaya Mill.
- MSDS socialization on January 16, 2020 to 22 employees of Selapan Jaya Mill.

In the training record there is also evidence that third parties such as the FFB contractor also participated in the training. Based interview with one of contractor (CV Anton Putra), sighted that contractor also provide training from CH such as PPE.

3.7.3

The certification unit has shown training records related to the RSPO SCCS in the Recording of the ISCC v.203 & RSPO SCCS Socialization Report as well as the Critical Point Control Socialization which was conducted on October 14, 2020 and was attended by 18 employees including weigh operators, laboratory staff, dispatch crew, sorting employees to security staff.

The auditors also conducted direct interviews with these employees, and the employees claimed to have attended training related to SCCS and were able to demonstrate the SCCS procedures.

Status: Comply

3.8

Supply Chain Requirements for Mills

3.8.1 & 3.8.2

Selapan Jaya POM implements module E (MB) in its supply chain system. Selapan Jaya POM records the volume of certified and non-certified FFB from each FFB sources separately. Based on field observation and document review, Selapan Jaya POM receives FFB from non-certified sources, such as:

- KUD Ipoh Raya
- KUD Balian Sejahtera Abadi
- Plasma Rantau Durian

Selapan Jaya POM already record the volume of certified FFB from each FFB sources (daily update).

3.8.3

Estimates of CPO and PK produced by Selapan Jaya POM obtained from the projection based on actual data of 12 months before audit activities, here's the detail:

Product	Last Year Projected Certified Volume (Ton) (25 Jan 2020 – 24 Jan 2021)	Realization from November 2019 until October 2020 (Ton)	Projection certified volume
FFB	294,600	185,434	200000
CPO	63,500	42139.327	43000
PK	14,800	9939.889	10200

3.8.4

The Mill have been registered in RSPO IT platform for license period (25 January 2020 – 24 January 2021), with license id CB97744, RSPO member id: RSPO_PO10000005580, member name: PT Sampoerna Agro Tbk Selapan Jaya.

All transactions also have been registered on RSPO IT Platform, including removing stock certified product sold under other scheme (ISCC) as amount as 3,575 ton and CSPK volume sold as physical as amount as 5,225 ton.

3.8.5

The Certificate Holder has the procedure of supply chain system & traceability (No. P-SAG-PKS-PRS-14, dated 27 July 2019 revision 3). 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 procedures also identified role of implementation responsibility persons that trained. Certificate holder needs to refer the procedure with the new RSPO policy related to SCCS on RSPO Supply Chain Certification Standard 2020 endorsed by the RSPO Board of Governors on 1 February 2020. **OFI**

3.8.6

Certificate holder has internal audit procedure on Document of Integrated Management System Procedure Audit Internal (No.P-SAG-HO-SUS-03) ratified on 1 November 2019. The procedure informs about:

- System & Certification Manager made an Internal Audit program (FM-SAG-HO-SUS-030001) for all system management scheme (eg. ISO 9001, RSPO, ISPO and ISCC) including supply chain management.
- Internal audit conduct once a year.
- Certification unit must close the non-conformity on 6 months.
- Internal audit and corrective action report will become one of management review agenda.

Internal audit was held on August to November 2020 for all business unit and there is no conformity related to supply chain indicators.

3.8.7

Selapan Jaya POM received FFB from certified and non-certified RSPO source, here's the detail:

Month	FFB Certified (kg)	FFB Non-Certified (kg)
November 2019	30,854,895	6,006,416
December 2019	19,748,028	6,078,237
January 2020	16,806,432	4,738,295
Februari 2020	12,068,627	3,585,896
March 2020	9,166,375	4,552,585
April 2020	11,264,525	4,771,168
May 2020	11,427,116	2,857,420
June 2020	13,023,029	3,856,897
July 2020	9,957,330	2,254,888
August 2020	11,608,685	1,917,009
September 2020	14,751,937	4,181,949
October 2020	24,757,759	4,951,387

The auditor has verified FFB received records over the last 12 months, the total FFB certified received was 185,434.73 MT and non-certified 49,752.14 MT.

3.8.8

Based on document verification and field observation on weighbridge its known that there's only CSPK transaction on licenses period (there's no CSPO sold as RSPO product).

The company shows documentation of certified products, such as sales contracts, shipping announcements, delivery orders, etc. These documents describe the names and contacts of the buyers and sellers, delivery dates, product descriptions, quality, quantity, member ID, and others. Example: Sales contract No. 009/PK/SC/SA/0320 for CSPK, buyer name and address of buyer, shipping date on 29 April 2020, volume as amount as 100 MT and stamped of RSPO Certified Mass Balance.

3.8.9; 3.8.10 & 3.8.11

Based on field observation, the physically handling of product are conducted by mill itself since FFB receive in grading station and processed to CPO and PK, except the transportation of product are sourced to third party, which bonded by the agreement. Certificate holder already had statement on supply chain procedure that "Guarantee of data openness for auditors to audit transporter or bulking station". In addition, this statement has been stated on contractor agreement.

Selapan Jaya POM has record the name, address, and contact person of certified product transport contractor in

Contractor List document. For examples:

- CV. Alam Wijaya (No.: 001/CPO/SA/AW/II/2020), the contracts valid from 2 Januari 2020.
- PT Maju Bersama Anggiat Miduk (No.011/CPO/SA/MBAM/II/2020), the contracts valid from 2 February 2020.

3.8.12

Selapan Jaya Mill has record and balance of all RSPO CSPO and CSPK, non-certified products produced, as well as presented in the Table bellows:

Crude Palm Oil

Period	CPO Production (kg)		CSPO Delivery (kg)			CPO Delivery (kg)
	Certified	Non-Certified	Certified	ISCC	Non-Cert	
Opening	2,523,012	-	-	-	-	-
Nov '19	6,713,363	1,327,294	-	-	7,354,696	1,327,294
Dec '19	4,452,389	1,393,056	-	-	4,908,644	1,393,056
Jan '20	3,838,487	1,094,263	-	-	4,464,217	1,094,263
Feb '20	2,854,405	870,577	-	400,000	2,550,763	870,577
Mar '20	2,131,089	1,071,790	-	-	2,294,800	1,071,790
Apr '20	2,471,609	1,077,208	-	625,000	1,814,332	1,077,208
May '20	2,485,498	638,116	-	325,000	1,857,714	638,116
June '20	2,759,970	817,396	-	325,000	2,818,224	817,396
July '20	2,047,167	483,623	-	525,000	1,615,757	483,623
Aug '20	2,254,249	356,623	-	511,000	1,874,057	356,623
Sep '20	2,879,328	806,162	-	525,000	2,120,278	806,162
Oct '20	4,728,761	949,475	-	339,000	4,057,415	949,475
Total	42,139,327	10,885,583	-	3,575,000	37,730,897	10,885,583

*Note: License periode is from 25 January 2020 – 24 January 2021. CPO delivery for other scheme (ISCC) which is not claim as RSPO selling has been removed from RSPO IT Platform (No double counting). There is no CSPO sold from license periode.

Palm Kernel

Period	PK Production (kg)		CSPK Delivery (kg)			PK Delivery (kg)
	Certified	Non-Certified	Certified	ISCC	Non-Cert	
Opening	555,040	-	-	-	-	-
Nov '19	1,661,005	341,889	816,520	-	1,101,641	341,889
Dec '19	997,292	314,747	673,680	-	342,593	314,747
Jan '20	714,699	205,890	97,930	-	726,170	205,890
Feb '20	537,010	164,402	-	-	526,828	164,402
Mar '20	445,864	225,192	-	-	439,058	225,192
Apr '20	572,056	252,069	292,870	-	293,961	252,069
May '20	627,566	162,171	167,480	-	372,099	162,171
June '20	663,240	197,320	769,280	-	-10,360	197,320
July '20	466,061	113,135	427,230	-	84,595	113,135
Aug '20	609,777	97,612	578,100	-	5,668	97,612
Sep '20	790,952	226,533	402,470	-	321,357	226,533
Oct '20	1,299,327	260,694	663,640	-	113,296	260,694
Total	9,939,889	2,561,654	4,889,200	-	4,316,650	2,561,654

*Note: License periode is from 25 January 2020 – 24 January 2021. CSPK delivery transaction has been informed on RSPO IT Platform as amount as 4,325 ton (during audit process).

3.8.13; 3.8.14 & 3.8.15

The mill has been defined the extraction rate dividing CPO or PK production by the total FFB process. Based on that explanation, extraction rate calculated by industry average. The implementation based on Sounding Production Procedure (No. WI-SAG-PKS-LAB-0133). The extraction rate always done every morning by sounding on Oil Tank.

3.8.16

Selapan Jaya Mill has been registered in IT platform palm trace RSPO <https://palmtrace.rspo.org/web/rspo/member-directory> which information as follows:

- Member Name: PT Sampoerna Agro Tbk Selapan Jaya Mill
- Membership No.: 1-0031-07-000-00
- Member ID: RSPO_PO1000005580
- License ID: CB97744

Whole transaction of CSPO/CSPK has been declared in RSPO IT Platform. The company has removing the stock in palm trace for certified product that sold as conventional and others scheme (ISCC) as amount as 3,575-ton CSPK.

3.8.17

Based on management representative interview and document review, the mill not use trademark on its sales activities and communication.

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

Company has policy on human rights written on Vision, Mission, and Policy of Sampoerna Agro, dated 2 May 2015. The policy explains that respecting human rights issue, included rights of all workers to association and negotiate collectively and give same opportunity in working. This policy also stated "To respect human rights activists". It has been socialized to the workers and contractor. Based on interview with worker in estate and mill, they know and understand about workers' rights. Consultation with worker union, it is known that there is no complaint related to human rights violation. If there was a complaint, the complaint can still be resolved by amicable way between employees.

KUD also has policy to respect human rights written on joint policy and commitment which explain that cooperative respect human rights, including the right of all workers to organize and bargain collectively. Based on interview with board and farmers of cooperative unit, there is no complaint related to human rights violation.

4.1.2

CH has policy about not instigate violence or any form of intimidation in its operations which stated "To uphold safety, orderliness, and harmonious relationships in all plantation business activities, by putting forward consultation with stakeholders, as well as prohibiting all illegal forms of intimidation, and violence". Interview with previous land owners stated that the company does not take over the land by force. Communities also inform, company have never committed acts of violence in their activities.

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

Company has a mechanism of complaint and grievance handling written in *SOP Komunikasi, Partisipasi, dan Konsultasi* (P-SAG-HA-CA&L). Complain from worker can be submitted to worker's supervisor verbally or written and complaint from external stakeholders can be submitted to manager, CA&L department, sustainability unit, and human resource and services and will protect identity reporter. Interview with worker in mill and estate, it is known that workers understand how to deliver their complaint if any. Interview with representative of Pulau Geronggang Village and government agency, it is known that they understand the mechanism to deliver their complaint if any.

4.2.2

Based on the results of communication with KUD administrators and company representatives, it was found that there were no illiterate parties around the certification unit. To ensure that the system is understood by all parties, the company conducts outreach to representatives who can read and write.

4.2.3; 4.2.4

Complaint from internal stakeholder is documented in log book of stakeholder communication. Interview with workers and union, inform that there is no complaint for 2020.

Based on interview with Plantation Agency of Ogan Komering Ilir District, there is a complaint from Pulau Geronggang resident about smallholder development in PT Telaga Hikmah, especially Hikmah Dua Estate. This issue has been verified since previous audit and until now still on process with government facilitator to resolve. All documentation is documented well.

Status: Comply

4.3

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

4.3.1

Contribution to local development is carried out through partnership with smallholder, local contractor, and CSR implementation. Based on interview with representative of Pulau Geronggang Village, it is known that company has contribute to local development. Contribution to increasing smallholder productivity is carried out by providing training and counseling about operational activity to workers and smallholders. Company and KUD showed documentation of CSR implementation, among others:

- Assistance to renovate government office
- Assistance to Early Childhood Education in Bumi Makmur Village
- Social assistance treatment
- Environment-based literacy activities
- Support for the Embacang Village in Creativity Event

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

Based on document review and field visit known that Certificate Holder has manage an area of 15,868.045 Ha consist of 3,238.595 Ha main estate and 12,629.45 Ha smallholders scheme which all area is included in this certification scope. CH has land use right which are:

- PT Telaga Hikmah (Hikmah Dua Estate) 3,120 Ha:
 1. HGU by decree of Sumatera Selatan Land Agency Head No. 01/HGU/BPN-26/2004 dated 19 October 2004 for an area of 126 Ha.
 2. HGU by decree of Sumatera Selatan Land Agency Head No. 02/HGU/BPN/2004 dated 7 January 2004 for an area of 2,994 Ha.
- PT Sampoerna Agro: 118.595 Ha in the form of HGB certificate by decree of Ogan Komering Land Agency Head No. 1 dated 17 September 2001.
- Smallholders land title for 6,815 smallholders (12,591.40 Ha) with total smallholders are 6,838 (12,629.45 Ha), there are 23 smallholders land title in progress to get land title from the government.

4.4.2; 4.4.3; 4.4.4; 4.4.5; 4.4.6

The Company has FPIC procedure P-SAG-HO-CA&L-03 regarding to land compensation. The Company has no new land acquisition and the entire compensation process was completed in 2003. The results of compensation documents verification and interview with communities included previous landowner are known that there are no indigenous rights or customary rights and there are no issues regarding to FPIC process. The compensation process is done directed to the land owner and not diminish the legal/customary right, landowners are given the freedom to release their land without coercion.

In the HGU area of the company (Hikmah Dua Estate) there are area of community land that have not been compensated (540.21 Ha), this is because the cultivators are not willing to relinquish their cultivated land. Based on the results of visits to cultivated areas such as in Hikmah Dua Estate block 21 and from interviews with the people of the villages of Pulau Geronggang it is known that the company did not force or seize these areas. Regarding these areas, the company has identified the cultivators and made an agreement with the cultivating parties started with negotiation on 14 October 2017, participatory mapped with scale of 1:18,000 and statement of head village on October 2017.

Status: Comply

4.5

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

4.5.1 – 4.5.8

The Certificate Holder with own estate (Hikmah Dua Estate) and smallholder plantation do not expand or open new plantings since last assessment. The entire compensation process was completed in 2003.

Status: Comply

4.6

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

4.6.1 – 4.6.4

The Company has Land Compensation Procedure (P-SAG-HO-CA&L-03) dated 1 September 2017. The Company has no new land acquisition and the entire compensation process was completed in 2003. The results of compensation documents verification and interview with communities included previous landowner are known that there are no indigenous rights or customary rights and there are no issues regarding to FPIC process. The compensation process is done directed to the land owner and not diminish the legal/customary right, landowners are given the freedom to release their land without coercion. All evidence of recording in the form of Maps, Negotiated Results, Declaration of Disposal of Rights by the Land Owner, Minutes of Compensation, Payment Receipts are documented and filed in estates, according to the location of the compensated land.

In the HGU area of the company (Hikmah Dua Estate) there are still areas of community land that have not been compensated (540.21 Ha), this is because the cultivators are not willing to relinquish their cultivated land. Based on the results of visits to cultivated areas such as in Hikmah Dua Estate block 21 and from interviews with the people of the villages of Pulau Geronggang it is known that the company did not force or seize these areas. Regarding these areas, the company has identified the cultivators and made an agreement with the cultivating parties started with negotiation on 14 October 2017, participatory mapped with scale of 1:18,000 and statement of head village on October 2017.

Status: Comply

4.7

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

4.7.1 – 4.7.3

Selapan Jaya Mill and Hikmah Dua Estate has compensated operational area and was completed in 2003. The compensation process is done directed to the land owner and not diminish the legal/customary right, landowners are given the freedom to release their land without coercion. All evidence of recording in the form of Maps, Negotiated Results, Declaration of Disposal of Rights by the Land Owner, Minutes of Compensation, Payment Receipts are documented and filed in estates, according to the location of the compensated land. In the HGU area of the company (Hikmah Dua Estate) there are still areas of community land that have not been compensated (540.21 Ha), this is because the cultivators are not willing to relinquish their cultivated land. Based on the results of visits to cultivated areas such as in Hikmah Dua Estate block 21 and from interviews with the people of the villages of Pulau Geronggang it is known that the company did not force or seize these areas.

While for smallholder area is government program namely *Transmigrasi*.

Status: Comply

4.8

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

4.8.1 – 4.8.4

The Company has Land Compensation Procedure (P-SAG-HO-CA&L-03) dated 1 September 2017. The Company has no new land acquisition and the entire compensation process was completed in 2003. The results of compensation documents verification and interview with communities included previous landowner are known that there are no indigenous rights or customary rights and there are no issues regarding to FPIC process. The compensation process is done directed to the land owner and not diminish the legal/customary right, landowners are given the freedom to release their land without coercion. All evidence of recording in the form of Maps, Negotiated Results, Declaration of Disposal of Rights by the Land Owner, Minutes of Compensation, Payment Receipts are documented and filed in estates, according to the location of the compensated land.

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Status: Comply

PRINCIPLE #5 SUPPORT SMALLHOLDER INCLUSION

5.1

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

5.1.1; 5.1.2; 5.1.3; 5.1.4 & 5.1.5

PT Sampoerna Agro, as the owner of the processing plant, has a cooperation agreement with supplier plantations which contains information related to the price of FFB. For example, in the Cooperation Agreement between PT Sampoerna Agro and Cooperative members Jaya Makmur (No. : 006 / GMP-E / VII / 2018) especially in Article 5 explains:

- The purchase price for the production of oil palm fresh fruit bunches is determined based on the Minister of Agriculture Decree No. 14 of 2013
- The procedure for fixing the purchase price of FFB produced by farmers is carried out by the South Sumatra provincial pricing team in accordance with the South Sumatra Governor Regulation (No. 28/2006) concerning Guidelines for the Implementation of the Purchase Price of FFB for Planters.
- The purchase price for plasma smallholder FFB by the nucleus company is determined based on the price formula as stated in MOA 17/2010 using data on the price of CPO, palm kernel and the Provincial "K" index that has been decided by the Provincial FFB Purchasing Price Team, with the purchase price formula TBS as follows: HTBS (FFB Price) = K (Hms x Rms + His x Ris)
- The FFB price is the same as the smallholder's FFB price issued by the Plantation Office of South Sumatra Province based on the year of planting.

The agreement is mutually agreed upon and signed by company representatives and also the head of KUD. Based on facts in the field and interviews with cooperative managers, currently all management and cooperative members have the right to make decisions regarding contracts related to cooperative policies, especially those related to the sale and purchase of FFB.

5.1.6

The certificate holder has records related to the purchase / payment of FFB from suppliers such as cooperative, for example:

- Records of Debit Note for Plasma Farmers at KUD Bina Sejahtera in September 2020 for FFB payments of 2,021,935,000 kg of FFB.
- Records of Debit Note for Plasma Farmers at KUD Jaya Makmur in September 2020 for the FFB payment of 2,892,587,000 kg of FFB.

In the recording, it is known that both parties (KUD and the company) have signed it. From the recording, it is also known that the payment has been in accordance with the FFB price that has been determined by the relevant agency according to the year of planting.

5.1.7

The certificate holder has shown evidence of the calibration results of the weighing equipment in Selapan Jaya Mill in the Test Result Information Record (No. : 167 / Disperindag / Bid.Met / XI / 20) in the Metrological Sector of the Prabumulih City Government Industry and Trade Office on November 10th, 2020. The third party stated the test results, "Ratified in 2020 based on the Law of the Republic of Indonesia No. 2 of 1981 concerning Legal Metrology by affixing a legal sign of 2020 in the form of the number 20 in regular and guarantee pentagons".

5.1.8 & 5.1.9

The company conducts a campaign related to RSPO certification to oil palm farmers around the company by conducting public consultations to nearby villages, this can be made clear from the results of public consultations with the surrounding community.

Company has *SOP Komunikasi, Partisipasi, dan Konsultasi* (P-SAG-HA-CA&L) which explain communication mechanism with external and internal stakeholder. Cooperative unit also has procedure regulates about communication mechanism written on *SOP Komunikasi, Partisipasi, dan Keluhan* (SA-PLASMA-PP-CA&L-01). The procedure is available in Bahasa Indonesia and English.

Based on document review of Incoming letters from external stakeholder logbooks period 2020, there's no complaint from smallholders members, especially KUD members.

Status: Comply

5.2

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

5.2.1 – 5.2.5

CH has support smallholders to improve livelihoods and their inclusion in sustainable palm oil value chain. Until now, there are 12 KUD which has been cooperate to follow RSPO certification and there are the others KUD which still on process to follow RSPO certification. In 2020, there are 4 KUD which checking by Sampoerna Agro to prepare RSPO certification. The aspect that was checked consist of land tenure, infrastructure, operational report and organization document. Beside that, Sampoerna Agro also coaching the smallholders to follow RSPO standard such as in 20 January 2020 coaching was conducted in KUD Harapan Jaya Mandiri.

Status: Comply

PRINCIPLE #6 RESPECT WORKERS' RIGHTS AND CONDITIONS

6.1

Any form of discrimination is prohibited.

6.1.1; 6.1.2

CH has policy related to nondiscrimination and equal opportunity written on CH policy dated 1 October 2019 which stated *"To respect and uphold human rights, including the right of employees to form labor unions and discuss issues collectively. We neither discriminate based on race, ethnicity, nationality, religion, physical disabilities, gender, sexual orientation, membership in labor unions, political affiliations, nor age. No forced nor illegal labor. To respect human rights activists"*. Based on field observation and interview with workers (estate, mill, KUD Maju Lancar, KUD Jaya Makmur, KUD Permata Bunda, KUD Serba Usaha), it is known that there is no issue or complain from worker regarding discrimination. In addition, employees come from different religions, genders, and places. CH also accept employees from villages around the company.

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. There is no new recruitment in 2020.

Workers in KUD are direct employees of smallholder and KUD employees. Direct employees of smallholder usually harvesting worker, loose fruit picker, FFB loader, and KUD employees is Pesticide Operators. Workers mostly comes from village where cooperative is based.

6.1.4

Based on interviews with female workers and the gender committee in CH, it was found that pregnancy testing was only carried out to ensure that female workers who were pregnant or breastfeeding did not work with chemicals.

6.1.5

CH 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 3 months. Pregnant and nursing female worker is prohibited to work related to chemical and also CH gives special breast feeding time for female worker. Gender committee also inform, there is no issue or complaint related to sexual harassment on the workplace.

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

There is a minimum wage stipulated by the local office in the South Sumatra Governor Decree (No. : 595 / KPTS / DISNAKERTRANS / 2019) Regarding the 2020 Minimum Wage for South Sumatra Province. The document explains that the 2020 Minimum Wage for South Sumatra Province is Rp. 3,043,111 per month with a standard of 7 hours a day and / or 40 hours a week.

KUD also has a policy regarding worker wages that refers to this regulation, for example in the Decree of the KUD Jaya Makmur Mesra (No. : 02 / KUD-JYM / BM / II / 2020) concerning Determination of Wages for Workers / Daily Employees. The 2020 period is set for February 3, 2020. The document explains things such as the calculation of the harvester's wages, the calculation of the spray wages, the calculation of the wages of fertilizers, loaders, and pruning. The determination of the wages made by each cooperative refers to the minimum wage in the province of South Sumatra, where the cooperative unit converts it into wages per / hour worked. This is because the workers who are employed at the cooperative unit are not full 7 hours each day.

For the Hikmah Dua Estate and Selapan Jaya Mill certification units, there are also policies related to the details of the wage scale structure for employees in the 2020 Permanent and Temporary Daily Employee Basic Wage Memorandum (No. : 014 / KGM / I / 2020) on 29 January 2020.

From document verification of payroll period September and October 2020, based on sample from 8 company workers (Operators, Mechanic, Harvester, Security and upkeep workers) it is known that the workers have been paid with minimum wages which has been appointed by government.

Contractor workers is paid based on working result not based on working hours such as workers in CV Anton Putra.

6.2.2 & 6.2.3

The certificate holder has a Collective Labor Agreement which is contained in the Collective Labor Agreement Document between PT Sampoerna Agro and the Sampoerna Agro Workers Union (SPSA) which has been registered at the Manpower and Transmigration Office of South Sumatra Province with Number 15 / E / PKB / XII / 2019 on December 23 December 2019. The agreement discusses the rights and obligations of workers such as: union workers facilities and assistance, worker recruitment, wages, working days and hours of work, exemption from worker obligations, health care,

social security and worker health, occupational safety and health, work order and discipline, complaints and resolutions, termination of employment, to implementing regulations. This Collective Labor Agreement is valid for 2 years until 2021.

For KUD, the workers' rights and obligations are contained in each work agreement. For example, the company shows a recording of a work agreement for employees of KUD Permata Bunda (No.172 / KUD-PB / VIII / 2018) signed by both parties.

There're evidences of legal requirement has been implemented, such as:

- There's wage scale structure.
- Workhour and overtime payment based on government regulation
- Workers has been registered on *BPJS Ketenagakerjaan* and *BPJS Kesehatan*.

Based on interview with workers and document verification, there's deduction for workers such as BPJS deduction tax deduction. It has been stated on Collective Labour Agreement. Also, all workers get salary slips with details payment (salary, deduction and abstention).

6.2.4 & 6.2.5

The company (mill and estate) has provided adequate housing, electricity, rinse house, water supplies, medical, educational and welfare as required by government regulation.

The auditor conducted field observations at the Hikmah Dua Estate employee housing facility, it was known that the workers' living conditions were in a proper state of residence and ready to be used as an increase in employee welfare.

The estate location is located not far from Palembang City (approximately 3 hours) and the road access is so good for employees. The unit of certification also facilitates the employee market every week, so that employees can get the necessities of life affordable.

6.2.6

In relation to DLW (Decent Living Wage), the company has tried to do Prevailing Wage calculations for each unit, which included samples of In-Kind Benefits, such as: Basic Wage, Housing Allowance, Transport Allowance, Housing and utilities such as water or electricity for home, food ration (rice), Medical facilities, and school for workers children. Based on the calculation, each worker got Rp 4,748,900 every month.

6.2.7

Regarding permanent work, especially the Hikmah Dua Estate certification unit, currently not all harvest workers have become KHT (permanent daily employees), auditors carry out field verification by interviewing 3 harvest workers and also worker union representatives it is known that what causes harvest employees not all of them are permanent employees is a problem related to incomplete employee biodata. The union representative explained that the majority of harvest employees come from outside the region, and these employees are constrained in completing employee biodata such as KTP (identity card) and KK (Family Card). However, for workers who have completed, the company shows evidence of the appointment of harvest employees to KHT for the 2020 period in the Memorandum of Approval for the Appointment of KHL to become KHT (No. : 0241 / HRS / VIII / 2020) which was approved on 31 August 2020 by the Head of HR Operation.

Status: Comply

6.3

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

6.3.1

Policies are available to form trade unions both in PT Sampoerna Agro Tbk and KUD unit. For example, PT Sampoerna Agro Vision, Mission, and Policy which states that the Company respects the rights of every worker to form and become a union member. For KUD, there is a joint policy and commitment that states respect for human rights, including the right of all workers to collectively and negotiate collectively. The company has a union and is known to all workers in the estate and mill. In addition, the KUD also has a representative group of workers whose representative is elected directly by

workers and smallholders.

6.3.2

The union conducted internal meeting periodically or where there is an issue with company. There are meeting documentation, such as minutes of meeting on 8 July 2020 about settlement to the vacant of labor union in Selapan Jaya Mill. The documentation is available in office unit and available for member if they were asking. Interviews with labor union in Hikmah Dua Estate and members of the labor union in mill, stated that regular meetings were held by labor union either internally or involving company representatives. Based on interview with head of SPSA in Hikmah Dua Estate, sighted union has been register in manpower agency.

6.3.3

The results of interviews with labor union in Hikmah Dua estate and members of the labor union in mill, stated that the company did not interfere with the establishment or activities of labor union.

Status: Comply

6.4

Children are not employed or exploited.

6.4.1; 6.4.2; 6.4.3; 6.4.4

Policy to maintain morality is written in CH policy dated 1 October 2019 which stated *"To protect female employees at workplace by strongly prohibiting any sexual harassment and violence towards them, as well as protecting their reproduction rights. We do not employ underaged children and we do facilitate child care"*. KUD unit also policy which stated that won't employ children under 18 years old. Based on document review and field observation, there are no workers under 18 years old. Based on public consultation with Labor and Transmigration Agency of Ogan Komering Ilir Regency and field observation in estate and POM, there is no issue regarding child labor. Workers also stated that they know the minimum age to work in the company. Based on field observation in estate and smallholders area, auditors did not sighted any harvester accompanied by their wife or children. The workers that interviewed also inform, children is not allowed to follow the working area (plantation area).

Status: Comply

6.5

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

6.5.1; 6.5.2

Policy to maintain morality is written in CH policy dated 1 October 2019 which stated *"To protect female employees at workplace by strongly prohibiting any sexual harassment and violence towards them, as well as protecting their reproduction rights. We do not employ underaged children and we do facilitate child care"*. Based on interview with female worker in Hikmah Dua Estate, it is known that they understand the policy. Female workers also understand the mechanism of complaint submission. Interview with committee of Gender Committee, it is known that there is no issue or complaint related to sexual harassment on the workplace.

CH 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 3 months. Pregnant and nursing female worker is prohibited to work related to chemical and also gives special breast-feeding time for female worker.

Status: Comply

6.6

No forms of forced or trafficked labour are used.

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. The recruitment is done according to the CH procedure. All workers have work agreement that explain about the obligation and rights of the worker. Workers is work based on the contract and work order. Field observation and interviews with the workers in Estate and Mill, known that there is no discrimination among them. They came from local and nonlocal worker. Based on field observation in estate, auditors did not sight any harvester accompanied by their wife or children. Based on interview with representative of union, there is no issue related

to force labor.

While in KUD, Workers are direct employees of smallholder and KUD employees. Direct employees of smallholder usually harvesting worker, loose fruit picker, FFB loader, and KUD employees is pesticide operator. Workers mostly comes from village where KUD is based.

Status: Comply

6.7

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

6.7.1

The company has a P2K3 structure approved by the Head of Regency Manpower and Transmigration Office of South Sumatera for each unit, such as:

- KUD Jaya Makmur
Ratification of the Committee for Occupational Safety and Health (P2K3) and the Emergency Management Team for KUD Jaya Makmur - PT Sampoerna Agro Ogan Komering Ilir District, South Sumatera Province by the Manpower and Transmigration Office of South Sumatra Province. General Secretary on behalf of Eko Suprayitno, the OHS expert license valid until 16 April 2021.
- KUD Permata Bunda
Records of ratification of the Committee for Occupational Safety and Health (P2K3) KUD Permata Bunda structure (No. 1514 / SK / nakertrans / 2019) which was approved by the relevant agency on 14 June 2019. The secretary is OHS expert on behalf of Kadek Suadnyane which is valid until April 16, 2021.

The organization routinely conducts monthly meetings on OHS issues in the workplace. The minutes of the meeting were recorded and stored well. Based on interviews to workers who are members of the OHS organization it is known that monthly meetings are always routinely conducted to discuss about OHS such as consistency of PPE usage, work accident report, medical checkup, safe working practices etc.

6.7.2

The company and KUD have procedure for emergencies respons. The procedure has cover major potential emergencies such as fire, chemical spillage, earthquakes, flooding, and demonstration. The procedure stated on Indonesian language.

The certificate holder also has procedures related to emergency response, such as:

- Emergency Preparedness and Response Procedure at PKS (No: P-SAG-PKS-DRR-01, 1 September 2009) and approved by the COO of PT Sampoerna Agro.
- Work Instruction for Washing and Cleaning Ex Sacks of Fertilizer (WI-SA-PLASMA-PP-0303) on October 1, 2015.
- Work Instruction for Washing and Cleaning Ex Pesticide Packaging (WI-SA-PLASMA-PP-KS-0606) on October 1, 2015.
- Handling Procedure of Hazardous Material (No.P-SAG-RO-PCR-05) dated 1 October 2012.

Based on field observation at Selapan Jaya Mill, Hikmah Dua Estate and KUD Unit, it is known that the contents of first aid box are available as determined by the company. As well as interviews with foreman in Hikmah Dua Estate that foreman are also able to explain the function of each tool in the first-aid box. Monitoring first aid kit has been conducted regularly every month, if there is use of it must be noted on the form provided, and first aid kit that is used it must be replenished and reported Sustainability staff. Based on field observation in POM and each Estates office, it is known that the company already provided evacuation road and muster point.

6.7.3

The company has a Memorandum regarding the Provision and Usage of PPE No: 076 / MD / VI / 2016 dated 22 June 2015 which explains the types of PPE workers and the wear and tear of PPE, for example for the factory area, ear protection equipment, namely ear plugs, foot protection equipment, namely shoes safety, hand protective equipment, namely gloves, respiratory protective equipment, namely cloth masks.

The company monitors PPE for each employee. This monitoring is contained in the Personal Protective Equipment

Monitoring Record. Monitoring is carried out every 3 months.

The company also shows evidence of providing PPE to workers, for example:

- Minutes of handover of personal protective equipment in the form of safety shoes on June 22, 2020 to 118 factory employees.
- Minutes of handover of work clothes in 2020 for 12 biogas station employees.

Based on field visit in estate and mill and interview with personnel, it is known that the management unit has provided PPE for personnel. For instance, for example the operators (Boiler, Engine Room) using personal protective equipment in accordance with specified hazard identification and risk analysis. In addition, interview with harvesting personnel in Hikmah Dua Estate and KUD Jaya Makmur it revealed that company would substitute or replace the PPE if there is a damage or broken on the old one. Management unit has been consistence to maintain the PPE using.

6.7.4

The management unit provided accident insurance for personnel based on the applicable regulation. The insurance such as manpower insurance is paid monthly to national social insurance for manpower/ BPJS. Meanwhile, for medical insurance, the company has registered its entire personnel in manpower medical insurance/ BPJS. Based on interview with some personnel, it is known that the entire personnel have been registered in manpower medical insurance/ BPJS.

For KUD, not all employee has been registered on BPJS program. But all KUD has projection for all workers to be registered on BPJS program, here's the details:

- KUD Serba Usaha planned registration will done on December 2020 with total 93 workers and on August 2021 with total 88 workers
- KUD Jaya Makmur planned registration will done on December 2020 with total 77 workers and on August 2021 with total 80 workers
- KUD Maju Lancar planned registration will done on December 2020 with total 58 workers.

Each business unit also has a Cooperation agreement with occupational health services, for example contained in the Record of the Cooperation Agreement between the Mesuji Raya Community Health Center and KUD Jaya Makmur Mesra (No. 004 / KPKSR-JM / X / 2018) which was agreed on 11 October 2019. This agreement is valid 5 year to October 2024.

Based on the results of interviews with workers at the mill, the recorded work accident reports, it is known that there has been a major work accident that causes death at the Selapan Jaya POM. The accident occurred at a kernel station. The company has carried out follow-up activities related to this matter, such as:

- Make an accident chronology report.
- Report the work accident to BPJS (stage 1)
- Conduct OHS committee meetings to conduct further discussions related to future preventive actions.

During field observations, auditors have seen improvements from the company by carrying out repairing on nut silo line 1 with a best material by the contractors (PT Surya Magapenta Indonesia) on September 2020.

6.7.5

The company shows records of work accidents for the period 2020 in each business unit, for example:

- Selapan Jaya Mill Work Accident Statistics Document for the Period of January - September 2020 with a note: Total Employee Hours of Work 336,574; Number of Work Accidents 2; Number of Days Lost 6,002; Frequency Rate 5.94; Severity Rate 17,832.63; Number of days without accidents 198.
- Hikmah Dua Estate Work Accident Statistics Report for the period up to December 2019 with details: Severity Rate 478; Frequency Rate: 102; Number of days without accidents 266.
- KUD Jaya Makmur work accident statistics report for the period up to December 2020 with details: SR 0; FR 0; number of days without accidents 210.

Status: Comply

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

7.1
Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.
7.1.1

The company has program of Integrated Pest Management (IPM) plans as documented on procedure and Work Instruction as follows:

- Procedure P-SAG-KBN-PML-16 Controlling Leaf, Stem and Root Pest date March 2, 2015
- Work Instruction WI-SAG-KBN-PML-1601 Controlling Leaf Pest date March 2, 2015
- Work Instruction WI-SAG-KBN-PML-1602 Planting Beneficial Plant date March 2, 2015
- Work Instruction WI-SAG-KBN-PML-1603 Controlling Stem Pest date March 2, 2015
- Work Instruction WI-SAG-KBN-PML-1604 Controlling Root Pest date March 2, 2015
- Procedure P-SAG-KBN-PML-17 Controlling Tirataba Pest date March 16, 2012
- Procedure P-SAG-KBN-PML-18 Controlling Rat Pest date March 16, 2012
- Procedure P-SAG-KBN-PML-18 Controlling Pest and Disease in Smallholder Estate date March 16, 2012

Procedure and Work Instruction consist of manual, chemist and biological technic to control pest and disease.

One way for companies to naturally control nettle caterpillar is by planting and maintaining beneficial plants to attract natural enemy insects for nettle caterpillar such as *Turnera subulata* and *Antigonon leptopus* plants. Based on field observations, it can be seen that along the CR and MR roads the *Turnera subulata* plants are already well developed. A record of the progress of planting host plants for natural enemies of pests such as *Turnera subulata* and *Antigonon* is also shown.

Based on the results of field visits to KUD Permata Bunda (plot 1998 group 77) and KUD Serba Usaha (plot 1306 group 43), it is known that the KUD has used owls as one of the natural enemies of rats for pest control.

7.1.2

Based on the results of the study of the beneficial plant planting documents, it was found that the *Antigonon leptopus* planting company, *Turnera subulata*. The company also uses owls as natural enemies of rats. Based on the prevailing regulations in Indonesia, it is known that the species developed by the company are not classified as invasive species.

7.1.3

Based on the results of interviews with company management, it is known that the company does not control pests by using fire. Pest control is carried out chemically after first carrying out a census and biological control by planting beneficial plants as a home for natural enemy insects from leaf-eating caterpillars and breeding owls (*Tyto Alba*) as natural enemies of rats.

Based on the results of field visits to Hikmah Dua estate and KUD samples, it is known that there is no trace of the use of fire as a means of controlling pests and diseases.

Status: Comply

7.2
Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.
7.2.1 and 7.2.2

The company has shown a list of pesticides used by the company and KUD for the period 2020. The list of documents explains the name of the pesticide, the active ingredient, the LD50, the target of the pesticide, the registration permit number and the validity period of the distribution permit and the use of pesticides per hectare. Based on these documents, it is known that there are 7 types of pesticides used in Hikmah Dua Estate and 2 types of pesticides used by each KUD. An example is the use of Garlon with the active ingredient triclopir butoxy ethyl ester 670 g / L, LD 50 710 mg / Kg, registration number 0103011984695 and the permit period is valid until April 16, 2023 and the target is broad leaf weeds, the use of a multi-purpose cooperative during the 2020 period is 339 liters and the area of use 1144, 07 ha. From the use of pesticides, it is known that the use of pesticides per hectare is 0.29 liters per hectare and the total use of active ingredients per hectare is 198.57 g / L.

7.2.3

The company has shown a memorandum from the R&D Director dated November 8, 2019 number 121 / DRD / XI / 2019 regarding the use of chemical substitutes for paraquat. In the memorandum, it was explained that Sampoerna Agro's sustainability policy had determined that Paraquat chemicals could no longer be used due to high levels of toxicity and low degradability of the active ingredients. For this reason, other active ingredients to replace Paraquat are using the active ingredient herbicide Methyl Metsulfuron and LVA Emulant emulsifying surfactant (C13 oxo alcohol ethoxylates) with recommended doses per ha of 0.75 kg / ha and 0.8 liter / ha.

The company has shown a memorandum from the R&D Director dated 15 November 2019 number 124 / DRD / XI / 2019 regarding the discontinuation of the use of paraquat and chemicals that are prohibited from being used under the provisions of the RSPO.

The company has also shown documents on the use of pesticides for the 2018-2020 period. Based on this document, it is known that from November 2019 until the time when the audit was carried out, the company and KUD no longer used pesticides with active paraquat ingredients according to the above memorandum.

7.2.4

Based on the results of the study of pesticide use documents during 2020 for each plantation, it is known that the company does not use pesticides preventively to control pests and diseases. The results of interviews with company management explained that the use of pesticides for pest and disease control was always based on census results.

7.2.5

The company has shown documents on the use of pesticides for the 2020 period for the sample Hikmah Dua estate and 4 KUDs. Based on the pesticide use document, it is known that the company does not use pesticides with active ingredients of paraquat or pesticides belonging to WHO class 1 A / 1B category. Based on the results of field visits to chemical storage warehouses (pesticides) in Hikmah Dua Estate and KUD, it was found that there were no pesticides with active ingredients of paraquat or pesticides belonging to the WHO class 1 A / 1B category.

7.2.6

The company has shown documentary evidence of the training that has been provided to employees for the sample Hikmah Dua Estate and 4 KUDs. One of the example is :

1. Minutes of the implementation of the herbicide use training activity on November 7, 2019 at KUD Jaya Makmur. The training was attended by 12 participants.
2. Minutes of the implementation of K3, P2K3, and Spray training activities to the Spray Unit Team on January 6, 2020 at KUD Jaya Makmur. The training was attended by 11 participants.
3. Minutes of the implementation of the spraying socialization activities on February 26, 2020 at KUD Permata Bunda. The training was attended by 11 participants.

7.2.7

Based on the results of field visits in chemical storage warehouses (pesticides), it is known that pesticides are stored based on the type of each pesticide, besides that it is also known that pesticides have also been equipped with MSDS and there is also a "trap" to accommodate the spilled pesticides when they are taken.

7.2.8

The company has procedure of Integrated Management System (IMS) about Waste Management (P-SAG-KBN-LMB-01 revision 02 issued date October 30, 2015). The procedure consists of 4R system (Reduce, Reuse, Recycle and Recovery). The management and waste disposal plan has been include about used pesticide container and hazardous is disposal to third parties. The last transported by third parties licensed (PT Dame Alam Sejahtera) on 29 July 2020 is 0,050 tones for item used pesticide container. There is document identification of the source of waste and its control in KUD Hikmah II Estate, KUD Jaya Makmur, KUD Permata bunda and POM on January 2020 is explained the used pesticide container transported by third parties licensed.

Based on interviews with employees and foremen of pesticide application in Hikmah Dua estate and KUD Jaya Makmur management, is known that all containers used were returned and sent to temporary storage places for hazardous and toxic waste materials that were not used for purposes other than pesticide application activities. All used containers, work

tools and work clothes are stored in a special storage area. Thus, there are no contaminated items to be taken home. The results of the employee's home Hikmah Dua estate observations show that it is not found that the used pesticide packaging is disposed of at the disposal site and is not used for other purposes such as trash cans, flower pots and so on.

7.2.9

Based on the results of interviews with company management, it was found that the company did not spray for pest control by air.

7.2.10

The certificate holder has shown the results of the annual special health examination records for pesticide operators which are contained in the PT Sampoerna Agro Plasma Plantation Health Inspection Report (Spirometry and Cholinestrase) from 2 to 7 March and 17 March 2020 by the UPTD Balai Hiperkes and Work Safety Office of the Department of Manpower and Work Safety in South Sumatra Province (No. : 560/33 / UPTD / BHP / 2020). Here are some details of the workers being inspected:

- KUD Jaya Makmur as many as 23 spray workers in normal conditions.
- KUD Maju Lancar as many as 19 spray workers in normal conditions.
- KUD Serba Usaha as many as 12 workers who deal with pesticides in normal conditions.
- KUD Marga Mulya as many as 41 pesticide workers in normal conditions.

Interview with warehouse officer, sighted the workers who work with chemical is follow medical surveillance once a year. The test result will be inform directly to the workers.

7.2.11

Based on the results of the foreman's interview in the field, it was found that pregnant and breastfeeding workers were not allowed to work as employees dealing with pesticides. This also applies to workers in KUD.

The certification unit also has a memorandum regarding the prohibition of employing pregnant or breastfeeding women to spray and fertilize with document number 0044 / MD / VIII / 2010 which was issued by the Managing Director on August 31, 2010.

Status: Comply

7.3

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

7.3.1

The company has procedure of Integrated Management System (IMS) about Waste Management (P-SAG-KBN-LMB-01 revision 02 issued date October 30, 2015). The procedure consists of 4R system (Reduce, Reuse, Recycle and Recovery). Management and waste disposal plan has been include about identification and monitoring the waste and pollution source and hazardous and toxic waste disposal to third parties. There is document identification of the source of waste and its control in KUD, Hikmah Dua Estate, KUD Jaya Makmur, KUD Permata Bunda and POM on January 2020 is explained the used pesticide container transported by third parties licensed.

7.3.2 & 7.3.3

The company has identified the source of waste and pollution source and treat the identified source to reduce emission and pollution. The effort taken by the company are:

- Domestic waste: based on field observation, the company has collected domestic waste periodically and dump it to the landfill and its known that location of landfill is far away from waterways and the housing area.
- Empty fruit bunch is applied to estate plantation area to substitute chemical fertilizer. Based on field visit EFB application is well managed.
- Shell and fiber are reused for engine fuel of boiler. It reduce the carbon emission from the combustion of fossil fuel.
- POME use for fertilizer, based on field visit the condition of flatbed has been maintenance well and no environmental pollution potential.
- The managing for clinical waste, the company also has cooperation with licensed parties such as PT Dame Alam Sejahtera.

For Hazardous waste generated operational is transported by third parties licensed from government, accordance agreement letter:

- Letter of agreement for the management hazardous waste between KUD Jaya Makmur and PT Dame Alam Sejahtera for hazardous waste transported activities No. 097 / MOU / JM-RAS / VI / 2020 dated July 1, 2020, valid for 1 year.
- Letter of agreement for the management hazardous waste between KUD Maju Lancar and PT Dame Alam Sejahtera for hazardous waste transported activities No. 095/MOU/ML-RAS/VI/2020 dated July 1, 2020, valid for 1 year.
- Letter of agreement for the management hazardous waste between KUD Permata Bunda and PT Dame Alam Sejahtera for hazardous waste transported activities No. 093/MOU/PB-RAS/VI/2020 dated July 1, 2020, valid for 1 year.
- Letter of agreement for the management hazardous waste between KUD Serba Usaha and PT Dame Alam Sejahtera for hazardous waste transported activities No. 090/MOU/SU-RAS/VI/2020 dated July 1, 2020, valid for 1 year.

The certification unit shown the evidence of hazardous waste transported, consist of:

- KUD Maju Lancar date 15 October 2020, ex pesticide container & inner fertilizer sack is 152.71 kg Number Manifest BGN 0000029.
- KUD Permata Bunda date 15 October 2020, ex pesticide container & inner fertilizer sack is 127.40 kg Number Manifest BGN 0000027.
- KUD Serba Usaha date 20 October 2020, ex pesticide container & inner fertilizer sack is 149.36 kg Number Manifest BGN 0000031.
- KUD Serba Usaha date 15 October 2020, ex pesticide container & inner fertilizer sack is 404.88 kg Number Manifest BGN 0000025.

Based on document review and field observation found that company and KUD shown proper management ways for Ex chemical containers, medical waste, and other hazardous / non hazardous waste disposal, based on procedures and waste management plan 2020 and own procedure. Field observation on Hikmah Dua estate housing for example found that companies managed settlements/housing domestic waste by provide landfill on each division and sort the organic/an-organic waste, no open fire for waste disposal.

Status: Comply	
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7.4

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

7.4.1

Practices that maintain or enhance soil fertility to ensure sustained yield are contained in:

- Procedure for fertilizing palm, number document: P-SAG-KBN-PML-21 Rev 01 issued on date March 16, 2012 for main estate.
- Procedure for fertilizing, number document: SA-PLASMA-PPKS-03, Issued on date April 1, 2016 for smallholder.

Hikmah Dua Estate and 4 KUD which are sample assessments can show fertilization realization documents for the period January to October 2020. The company has also shown an empty bunch and solid dencater application document for Hikmah Dua estate for the period January to October 2020.

Based on the results of interviews with fertilizer workers at KUD Permata Bunda, it is known that workers can explain the fertilizer standards that the company has. The worker also explained that fertilization was not allowed near water bodies because it could pollute the environment and the worker was obliged to use PPE when doing work.

The company has the opportunity to ensure fertilization is carried out in accordance with the direction of the Company's R&D. **OFI**

7.4.2

The company has shown the results of the analysis of leaf samples for each village unit cooperative as well as for Hikmah Dua Estate, the results of which are contained in the 2020 fertilization recommendation. The parameters that are tested are nutrients N, P, K, Ca, Mg and B.

The company has also shown the results of soil sample analysis for the KUD and Hikmah Dua Estate. The results of the analysis of the soil samples are as follows:

- Report of Analysis No: 056 / SL? / 2019 with Total test parameters - N, TOC, CEC, Exch (K, Na, Ca, Mg), P2O5 in HCL 25%, P2O5- Bray II, pH-H2O, Al -dd, texture, Boron, Fe in DTPA
- Soil analysis was carried out on 17 September 2016 (20 soil samples). Conducted by PT Binasawit Makmur Analytical Laboratory. Parameters analyzed are soil fraction, soil texture, pH, C, N, C / N, P, K, Ca, Na, Mg, JKB, CEC, KB and other micro nutrients

7.4.3

The company has a nutrient recycling strategy that is stated in the fertilizer SOP with number P-SAG-KBN-PML-21 Rev 01 and work instructions with number WI - SAG - KBN - PML - 2104 regarding the application of manual organic fertilizers and WI-SAG - KBN - PML - 2105 concerning the application of mechanical organic fertilizers.

The company has demonstrated documents using empty bunches and solid decanters as a nutrient recycling strategy. As for the implementation in wisdom 2 estate is as follows:

- Empty Bunch
Plans: 68,192 tonnes
Actual: 41,029 tons
- Solid decanter
Plans: 18,685 tonnes
Realization: 6,925 tons

7.4.4

The company has shown fertilization documents owned by Hikmah Dua Estate and 4 KUDs which were sampled for the 2020 period. Examples of fertilization implementation are as follows:

- Hikmah Dua Estate: Urea of 55.4 tons
- KUD Serba Usaha: NPK of 361.55 tons
- KUD Permata Bunda: Urea of 273.5 tons
- KUD Jaya Makmur: MOP of 332.6 tons

KUD Maju Lancar no longer fertilizes because in 2021 there will be replanting of oil palm.

Status: Comply

7.5

Practices minimise and control erosion and degradation of soils.

7.5.1

The Estate and All KUDs have maps of any fragile soils detailing their soil profile. As seen on the map, the soil types in the Hikmah Dua Estate are dominated by Typic Kandiodults, Typic Hapludults, Typic Dystrudepts. Meanwhile the soil types in the All KUDs are dominated by Typic Kandiodults, Typic Hapludults and Plinthic Kanhapludults.

7.5.2

Based on the results of the review of the statement area documents and the replanting plan program, it was found that there were no replanting activities at the Hikmah Dua Estate or KUD Permata Bunda, KUD Maju Lancar, KUD Maju Jaya, and KUD Serba Usaha.

7.5.3

Based on the results of a review of the area statement documents, planting year documents, and interviews with company management, it was found that the company had not planted any new oil palm trees.

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, 7.6.3

Based on the results of the study of the planting year document and the statement area, it was found that the company

had not planted any new oil palm plantations for the development of new plantations.

Status: Comply

7.7

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

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

The Estate and All KUDs have maps of any fragile soils detailing their soil profile. As seen on the map, the soil types in the Hikmah Dua Estate are dominated by Typic Kandiodults, Typic Hapludults, Typic Dystrudepts. Meanwhile the soil types in the All KUDs are dominated by Typic Kandiodults, Typic Hapludults and Plinthic Kanhapludults

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 that take account of the efficiency of use and renewability of sources can be seen in the 2020 water management plan and HCV management plan. Water management implementation has described in EIA report Semester 1 of 2020. The Plan had described the objectives such as water sources including catchment pond, rainfall records, water requirement, current, water quality and contingency plan.

According to an environmental monitoring analysis, it was informed that the company's activities had not yet had a negative impact. In addition, water consumption in the housing complex of Mill (WTP) and consumption water is bought from gallon water. water testing shows that all parameters comply with Minister of Health Regulation No. 32 of 2017.

The company has conducted the testing of surface water quality once every 6 months, based on the results of testing of semester 1 of 2020 known there is no test results that exceed the quality standard Government Regulation No. 82/ 2001 Class II.

7.8.2

The company has procedures related to the identification of sources and water quality (P-SAG-ADM-KTU-08). These procedure concerning to protect and manage the riparian zone. The company has identified rivers and wetlands inside plantation area. Analysis of HCV containing distribution maps of the river in the area of PT SA, PT TH and the cooperative of PT SA. Based on the identification documents of High Conservation Value (HCV) that rivers flow in the operational area of Selapan Jaya mill and supply base is Ketek river, Dabok river and Tungong river.

All identified buffer zone has been designated as HCV and protected areas. Field observations on block 33 B Hikmah Dua estate and HCV Area plots number 1324-1325 at KUD Serba Usaha showed evidence of surface water protection measures and including riparian such as:

- Determination of river buffer zone with a distance of 50 meters left-right of small river demarcation of the border is done with the installation of boundary markers.
- No chemicals application (fertilizers and herbicides) in the buffer zone area.
- Signboard of river buffer zone protection. Prohibiting the use of chemicals in the river buffer zone.
- Planting riparian with Guatemala, bamboo and trembesi to prevent landslide and erosion.

7.8.3

The company already has a permit for the disposal of palm oil industry wastewater to PT Sampoerna Agro based on the decision of the Regent of Ogan Komering Ilir number: 370/KEP/D.LH/2017 dated June 19, 2017 which is valid for 5 years. Wastewater is discharged into the Dabok Hitam river, with the highest discharge of 2.5 M2 per ton of CPO Palm Oil Product.

The company has routinely tested the quality of POME every 1 month in an accredited laboratory, based on the results of testing during January – October 2020 it is known that all parameters including BOD are still in accordance with the Minister of Environment Regulation No. 5 of 2014.

7.8.4

The water usage monitoring was done periodically and recorded, for example on October 2020 FFB processed 29,780 MT, process water usage 35,315 M3, and water usage efficiency was 1.19 m³/mt FFB processed, under standard efficiency on year 2020 is 1.20 m³/mt FFB processed.

Base observations on Selapan Jaya mill water treatment plant found monitoring for raw and process water usage was done by officer periodically, and flowmeters at inlet/outlet serves normally. Procedure for Mill water usage and monitoring are provided and has been listed on procedures No P-SAG-ADM-KTU-08.

The company already has the First Extension of Surface Water Extraction and Utilization Permit (SIPPAIR) of PT Sampoerna Agro Tbk in Ogan Komering Ilir Regency from the One-Stop Investment and Integrated Service Office of South Sumatra Province Number: 0406 / DPMPTSP.V/X/ VIII / 2020 dated 2 October 2020 which is valid for 2 years. Permitted water discharge is 9880 M3 per day. The company shows proof of payment of water fees for the June 2020 usage period which was paid on 8 July, 2020 through the South Sumatera Bank.

Status: Comply

7.9
Efficiency of fossil fuel use and the use of renewable energy is optimized.

The company has consistently implemented efficiency of fossil fuel efforts through renewable energy usage by using shell and fiber. It efforts has documented and monitored well. For example, in monitored renewable energy usage and efficiency analysis document recorded as follows:

- Daily monitoring of the use of solid waste for boiler fuel.
- Daily monitoring on fossil fuels use in each unit.

The Company has a record of the use of renewable energy or fossil energy are explained on recapitulation GHG source POM on 2019. Directly, The unit certification already maximizing the use of renewable energy (fiber & shell) as boiler fuel. For example use of shells and fiber period January to December 2019 has produces 1,179,360 kWh of electricity from turbine. Renewable energy use per ton of palm product in the mill is 21.7 kwh / ton FFB. Result Direct fossil fuel used is 0.70 kWh/ ton FFB.

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 auditor verification result during audit known data pesticides usages monitoring, data diesel fuel monitoring, HCV identification, data POME, total planted area and etc. found that accurate data has been put into the RSPO palm GHG Calculator. Meanwhile this GHG calculation using options No 1 (apply full version).

GHG calculation on 2018 shown net emission of GHG are increasing compared to 2018 net GHG is -0.23 tCO₂e/t Product vs 1 tCO₂e/t Product for year 2018 period while period year 2019 is 0.13 tCO₂e/t Product.

Calculation of GHG and its monitoring has conducted by sustainability department. GHG emission calculated using RSPO palm GHG calculator 4.0 Summary of GHG emission for Selapan POM and its supply base are listed as follows :

Summary Emission

Product	tCO ₂ e / tProduct	Action
CPO	0.13	
PK	0.13	
PKO	0.00	
PKE	0.00	

Description	Unit	Value	Action
Oil palm planted on mineral soil	Ha	24901.17	✓
Oil palm planted area on peat	Ha	802.35	✓
Total oil palm planted area	Ha	25703.52	✓
Conservation area (Forested)	Ha	53.82	✓
Conservation area (Non-Forested)	Ha	39.71	✓
FFB Production per hectare	t/ha	19.75	✓
OER	%	20.63	✓
KER	%	5.27	✓

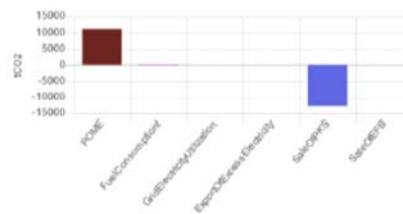
Field Emission Own Crop Mill Emission
Field Emission Third Party Field Emission Group



Mill Emissions and Credits

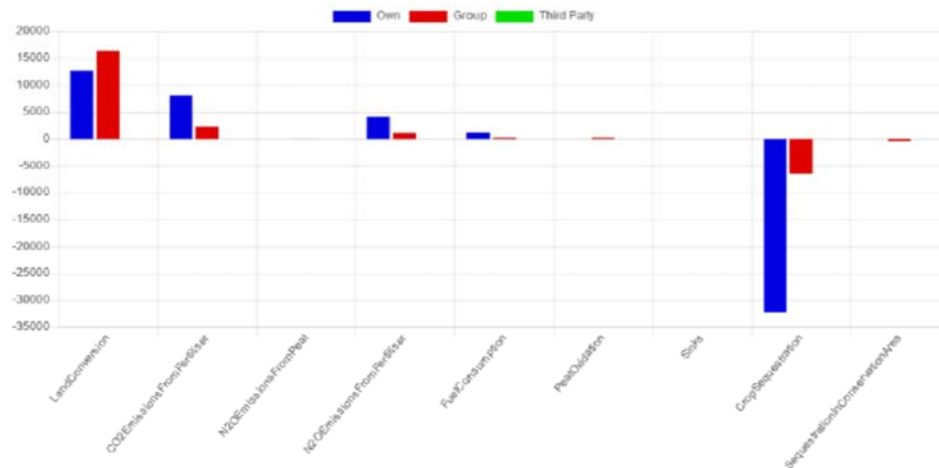
Description	tCO ₂	tCO ₂ e/t FFB	Action
Emission Sources			
POME	11194.09	0.03	
Fuel Consumption	255.33	0.00	
Grid Electricity Utilisation	0.00	0.00	
Credits			
Export of Excess Electricity to Housing & Grid	0.00	0.00	
Sale of PKS	-12967.25	-0.04	
Sale of FFB	0.00	0.00	
Total	-1537.84	-0.00	

Emission Source/Credit

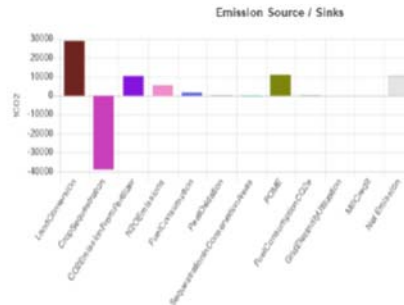


Estate/Plantation field emissions and sinks

	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	12761.34	0.88	0.05	16465.42	1.47	0.31	0.00	0.00	0.00	29226.76
CO2 Emissions from Fertiliser	8152.75	0.56	0.03	2373.27	0.21	0.05	0.00	0.00	0.00	10526.02
N2O Emissions from Peat	0.00	0.00	0.00	41.84	0.00	0.00	0.00	0.00	0.00	41.84
N2O Emissions from Fertiliser	4272.47	0.29	0.02	1253.36	0.11	0.02	0.00	0.00	0.00	5525.85
Fuel Consumption	1352.45	0.09	0.01	314.31	0.03	0.01	0.00	0.00	0.00	1666.76
Peat Oxidation	0.00	0.00	0.00	305.20	0.03	0.01	0.00	0.00	0.00	305.20
Sinks										
Crop Sequestration	-32385.51	-2.23	-0.14	-6569.70	-0.59	-0.12	0.00	0.00	0.00	-38955.21
Sequestration in Conservation Area	0.00	0.00	0.00	-485.59	-0.04	-0.01	0.00	0.00	0.00	-485.59
Total	-5846.50	-0.40	-0.02	13698.14	1.22	0.26	4385.96	0.00	0.00	12237.59

Field Emission and Sinks

Emissions from Palm Kernel Crusher

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



Production	t/yr
FFB processed	325,490.18
CPO produced	67048.245
PK produced	

Palm Oil Mill Effluent (POME) Treatment

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

POME Divert to Anaerobic Digestion

POME to anaerobic pond (%)	8
Divert to methane capture (flaring) (%)	0
Divert to methane capture (electricity generation) (%)	92

7.10.2 & 7.10.3

Based on planting year data, known the company planted from 1994 to 2012. Until surveillance 4 no new planting activities above year 2014.

The company has identified pollutions and emissions sources of Selapan Jaya POM, such as CO₂ (boiler, generator, transportation), CH₄ (POME), hazardous waste (WTP, chemical storage), noise (machinery). The sources of pollution and emissions for estate are listed on the identification documents and management plans for pollution sources for the period 2020, such as: emissions (CO₂, CO), noise, chemical waste, organic and inorganic waste and infectious waste. Plans to reduce or minimize has been implemented and monitored as explained on RKL-RPL semester I year 2020. Fossil fuel

reducing on Selapan Jaya POM palm oil mill have been implemented by fiber/shell usage for boiler. POME has been monitored every month and monitoring periods January – October 2020, shown that all of POME testing parameters is compliant to the standards quality.

Status: Comply

7.11

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

7.11.1, 7.11.2 & 7.11.3

The company have a zero burning policy that explicit stated in Group Company Policy signed by Chief Executive Officer on July 20th, 2015. The statement is: To prevent environment pollution and land clearing without fires (zero burning). A procedure for zero burning on Land Clearing, SOP No P-SAG-KBN-PML-03, is available. This procedure is referring to national law regarding controlling on damage and Environment Pollution caused by land fire and forest fire. The SOP mentioned that land clearing must be carried out with controlling and zero burning, and also prohibition of HCV areas disturbance. Land clearing method used is the uprooting and stacking of the wood to rotten.

All KUD have a policy to avoid the usage of fire during land clearing or replanting presented in procedure of land preparation for replanting. The work instruction mentioned that land preparation for replanting with zero burning. Based on planting year data, known the company planted from 1994 to 2012. Until surveillance 4 no new planting activities, meanwhile base on shown plans of replanting known the replant oil palm is only for plasma on year 2021.

Status: Comply

7.12

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

7.12.1, 7.12.2 & 7.12.3

The opening after November 2005 has been reported by the company to the RSPO. Based on RSPO email (rspocompensation@rspo.org) on October 25, 2017, the PT Telaga Hikmah have passed LUCA review with information Total final conservation liability 0 Ha and Total area requiring remediation 0 Ha.

The company (Hikmah Dua estate) has conducted HCV assessment on September 23-28, 2012 by Forest Faculty, Bogor Agriculture University. HCV conducted by qualified assessors namely Dr Nyoto Santosa and Ir Ahmad Faisal Siregar. HCV identification found HCV 4.1 (swamp area) about 53.82 Ha. In the HCV study process the company and consultant conducted public consultation with relevant stakeholder on September 28, 2012 attended by 60 persons from related community and internal workers.

The company also has conducted HCV assessment for its supplier (17 KUD) in 2017 and 1 KUD i.e. KUD Jadi Mandiri is conduct HCV assessment on 2010. HCV conducted by qualified assessor. The HCV assessment cover area of 20,217.27 ha. HCV identification found HCV is overlapping between HCV 1.1 and HCV 4.1 about 137.75 Ha, The HCV area for 11 KUDs included in the certification scope was 39.71 Ha. In the HCV study process the company and consultant conducted public consultation with relevant stakeholder on February 17, 2017 attended by 57 persons from related community. Based on document submitted by Proforest namely RSPO No deforestation consultancy: high forest cover countrie, Consultancy report on definitions and recommendations to the RSPO June 2018 as known not set HFCL for Indonesia. The HCS no applied for this assessment because the company has been certified before November 2018.

7.12.4, 7.12.5

The company established HCV management plan to maintain the HCV areas in operation area of PT SA, listed on Management plan HCV 2020 documents. HCV management activities that taken by the management unit are maintain HCV attributes (HCV boundary, sign board), HCV socialization (community and worker), maintain HCV area, fire control, regular patrols for maintain HCV security, RTE species monitoring, enrichment in riparian.

Field visits on HCV Area, Block 33B Hikmah Dua Estate and HCV Area plots number 1324-1325. On Serba Usaha Cooperative Unit found that companies have marked buffer zone, still natural vegetation and HCV signboard placement. During field visit also found riparian condition were managed well and there is no chemical activity indications on those riparian that become sampling audit.

Results of the verification documents, field visits and interviews with villagers obtained information that there are no areas of HCV-related and affect the local community.

7.12.6 & 7.12.7

The HCV assessment cover the presence of protected area that significantly affected by the plantation and mill, conservation status and identification of HCV habitats. Based on HCV assessment identification no found any species (flora and fauna) categorized as RTE species. The HCV assessment conduct used the Common Guidance for Identification of HCV, HCV assessment manual (HCVRN 2013) and Guidance of identification of HCV in Indonesia (HCV Toolkit Indonesia, 2008). The company has HCV map.

The company has rules to protect RTE species that stated on procedure of Konservasi Satwa dan Tumbuhan Dilindungi (SOP-AGR-052-R03 dated 1 August 2017). The company and smallholder have management and monitoring program to educate the worker and local company about the status RTE species by periodic socialization of HCV value. There is a memorandum no 058/MD/V/2016 date May 16, 2016 signed by Managing Director Sumatera that mention the disciplinary sanction if any worker and local community found to have captured, harmed, collected or killed RTE species in accordance with government regulation.

The company have established HCV management plan, and implemented it well. Regularly patrols record RTE species and monitored illegal hunting, and other illegal activities. The company has been monitored RTE every month and recapitulation every quarter, base on monitoring period June to August 2020 for Hikmah Dua Estate and all KUD. All of records for daily patrols on year 2020 for estate and KUD are available and verified by auditors and concluded no RTE species on operation area.

Non-conformity No. 2020.02 with status non critical.

- The CH has not been able to show evidence of monitoring of HCV area boundary markers in accordance with established procedures.
- The CH has not yet demonstrated an evaluation of the implementation of HCV management and monitoring in 2019.

7.12.8

The opening after November 2005 has been reported by the company to the RSPO, while for planting above 2010 without going through the NPP stage the company has received sanctions for 3 years unable to claim certified products for planting areas above 2010. As for now the sanctions are for 3 years. already passed. As for the previous audit, up to now there has been no change and no new developments.

7.12.7	Status: Non-conformity No. 2020.02 with status non critical
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3.2 Conformity Checklist of Certificate and Trademark Use

1.	Evidence of permission or approval certificate and trademark from Certification Body which submitted by Client	X or √
ASA-4	CH does not use RSPO trademark both on and off products	✓
	Status: Comply	
2.	Implementation of certificate and trademark used by Client comply with size and type (shape) against Guideline of trademark Use	X or √
ASA-4	CH does not use RSPO trademark both on and off products	✓
	Status: Comply	
3.	Implementation of Certificate and Trademark is not used on product	X or √
ASA-4	CH does not use RSPO trademark both on and off products	✓
	Status: Comply	
4.	Controlling of Certificate and Trademark, including withdrawing inappropriate trademark.	X or √
ASA-4	CH does not use RSPO trademark both on and off products	✓
	Status: Comply	

3.3 Summary of RSPO Partial Certification.

Compliance of the uncertified management units of PT Sampoerna Agro Tbk 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

PT Sampoerna Agro Tbk Time Bound Plan (TBP) is explained in table 1.10. PT Sampoerna Agro Tbk run ten (10) mills and ninety (90) estates (own and smallholders) in Indonesia and has achieved RSPO certified for six (6) mills and supply base in Indonesia. PT Sampoerna Agro Tbk has informed the TBP progress, MUTU has considered that PT Sampoerna Agro Tbk is comply with the RSPO requirement for TBP. The Time Bound Plan was revised and declared by PT Sampoerna Agro Tbk on 9 July 2020 approved by Chief Executive Officer.

MUTU has verified partial certification for un-certified unit's subsidiary of PT Sampoerna Agro Tbk based on their Time Bound Plan. There are two (2) mills and forty-seven (47) uncertified management unit of PT Sampoerna Agro Tbk. 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 is no significant land conflicts which have not been declared above
- The company has follow RSPO requirement related to Remediation and Compensation Procedure.
- There is no labour disputes that are not being resolved through an agreed process
- All plantations established since 2005 have been done so in accordance with the applicable laws of the country and that there is no evidence of non-compliance with law in any of the non-certified holdings which has not been declared above

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
2.2.1	Did the company conduct an internal audit? If so, has a positive assurance statement been produced?	<p>Company Group/Holding Statement: Companies are already doing internal audits. There are internal audit reports for each company.</p> <p>Auditor Verification: Internal Audit report available for uncertified management unit:</p> <ul style="list-style-type: none"> - PT Sungai Rangit (Sungai Rangit Mill and supply base), February 2020 - PT Lanang Agro Bersatu (Lanang Agro Bersatu Mill and supply base), March 2020 - PT Tebar Tandan Tenerah, February 2020 - PT Nusantara Sarana Alam, February 2020 - PT Kedurang Prakarsa Nabati, February 2020 - PT Pratiwi Agro Sejahtera, February 2020 - PT Kusuma Mentari Makmur, February 2020 - PT Agro Panindo Utama, February 2020.
i.	<p>No replacement after dates defined in NIs Criterion 7.3 of:</p> <ul style="list-style-type: none"> • Primary forest. • Any area identified as containing High Conservation Values (HCVs). 	<p>Company Group/Holding Statement: The uncertified management units has carried out some ef-forts to comply requirement as follows: HCV assessment :</p>

	<ul style="list-style-type: none"> Any area required to maintain or enhance HCVs in accordance with RSPO criterion 7.3. Hikmah V estate (additional for land use right year 2019) – PT Telaga Hikmah has carried out HCV assessment on 24 to 29 September 2012. KUD Makmur Bersama (scheme of smallholder under Sumber Sawit estate) has carried out HCV assessment on 24 to 27 January 2017 Limau Kesturi Estate – PT Sawit Selatan has carried out HCV Assessment on July to August 2011 and re-assessment on Oct to November 2016. Limau Kasturi Estate Smallholder has carried out HCV assessment on July 2011. Jaya Permai Estate, Nawa Surya Estate & Puncak Terang Estate – PT Selatan Jaya Permai has carried out HCV assessment on 18 to 28 May 2010 and re-assessment on 04 to 12 August 2015. Nawa Surya Estate Smallholder has carried out HCV assessment on May 2010. Gading Jaya Estate & Sepucuk Estate – PT Sampoerna Agro Tbk has carried out HCV assessment on 17 to 19 December 2013 (Gading Jaya Estate) and on 18 to 19 May 2010 (Sepucuk Estate). Megaterang Estate & Tanjung Sari Estate – PT Mutiara Bunda Jaya has carried out HCV assessment on 11 to 18 September 2012. KUD Tanjung Mesayu, KUD Sumber Makmur, KUD Sari Makmur and KUD Permata Indah (Mega Terang Small-holder) – scheme of smallholder under PT Mutiara Bunda Jaya has carried out HCV assessment on 6-11 February 2017. Baboti Estate, Rauk Naga Estate Waringin Estate, Sukamara Estate, Telaga Bintang Estate and Sungai Sagu Estate – PT Sungai Rangit has carried out HCV assessment on 12 to 16 February 2013. UAI smallholder has carried out HCV assessment on May 2010. Gaharu Palm Estate – PT Anugrah Palm Indonesia has carried out HCV assessment on 01 to 10 December 2014 and re-assessment on August 2017. Bukit Subur Estate & Bukit Makmur Estate – PT Lanang Agro Bersatu has carried out HCV assessment on 03 to 10 August 2010 and re-assessment on 13 to 15 April 2017. Lanang Agro Bersatu smallholder has carried out HCV assessment on May 2012. Gunung Tenerah Estate – PT Tebar Tanda
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		<p>Tenerah has carried out HCV assessment on 20 to 25 June 2013.</p> <ul style="list-style-type: none"> • Gunung Alam Estate – PT Nusantara Sarana Alam has carried out HCV assessment on 19 to 26 August 2014. • Kedurang Perkasa Nabati Estate – PT Nusantara Sarana Alam has carried out HCV assessment on 19 to 26 August 2014. • Gunung Sejahtera Estate – PT Pertiwi Agro Sejahtera has carried out HCV assessment on 20 to 29 June 2013. • Gunung Mentari Estate – PT Kusuma Mentari Makmur has carried out HCV assessment on 14 to 20 April 2014. • Gunung Utama Estate – PT Agro Planindo Utama has carried out HCV assessment on 14 to 20 April 2014. <p>Disclosure of non-complaint land clearing & RaCP :</p> <p>All uncertified management units above has carried out land clearing activities since November 2005 without preceded by HCV identification/assessment and after year 2010 exception Gading Jaya Estate & Sepucuk Estate – PT Sampoerna Agro Tbk because it have not the year of planting more year 2010.</p> <p>Auditee has provided disclosure of non-complaint land clear-ing and/or LUCA document and document of RaCP process on behalf uncertified management units and certified management units. Uncertified management units such as PT Usaha Agro Indonesia (12,502 ha), PT Kedurang Prakarsa Nabati, PT Selatan Jaya Permai and Telaga Hikmah Small-holder and certified management units such as PT Telaga Hikmah, PT Mutiara Bunda Jaya, PT Sampoerna Agro Tbk (Sepucuk & Gading Jaya Estate), PT Aek Tarum, PT Gunung Tua Abadi and PT Bina Sawit Makmur. Whereas, other uncertified management units has been provided plan of submit LUCA to RSPO.</p> <p>Information of LUCA for some certified and uncertified management units as follow as :</p> <ul style="list-style-type: none"> • PT Telaga Hikmah : disclosure of non-complaint land clear-ing and LUCA document has submitted to RSPO secretariat. LUCA document has submitted dated on 07 September 2016 and the result of LUCA verification is zero compensation liability.
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	<ul style="list-style-type: none"> • PT Mutiara Bunda Jaya : disclosure of non-complaint land clearing and LUCA document has submitted to RSPO secretariat. LUCA document has submitted dated on 10 March 2018 and the last of process is the auditee has submitted response from RSPO Secretariat dated on 16 December 2019. • PT Sampoerna Agro Tbk (Sepucuk & Gading Jaya Estate): disclosure of non-complaint land clearing and LUCA document has submitted to RSPO secretariat. LUCA document has submitted dated on 21 May 2018 and the last of process is the auditee has submitted LUCA revision based on response from RSPO Secretariat dated on 12 December 2018. • PT Usaha Agro Indonesia (12,502 ha) : disclosure of non-complaint land clearing and LUCA document has submitted to RSPO secretariat. LUCA document has submitted dated on 07 September 2016 and the result of LUCA verification is zero compensation liability. • PT Selatan Jaya Permai : disclosure of non-complaint land clearing and LUCA document has submitted to RSPO secretariat. LUCA document has submitted dated on 11 June 2018 and the last of process is auditee has submitted revision of LUCA based on response from RSPO Secretariat dated on 31 July 2018. • PT Kedurang Prakarsa Nabati : disclosure of non-complaint land clearing and LUCA document has submitted to RSPO secretariat. LUCA document has submitted dated on 13 April 2018 and the last of process is the auditee still preparing LUCA revision based on response from RSPO Secretariat dated on 04 October 2018. • Telaga Hikmah Smallholder : disclosure of non-complaint land clearing and LUCA document has submitted to RSPO secretariat. LUCA document has submitted dated on 31 May 2018 and the last of process is the auditee has received response dated on 25 August 2019 from RSPO secretariat. <p>Company has carried out New Planting Procedure (NPP) process for some management units under PT Sampoerna Agro Tbk i.e PT Sungai Rangit, PT Anugrah Palm Indonesia, PT Kusuma Mentari Makmur, PT Agro Planindo</p>
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		<p>Utama, PT Perti-wi Agro Sejahtera, PT Usaha Agro Indonesia (2,283 ha), PT Telaga Hikmah, PT Sampoerna Agro Tbk, PT Mutiara Bunda Jaya and PT Lanang Agro Bersatu. Field and document verification has carried out by Certification Body (CB) and NPP reports has submitted to RSPO Secretariat.</p> <p>Auditor Verification: HCV assessment has been conducted for:</p> <ul style="list-style-type: none"> - PT Sungai Rangit, Feb 2013 - PT Lanang Agro Bersatu, August 2010 - PT Tebar Tandan Tenerah, June 2013 - PT Nusantara Sarana Alam, August 2014 - PT Kedurang Prakarsa Nabati, June 2016 - PT Pratiwi Agro Sejahtera, June 2013 - PT Kusuma Mentari Makmur, April 2014 - PT Agro Panindo Utama, April 2014 <p>Year of planting in each subsidiaries are:</p> <ul style="list-style-type: none"> - PT Sungai Rangit, 1998 to 2013 - PT Lanang Agro Bersatu, 2010 to 2018 - PT Tebar Tandan Tenerah, 2014 to 2017 (still develop) - PT Nusantara Sarana Alam, 2015 to 2017 (still develop) - PT Kedurang Prakarsa Nabati, 2018 (still develop) - PT Pratiwi Agro Sejahtera, 2013 to 2017 (still develop) - PT Kusuma Mentari Makmur, 2014 to 2017 (still develop) - PT Agro Panindo Utama, 2014 to 2017 (still develop) <p>LUCA assessment has been conducted for:</p> <ul style="list-style-type: none"> - PT Sungai Rangit, March 2016 - PT Lanang Agro Bersatu, February 2016 - PT Tebar Tandan Tenerah, July 2015 - PT Nusantara Sarana Alam, August 2015 - PT Kedurang Prakarsa Nabati, June 2016 - PT Pratiwi Agro Sejahtera, November 2015 - PT Kusuma Mentari Makmur, May 2015 - PT Agro Panindo Utama, July 2015 <p>The un-certified unit still on process to comply with RaCP process.</p>
ii.	Any new plantings since January 1 st 2010 must comply with the RSPO New Plantings Procedure.	<p>Company Group/Holding Statement: Year of planting in each subsidiaries are:</p> <ul style="list-style-type: none"> - PT Sungai Rangit, 1998 to 2013 - PT Lanang Agro Bersatu, 2010 to 2018 - PT Tebar Tandan Tenerah, 2014 to 2017 (still develop)

		<ul style="list-style-type: none"> - PT Nusantara Sarana Alam, 2015 to 2017 (still develop) - PT Kedurang Prakarsa Nabati, 2018 (still develop) - PT Pratiwi Agro Sejahtera, 2013 to 2017 (still develop) - PT Kusuma Mentari Makmur, 2014 to 2017 (still develop) - PT Agro Panindo Utama, 2014 to 2017 (still develop) <p>Subsidiaries of Sampoerna Agro Tbk has carried out New Planting Procedure (NPP) process for some management units under PT Sampoerna Agro Tbk i.e PT Sungai Rangit, PT Anugrah Palm Indonesia, PT Kusuma Mentari Makmur, PT Agro Planindo Utama, PT Perti-wi Agro Sejahtera, PT Usaha Agro Indonesia (2,283 ha), PT Telaga Hikmah, PT Sampoerna Agro Tbk, PT Mutiara Bunda Jaya and PT Lanang Agro Bersatu. Field and document verification has carried out by Certification Body (CB) and NPP reports has submitted to RSPO Secretariat.</p> <p>Auditor Verification: Uncertified unit that conduct land clearing area after 1 January 2010 without NPP will be subject of sanction.</p>
iii.	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>Company Group/Holding Statement: The organization have some procedures relate of land compensation i.e P-SAG-RO-CAS-02 & P-SAG-RO-CAS-03. It has covered mechanism of identifying legal and customary or user right and identifying people entitled to compensation.</p> <p>The organization has carried out some meetings or discussions/ socializations relate of land acquisition since initial discussion/ meeting, information gathering and associated consultations, negotiation and agreement signed.</p> <p>Until end year 2019 that any uncertified management units have not land conflict and other uncertified management unit was solved or still in-process their the land conflict by each uncertified management units</p> <p>Auditor Verification: Auditor has verified the supporting evidence of above the company statement. There are no land conflicts for:</p> <ul style="list-style-type: none"> - PT Sungai Rangit - PT Lanang Agro Bersatu

		<ul style="list-style-type: none"> - PT Tebar Tandan Tenerah - PT Nusantara Sarana Alam - PT Kedurang Prakarsa Nabati - PT Pratiwi Agro Sejahtera - PT Kusuma Mentari Makmur - PT Agro Panindo Utama <p>Based on information in media online, known that:</p> <ul style="list-style-type: none"> - PT Sungai Rangit: No information of conflict - PT Lanang Agro Bersatu: https://www.hmstimes.com/sengketa-lahan-dengan-pt-lab-warga-sandai-lakukan-audiensi-ke-dprd-ketapang/ on March 2019 - PT Tebar Tandan Tenerah: No information of conflict - PT Nusantara Sarana Alam: No information of conflict - PT Kedurang Prakarsa Nabati: No information of conflict - PT Pratiwi Agro Sejahtera: No information of conflict - PT Kusuma Mentari Makmur: No information of conflict - PT Agro Panindo Utama: No information of conflict.
iv.	Any Labour disputes are being resolved through a mutually agreed process, in accordance with RSPO criterion 6.3.	<p>Company Group/Holding Statement: There is no issue of labour disputes in uncertified unit. The company also has procedure for Internal complaints and grievances. The procedure is No P-SAG-RO-CAS-08 dated April 1st 2012.</p> <p>Auditor Verification: There is no information from public source and RSPO website on any labour conflict for uncertified unit of the group subsidiaries.</p>
v.	Any Legal non-compliance is being resolved in accordance with the legal requirements, with reference to RSPO criteria 2.1 and 2.2.	<p>Company Group/Holding Statement: Companies comply with the regulations in accordance with the requirements of the RSPO 2.1 and 2.2 where there is no violation of the rules that are relevant to the plantation. The company has a mechanism to evaluate compliance with regulations, namely <i>Prosedur Hukun dan Persyaratan Lainnya</i>.</p> <p>Auditor Verification: Land legal process is still going on and there is a detail update progress documented by the company for each year.</p> <ul style="list-style-type: none"> - PT Sungai Rangit has had HGU and IUP. - PT Lanang Agro Bersatu has had HGU.

		<ul style="list-style-type: none"> - PT Tebar Tandan Tenerah has had IUP and location permit. The HGU is still on process. - PT Nusantara Sarana Alam has had IUP and location permit. The HGU is still on process. - PT Kedurang Prakarsa Nabati has had IUP and location permit. The HGU is still on process. - PT Pratiwi Agro Sejahtera has had IUP and location permit. The HGU is still on process. - PT Kusuma Mentari Makmur has had location permit. The IUP and HGU is still on process. - PT Agro Panindo Utama has had IUP and location permit. The HGU is still on process.
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3.4 Identification of Findings, Corrective Action, Observations, Opportunity for Improvement and Noteworthy Positive Components.
3.4.1. Identification of Findings, Corrective Actions and Observations at ASA-3 Assessment

NCR No.	: 2019.01	Issued by	: Hasiholan Sihombing
Date Issued	: 15 November 2019	Time Limit	: 13 February 2020
NC Grade	: Major	Date of Closing	: 23 January 2020
Standard Ref. & Requirement	: 4.7.3 Records of Occupational Health and Safety (OHS) program (see 4.8) and Personal Protective Equipment (PPE) training in accordance with the result of hazard identification and risk analysis shall be available to all workers.		
Evidence observed (filled by auditor): Based on the results of auditor verification found the following evidence: <ul style="list-style-type: none">- The company has a Memorandum regarding Provision and Life Period of PPE No: 076 / MD / VI / 2016 dated June 22, 2015 which explains the type of PPE of workers and the life of PPE, for example for the factory area, ear protection devices namely ear plugs, foot protection devices namely safety shoes, hand protective equipment namely gloves, respiratory protective equipment namely cloth masks.- Based on field observations and interviews with operators at Selapan Jaya Mill (press station, kernel station, clarification station and boiler station) it is known that 2 of the 4 operators interviewed did not use ear protection equipment and 2 other operators used cotton as ear protection.- Based on field observations and interviews with operators at Selapan Jaya Mill (sterilizer station, kernel station, clarification station and boiler station) it is known that 4 operators interviewed using foot protective equipment in the form of boots that were bought by themselves because the shoes given by the company were left at home.- Based on field observations and interviews with operators at the boiler station, it is known that the operator uses his own cloth mask as a respiratory protective device.- Based on observations at the press station and next to temporary storage for hazardous and toxic waste Selapan Jaya Mill, it is known that there are cutting welding activities where the operator does not use hand protective equipment.- The company shows that there are monitoring activities of the PPE condition of operators in the Selapan Jaya Mill which are carried out every month, for example shown the monitoring record in October 2019.- Minutes of PPE handover were shown to workers at Selapan Jaya Mill on October 31, 2019.			
Non-Conformance Description (filled by auditor): Based on the evidence, it is concluded that the company has not been effective in ensuring that PPE is used by workers in the field in accordance with the procedures they have.			
Root Cause Analysis (filled by organization audited): The company has not identified and evaluated the ineffective use of PPE by workers in the field in accordance with company procedures			
Correction (filled by organization audited): <ul style="list-style-type: none">1. Ensure that all employees have received PPE according to their respective types of workers2. Conducting socialization of the provisions on the use of PPE to all workers in the field			
Corrective Action (filled by organization audited): <ul style="list-style-type: none">1. Identifying and evaluating the ineffective use of PPE by workers in the field in accordance with company procedures2. Monitoring the Use of PPE Workers in accordance with the results of identification and evaluation in the field.			

Assessor Evaluation and Conclusion *(filled by auditor):*
Auditor Verification, December 10, 2019

The company sends evidence of improvements in the form of work programs of PPE inspection and PPE inspection at Selapan Jaya POM which are conducted every week. However, there are still auditors questions about the root cause analysis, corrections and corrective actions described by the company in the above column. Therefore, Nonconformities on this indicator have not yet been closed.

Auditor Verification (January 23, 2020)

Based on an analysis of the root causes presented and evidence of corrections and corrective actions submitted, this Nonconformities was stated to be closed and will be observed in the next audit activity.

Verified by	: Hasiholan Sihombing
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NCR No.	: 2019.02	Issued by	: Bayu Yogatama
Date Issued	: 15 November 2019	Time Limit	: 13 February 2020
NC Grade	: Major	Date of Closing	: 23 January 2020
Standard Ref. & Requirement	: 5.3.2 There shall be evidence that all chemicals and their empty containers are disposed of responsibly		

Evidence observed *(filled by auditor):*

Based on the results of verification of documents and field visits found the following evidence:

- The company has a Waste Management SOP set forth in the Integrated Management System Procedure No. document. P-SAG-PKS-LMB-01 dated 30 October 2015 and P-SAG-KBN-LMB-01 revised 02 dated 30 October 2015. It was explained in the SOP, that LB3 management is carried out by means of every hazardous waste produced placed in a red trash can which is then stored in hazardous waste warehouse in accordance with PP No. 101 of 2014.
- Based on the results of the auditor's visit to several locations located in Selapan Jaya Mill and KUD, several hazardous waste were found that were not stored in their places, such as:
 - 15 packages of used pesticides (round up) & 2 packages of ex paint and 2 packages of used pesticides (round up) stored in the Genset room of KUD Bina Tani Mulya.
 - Ex-Nalco Jerigen in the Selapan Jaya PKS workshop area
 - Used resin packaging, ex paint cans and diesel fuel in the Biogas Plant area..

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

The Management Unit has not been able to show evidence of all chemical waste and its containers are managed responsibly according to the existing SOP.

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

SOP for Waste Management in PKS (P-SAG-LMB-01) has not been effective because all the used hazardous and toxic material waste packages have not been properly recorded out of the warehouse

Correction *(filled by organization audited):*

Submitting all hazardous and toxic material waste to the temporary storage area. Hazardous and toxic material waste in accordance with SOP on Waste Management in PKS (P-SAG-LMB-01)

Corrective Action *(filled by organization audited):*

1. Identifying the use of hazardous and toxic material waste and hazardous and toxic material waste packaging that comes out of the warehouse

2. Register the package of hazardous and toxic material waste that has been produced from the warehouse and submit it to the hazardous and toxic material waste to the temporary storage.
3. Socializing SOP on Waste Management in PKS (P-SAG-LMB-PKS-01) to workers.

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

Verification December 16, 2019

The company shows evidence of improvement in the form of evidence of handover of hazardous and toxic material waste and update of hazardous and toxic material waste Balance in the Selapan Jaya POM, however, there are still auditors questions about the root cause analysis and corrective actions described by the company in the above column. Therefore, Nonconformities on this indicator have not yet been closed.

Auditor Verification (January 23, 2020)

Based on an analysis of the root causes presented and evidence of corrections and corrective actions submitted, this Nonconformities was stated to be closed and will be observed in the next audit activity.

Verified by	:	Bayu Yogatama
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3.4.2. Identification of Findings, Corrective Actions and Observations at ASA-4 Assessment

NCR No.	:	2020.01	Issued by	:	Radytio Puspanjana
Date Issued	:	27 Nov 2020	Time Limit	:	Recertification
NC Grade	:	Non critical/ minor	Date of Closing	:	5 January 2021
Standard Ref. & Requirement	:	2.2.2 All contract, including those or FFB supply, contain specific clause on meeting relevant legal requirements and this can be demonstrated by the third party.			
Evidence observed (filled by auditor): The Selapan Jaya POM and Hikmah Dua Estate already have a work agreement letter with a third party which explains that service providers must compliance law regulations government for aspect occupational health and safety.					
Non-Conformance Description (filled by auditor): The Selapan Jaya POM and Hikmah Dua estate have not been able to show proof of fulfillment of legal obligations by third parties, related to occupational health and safety insurance.					
Root Cause Analysis (filled by organization audited): The company has not conducted an evaluation to a third party regarding the fulfillment of legal obligations by a third party regarding occupational health and safety insurance.					
Correction (filled by organization audited): Encourage third parties to register their workers for occupational health and safety insurance in stages.					
Corrective Action (filled by organization audited): The conducted evaluation of third parties regarding all compliance with laws and other regulations.					
Assessor Evaluation and Conclusion (filled by auditor): Auditor verification date 5 January 2021 The company shown a evidence consist of: <ul style="list-style-type: none">- Proof of payment of Employment Insurance (<i>BPJS Ketenagakerjaan</i>) of the contractor PT Tenggerraja Jaya Teknik for the period of October 2020 paid on November 30, 2020.- Proof of payment of Health insurance (<i>BPJS Kesehatan</i>) of the contractor CV Alam Wijaya for the period of October 2020 paid on November 9 2020.- Proof of payment of Employment Insurance (<i>BPJS Ketenagakerjaan</i>) and Health insurance (<i>BPJS Kesehatan</i>) of the contractor PT Telaga Nikmah for the period of October 2020 paid on November 9 2020.- The minutes of the meeting between contractors CV Anton Putra and the company (PT Telaga Hikmah) on December 29, 2020, discussing the registration procedures for Employment Insurance (<i>BPJS Ketenagakerjaan</i>) and Health insurance (<i>BPJS Kesehatan</i>) as a form of support for fulfilling legal obligations in the fields of health insurance and employment insurance. Base on the evidence submitted to auditor, the nonconformity number 2020.01 has been comply and will be observed on next audit.					
Verified by	:	Radytio Puspanjana			

NCR No.	: 2020.02	Issued by	: Radytio Puspanjana
Date Issued	: 27 Nov 2020	Time Limit	: Recertification
NC Grade	: Non Critical/ Minor	Date of Closing	: 5 January 2021

Standard Ref. & Requirement	7.12.7 The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.
Evidence observed (filled by auditor): The CH already has: <ul style="list-style-type: none"> • SOP for HCV monitoring which explains that monitoring of HCV area boundaries is carried out every 6 months • The HCV management and monitoring plan for the period 2020 - 2024, the monitoring activities consist of monitoring disturbance of HCV areas 12 times a year, monitoring the effectiveness of HCV management 12 times a year, monitoring rehabilitation and restoration activities on the riparian once a year, monitoring and evaluating the SOP applied once a year. • RTE species monitoring report of the KUD Permata Bunda, Jaya Makmur and Maju Lancar • The monitoring water quality testing report of the KUD. • The HCV monitoring and management report year 2019. Non-Conformance Description (filled by auditor): <ul style="list-style-type: none"> • The CH has not been able to show evidence of monitoring of HCV area boundary markers in accordance with established procedures. • The CH has not yet demonstrated an evaluation of the implementation of HCV management and monitoring in 2019. 	
Root Cause Analysis (filled by organization audited): Management and Monitoring Procedures for High Conservation Value Areas (HCV) SA - PLASMA - PP -KS- 12 are still not being implemented optimally by CH due to budget constraints for the KUD assisted in making HCV monitoring stakes.	
Correction (filled by organization audited): The calculated of the HCV buffer zone and boundary markers for riparian and swamp.	
Corrective Action (filled by organization audited): <ul style="list-style-type: none"> - The Socializing management and monitoring procedures for High Conservation Value Areas - HCV (SA - PLASMA - PP - KS - 12) to assisted KUDs, especially KUDs that have High Conservation Value Areas (HCV). - The reviewed of the monitoring results of the management and monitoring of HCV in 2020 and making the 2021 management plan for the Assisted KUDs can be implemented in accordance with ensuring the SOP for the management and monitoring of High Conservation Value Areas (SA - PLASMA - PP - KS - 12). 	
Assessor Evaluation and Conclusion (filled by auditor): Auditor verification date 5 January 2021 The company shown a evidence consist of: <ul style="list-style-type: none"> - Minutes of letter of the checked the HCV mark boundary at KUD Sumber Sentosa dated December 15, 2020, attached documentation the activities photo. - Minutes of letter of the checked the HCV mark boundary at KUD Serba Usaha dated December 16, 2020, attached documentation the activities photo. - Minutes of letter of the checked the HCV mark boundary at KUD Sedia Mukti (riparian Tonjong river and riparian Ijo river) dated December 12-14, 2020, attached documentation the activities photo. - Minutes of letter of the checked the HCV mark boundary at KUD Permata Bunda (riparian Kemang river, riparian dabuk river and swamp) dated December 8, 2020, attached documentation the activities photo. - Minutes of letter of the checked the HCV mark boundary at KUD Marga Mulya (swamp) dated December 16, 2020, attached documentation the activities photo. - Minutes of letter of the checked the HCV mark boundary at KUD Maju Lancar (riparian Ijo river) dated December 9, 2020, attached documentation the activities photo. 	

- Minutes of letter of the checked the HCV mark boundary at KUD Jaya Makmur dated December 9, 2020, attached documentation the activities photo.
- The HCV management review 2020 minutes date December 10, 2020 for scope of KUD.
- The Report of socialization of HCV management and monitoring SOPs on December 10, 2020 to representatives of KUD management.
- The inventory data of the HCV boundaries on riparian KUD areas (Permata Bunda, Jaya Makmur, Maju Lancar, Sedia Mukti, Sumber Sentosa, Serba Usaha and Marga Mulya) period 2020.

Base on the evidence submitted to auditor, the nonconformity number 2020.02 has been comply and will be observed on next audit.

Verified by	:	Radytio Puspanjana
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3.4.3. Opportunity for Improvement

No	Ref. Std.	Description
1	3.3.2	The company ensures that the implementation of SOPs guided by the KUD is fully implemented
2	6.7.4	The BPJS program was completed as planned
3	7.4.1	Ensure fertilization is carried out in accordance with directions from the company's RnD

3.4.4. Noteworthy Positive Components

No	Ref. Std.	Description
1	-	Management commitment to applying the principles of sustainable palm oil management
2	-	Management of KUD with the principles of sustainable palm oil
3	-	Implementing ISPO and ISCC certification systems

3.5 Summary of Arising Issues from Public and Auditor Verification

Public Issues (Institution/ NGO/Community)	Auditor Verification
Head of Worker Union SPSA (<i>Serikat Pekerja Sampoerna Agro</i>) Hikmah Dua Estate <ul style="list-style-type: none"> The company has paid wages and employee rights in accordance with applicable regulations. There are no serious or fatal work accidents in the Hikmah Dua Estate. There are no employee complaints that have not been completed. Employee complaints such as housing conditions have been followed up. The company has provided PPE to workers. The company has conducted periodic health checks on high-risk workers. Not all harvester workers are permanent worker, its because of lack identity. Workers union has been register in manpower agency 	<p>Related to not all harvester workers are permanent workers, worker union representatives said the problem related to incomplete employee bio data. The union representative explained that the majority of harvest employees come from outside the region, and these employees are constrained in completing employee bio data such as KTP (identity card) and KK (Family Card). However, for workers who have completed, the company shows evidence of the appointment of harvest employees to KHT for the 2020 period in the Memorandum of Approval for the Appointment of KHL to become KHT (No .: 0241 / HRS / VIII / 2020) which was approved on 31 August 2020 by the Head of HR Operation.</p>
Ogan Komering Ilir District Land Service <ul style="list-style-type: none"> There is a land dispute in Telaga Hikmah with the village community on Geronggang Island and it has been included in the handling list by the agency There are demands/disputes from Sungai Sadong Village There are no problems related to HGU 	<p>CH has process to resolve the land dispute and has been explain in Criteria 4.2. Based on document verification and interview, Sungai Sadong Village is not in certification scope of Selapan Jaya POM.</p>
Environmental Office of Ogan Komering Ilir Regency <ul style="list-style-type: none"> There are no issues related to environmental pollution Regular environmental reporting is always reported and never too late There is no problem with environmental permits 	<p>CH has complied with RSPO PnC</p>
Ogan Komering Ilir Regency Manpower Office <ul style="list-style-type: none"> Routine reports have been submitted There is no information regarding work accidents There are no issues related to employment Labor unions and LKS Bipartite have been reported to the office. 	<p>CH has complied with RSPO PnC</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
Ogan Komering Ilir District Office of Plantation and Animal Husbandry <ul style="list-style-type: none"> • Reporting must be routinely submitted to the office • There is no HGU problem • The company always reports CSR activities • Facilities and infrastructure for land fire extinguishers have met the standards • There is no information regarding land fires • There is a land dispute with Pulau Geronggang village 	<p>CH has process to resolve the land dispute and has been explain in Criteria 4.2.</p>
Geronggang Island Community Figures <ul style="list-style-type: none"> • There are land disputes against 152 plots that have not been resolved. • The village is always involved in the formulation of CSR • The company always responds to every request for information from the village 	<p>CH has process to resolve the land dispute and has been explain in Criteria 4.2.</p>
PT Technindo Contromatra (Mill Contractor) <ul style="list-style-type: none"> • Every contractor worker is registered as a member of the BPJS • There are no obstacles regarding the distribution • Workers are equipped with PPE • Payment of workers' wages has followed the Regional Minimum Wage • No work accidents • Contactors also apply Overtime for workers 	<p>CH has complied with RSPO P&C</p>
Mandiri Hikmah Dua Cooperative (FFB transport contractor, EFB Transport, Maintenance) <ul style="list-style-type: none"> • It has been reported to the Manpower office • Workers are equipped with PPE provided by the contractor • The company carries out routine monitoring of contractors • Wage system based on work results • There is no problem with payment of work results • No work accidents 	<p>CH has complied with RSPO P&C</p>
CV Anton Putra (FFB and EFB transport contractor) <ul style="list-style-type: none"> • It has been reported to the Manpower office 	<p>CH has complied with RSPO P&C</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<ul style="list-style-type: none"> Workers are equipped with PPE provided by the contractor The company carries out routine monitoring of contractors Wage system based on work results There is no problem with payment of work results No work accidents 	
Labor union <ul style="list-style-type: none"> There are no negative issues related to employment and no complaints. CLA period in 2019 to 2021 Wages paid in accordance with minimum wages Workers has been provide with insurance (BPJS of employment and health) Education facilities in company area only kindergarten, while for elementary school, junior high school and high school is located in surrounding village. CH facilitated the bus to school. No indication of discrimination CH has provide PPE to all workers 	CH has complied with RSPO P&C
Gender Committee <ul style="list-style-type: none"> No cases of sexual harassment CH respects reproductive rights such as leave for menstrual and maternity. Gender committee has routine activities such as socialization, gymnastics and recitation, routine meetings, etc. No indication of discrimination 	CH has complied with RSPO P&C

4.0	CERTIFIED ORGANISATION'S ACKNOWLEDGEMENT OF INTERNAL RESPONSIBILITY
4.1	Formal Sign-off of Assessment Findings
	<p>Hereunder sign by management representative from inspected company to acknowledge a field assessment and agree for all content explained in this assessment report, included of non-compliance findings.</p> <p>Signed on behalf of:</p> <div style="display: flex; justify-content: space-around; align-items: flex-end;"> <div style="text-align: center;"> <p>PT Sampoerna Agro Management Representative</p>  <p><u>Yusi Rosalina</u></p> <p>Tuesday, 05 January 2021</p> </div> <div style="text-align: center;"> <p>Mutuagung Lestari Lead Auditor</p>  <p><u>Ardiansyah</u></p> <p>Tuesday, 05 January 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	Hikmah Dua Estate: - 3 Harvester - 1 Upkeep Supervisor. - 1 hazardous waste warehouse officer. - 1 warehouse officer. - 1 officer Room rinse of pesticide applicators - 6 Fire Fighter	Mesuji Raya Sub-district, Ogan Komering Ilir District, Sumatera Selatan	-	Field observation and direct interview	November 26 th , 2020	✓	-
2	Selapan Jaya Mill: - 2 Weighbridge Operators - 2 Security - 3 Grading Workers - 1 engine room operator - 2 Boiler Operator - 1 Press Station Operator - 2 Sterilizer operators - 1 Hydrant Operator - 1 WTP operator - 1 Biogas officer - 1 WWTP operators. 1 WTP operators	Mesuji Raya Sub-district, Ogan Komering Ilir District, Sumatera Selatan	-	Field observation and direct interview	November 26 th , 2020	✓	-
3	Head of SPSA Worker Union Hikmah Dua Estate	Mesuji Raya Sub-district, Ogan Komering Ilir District, Sumatera Selatan	-	Interview by phone	November 26 th , 2020	✓	-
4	Provincial Head of Sampoerna Worker Union	Mesuji Raya Sub-district, Ogan Komering Ilir District, Sumatera Selatan	-	Interview by phone	November 26 th , 2020	✓	-
5	Gender committee	Mesuji Raya Sub-district, Ogan Komering Ilir District, Sumatera Selatan	-	Interview by phone	November 26 th , 2020	✓	-
6	KUD Jaya Makmur: - 3 Harvester.	Mesuji Raya Sub-district, Ogan Komering Ilir District, Sumatera Selatan	-	Field observation and direct interview	November 25 th , 2020	✓	-

No	Institution/ NGO/ Community	Address	Phone/ Email	Form of Communication	Date of Contact	Response	
						Yes	No
	- 1 warehouse officer.	District, Sumatera Selatan		interview			
7	KUD Maju Lancar. - 1 warehouse officer - 3 harvester. - 5 pesticide operators	Mesuji Raya Sub-district, Ogan Komering Ilir District, Sumatera Selatan	-	Field observation and direct interview	November 25 th , 2020	✓	-
8	Permata Bunda Cooperative Unit. - 2 harvester - 1 supervisor - 1 warehouse officer - 2 pesticide operators	Mesuji Raya Sub-district, Ogan Komering Ilir District, Sumatera Selatan	-	Field observation and direct interview	November 25 th , 2020	✓	-
9	KUD Serba Usaha. - 2 harvester - 1 Clerk - 2 Supervisor - 1 pesticide operators	Pedamaran Timur Sub-district, Ogan Komering Ilir District, Sumatera Selatan	-	Field observation and direct interview	November 26 th , 2020	✓	-
10	Ogan Komering Ilir District Land Service	Ogan Komering Ilir District	-	Interview by phone	November 24 th , 2020	✓	-
11	Environmental Office of Ogan Komering Ilir Regency	Ogan Komering Ilir District	-	Interview by phone	November 24 th , 2020	✓	-
12	Ogan Komering Ilir Regency Manpower Office	Ogan Komering Ilir District	-	Interview by phone	November 24 th , 2020	✓	-
13	Ogan Komering Ilir District Office of Plantation and Animal Husbandry	Ogan Komering Ilir District	-	Interview by phone	November 24 th , 2020	✓	-
14	PT. Technindo Contromatra (Mill Contractor)	Ogan Komering Ilir District	-	Interview by phone	November 24 th , 2020	✓	-
15	Mandiri Hikmah Dua Cooperative (FFB transport contactor,	Ogan Komering Ilir District	-	Interview by phone	November 24 th , 2020	✓	-

No	Institution/ NGO/ Community	Address	Phone/ Email	Form of Communication	Date of Contact	Response	
						Yes	No
	EFB Transport, Maintenance)						
16	CV Anton Putra (FFB and EFB transport contractor)	Ogan Komering Ilir District	-	Interview by phone	November 24 th , 2020	✓	-
17	Geronggang Island Community Figures	Ogan Komering Ilir District	-	Interview by phone	November 26 th , 2020	✓	-
18	Sawit Watch	Indonesia	info@sawitwatch.or.id	Email	13 Nov 2020	-	✓
19	WALHI	Indonesia	informasi@walhi.or.id	Email	13 Nov 2020	-	✓
20	AMAN	Indonesia	rumahaman@cbn.net.id	Email	13 Nov 2020	-	✓
21	WWF	Indonesia	wwf-indonesia@wwf.or.id	Email	13 Nov 2020	-	✓

Appendix 2. Assessment Program

DATE	23 – 28 November 2020	
PLANNED TIME	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
Monday, 23 November 2020		
07.35 – 08.45	Jakarta – Palembang	All Auditor
09.00 – 13.00	Palembang – PT Sampoerna Agro (PKS Selapan Jaya)	All Auditor
14.30 – 15.00	Opening Meeting <ul style="list-style-type: none">Auditee Speech (Introduction of PIC, Profile of Certified Management Unit)Auditor Team Speech (Introduction, Audit Objective, Audit Scope, Audit Plan Discussion, Determine of Audit Sample, Transparency and Confidentiality Clarification)	
15.00 – 17.00	Field observation to Selapan Jaya Mill (PT. Sampoerna Agro) <ul style="list-style-type: none">Supply Chain verification (FFB Receiving, Weighbridge),Implementation of Occupational Health & Safety Aspect, Implementation of Employment Procedure and Mechanism Aspect, security post, FFB Sorting, Processing Activity, Despatch CPO)Implementation of Environmental aspect, Inspection to Chemical Storage, Hazardous Waste Storage, Fire Control Simulation, POME Pond & land application	All Auditor
Tuesday, 24 November 2020		
07.00 – 08.00	PT Sampoerna Agro – KUD Permata Bunda	All Auditor
08.00 – 12.00	Field Observation to KUD Permata Bunda Aspect to be verified : <ul style="list-style-type: none">Implementation of Legal Aspect (Land Ownership, Legal Boundaries, HCV area)Implementation of Agronomy Aspect (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application), Implementation of Occupational Health & Safety Aspect, Implementation of Employment Procedure and Mechanism AspectVisit to KUD Office (interview to KUD Officer, head of village and farmers, Implementation of Environmental, and Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management), Observation of Workers Facilities (Housing, School, Worship Place).	All Auditor
	Documents Review of KUD Permata Bunda <ul style="list-style-type: none">Review of previous assessment findingsVerification of Basic Information Mill and EstateVerification of P n C documents	All Auditor
12.00 – 14.00	BREAK	All Auditor
14.00 – 17.00	Document review of Selapan Jaya Mill (PT Sampoerna Agro) dan Hikmah Dua Estate (PT. Telaga Hikmah)	All Auditor
	Interview with Gender Committee, Worker’s Union, Worker’s Cooperative,	BSH
	Local Contractor (for Mill and Estate), Smallholders, Third Party Supplier, local NGO (if any)	RPJ

DATE	23 – 28 November 2020	
PLANNED TIME	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
	Consultation Stakeholder with Government Agencies (Via Telephone), indigenous peoples, local communities and previous land owners (For Core Estate and Mill scope).	JHP/ ARD
Wednesday, 25 November 2020		
07.00 – 08.00	PT Sampoerna Agro – KUD Jaya Makmur	All Auditor
08.00 – 10.00	Field Observation to KUD Jaya Makmur Aspect to be verified : <ul style="list-style-type: none"> - Implementation of Legal Aspect (Land Ownership, Legal Boundaries, HCV area - Implementation of Agronomy Aspect (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application), Implementation of Occupational Health & Safety Aspect, Implementation of Employment Procedure and Mechanism Aspect - Visit to KUD Office (interview to KUD Officer, head of village and farmers, Implementation of Environmental, and Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management), Observation of Workers Facilities (Housing, School, Worship Place). 	All Auditor RPJ JHP/ ARD BSH
11.00 – 12.00	Documents Review of KUD Jaya Makmur <ul style="list-style-type: none"> • Review of previous assessment findings • Verification of Basic Information Mill and Estate • Verification of P n C documents 	All Auditor
12.00 – 13.00	BREAK	All Auditor
13.00 – 14.00	Travel to Maju Lancar	All Auditor
14.00 – 17.00	Field Observation to KUD Maju Lancar & Document Review Aspect to be verified : <ul style="list-style-type: none"> - Implementation of Legal Aspect (Land Ownership, Legal Boundaries, HCV area - Implementation of Agronomy Aspect (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application), Implementation of Occupational Health & Safety Aspect, Implementation of Employment Procedure and Mechanism Aspect - Visit to KUD Office (interview to KUD Officer, head of village and farmers, Implementation of Environmental, and Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management), Observation of Workers Facilities (Housing, School, Worship Place). 	All Auditor RPJ JHP/ ARD BSH
Thursday, 26 November 2020		
07.00 – 08.00	Travel PT Sampoerna Agro – KUD Serba Usaha	All Auditor
08.00 – 10.00	Field Observation to KUD Serba Usaha Aspect to be verified : <ul style="list-style-type: none"> - Implementation of Legal Aspect (Land Ownership, Legal Boundaries, HCV area - Implementation of Agronomy Aspect (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application), Implementation of Occupational Health & Safety Aspect, Implementation of Employment Procedure and Mechanism Aspect - Visit to KUD Office (interview to KUD Officer, head of village and farmers, Implementation of Environmental, and Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management), Observation of Workers Facilities (Housing, School, Worship Place). 	RPJ JHP/ARD BSH

DATE	23 – 28 November 2020	
PLANNED TIME	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
10.00 – 12.00	Documents Review of KUD Serba Usaha <ul style="list-style-type: none"> Review of previous assessment findings Verification of Basic Information Mill and Estate Verification of P n C documents 	All Auditor
12.00 – 13.00	BREAK	All Auditor
13.00 – 14.00	Travel to Selapan Jaya Mill	All Auditor
14.00 – 17.00	Document review of Selapan Jaya Mill (PT Sampoerna Agro) dan Hikmah Dua Estate (PT. Telaga Hikmah) <ul style="list-style-type: none"> Review of previous assessment findings Verification of Basic Information Mill and Estate Verification of P n C documents 	All Auditor
Friday, 27 November 2020		
08.00 – 12.00	Field Observation to Hikmah Dua Estate (PT. Telaga Hikmah) Aspect to be verified : <ul style="list-style-type: none"> Implementation of Legal Aspect (Land Ownership, Legal Boundaries Implementation of Agronomy Aspect (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application), Implementation of Occupational Health & Safety Aspect, Implementation of Employment Procedure and Mechanism Aspect Implementation of Environmental, and Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management), Observation of Workers Facilities (Housing, School, Worship Place), HCV area.. 	RPJ ARD/JHP BSH
12.00 – 14.00	BREAK	All Auditor
13.00 – 15.00	Interim meeting	All Auditor
15.00 – 17.00	Closing Meeting	All Auditor
Saturday, 28 November 2020		
10.00 – 16.00	PT Sampoerna Agro (PKS Selapan Jaya) – Palembang	All Auditor
19.15 – 20.25	Palembang – Jakarta	