

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

[✓] Surveillance

Name of Management Organisation : Semilar Mill, PT Tapian Nadenggan subsidiary of Golden Agri Resources Ltd.
 Plantation Name : PT Tapian Nadenggan : Semilar Estate and Sei Rindu Estate
 PT Buana Artha Sejahtera : Mandang Estate and Puri Estate
 Location : Rungau Raya Village, Sub District of Danau Seluluk, District of Seruyan, Kalimantan Tengah Province, Indonesia
 Certificate Code : MUTU-RSPO/028
 Date of Certificate Issue : 22 July 2018 Date of License Issue : 22 August 2021
 Date of Certificate Expiry : 21 July 2023 Date of License Expiry : 21 July 2022

Assessment	Assessment Date	PT. Mutuagung Lestari Auditor	Reviewed by	Approved by
Remote ASA 1.2	14 to 16 September 2020	Arif Faisal Simatupang (Lead Auditor), Satria Adi Putra , Radityo Puspanjana, Nurdin Chaeriana	Trismadi Nurbayuto	Ardiansyah
Onsite ASA 1.2 & ASA 1.3	07 to 11 June 2021	Arif Faisal Simatupang (Lead Auditor), Afiffuddin, Dwi Haryati, Asystasya Aishah Silalahi		

Assessment	Approved by MUTUAGUNG LESTARI on:
Onsite ASA 1.2 & ASA 1.3	09 July 2021

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Figure 1. Location Map of PT Tapian Nadenggan and PT Buana Artha Sejahtera

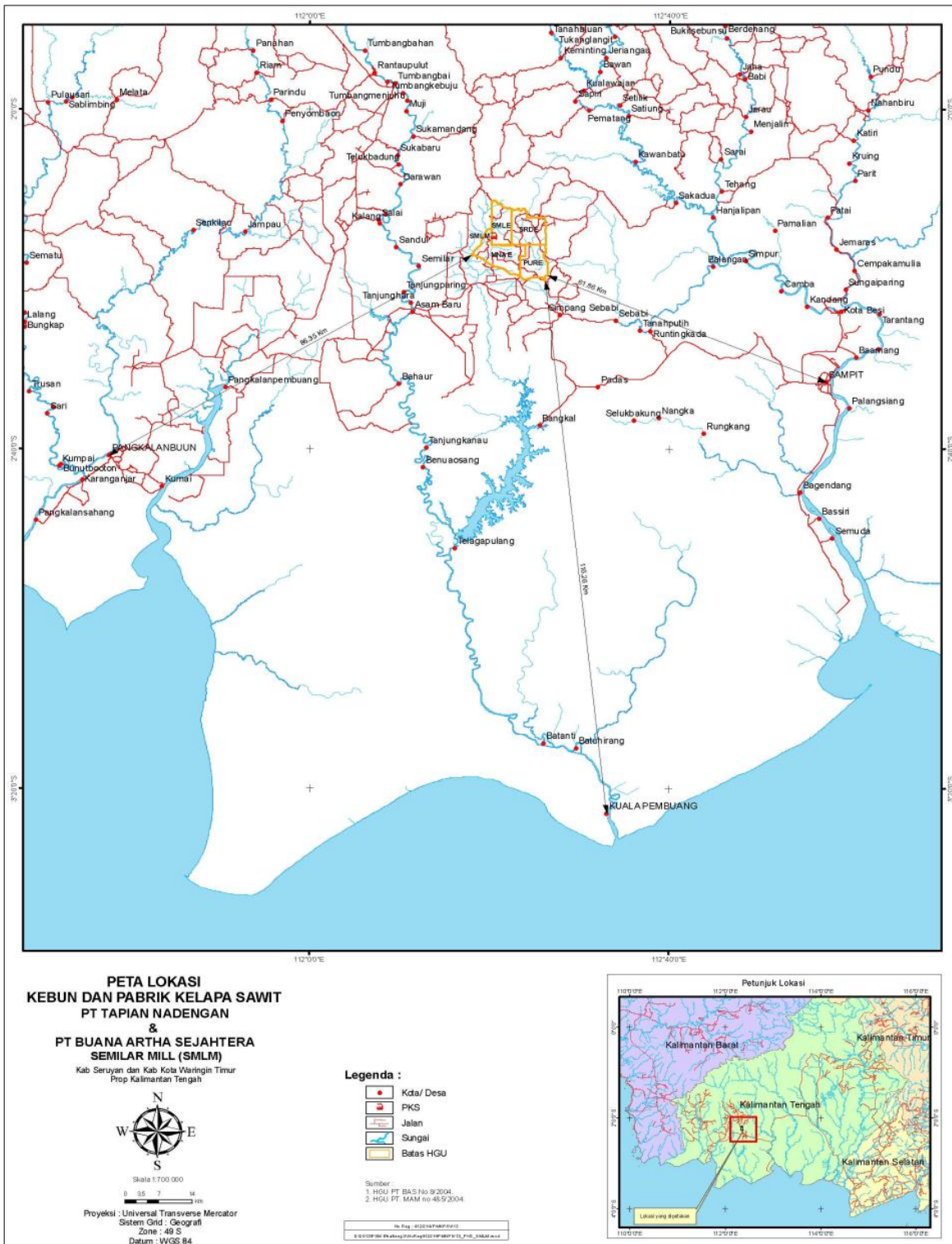


Figure 2. Operational Map of PT Tapian Nadenggan – Semilar Estate

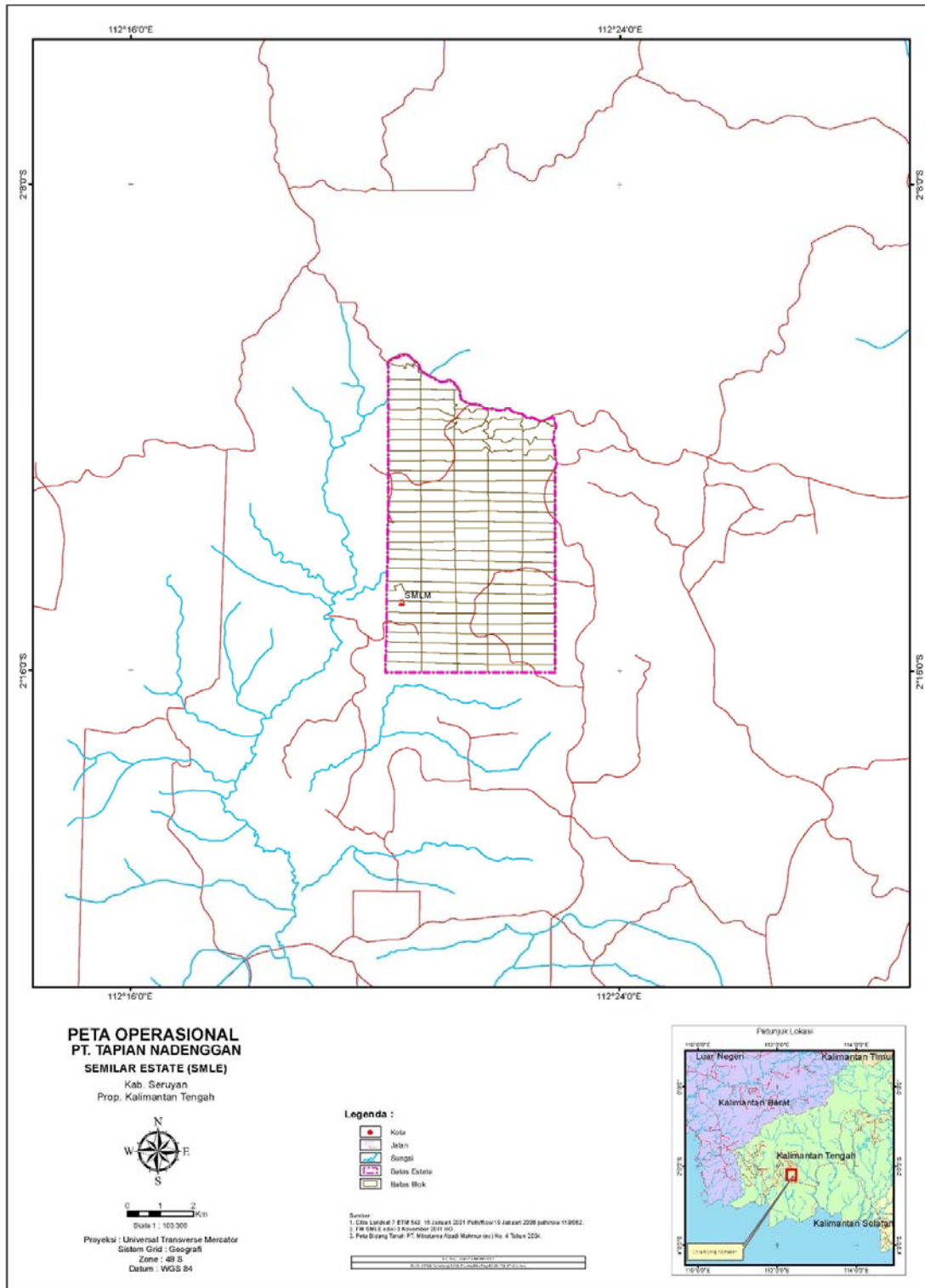


Figure 3. Operational Map of PT Tapian Nadenggan – Sei Rindu Estate

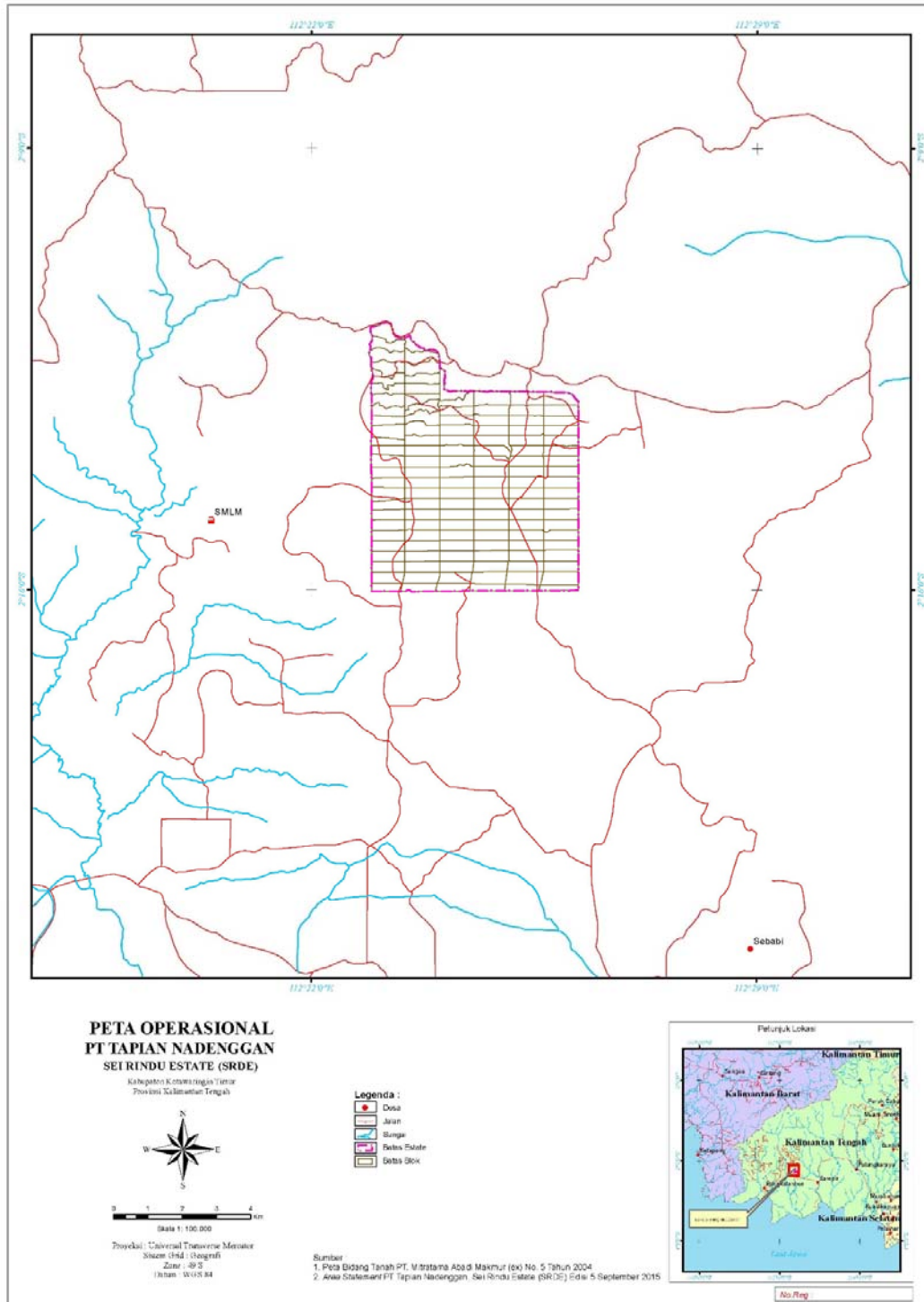


Figure 4. Operational Map of PT Buana Artha Sejahtera – Puri Estate

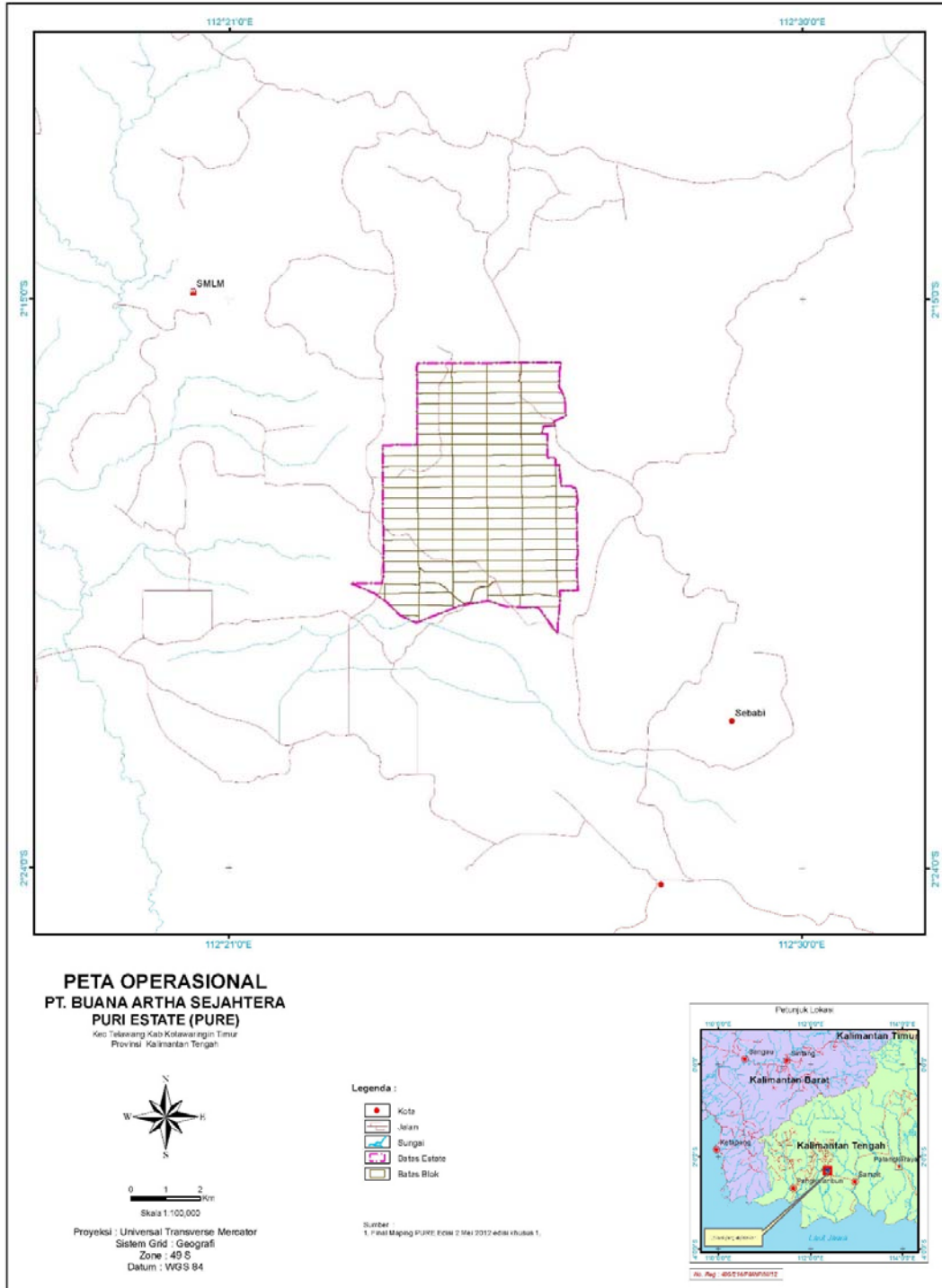
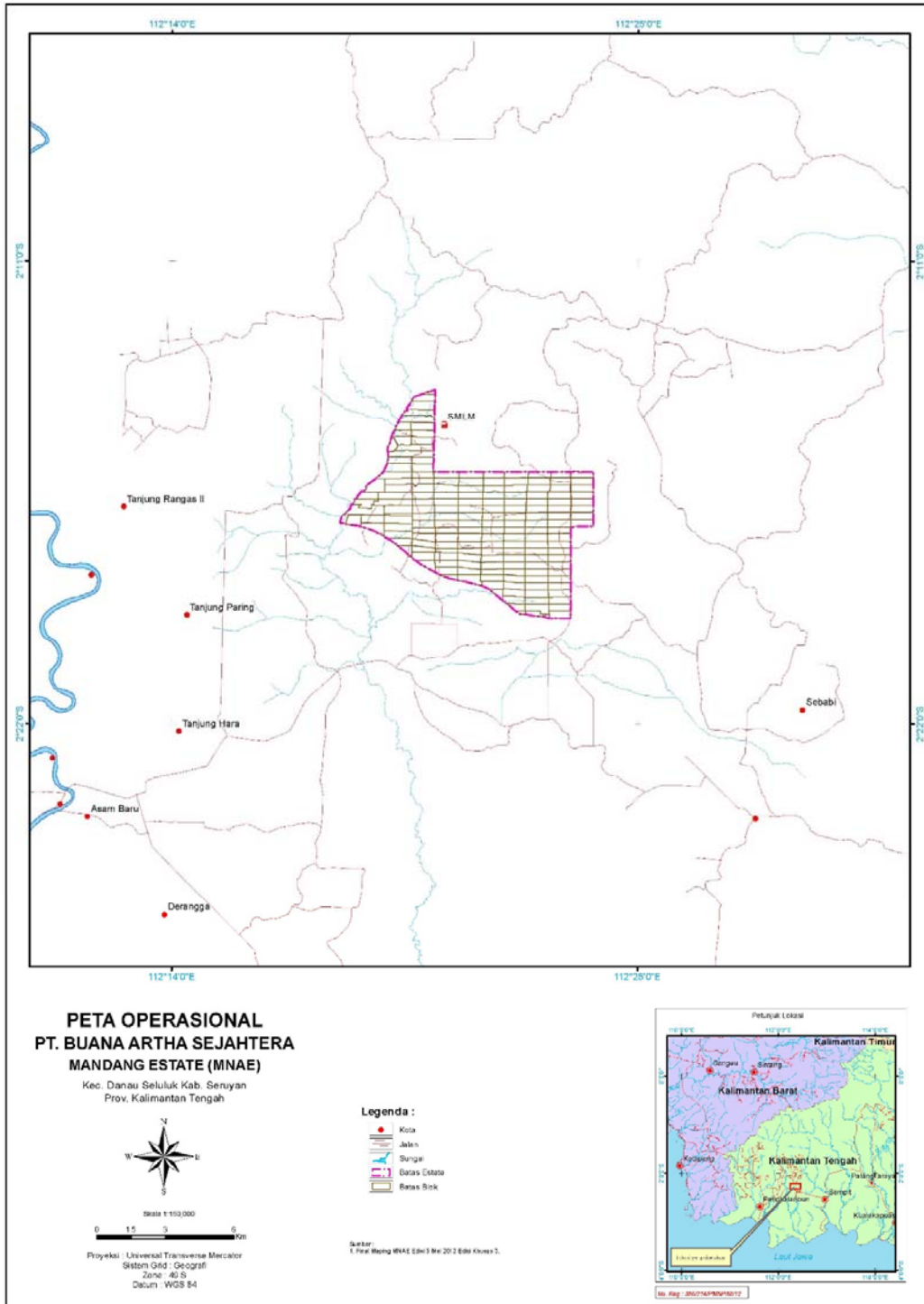


Figure 5. Operational Map of PT Buana Artha Sejahtera – Mandang Estate



Abbreviations Used

ASA	:	Annual Surveillance Assessment
B3	:	<i>Bahan Berbahaya dan Beracun</i> (Hazardous Waste)
BAP	:	Binasawit Abadi Pratama
BAS	:	Buana Artha Sejahtera
BOD	:	Biological Oxygen Demand
BPA	:	Balai Penitipan Anak / Daycare
BPJS	:	<i>Badan Penyelenggara Jaminan Sosial</i> (Social Assurance of Labor)
BPN	:	<i>Badan Pertanahan Nasional</i>
CITES	:	Convention on International Trade in Endangered Species of Wild Fauna and Flora
CLA	:	Collective Labor Agreement
CPO	:	Crude Palm Oil
CSR	:	Corporate Social Responsibility
EFB	:	Empty fruit bunch
FFB	:	Fresh Fruit Bunch
FPIC	:	Free Prior Informed and Consent
FR	:	Frequency Rate
GAR	:	Golden Agri Resources
GHG	:	Greenhouse Gas
GSEP	:	Golden Agri Resources Social Environment Policy
HCV	:	High Conservation Value
HGU	:	<i>Hak Guna Usaha</i> / land use tittle
HIRAC	:	Hazard Identification and Risk Assesment
HRD	:	Human Right Defender
HROPS	:	Human Resources Operational
IPM	:	Integrated Pest Management
ISCC	:	International Sustainability & Carbon Certification
ISPO	:	Indonesian Sustainable Palm Oil
KTP	:	<i>Kartu Tanda Penduduk</i> / Identity Card
LSU	:	Leaf Sampling Unit
LUCA	:	Land Use Change Analysis
MCAR	:	Management Committee Agronomy and Research
MCMD	:	Management Committee for Mill Development
MHS	:	Micron HerbySprayer
MNAE	:	Mandang Estate
MSDS	:	Material Safety Data Sheets
NGO	:	Non Government Organization
OER	:	Oil Extraction Rate
OHS	:	Occupational Health and Safety
OHSMS	:	Occupational Health and Safety Management System
OIA	:	Operational Internal Audit
P2K3	:	<i>Panitia Pelaksana Kesehatan dan Keselamatan Kerja</i> (OHS Guiding Committee)
PIC	:	Person In Charge
PK	:	Palm Kernel
PKB	:	<i>Perjanjian Kerja Bersama</i>
PKWT	:	<i>Perjanjian Kerja Waktu Tertentu</i> / Certain Time Work Agreement.
PMNP	:	Plantation Monitoring and Planning
POME	:	Palm Oil Mill effluent

PPE	:	Personal protective equipment
PT	:	<i>Pekerja Tetap</i> / Pekerja Tetap
PURE	:	Puri Estate
RaCP	:	Remediation and Compensation Plan
RAT	:	<i>Rapat Anggota Tahunan</i> (The Annual Meeting of Members)
RC	:	Regional Control
RKL/RPL	:	<i>Rencana Pengelolaan Lingkungan / Rencana Pemantauan Lingkungan</i> (Environment Management and Monitoring Plan)
RSPO	:	Roundtable Sustainable Palm Oil
RSUD	:	<i>Rumah sakit umum daerah</i> / regional hospital
RTE	:	Rare trade endangered
SAP	:	Sistem Application in Product in Data Processing Unit
SCCS	:	Supply Chain Certification Standard
SIA	:	Social Impact Assessment
SMARTRI	:	SMART Research Institute
SMLE	:	Semilar Estate
SMLM	:	Senilar Mill
SOP	:	Standart Operating System
SPO	:	Sustainable Palm Oil
SR	:	Severity Rate
SRDE	:	Sei Rindu Estate
SSA	:	Social Security Administrator
SSU	:	Soil Sampling Unit
TN	:	Tapian Nadenggan
UPDKS	:	Ulat Pemakan Daun Kelapa Sawit (Oil Palm Leaf Eating Caterpillar)
VPA	:	Vice President Assesment
WTP	:	Water Treatment Plant
WWTP	:	Waste Water Treatment Plant

1.0	SCOPE of the CERTIFICATION ASSESSMENT		
1.1	Assessment Standard Used	<ul style="list-style-type: none"> • RSPO Certifications Systems for Principles & Criteria and RSPO Independent Smallholders Standard (Endorsed by RSPO Board of Governors on 12 November 2020) • Indonesia National Interpretation RSPO Principles and Criteria for the Production of Sustainable Palm Oil 2018 Endorsed by the RSPO BOG on 20th April 2020 	
1.2	Organisation Information		
1.2.1	Organisation name listed in the certificate	PT Tapan Nadenggan subsidiary of GAR	
1.2.2	Contact person	Yahya Mustakim	
1.2.3	Organisation address and site address	RSPO registered company: 108 Pasir Panjang Road, #06-00 Golden Agri Plaza, Singapore 118535 Liaison Office: Sinar Mas Land Plaza, Tower II, 30th Floor Jl. MH Thamrin No. 51, Jakarta 10350, Indonesia	
1.2.4	Telephone	(+62-21) 50338899	
1.2.5	Fax	(+62-21) 50389999	
1.2.6	E-mail	yahya.mustakim@sinar-mas-agri.com	
1.2.7	Web page address	http://www.goldenagri.com.sg	
1.2.8	Management Representative who completed the application for certification	Yahya Mustakim <i>(Head of SPO Certification & Low GHG Emissions Strategy)</i>	
1.2.9	Registered as RSPO member	1-0096-11-000-00, 31 March 2004	
1.3	Type of Assessment		
1.3.1	Scope of Assessment and Number of Management Unit	Semilar Mill, Semilar Estate, Mandang Estate, Sei Rindu Estate and Puri Estate.	
1.3.2	Type of certificate	Single	
1.4	Locations of Mill and Plantation		
1.4.1	Location of Mill		
	Name of Mill	Location	Coordinate
			Latitude Longitude
	Semilar Mill	Rungau Raya Village, Danau Siluluk Sub-District, Seruyan District, Kalimantan Tengah Province, Indonesia	S 02° 14' 54" E 112° 20' 26"
1.4.2	Location of Certification Scope of Supply Base		
	Name of Supply Base	Location	Coordinate
			Latitude Longitude
	Semilar Estate (PT TN)	Rungau Raya Village, Danau Siluluk Sub-District, Seruyan District, Kalimantan Tengah Province, Indonesia	S 02° 15' 06" E 112° 20' 59"
	Sei Rindu Estate (PT TN)	Pantap Village, Mentaya Hulu Sub-District, Kotawaringin Timur District,	S 02° 15' 13" E 112° 24' 29"

		Kalimantan Tengah Province, Indonesia				
	Mandang Estate (PT BAS)	Rungau Raya Village, Danau Siluluk Sub-District, Seruyan District, Kalimantan Tengah Province, Indonesia	S 02° 16' 28"	E 112° 20' 17"		
	Puri Estate (PT BAS)	Biru Maju Village, Telawang Sub-District, Kotawaringin Timur District, Kalimantan Tengah Province, Indonesia	S 02° 18' 22"	E 112° 25' 13"		
1.5	Description of Area Statement					
1.5.1	Tenure					
	• State		17,088.00	Ha		
	<i>CH has had the land rights in the form of Land Use Title (HGU) for an area of 8,279.23 hectares which consist of 2 certificate HGU and HGU progress of PT BAS for an area of 8,808.77 Ha</i>					
	• Community		-	Ha		
1.5.2	Area Statement					
	• Total area		17,088.00	Ha		
	• Mature area		15,864.88	Ha		
	• Mill		31.05	Ha		
	• Infrastructure (emplashment and road)		740.67	Ha		
	• HCV (forest – non planted area)		158.52	Ha		
	• Others (drain, swamp and enclave)		292.88	Ha		
	*Total HCV area is 742.58 Ha. HCV area 158.52 Ha is in form of forest. However, the rest of HCV (497.6+244.98-158.52=584.06 Ha) is riparian river and included in planted area.					
1.6	Planting Year and Cycles					
1.6.1	Age profile of planting year					
	Planting Year	Hectarage (Ha)				
		Semilar Estate	Sei Rindu Estate	Mandang Estate	Puri Estate	Total
	1998	-	-	16.40	-	16.40
	2000	-	-	176.35	323.19	499.54
	2001	-	-	157.95	-	157.95
	2004	-	-	106.66	-	106.66
	2005	2,998.59	-	480.77	1,202.35	4,681.71
	2006	1,006.28	3,458.64	2,945.06	655.60	8,060.58
	2007	-	290.16	822.64	733.04	1,845.84
	2008	-	-	46.22	407.04	453.26
	2011	-	-	37.94	-	37.94
	Sub Total Mature	4,004.87	3,748.8	4,789.99	3,321.22	15,864.88
	-	-	-	-	-	-
	Sub Total Immature	-	-	-	-	-
	TOTAL	4,004.87	3,748.8	4,789.99	3,321.22	15,864.88
1.6.2	New Planting area after January 2010			-	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/two year)	CPO		Palm Kernel	
				Out put (tonnes)	Extraction (%)	Out put (tonnes)	Extraction (%)
	Semilar Mill	80	697,284.49	165,565.95	23.74	42,392.84	6.08
	<i>*Production data of 24 months before assessment (September 2019 – April 2021)</i>						
1.7.2	Description of Certification Scope of Supply Base						
	Name of Estate	Total Area (Ha)	Planted / Production Area (Ha)	FFB (tonnes/two year)	Yield (tonnes/ha/ye ar)	Supplied to Mill	
						FFB (tonnes/two year)	%
	Semilar Estate	4,288.63	4,004.87	188,922.08	23.12	188,922.08	100
	Sei Rindu Estate	3,990.60	3,748.80	179,723.19	23.50	179,723.19	100
	Mandang Estate	5,170.35	4,789.99	196,183.60	20.07	196,183.60	100
	Puri Estate	3,638.42	3,321.22	132,192.02	19.51	132,192.02	100
	TOTAL	17,088.00	15,864.88	697,284.49	21.54	697,284.49	100
	<i>*Production data of 24 months before assessment (September 2019 – April 2021)</i>						
1.7.3	FFB description from other source						
	Name of sources/Organis ation (RSPO certified / non-certified)	Type of Organisation	number of smallholders	Production Area (Ha)	Supplied to Mill		
					FFB (tonnes/year)		
	-	-	-	-	-		
	TOTAL						-
	<i>*Production data of 24 months before assessment (September 2019 – April 2021)</i>						
1.7.4	Product categories			FFB, CPO, PK			
1.8	Tonnage of Product						
1.8.1	Past Annual Claim Certified Product		Last Year Projected Certified Volume (MT)		Last Year Actual Certified Volume (September 2019 to April 2021) (MT)		
	FFB Processed	IP	755,239		697,284.49		
		MB	77,199		0		
	CPO Production	IP	178,304		165,565.95		
		MB	18,528		0		
	Palm Kernel (PK) Production	IP	44,652		42,392.84		
		MB	4,323		0		
	<i>Note: the Mill available in IP and MB module. However, since September 2019 until ASA 1.2 & ASA 1.3 the Mill only implement IP module.</i>						
1.8.2	Product selling						
	Type of selling product			Actual selling product for last year (September 2019 – April 2021) (MT)			

	CSPO sold as RSPO certified product										50,333.72
	CSPK sold as RSPO certified product										33,471.51
	CSPO sold under other scheme										115,223.98
	CSPK sold under other scheme										0
	CSPO sold as conventional										0
	CSPK sold as conventional										8,909.25
	<i>Note: the Mill available in IP and MB module. However, since September 2019 until ASA 1.2 & ASA 1.3 the Mill only implement IP module.</i>										
1.8.3	Estimate of Certified FFB Claim										
	Name of Estate(s)	Total Area (Ha)	Production Area (Ha)	FFB (tonnes/year)	Yield (tonnes/ha/year)						
	Semilar Estate	4,288.63	4,004.87	112,000	27.97						
	Sei Rindu Estate	3,990.60	3,748.80	106,000	28.28						
	Mandang Estate	5,170.35	4,789.99	112,000	23.38						
	Puri Estate	3,638.42	3,321.22	79,000	23.79						
	TOTAL	17,088.00	15,864.88	409,000	25.78						
	<i>*Projected FFB production for 12 months of next license</i>										
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
			IP	MB	IP	MB		IP	MB		
	Semilar Mill	80	326,000	83,000	78,300	19,300	24.00	19,600	5,000	6.00	IP / MB
	<i>*Projected CSPO and CSPK production for 12 months of next license</i>										
1.9	Other Certifications										
	ISCC	ISCC (<i>International Sustainability Carbon Certification</i>) Certificate No. EU-ISCC-Cert-ID218-20180112									
	RSG	Based on buyer request									
	ISPO	MUTU-ISPO/063, issued by PT Mutuagung Lestari valid from 19 July 2016 to 18 Juli 2021									
1.10	Time Bound Plan										
1.10.1	Time Bound Plan for Other Management Units										
	Management Unit		Estate (Supply Base)	Time Bound Plan	Location	Status					
	Mill	Time bound									
	Pangkalan Panji (PT Sawit Mas Sejahtera)	2013	Sawit Mas Estate	2013	Sumatera Selatan Province	Certified					
			Sawit Mas Estate (HGU on progress – 2,291 Ha)	2022		-					
	Bumi Sawit Mill (PT Bumi Sawit Permai)	2013	Bumi Sawit Estate	2013	Sumatera Selatan Province	Certified					
			Bumi Sawit Estate (HGU on progress – 773.39 Ha)	2022		-					
	Muara Kandis Mill (PT Djuandasawit Lestari)	2013	Muara Tawas Estate	2013	Sumatera Selatan Province	Certified					

		Muara Kandis Estate	2013		Certified
		Muara Kandis Estate (HGU on progress – 418.49 Ha)	2022		-
		Muara Tawas Estate (HGU on progress – 57.7 Ha)	2022		-
		Smallholder (KKPA Pandawa)	2022		-
Sungai Rungau Mill (PT Sumber Indah Perkasa)	2013	Sungai Rungau Estate	2013	Kalimantan Tengah Province	Certified
		Sungai Seruyan Estate	2013		Certified
		Terawan Estate	2013		Certified
		Tangar Estate	2013		Certified
		Bukit Tiga Estate	2013		Certified
Bukit Perak Mill (PT Bumi Permai Lestari)	2013	Bukit Perak Estate	2013	Bangka Belitung Province	Certified
		Bukit Permata Estate	2013		Certified
		Bukit Lestari Estate (PT Bumi Bangka Lestari)	2023		-
		Bukit Permai Estate (PT Bumi Permai Surya Lestari)	2023		-
Tanjung Kembiri Mill (PT Forestalestari Dwikarya)	2013	Tanjung Kembiri Estate	2013	Bangka Belitung Province	Certified
		Tanjung Rusa Estate	2013		Certified
		Tanjung Rusa Estate (HGU on process 48.81 Ha)	2022		-
		Tanjung Sawit Estate (PT Palmindo Biliton Berjaya)	2023		-
		Tanjung Sawit Plasma (PT Palmindo Biliton Berjaya)	2023		-
		Tanjung Rusa KKPA	2021		-
Sungai Buaya Mill (PT Sumber Indah Perkasa)	2014	Sungai Buaya Estate	2014	Lampung Province	Certified
		Sungai Buaya Estate (HGU on process – 155.46 Ha)	2022		-
		Smallholder (KKPA Gedung AJi Lama)	2014		Certified

		Smallholder (KKPA Mesuji)	2014		Certified
Sungai Merah Mill (PT Sumber Indah Perkasa)	2014	Sungai Merah Estate (HGU on process – 241.54 Ha)	2014	Lampung Province	Certified
		Sungai Merah Estate	2022		-
		Smallholder (KKPA Gedung AJi Baru)	2014		Certified
Kasuari Mill (PT Sinar Kencana Inti Perkasa)	2021	Cendrawasih Estate	2021	Papua Province	ST-1
		Nuri Estate	2021		ST-1
		Rajawali Estate	2021		ST-1
		Mambruk Estate (PT Sumber Indah Perkasa)	2021		ST-1
Pekawai Mill (PT Agrolestari Mandiri)	2021	Kayung Estate	2021	Kalimantan Barat Province	ST-1
		Pekawai Estate	2021		ST-1
		Sungai Kelik Estate	2021		ST-1
		Nanga Tayap Estate	2021		ST-1
		Smallholder (Kayung Plasma)	2021		ST-1
Kenanga Mill (PT Kencana Graha Permai)	2014	Kencana Estate	2015	Kalimantan Barat Province	Certified
		Cendana Estate	2015		Certified
		Kenanga Estate (PT Cahaya Nusa Gemilang)	2021		Certified
		Delima Estate (PT Kencana Graha Permai)	2021		-
		Smallholder (Kencana Plasma)	2022		-
		Smallholder (Kenanga Plasma)	2022		-
Perdana Mill (PT Binasawit Abadi Pratama)	2023	Perdana Estate	2023	Kalimantan Tengah Province	ST-1
		Lenggana Estate	2023		ST-1
		Semandau Estate	2023		ST-1
		Muara Dua Estate	2023		ST-1
Kuayan Mill (PT Agrokarya Prima Lestari)	2023	Bukit Santuhai Estate	2023	Kalimantan Tengah Province	ST-1
		Tajur Beras Estate	2023		ST-1
		Seranau Estate	2023		ST-1
		Sungai Sambon Estate	2023		ST-1
		Sungai Sambon Plasma	2023		-
		Sapiri Estate (PT Buana Adhitama)	2023		ST-1

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

		Estate			
		Sungai Ayawan Estate (PT Aditunggal Mahajaya)	2023		-
Sungai Magalau Mill (PT Sinar Kencana Inti Perkasa)	2022	Sungai Magalau Estate	2022	Kalimantan Selatan Province	-
		Senakin Estate	2022		-
Jalemo Mill (PT Agro Lestari Sentosa)	2023	Balasang Estate	2023	Kalimantan Tengah Province	-
		Jalemo Estate	2023		-
		Kajui Estate (PT Agro Lestari Sentosa)	2023		-
		Manuhing Estate (PT Agro Lestari Sentosa)	2023		-
Sako Mill (PT Adi Tunggal Mahajaya)	2023	Mentaya Estate	2023	Kalimantan Tengah Province	ST-1
		Kuayan Estate	2023		ST-1
		Sako Plasma	2023		-
Padang Halaban Mill (PT SMART Tbk)	2011	Padang Halaban Estate	2011	Sumatera Utara Province	Certified
		Penantian Estate	2011		Certified
		Adipati Estate	2011		Certified
		Kanopan Ulu Estate	2011		Certified
Batu Ampar Mill (PT SMART Tbk)	2012	Batu Ampar Estate	2012	Kalimantan Selatan Province	Certified
		Batu Mulia Estate	2012		Certified
		Sungai Panci Estate	2012		Certified
		Sungai Panci KKPA	2012		Certified
Tanah Laut Mill (PT SMART Tbk)	2012	Tanah Laut Estate	2012	Kalimantan Selatan Province	Certified
		Kinta Pura Estate	2012		Certified
Langga Payung Mill (PT Tapian Nadenggan)	2012	Langga Payung Estate	2012	Sumatera Utara Province	Certified
		Paya Baung Estate	2012		Certified
		Normark Estate	2012		Certified
Hanau Mill (PT Tapian Nadenggan)	2012	Hanau Estate	2012	Kalimantan Tengah Province	Certified
		Tasik Mas Estate	2012		Certified
		Tanjung Paring Estate	2012		Certified
		Langadang Estate	2012		Certified
		Medang Sari Estate (PT Satya Kisma Usaha)	2022		-
Semilar Mill (PT Tapian Nadenggan)	2013	Semilar Estate	2013	Kalimantan Tengah Province	Certified
		Sei Rindu Estate	2013		Certified
		Mandang Estate	2013		Certified
		Puri Estate	2013		Certified
Jak Luay Mill (PT Tapian Nadenggan)	2015	Pantun Mas Estate	2015	Kalimantan Timur Province	Certified
		Jak Luay Estate	2015		Certified
		Jak Luay KKPA	2022		-

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

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

		Mandiri)			
		Keranji Estate (PT Bangun Nusa Mandiri)	2023		ST-1
		Smallholder (Gaharu Plasma)	2023		-
		Smallholder (Kenari Plasma)	2023	Kalimantan Barat Province	-
Sungai Air Jernih Mill (PT Bahana Karya Semesta)	2022	Sungai Air Jernih Estate	2022	Jambi Province	-
		Sungai Mentawak Estate	2022		-
		Sungai Merak Estate	2022		-
		Sungai Badak Estate	2022		-

TBP is approve on January 2021.

There is revision of timebound plan on 21 January 2021 made by Head of Sub Div SPO Certification and Low GHG Strategy. There are justification for mills and estates that postpone, with explanation:

- Pandawa KKPA are postponed to 2022 due to the SHM process.
- Tanjung Rusa KKPA are postponed to 2022 due to the SHM process.
- Kenangan Estate dan Delima Estate are postponed to 2021 due to pandemic covid-19 so that on-site audit in 2020 cannot be implemented.
- Batang Gading Estate are postponed 2022 due to still in process for RaCP (LUCA review).
- Rama-Rama KKPA are postponed to 2023 due to still in process for land rights (SHM).
- Kasuari Mill and supply bases are postponed to 2022 due to still in process of EIA (AMDAL) revision and permit for hazardous waste warehouse
- Pekawai Mill and supply bases are postponed to 2021 due to pandemic covid-19 so that on-site audit in 2020 cannot be implemented.
- Belian Mill and supply bases are postponed to 2021 due to pandemic covid-19 so that on-site audit in 2020 cannot be implemented.
- Sungai Kikim Mill and supply bases are postponed to 2022 due to still in process of EIA (AMDAL) revision.
- Sungai Magalau Mill and supply bases and supply bases are postponed to 2022 due to still in process for RaCP (LUCA review).
- Jalemo Mill and supply bases are postponed to 2023 due to still in process for HGU and RaCP (LUCA review).
- Gunung Kombeng Mill and supply bases are postponed to 2022 due to still in process for land rights (SHM).
- Rantau Panjang Mill and supply bases are postponed to 2022 due to still in process for RaCP (LUCA review).

In this timebound plan revision, it is known that Bukit Lestari Estate (PT Bumi Bangka Lestari) and Bukit Permai Estate (PT Bumi Permai Surya Lestari) no longer exist. The company explained this because that management unit was not part of GAR because it had not been acquired. The company showed evidence that has been reporting to the RSPO on 7 December 2020 the entire management unit that is under GAR as many as 47 mills and 166 estate (own and smallholders) and there is no Bukit Lestari Estate (PT Bumi Bangka Lestari) and Bukit Permai Estate (PT Bumi Permai Surya Lestari). There is also information that there has been a merger of estates such as Balasang Estate which have merged into Jalemo Estate at PT Agro Lestari Sentosa and Sungai Sambon Estate has merged into Tajur Beras Estate at PT Agrokarya Prima Lestari. Therefore, in this revised timebound plan there is no longer Balasang Estate and Sungai Sambon Estate.

There are some companies that are not fully certified, due to some area still on process to get land title (HGU) and RaCP process, consist of:

1. PT Ivomas Tunggal (Samsam Estate, Kandista Estate, Nenggala Estate, Sei Rokan Estate, Ujung Tanjung Estate);
2. PT Rama Jaya Pramukti (Ramarama Estate);

	<ol style="list-style-type: none"> 3. PT Buana Wira Lestari (Nagasakti Estate; Nagamas Estate and Kijang Estate); 4. PT Forestalestari Dwikarya (Tanjung Rusa Estate); 5. PT Djuanda Sawit Lestari (Muara Kandis Estate & Muara Tawas Estate). 6. PT Sumber Indah Perkasa (Sungai Merah Estate and Sungai Buaya Estate). 7. PT Sawit Mas Sejahtera (Sawit Mas Estate) 8. PT Bumi Sawit Permai (Bumi Sawit Estate) 9. PT SMART Tbk (Kinta Pura Estate) 10. PT Tapian Nadenggan (Log Buluh Estate and Bukit Subur Estate) 11. PT Satya Kisma Usaha (Sungai Bengkal Estate, Kilis Estate and Sungai Bengkal KKPA) 12. PT Bumipalma Lestari Persada (Bumi Palma Estate)
1.10.2	Progress of Associated Smallholders and Outgrowers for Certifiable Standard
	The company has no scheme smallholder.

2.0	ASSESSMENT PROCESS
2.1	Assessment Team
Remote ASA 1.2	<ol style="list-style-type: none"> Arif Faisal Simatupang (Lead Auditor) Bachelor of Agriculture, from Department of Agriculture Agronomy, Faculty of Agriculture, University of Gadjah Mada. He has successfully completed an RSPO endorsed P&C Lead Auditor Training, RSPO SCCS endorsed Lead Auditor Training, Indonesian Sustainable Palm Oil (ISPO) Lead Auditor Training, Management System Certification ISO 9001-2008 Lead Auditor Training, Environmental Management System ISO 14001 Lead Auditor Training, ISO 17021 and ISO 17065 Awareness Training, Management of High Conservation Value (HCV) Training, Social Accountability SA 8000 Training. He has four years of working experience as a Field Assistant on oil palm plantation Company in Indonesia. Since 2014, he works as an auditor of RSPO and ISPO in the aspects of legal, social, best management practices of mill and estate, OHS, employment, and environmental. In this audit, he was assessing the aspects of best management practices of agronomy and processing. During this assessment he Plantation Legality, Supply Chain, TBP, and Partial Certification. Satria Adi Putra (Auditor). Indonesian citizen, Diploma III majoring in Palm Oil Plantation. Have experience of work more than six years since 2009 as the operational staff of private oil palm plantations in Indonesia. Training have been followed including Occupational Health and Safety Expert, Orang Utan and Wildlife Management, ISPO Auditor Training, ISCC Auditor, IHT Potential Mapping and Conflict Resolution in Production Forests, OHSAS 18001, SA 8000, RSPO Lead Training, Lead Auditor Training for ISO 9001, ISO 14001, ISO 17021, ISO 17065, ISO 19011, ISO 22000. During this assessment he was verified OHS, worker welfare, GHG and Transparency. 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 audit as auditor base on Best Management Practice and Environment. In this audit he is responsible for assessing the aspects of BMP of Agronomy/Processing and Transparency, Environment and HCV. Nurdin Chaeriana (Observer). Associate Expert in Forest Management, Faculty of Forestry, has 5 years working experience in Industrial Plantation Forest Companies as Environment, Health and Safety Staff and worked for 5 years in plantations as Assistant Manager of Sustainability. Training attended was ISPO Lead Auditor, General OHS Expert, Hazardous and Toxic Waste Material Management Technical Guidance, Fundamentals of Forest and Land Fire Control, Training of Trainer Fire Fighting Course, Basic Fire Fighting Course, Fire Management, Fire Fighting Technique Prevention & Control, ISO 14001:2004 Internal Auditor. During this audit, he conducted as Observer.
Onsite ASA 1.2 + ASA 1.3	<ol style="list-style-type: none"> Arif Faisal Simatupang (Lead Auditor). Bachelor of Agriculture, from Department of Agriculture Agronomy, Faculty of Agriculture, University of Gadjah Mada. He has successfully completed an RSPO endorsed P&C Lead Auditor Training, RSPO SCCS endorsed Lead Auditor Training, Indonesian Sustainable Palm Oil (ISPO) Lead Auditor Training, Management System Certification ISO 9001-2008 Lead Auditor Training, Environmental Management System ISO 14001 Lead Auditor Training, ISO 17021 and ISO 17065 Awareness Training, Management of High Conservation Value (HCV) Training, Social Accountability SA 8000 Training. He has four years of working experience as a Field Assistant on oil palm plantation company in Indonesia. Since 2014, he works as an auditor of RSPO and ISPO in the aspects of legal, social, best management practices of mill and estate, OHS, employment, and environmental. In this audit, he was assessing the aspects of best management practices of agronomy and processing. During this assessment, he verified the aspects of plantation legality and supply chain. Afiffuddin (Auditor). Indonesian citizen, Diploma III majoring Palm Oil Plantation, Bogor Agricultural University. Five years working experience since 2010 at Oil Palm Plantation Company in Indonesia as agronomy operational staff and followed several trainings namely: Basic Plantation Management Program, Auditor Training Indonesian Sustainable Palm Oil (ISPO), Training of RSPO lead auditor, RSPO SCCS, OHS General Expert, OHS System Management based on PP 50 2012 and Management System Certification (ISO 9001-2015/SNI 19011-9001:2015) ISO 17021, ISO 17065, SA 8000 training. He has been involved in several audit activities related to sustainable palm oil certification since 2016 covering Best Management Practices aspect, health and safety aspect and worker

- welfare aspect. During this audit, He conducted an assessment on BMP Agronomy and long-term budget.
3. **Dwi Haryati (Auditor)**, Bachelor of Agriculture Department of Agriculture – Program study : Agronomy. She has experienced on Palm Oil Plantation as Sustainability staff. Training have been followed include: Training Auditor ISPO, Quality Management ISO 9001-2008, ISO 14001 Environmental Management, ISO 17021 & 17065, HCV, General Health Safety Expert, Health Safety Management System, GHG Workshop by the ISPO Commission, IHT Palm Oil Mill Processing, Awareness RSPO, IHT Best Practice in Peat Management, Mapping Potential and Conflict Resolution in Production Forest, and Social Accountability SA 8000 Training. RSPO audit experience since March 2015 and ISPO since May 2014. During this assessment, she verified the aspects of Occupational Health and worker welfare.
 4. **Asystasya Aishah Silalahi (Auditor)**. Indonesia Citizen, Bachelor of Economy, Major of Agribusiness, Faculty of Economic and Management. She has one-year experience in consultancy. She has followed training such as ISPO Auditor Training, Lead Auditor ISO 9001:2015, OHS General Expert, RSPO lead auditor training course, SCCS, and several in house training related to environmental, BMP, SA 8000, etc. Has been involved in several audit activities since 2016 related to sustainable palm oil certification covering waste management aspect, Social Aspect, Health and Safety Aspect, and Worker Welfare. During this audit, she environment, conservation, and GHG aspect.

Curriculum vitae (CV) of the members and the assessment team is available at the PT Mutuagung Lestari office.

2.2	Assessment Methodology, Assessment Process and Locations of Assessment
2.2.1	Figure of person days to implement assessment
ASA 1.2 Remote	Number of auditors: 3 auditors and 1 observer Number of days for ASA-1.2 at Remote Audit: 3 days Number of working days for ASA-1.2 at Remote Audit: 9 Working days.
Onsite ASA 1.2 + ASA 1.3	Number of auditors: 4 auditors Number of days for onsite audit ASA 1.2 + ASA 1.3: 5 days Number of working days for onsite audit ASA 1.2 + ASA 1.3: 20 Working days
2.2.2	Assessment Process
Remote ASA 1.2	The assessment was conducted by measuring the sufficiency of implementation with the consistency done by the PT Tapian Nadenggan 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. The assessment was conducted in three methods: (1) document review, aiming to observe the sufficiency of types or substances from required documents; (2) <i>interview</i> , aiming to obtain more detailed information and cross check the information; and (3) field observation, aiming to observe directly the sufficiency of implementation on site. Some opportunities for improvement of the results ASA-1.2 delivered by the MUTU auditor to the management unit and the results are the subject will be verified at the next assessment phase (ASA-1.3). Improvement of findings from ASA-1.2 findings were observed by auditors at this ASA-1.2 assessment. All information obtained was recorded in Check List of PT Mutuagung Lestari (MUTU) and part of ASA-1.2 . The assessment program please find Appendix 2
Onsite ASA 1.2 + ASA 1.3	The assessment was conducted to measure the implementation of PT Tapian Nadenggan 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. This assessment conducted concurrently between onsite audit ASA-1.2 and ASA-1.3, it due to during pandemic covid -19 situation PT Tapian Nadenggan applying Scenario No. 4 in accordance with Contingency RSPO Audit Procedure 25 August 2020. Remote audit ASA-1.2 has been carried out on 14 to 16 September 2020 and until ASA 1.2 audit schedule, there is no field visit due to group safety policy, travel restriction, extended lockdown, restrictive quarantine procedures. Because PT Tapian Nadenggan implemented scenario 4, the process of certification on this audit held in accordance with Contingency RSPO Audit Procedure 25 August 2020 with covers two (2) period of audit (ASA 1.2 and

ASA-1.3) with a sample audit increase of 50%, (site, record and interviews).

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.

Some opportunities for improvement of the results **Onsite ASA 1.2 + ASA 1.3** delivered by the MUTU auditor to the management unit and the results are the subject will be verified at the next assessment phase (**ASA 1.4**).

Improvement of findings from **Onsite ASA 1.2 + ASA 1.3** findings were observed by auditors at this **Onsite ASA 1.2 + ASA 1.3** assessment. All information obtained was recorded in Check List of PT Mutuagung Lestari (MUTU) and part of **Onsite ASA 1.2 + ASA 1.3**

Because of the Covid-19 Pandemic and the policy of PT Tapan Nadenggan, the opening and closing meeting was conducted via online by Microsoft Teams Application. The meetings is attended by auditor team, auditee from unit certification, and supporting team from Head Office Jakarta. The document verification was also conducted via online through Smartdrive at auditor's accommodation.

The assessment program please find Appendix 2

<p>2.2.3</p>	<p>Locations of Assessment</p>
<p>Onsite ASA 1.2 + ASA 1.3</p>	<p>Semilar Mill</p> <ul style="list-style-type: none"> - Chemical warehouse. Field observations and interview related chemical management, OHS, and environmental aspect. - Sparepart Warehouse. Field observations and interview related sparepart management, OHS, and environmental aspect. - Hazardous Waste Temporary Warehouse. Field observations and interview related hazardous waste management, OHS and environmental aspect. - Workshop. Field observations and interview related workshop activity, OHS, environmental and worker welfare aspect. - Waste Water Treatment Plant. Field observations and interviews with WWTP operators regarding waste water management. - Water intake. Observation for POM water intake condition - Solid waste area. Observation related to waste management and observation of leachate drainage. - Water treatment plant. Observation for water usage monitoring and interview with operator related workers welfare and OHS. - Post Security. Observation of FFB reception and recording activities. - FFB weighing. Observation of FFB reception and weighing administration. - Grading station. Observations regarding SOP criteria for FFB suitable for processing, FFB sorting methods and established work procedures. - Sterilizer Station. Observations related to occupational safety and health as well as established work procedures - Tippler Station. Observations related to occupational safety and health as well as established work procedures - Clarification Station. Observations related to occupational safety and health as well as established work procedures - Press Station. Observations and interviews with boiler operators regarding employment, occupational safety and health and established work procedures prosedur - Boiler Station. Observations and interviews with Boiler operators regarding employment, occupational safety and health and established work procedures - Engine Room Station. Observations and interviews with machine house operators regarding employment, occupational safety and health and established work procedures. - Hydrant number 7 Boiler area. Observation of emergency response mechanisms and responses. <p>Semilar Estate</p> <ul style="list-style-type: none"> - HGU Pole No. MAM 83 (Block H72), MAM 5 (Block H72), MAM 6 (Block G71). Observations related to monitoring of HGU stakes, land boundaries and potential land disputes/conflicts with community/external parties.

- **Ruko River HCV Area in Block G53-54.** Observations related to the management of conservation areas in the form of river boundaries, border boundaries, prohibition of chemical application at the border.
- **Harvest, Block H50.** Observation of activities related to technical aspects of harvesting, fruit quality, OHS aspects and employment (child labour).
- **Owl cage, Block I47.** Observation of activities related to biological aspects of rat pest control.
- **Spraying with Controlled Dropped Application, Block I47.** Observation of activities related to technical aspects of spraying, K3 aspects, waste management and employment.
- **Child care center for Pondok 3 Division 6.** Observation of activities related to TPA caregivers related to working hours and child care center facilities.
- **Housing Pondok 3 (Division 6).** Observations related to facilities, domestic waste management, facilities to meet the daily needs of employees in the form of shops / stalls and places to buy and sell fuel as well as worker welfare.
- **Fertilizer warehouse.** Observations related to safe work and environmental aspects.
- **Chemical warehouse.** Observations related to safe work and environmental aspects.
- **Material warehouse.** Observations related to safe work and environmental aspects.
- **Fuel warehouse.** Observations related to safe work and environmental aspects.
- **Hazardous waste storage.** Observations related to safe work and environmental aspects.
- **Workshops.** Observations related to safe work and environmental aspects.

Sei Rindu Estate

- **Land demarcation aspect and HGU poles No. MAM 36 (Blok A51), MAM 37 (Blok A50).** Observation of land demarcation aspect and maintenance of HGU pole, as well as land dispute potency.
- **HCV of Riparian of Tajahan River. Blok E63.** Observation the implementation of HCV management and monitoring of HCV area, and boundary marking.
- **FFB Harvesting, Block C53.** Observation and interview with foreman and harvester related FFB quality, harvesting round, OHS, and employment.
- **Barn Owl Box, Block C53.** Observation of IPM, related to suppress rat infestation by installing and monitoring barn owl boxes.
- **Spraying Circle & Path, Block B53.** Interviews of working procedure, OHS, employment, and environmental.
- **Landfill, Division V.** Observation about domestic waste management.
- **Central storage.** Observation about PPE stock and OHS aspect in storage.
- **Agrochemical storage.** Observation about agrochemical stock and OHS aspect in storage.
- **Chemical Mixing area.** Observation about environment management and OHS aspect in mixing area.
- **Fertilizer storage.** Observation about fertilizer stock and OHS aspect in storage.
- **Workshop.** Observation about workshop condition and hazardous waste management.
- **Hazardous waste temporary storage.** Observation about hazardous waste stock, OHS aspect and hazardous waste management.
- **Bathroom for spraying workers and PPE storage.** Observation about condition of the bathroom, environment management, and condition of PPE and spraying tool storage.
- **Division V Housing complex.** Observation about housing condition, domestic waste management and hazardous waste management.

Mandang Estate

- **HCV Area (Forest and Riparian of Sungai Rungau), Block M46 Division VI.** Observation about condition and monitoring of HCV area.
- **Land application, Block L36, Division V.** Observation about worker's PPE, flat bed condition, and environment aspect.
- **Harvesting activity, Block K39 Division V and Block G42 Division III (2 harvesters, 2 loose fruit pickers).** Observation about worker's PPE and work tools.
- **Spraying activity, Block K43 Division V.** Observation about worker's PPE.
- **Barn owl box, Block G43 Division III.** Observation about barn condition and surrounding area of barn.
- **Landfill, Block G43 Division III.** Observation about domestic waste management.

- **Central storage.** Observation about PPE stock and OHS aspect in storage.
- **Agrochemical storage.** Observation about agrochemical stock and OHS aspect in storage.
- **Chemical Mixing area.** Observation about environment management and OHS aspect in mixing area.
- **Fertilizer storage.** Observation about fertilizer stock and OHS aspect in storage.
- **Firefighting simulation.** Observation about emergency respond.
- **Workshop.** Observation about workshop condition and hazardous waste management.
- **Hazardous waste temporary storage.** Observation about hazardous waste stock, OHS aspect and hazardous waste management.
- **Bathroom for spraying workers and PPE storage.** Observation about condition of the bathroom, environment management, and condition of PPE and spraying tool storage.
- **Housing worker complex.** Observation about housing condition, domestic waste management and hazardous waste management.

Puri Estate

- **HCV Biru River Riparian Area.** Observation the implementation of management in HCV of riparian area, and boundary marking.
- **Barn Owl Box, Block C37.** Observation of IPM, related to suppress rat infestation by installing and monitoring barn owl boxes.
- **Harvesting. Block C31.** Observation related OHS and workers welfare
- **Spraying. Block C31.** Observation related OHS, and workers welfare
- **Landfill block B31.** Observation related OHS and waste management
- **HGU pole and land demarcation No. 121,122, and 123.** Observation of aspect of land demarcation and maintenance of HGU pole, and land dispute potency.
- **FFB Transport. Block Z29/30.** Observation related to FFB transportation using the TGT (Tractor Grabber Truck).
- **Mixing and agrochemical / fertilizer container washing store.** Observation related OHS, and agrochemical waste management.
- **Rinse house for spraying team.** Observation for OHS and spraying team facilities
- **Daycare.** Observation for OHS and worker facilities
- **Housing (Pondok 1).** Observation related OHS, workers facilities, and domestic waste management
- **Clinic.** Observation for medical waste management, OHS, and worker facilities
- **Sparepart and PPE warehouse.** Observation minimum stock of PPE's.
- **Diesel fuel tank.** Observation related of OHS, material handling, environment aspect, emergency response and fire facilities.
- **Oil and Agrochemicals Warehouse.** Observation related to management of oil and agrochemical material and waste, MSDS, emergency response facilities and the types of pesticides used.
- **Chemical store.** Observation related OHS and material handling
- **Fire Fighting Facilities.** Observation and simulation the emergencies response facilities.
- **Hazardous Waste Warehouse (Temporary).** Field observations related to the fulfillment of the attributes health and safety, recording, and the implementation of compliance requirements hazardous waste temporary warehouse, wages and complaint mechanism.
- **Workshop.** Observations and interviews related to wages and overtime, waste management activities, OHS implementations and health inspections.
- **Fertilizer warehouse.** Observation related to management of agrochemical material and waste, MSDS, emergency response facilities and the types of fertilizer used.
- **Genset room.** Observations related PPE and OSH.
- **Harvesting activity Block H14.** Observation and interview related harvesting activity, Procedures, safe working practices and worker welfare.

2.3	Stakeholder Consultation and Stakeholders Contacted
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2.3.1	Summary of stakeholder consultation process.
Onsite ASA 1.2 + ASA 1.3	<p>Summary of stakeholder consultation process</p> <p>Consultation of stakeholders for PT Tapan Nadenggan was held by:</p> <ul style="list-style-type: none"> • Public Notification on PT Mutuagung Lestari Website on 10 May 2021 • Public consultation meeting with government institution (Environment Agency, Plantation Agency, Manpower Agency, and Land National Agency of Seruyan Regency) on 8 June 2021 and 10 June 2021 • Public consultation meeting with community(s) including previous land owner (Pantap Village, Sebabi Village, and Sumber Makmur Village) on 8 June 2021 • Public consultation meeting with internal stakeholders and contractor (Worker Union, gender committee, FFB transporter) on 8 June 2021 • Public consultation meeting with NGO via email (World Wide Fund Indonesia, Aliansi Masyarakat Adat Nusantara, Sawit Watch, Save Our Borneo, dan Walhi) on 31 May 2021 <p>Numbers of input from stakeholders were clarified by PT Tapan Nadenggan.</p>
2.3.2	Stakeholder contacted
	Please find appendix 1
2.4	Determining Next Assessment
	The next visit (ASA 1.4) will be conducted eight (8) months to twelve (12) month this assessment.

3.0 ASSESSMENT FINDINGS

3.1 Summary of Assessment Report of the RSPO Certification

MUTUAGUNG LESTARI has conducted an assessment of Semilar Mill – PT Tapian Nadenggan subsidiary of Golden Agri Resources operation consisting of one (1) mill and four (4) oil palm estates.

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

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

MUTUAGUNG LESTARI found that Semilar Mill – PT Tapian Nadenggan subsidiary of Golden Agri Resources 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.**

Therefore MUTUAGUNG LESTARI Recommends RSPO Certification of compliance is continued.

Ref Std.	VERIFICATION RESULT of MUTU-Certification	
PRINCIPLE #1 BEHAVE ETHICALLY AND TRANSPARENTLY		
<p>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.</p>		
<p>1.1.1 <u>Mandatory report for OHS and Worker Welfare Aspect.</u></p> <ul style="list-style-type: none"> • Reporting of Employment Report for PT Tapian Nadenggan (SRDE) in 2020 via online on July 14, 2020 and must be reporting back on July 14, 2021. • Reporting of Employment Report for PT Tapian Nadenggan (SMLE) in 2020 via online on June 9, 2020 and must be reporting back on June 9, 2021. • Reporting of Employment Report for PT Tapian Nadenggan (SMLM) in 2021 via online on February 17, 2021 and must be reporting back on February 17, 2022. • Reporting of Employment Report for PT Buana Artha Sejahtera (MNDE) in 2020 via online on July 14, 2020 and must be reporting back on July 14, 2021. • Reporting of Employment Report for PT Buana Artha Sejahtera (PURE) in 2021 via online on February 17, 2021 and must be reporting back on February 17, 2022. • P2K3 SRDE unit reports for the 1st Quarter of 2021 which have been reported to the Manpower and Transmigration Agency of Kalimantan Tengah Province on April 9, 2021. • P2K3 SMLE unit reports for the 1st Quarter of 2021 which have been reported to the Manpower and Transmigration Agency of Kalimantan Tengah Province on April 3, 2021. • P2K3 SMLM unit reports for the 1st Quarter of 2021 which have been reported to the Manpower and Transmigration Agency of Kalimantan Tengah Province on April 5, 2021. • P2K3 MNDE unit reports for the 1st Quarter of 2021 which have been reported to the Manpower and Transmigration Agency of Kalimantan Tengah Province on April 5, 2021. • P2K3 PURE unit reports for the 1st Quarter of 2021 which have been reported to the Manpower and Transmigration Agency of Kalimantan Tengah Province on April 9, 2021. 		

Legality Aspect

- The latest plantation progress report (LPUP) period of Trimester I 2021 has been sent to Plantation Agency on 1 June 2021.
- The latest HGU usage annual report of 2020 has been sent to Land Agency on 3 June 2021.

Environment Aspect

- Hazardous waste management report of PT Tapian Nadenggan and PT Buana Artha Sejahtera for 1st Quarter of 2021 submitted to Environment Agency of Seruyan Regency on 3 May 2021
- Land Application Management Report of PT Tapiang Nadenggan for 1st Quarter of 2021 submitted to Environment Agency of Seruyan Regency on 3 May 2021.
- Environment Management and Monitoring Report of PT Tapian Nadenggan and PT Buana Artha Sejahtera for 2nd Semester of 2020 submitted to Environment Agency of Seruyan Regency on 25 February 2020.

1.1.2

Based on the results of document studies and interviews with agencies, such as the *Dinas Ketahanan Pangan dan Pertanian Kabupaten Seruyan* of Seruyan Regency, it is known that the information presented by the Company has been presented in an appropriate language and can be accessed by the agency.

The unit of certification has provided evidence that information has been received in an appropriate form and language for relevant stakeholders, such as proof of handover of plantation business progress reports.

1.1.3

There is a response document for information services to requests for information, some of which are listed in the Information Response Book document, which explains the letter number, date of issuance of the letter, addressed (address), regarding the content of the letter and status. For example, for the SMLM unit, it is known that the outgoing/response letters during the period November 2020 – April 2021, which include a letter for payment of BPJS Health and Employment contributions, P2K3 Report, Surface Water Utilization Report, Bipartite LKS Recapitulation Report and Bipartite Management Change Report.

It is also available at Sei Rindu Estate in the form of an Information Book for Stakeholders that explains incoming mail information (letter number, date of entry, sender/agency, subject) and response information (letter number, date of outgoing letter, addressed, regarding the contents of the letter and status). Based on this document, it is known that during the period December 2020 – March 2021, there were 7 incoming letters from stakeholders, including:

- Incoming letter from the Pantap Village Head letter number 145/08/PEMDES-PTP/XII/2020, dated December 16, 2020, regarding heavy equipment borrowing. Responses have been given via outgoing letter number 212/EXT/SRDE/XII/2020, dated December 16, 2020.
- Incoming letter from the Principal of SMP Eka Tjipta Semilar letter number 421.3/TU/0531/II/2021, dated January 21, 2021, regarding transportation requests. The response has been given via outgoing letter number 021/SRDE-EXT/II/2021, dated January 21, 2021.

1.1.4

The mechanism of communication and consultation to stakeholders has been set in the SOP of Communication and Consultation to the Community (SOP/SMART/UMUM/SADV/II/004, dated July 1 2014). The SOP set the certain PIC in communication that is respective Unit Manager with a maximum response limit of ten days.

1.1.5

The company has had a list of stakeholders of 2020 which covering the information of name and address, contact, telephone, email consist of government bodies in Jakarta, Province, Regency, and Sub-District, Village Officials, community group and leaders, NGOs, suppliers and other contractors.

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 had a Social and Environmental Policy dated 1 November 2015. The policy describes the code of

integrity and ethical behavior of employees. The policy is written in bahasa and has been socialized to the workers. The company shown this annual dissemination of this policy.

Besides that socialization is also done through posters, signboards and banners in strategic locations, for example in the office or emplacement.

Interview with local contractor of it is known that company has been disseminated the policy of standard business of conduct.

The company has also shown evidence related to the socialization of the "Code of Integrity and Ethical Conduct Policy" which was carried out on May 24-26, 2021 implemented at PURE.

Based on interview with workers, it was known if the workers who are found to commit corrupt practices will be given strict punishment by the company and punished according to the applicable regulations.

1.2.2

The mechanism in implementation of code of conduct policy such as by due diligence in selection of third party contractor/supplier, stating at the agreement that the parties have to be meet the applied regulation such as no force and child labor. Also, the involvement of the stakeholders monitoring in this implementation, SOP for Handling Complaints and Dissatisfaction (SOP/SMART/GIMS-SCMD/USDV/I/001 dated 1 August 2017).

Representatives of the unit of certification show the contractor's performance evaluation document as a system to monitor compliance and the implementation of policies and ethical business practices as a whole. The evaluation of the contractor's performance includes disciplined use of PPE, environmental awareness, and compliance with laws and regulations.

Every local contractor has received a socialization regarding the policy of the code of ethics given at the time of signing the workers agreement stated which states that the unit management provider will carry out the work in accordance with the procedure and comply with all applicable codes of ethics in the company. The system for monitoring compliance and implementation of the policy already listed in the procedure.

Based on interview with contractors, it was explained that the company routinely conducts monitoring in the form of inspection of compliance with regulations such as PPE, accident insurance, wages, safe work practice and others.

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 unit of certification can demonstrate compliance with these laws and regulations, for example: have land title (HGU), have environmental documents, conduct factory wastewater testing, conduct river water quality testing, conduct groundwater quality testing, conduct air quality testing, perform noise and noise testing, pay employee wages, pay employee overtime, etc.

Compliance with Manpower Regulation

Company in general has complied with manpower regulation, including:

- Reporting of Labor Report for PT Tapan Nadenggan and PT Buana Artha Sejahtera in 2020- 2021 (online report).
- The implementation of the minimum wage in 2021 is in accordance with the Minimum Wage Decree of Seruyan and Kotim Regency established by the Governor of Kalimantan Tengah.
- Payment of overtime wages to workers in accordance with Decree of the Minister of Manpower No. 102 of 2004.
- Implementation of the structure and scale of wages for all levels of workers in accordance with Minister of Manpower Regulation No. 01 of 2017.

Compliance with OHS Regulation

Company in general has complied with OHS regulation, including:

- The establishment of the P2K3 (OHS Committee) for PT TN-SMLM (Decree No. 04/DISNAKERTRANS/I/2021) and

- PT BAS-MNDE (Decree No. 1/DISNAKERTRANS/II/2020) which were endorsed by Governor of Kalimantan Tengah.
- Provision of PPE for free to all workers and arrange the use of PPE according to the type of work based on the free predetermined HIRAC.
 - Have permits for all factory operating machines such as boiler machines that have been tested for eligibility according to applicable regulations (the last feasibility test was in September 2020).
 - Has a license / competency for some special jobs that require more expertise such as OHS experts, hiperkes, boiler operators, diesel engine operators, welder, wheel loader operators and others in accordance with the requirements contained in the legislation.
 - Has carried out a general health check (Medical Check Up) every year for all workers and special checks (cholinesterase, spirometry and audiometry) according to the level of risk / danger for certain jobs.

Legality Compliance

Regarding the legality compliance, the company has shown the legal compliance toward Indonesia law such as land title (HGU) and plantation business permit (IUP) that described in more detail in indicator 4.4.1.

BMP

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

2.1.2

The company has SOP Compliance with regulations & other requirements (SOP/SMART/GENERAL/SADV/II/002, dated July 1, 2014) which discusses: procedures for fulfilling requirements, completeness and flowchart which explain in detail in evaluating compliance with laws and regulations invitation, SPO requirements and others). The officers responsible for updating the list of regulations according to the SOP are: Identification of regulations at the national level by PCDV and at the regional level by regional SPO Officers and SPO Officer units.

The implementation of this procedure is the issuance of a law register document containing regulations that must be fulfilled and relevant to the company's operational activities, including for third parties working with the company (contractors). The law register is divided into several aspects, namely: Occupational safety and health, the environment, employment and plantations. To ensure whether or not there are additions and subtractions to relevant regulations, a review is conducted every once a year

To ensure compliance with the Company and third-party laws in the Company, routine monitoring is carried out once a year by means of compliance audit / internal audit.

The last internal audit for RSPO and SCCS was conducted on February 8-17, 2021. In addition to going through a compliance audit / internal audit, the company conducts monitoring and evaluation of third parties (contractors) through contractor evaluation activities which are conducted at least once a year. The types of evaluations carried out include contract compliance, contractor quality and performance, accuracy of work completion, compliance with labor regulations, OHS, housekeeping and the environment.

In addition, the Company has carried out an evaluation of each contractor and routine inspections every year to see the performance of the contractor. There are several important indicators in the annual evaluation including work quality, stipulated completion time, compliance with laws, implementation of OHS and housekeeping. Meanwhile, for annual inspections, there are seven main criteria, namely work environment, PPE, emergency response, work equipment, safety signs, contractor competence, and work in hazardous areas. For example is the contractor evaluation and inspection conducted on May 19, 2021 for Boiler station at SMLM.

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

2.1.3

Legal (HGU) boundaries are clearly demarcated and maintained based HGU Map issued by National Land Agency. Based on field observation on HGU poles (Semilar Estate No. MAM 83 (Blok H72), MAM 5 (Blok H72), MAM 6(Blok G71) and Sei Rindu Estate No. MAM 36 (Blok A51), MAM 37 (Blok A50)) and land demarcation in all Estates, was known that HGU poles has observed were available in the coordinates, and other boundaries such as boundary drain and road were maintained. There is no planting exceed the HGU boundary.

Moreover, the company has had SOP of HGU Poles Installation and Maintenance (No. SOP/SMART/CERS-EHSD/SADV/II/004), set that the poles maintenance will be conducted twice a year. The company has shown the latest documentation of semesterly HGU monitoring, described that all HGU are well maintained.

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

Unit management shows contractor data for 2020-2021 which informs Work agreement, about number of contract, contractor name, person in charge, address, type of work and period of contract.

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

Semilar Estate

Contract Number	Contractor name	Address	Work Type	Contract period
005/SMLE/LKL/03/21-ATBS	PT Satrindo Jaya Agropalma	Rungau Raya Village, Danau Seluluk Sub-District, Seruyan Regency	FFB transporter	March 21, 2021 to June 20, 2021

Sei Rindu Estate

Contract Number	Contractor name	Address	Work Type	Contract period
013/SRDE/SPK-LKL/IV/2021-ATBS	Juanda	Pantap Village, Mentaya Hulu Sub-District, Kotawaringin Timur Regency	FFB transporter	April 26, 2021 –July 25, 2021.

Mandang Estate

Contract Number	Contractor name	Address	Work Type	Contract period
007/MNAE/LKL/III/2021-ATBS	Satrindo Jaya Agropalma	Rungau Raya Village, Danau Selunuk Sub-District, Seruyan Regency	FFB transporter	April 1, 2021 – June 20, 2021.

Puri Estate

Contract Number	Contractor name	Address	Work Type	Contract period
15/PURE/LKL/03/21-ATBS	Banjir	Biru Maju Village, Telawang Sub-District, Kotawaringin Timur Regency	FFB transporter	March 26, 2021 - June 25, 2021
13/PURE/LKL/03/21-	Winarno	Biru Maju Village,	FFB transporter	March 26, 2021 -

ATBS		Telawang Sub-District, Kotawaringin Timur Regency	June 25, 2021
14/PURE/LKL/03/21- ATBS	Banjir	Biru Maju Village, Telawang Sub-District, Kotawaringin Timur Regency	FFB transporter March 26, 2021 - June 25, 2021

Semilar Mill.

Contract Number	Contractor name	Address	Work Type	Contract period
001/BAP/SMLM/10/2020- PK	PT Satrindo Jaya Agropalma	Sub-district Seluluk	Danau PK Transporter	01 October 2020 – 30 September 2024.
002/TN/SMLM/01/2019- CPO	PT Satrindo Jaya Agropalma	Sub-district Seluluk	Danau CPO transporter	02 January 2019 – 31 December 2021

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

2.2.2

In each work agreement between the Company and the contractor, there are several separate clauses related to fulfilling legal obligations in force in Indonesia as one of the obligations that must be fulfilled by the contractor.

Some of these obligations are related to the registration of workers' BPJS (Government Insurance Scheme), the provision of minimum wages, the obligation to use PPE, other permits such as tax payment (NPWP), vehicle licenses (STNK), driver license (SIM) and others. To ensure compliance with these clauses, the Company always requests the requirements for the completeness before the contractor does / starts work.

The results interviews with contractor workers (FFB & CPO transport) revealed that workers had received wages above the minimum wage, were registered in the BPJS program, have a vehicle license (STNK), driving license (SIM) and the worker understood about his status as a permanent worker.

This result is in line with the results of the document review which proves that the wages of contractor workers are above the minimum wage, have vehicle / driver license, fulfilling tax payments, BPJS payments and other requirements. For example, fulfillment includes:

- Proof of payment of wages for workers with employee numbers 10001 (truck driver) who received wages from 2020-2021 above the minimum wage (PT TN).
- BPJS payments for the 2021 period have been completely fulfilled and the last proof of payment is on May 7, 2021 for period of April 2021 (PT BAS).

In addition, the Company has carried out an evaluation of each contractor and routine inspections every year to see the performance of the contractor.

There are several important indicators in the annual evaluation including work quality, stipulated completion time, compliance with laws, implementation of OHS and housekeeping.

Meanwhile, for annual inspections, there are seven main criteria, namely work environment, PPE, emergency response, work equipment, safety signs, contractor competence, and work in hazardous areas. For example is the contractor evaluation and inspection conducted on May 19, 2021 for Boiler station at SMLM.

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

2.2.3

In each work agreement between the Company and the contractor/supplier, there are clauses related to fulfilling legal

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

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

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

Status: Comply

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

2.3.1, 2.3.2
Based on document verification and stakeholder consultation, since the Remote Audit (12 month data previous the audit) until On-site Audit, the Mill did not received FFB that was supplied from directly or indirectly FFB supplier.

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
There is a long-term plan that is described in a 5 (five) year plan, some of which are listed in the Profitability document which shows the annual long-term planning document for the 2020-2025 period. The plan includes FFB Production per year per estate, Production CPO and PK (tonnes), estate cost (upkeep, manuring, harvesting, transport, overhead, depreciation), mill cost (processing, repair & maintenance, overhead, depreciation), gross profit (IDR), gross profit margin (%), selling cost (transportation cost) CPO & PK, total selling cost, CPO pump cost, profit/loss and net profit/loss, FFB processed and Mill production. Regarding replanting, there is no replanting plan for the next 5 years.

3.1.2
Regarding replanting, in the Profitability document which shows the annual long-term planning document for the 2020-2025 period, there is no replanting plan for the next 5 years.

3.1.3
The unit of certification conducts a management review in a planned time according to the scale and nature of the activities carried out, ch are shown in the following:

- Semilar Mill
- Attendance list Thursday, April 29, 2021, which was attended by 9 participants.
 - Minutes of Management Review Meeting with Management Review Meeting Agenda for RSPO, ISPO, ISCC, SMK3, IOA Audit semester II 2020, as follows:
 - Action Plant OIA Audit Findings semester 2 2020 tahun
 - Results of GAP analysis of RSPO, ISPO, ISCC and SMK3 documents
 - SMK3 Performance
 - Consumer Feedback
 - Action Plant PC / VPM Finding

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

There is evidence of the implementation of the action plan for continuous improvement, taking into account the main social and environmental impacts and opportunities faced by the Company, which are shown in the SMLM Monitoring Implementation of Completed Innovations, such as

- Utilization of Wheels ex Transfer Carriage
- Kernel Silo Automation
- Etc.

3.2.2

The unit of certification has submitted an Annual Report using the RSPO metric template format. Based on the results of the study of the metric template for each unit, the following can be informed, including:

1. Estate(s) Name : Semilar
 Production Area (ha) : 4,004.87
 FFB Production (MT) Annual Data (Jan-Dec of Previous Calendar Year) Start Jan-20 , End Dec-20 : 113,738
 What is the total number of workers in the estate? 669
 What is the total number of workers in the following categories?
 - Local 669 (permanent 598, contract 71)
 - Permanent 598 (male 392, female 206)
 - Contract 71 (male 22, female 49)
 % of workers by demographics
 - Local 100 % (permanent 89.4 %, contract 10.6 %)
 - Permanent 89.4 % (male 58.6 %, female 30.8 %)
 - Contract 10.6 % (Male 3.3 %,female 7.3 %)
 Number of non-young workers in the estate : 669
 How many RSPO-related training have been organised in the last year? 50
 Number of lost time injuries : 375
 Total hours worked : 1,302,256
 Lost Time Injury Frequency Rate : 288

2. Estate(s) Name : Sei Rindu
 Production Area (ha) : 3,748,80
 FFB Production (MT) Annual Data (Jan-Dec of Previous Calendar Year) Start Jan-20 , End Dec-20 : 108,412
 What is the total number of workers in the estate? 572
 What is the total number of workers in the following categories?
 - Local 572 (permanent 414, contract 158)
 - Permanent 414 (male 284, female 130)
 - Contract 158 (male 80, female 78)
 % of workers by demographics
 - Local 100 % (permanent 72.4 %, contract 27.6 %)
 - Permanent 72.4 % (male 49.7 %, female 22.7 %)
 - Contract 27.6 % (Male 14.0 %,female 13.6 %)
 Number of non-young workers in the estate : 572
 How many RSPO-related training have been organised in the last year? 39
 Number of lost time injuries : 173
 Total hours worked : 1,188,398.5
 Lost Time Injury Frequency Rate : 146

Status: Comply

3.3

Operating procedures are appropriately documented, consistently implemented and monitored.

3.3.1

The Company has a documented procedure for the mill and estate. The estate procedure starts from the procedure of plant material, then the technique of nursery, fertilization, weed control, integrated pest management to harvesting and transporting compiled by the 2012 MCAR (Management Committee and Research) team. The Company also has a procedure for the process listed in SOP / SMART / MCMD / I / TM-PKS documents issued on December 6, 2013, were approved by the Chair of the MCMD and Head of Upstream. The SOP includes the Standard Operating Procedure in mill. Operational procedures in general have been socialized to all employees in accordance with their respective fields of work.

Based on field observations at Semilar Estate and Sei Rindu Estate on chemical weed control, and manual fertilization were found that employees can demonstrate how to work in accordance with existing procedures. Mill employees during field visits such as sterilizer operators and engine room operators can also explain tasks and responsibilities in accordance with existing work procedures.

3.3.2

Internal supervision has been carried out, for example, audits conducted by the OIA Department as well as field reviews and inspections carried out by internal controls starting from the foreman level to managers to monitor field implementation consistent with SOPs.

Audits are carried out on a regular basis including the implementation of all SOPs. Based on the results of interviews with management and review of the OIA Department's internal audit report documents, audit activities are carried out twice a year.

Internal Audit SOP (Document No. SOP/SMART/UMUM/SADV/009) which explains the work procedures that form the basis for plantation and mill operational activities that refer to SOP principles. The Repair and Prevention Plan is as follows:

- Unit Head determines and implements corrective and preventive actions and determines the timing of their implementation.
- Follow-up on non-conformance findings is detailed in the SOP for Actions and Prevention of Non-conformances.

3.3.3

The Internal supervision has been carried out, for example for audits conducted by OIA Department as well as field inspections and inspections carried out by internal supervision starting from the level of the foreman to managers to monitor field implementation consistent with the SOP.

The audit is carried out regularly including the implementation of all SOPs. Based on the results of interviews with management and review of OIA Department internal audit report documents, audit activities are conducted twice a year.

The company also has an Internal Audit SOP which includes explaining the steps for preparing an improvement and prevention plan. The company shows a recording of the results of measurements and monitoring carried out internally, including Mandang Estate showing the Operations Internal Audit Report document, the inspection date of 21 Februari – 3 March 2020 conducted by the OIA Department. Among the findings of the discrepancies are related harvesting inspection, FFB losses 0,11 %. The company has made improvements consist of maintaining the quality of the harvest and loose fruit picker on 10 March 2020.

Records of monitoring and follow-up carried out are maintained and available at the Company, which are shown Operations Internal Audit Report No. 32/Kaltengsel – SMLM/12/20 PT. Tapan Nadenggan / PKS Semilar, examination on 20 - 28 October 2020, with the scope of inspection namely Cash, Bank and Memorial Administration, Goods Inventory, Non-Plant Fixed Assets and Plant Product Processing.

Status: Comply

3.4

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

3.4.1, 3.4.2

Company has social dan environmental impact assessment in form of document:

- ANDAL PT Tapan Nadenggan covering area 9,300 Ha and mill capacity 90 tonnes FFB/hour which ratified by Environment Agency of Kalimantan Tengah Province through decree No. SK.660/014/KPA-DLH/III/2020 on 21 February 2021.
- Revision of RKL RPL of PT Tapan Nadenggan about additional activity of Methane Capture and waste transfer which ratified by Environment Agency of Kalimantan Tengah Province through decree No. SK.660/014/KPA-DLH/III/2020 on 21 February 2021.
- Environmental Permit issued by OSS for PT Tapan Nadenggan covering area 8,279.23 Ha.
- ANDAL of PT Buana Artha Sejahtera which ratified by Kalimantan Tengah Governor on 23 January 2006 with ratified number 06.a/2006.
- Environmental Feasibility of Palm Oil Plantation and Processing Mill Activities of PT Buana Artha Sejahtera based on Decree of Kalimantan Tengah Governor on 23 January 2006 No. 06.a/2006.
- Social impact assessment of PT Tapan Nadenggan and Buana Artha Sejahtera arranged in 2012.

Social impact assessment was made with participation from stakeholders and identified the impact raised from operational activity of PT TN and PT BAS. The report is accompanied by the following evidences:

- Attendance list for the implementation of the Social Impact Assessment, from 8 - 1- 2011 in Pantap Village
- Documentation in the form of photographs
- Attendance for Public Consultation, Social Impact Assessment, HCV, Environmental impact analysis of PT. Tapan Nadenggan & PT. Buana Artha Sejahtera, dated 19 October 2012
- Minutes of Public Consultation on Social Impact Assessment of PT Tapan Nadenggan & PT. Buana Artha Sejahtera, dated 19 October 2012
- Conclusion and Recommendation of Public Consultation on Social Impact Assessment of PT Tapan Nadenggan & PT. Buana Artha Sejahtera, dated 19 October 2012
- Photos of PT Tapan Nadenggan & PT's Social Impact Assessment Public Consultation. Buana Artha Sejahtera, dated 19 October 2012

Each of environmental and social impact assessment has management and monitoring plan which reviewed every year. The social management and monitoring plan for period of 2019 – 2020 was reviewed on March 2021 and also involved the stakeholder through questionnaire and interview.

The review of the Social Management and Monitoring Plan for the 2019 - 2020 of PT Buana Artha Sejahtera was prepared in March 2021 involving the participants from Biru Maju Village on 10 March 2021 and Sumber Makmur Village on 15 December 2020. Participation from the village community was carried out by distributing questionnaires. In addition to the village community, the company also involved Puri and Mandang Estate employees by interviewing and filling out questionnaires on November 17 and December 14, 2020. Based on the review results, it is known that the impact that appears is flooding due to overflowing river water and the plan that will be carried out is providing heavy equipment for repairing drainage channels.

As for PT TN, it was also compiled in March 2021 involving the Pantap dan Rungau Raya Village apparatus on March 1, 2021. Village community participation was carried out by distributing questionnaires. Based on the review of Social Management and Monitoring Plan for 2020-2021, there was an increase in the community's economy and the existence of social assistance from the company. The company has arranged activity plan towards the impact including recruiting employees, empowering contractors, and preparing CSR programs and realizing them.

Based on interview with representative of Pantap Village, Sumber Makmur Village, Rungau Raya, and Seabi Village, there is no negative impact related to social impact from operational activity of PT TN-BAS. All social impact has been identified in the Social Management and Monitoring Plan.

3.4.3

Company showed the implementation document of Social and Environment Management and Monitoring Plan for the 2019 – 2020 of PT TN and PT BAS, among others:

PT Tapan Nadenggan

The source of the negative impact is the residual water from CPO production that flows into rivers during the rainy season. Therefore, the management plan for the impact was:

- Maintenance of embankments and ditches and monitoring of water levels on a regular basis routinely on WWTPs within a certain period of time. This work is to ensure that there is no more runoff from the remaining production water CPO.
- Monitoring of water quality tests at WWTP.
- Socializes to the community, by inviting village apparatus to see the WWTP layout system that has been managed on 19 August 2020.

In relation to management and monitoring social impact, the impact is no longer relevant to be the social impact of SMLM. Therefore, the impact on the next period is omitted in the impact monitoring report social. However, it can refer to environmental management activities.

Company also carried out the management and monitoring plan to increase the positive impact, such as:

- The company has hired local workers from the villages surrounding. Based on interview with representative of Pantap and Rungau Raya Village, it is known that many villagers is work in the company.
- Empowerment of local contractors, such as FFB transporter.
- Implementing CSR programs.

As for the implementation of environment management and monitoring report, company showed the Report of RKL RPL for the 2nd Semester of 2020 that has been submitted to Environment Agency of Seruyan and Kotawaringin Timur Regency on 25 February 2021. The report informed that all the plans in the matrix of RKL RPL document has been implemented, such as testing the quality of emission and ambient air, soil, river water, potential for hazardous waste pollution, public attitudes and perceptions, and other impacts. There is no non-conformance arise from the monitoring result. The result of environment monitoring is in the range of threshold.

PT Buana Artha Sejahtera

The source of the negative impact is flood due to overflowing river. Therefore, the management plan for the impact was washing ditches on riverbanks where silting occurs. For this period, PT BAS has also budgeted for carrying out river washing activities or the process of deepening rivers that are experiencing silting. However, the ditch cleaning activity has not yet been carried out. This is because the availability of heavy equipment in the form of excavators is still constrained. However, PT BAS has carried out road maintenance repair activities in Biru Maju village.

Company also carried out the management and monitoring plan to increase the positive impact, such as:

- Prioritizing local purchasing and local contractors.
- Implementing CSR programs.
- The company has hired local workers from the villages surrounding. Based on interview with representative of Sebabi and Biru Maju Village, it is known that many villagers is work in the company

As for the implementation of environment management and monitoring report, company showed the Report of RKL RPL for the 2nd Semester of 2020 that has been submitted to Environment Agency of Seruyan and Kotawaringin Timur Regency on 25 February 2021. The report informed that all the plans in the matrix of RKL RPL document has been implemented, such as testing the quality of emission and ambient air, noise, soil, river water, public health, public attitudes and perceptions, and other impacts.

	Status: Comply	
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3.5 A system for managing human resources is in place.

3.5.1

The Company has procedures related to recruitment, selection, employment, promotion, retirement and termination of employment which are generally described in the Collective Labor Agreement period 2021-2023 written in Bahasa. In general these procedures describe:

- Recruitment of workers is based on needs and adjusted to the ability of the company.
- The age of the prospective worker is a minimum of 18 years at the time of recruitment of workers.
- Recruitment of workers is based on the ability, expertise and assessment of prospective workers.

- The company is authorized to carry out the placement, transfer and promotion of workers in accordance with applicable regulations.
- Termination of employment can occur when a worker retires, dies, resigns, and terminates an employment agreement due to a serious violation and others.

In addition to being publicly listed in CLA, the Company has other procedures in the form of Policies, SOP, Internal Memorandums and others related to recruitment, transfer, promotion, retirement, termination of employment and others. These procedures have been documented to all workers and their representatives. One of the socialization given to workers was related to Company Policies and Regulations on (GSEP) in May 22, 2021 and April 08, 2021. For example some procedures that are owned by the company include:

- Procedure No. KHI-SMART/001-00 concerning Employee Recruitment
- Procedure No. KHI-SMART/002-00 concerning Employee Agreement
- Procedure No. KHI-SMART/010-00 regarding Employee Promotion & Transfer
- Procedure No. KHI-SMART/009-00 concerning Employee Ratings

The results of interviews with workers (harvesting, spraying and mill operators) in SMLE, SRDE, MNDE, PURE and SMLM note that workers have a sufficient understanding of the procedures related to recruitment, promotion, retirement and factors causing termination of employment. Workers explain that in the acceptance process carried out in accordance with the terms / conditions according to ability / expertise, promotion is based on an assessment of the performance of each employee each year, and one of the causes of termination of employment can occur if the worker has committed a serious violation. Based on this explanation, Company has explicitly state the indiscriminatory policy during the recruitment selection, hiring and promotion process.

The Company still have workers with contract status is Contract Workers (PKWT), permanent worker (worker PT class 1-4) and Staff (above worker PT class). All the rights for each employment status has been distinguished. For workers with contract status (PKWT), Company also registered the worker with to Manpower and Transmigration Agency of Seruyan District in Januari 06, 2021 for 11 contract workers of Mandang Estate.

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

3.5.2

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

- The Company has a worker recruitment document from the start until the worker becomes a permanent worker. For example, a driver (SMLE-PT TN) who has recruitment documents such as a job application letter, identity card, family card, recruitment selection results, employment contract documents for contract workers (PKWT), medical check-up results and others. The worker started working as a contract worker (PKWT) on February 2021..
- Workers with employee number 19025 (Clinic clerk of PURE) who have experienced two increases in class in 2020 and 2021. This is based on the results of the assessment in 2020 with a result of "Good".
- Decree No. 001/SMLM-PRM/10/2020 on October 01, 2020 (getting a promotion with an increase in class from PT 4A to PT 2 (Payroll of SMLM)).
- There is a pension document for workers with employee number 09086 who have worked for 11 years 4 month and retired March 2021 according to Decree No. 094/MNAE-SK PHK/III/2021 dated March 01, 2021. In addition to the decree, there are also other supporting documents such as calculation of pension payments, labor documents of workers since they first worked, etc. All procedures and documents shown are in accordance with existing procedures and in accordance with applicable laws.

The results of interviews with workers (harvesting, spraying and mill operators) in SMLE, SRDE, PURE, MNAE and SMLM note that the Company has carried out labor procedures starting from recruitment, selection, acceptance, promotion and retirement procedures in accordance with existing regulations, as well as all The application is assessed in accordance with the abilities and competencies of the employees. For example, workers who initially entered were selected before being accepted, workers who received promotion / class promotion had received an assessment from their superiors and workers who retired received

all their rights as retirees.

During 2020 and 2021 there were no labor issues that occurred at PT Tapan Nadenggan and PT Buana Artha Sejahtera, this was strengthened by the results of consultations with the Labor Union in every unit (SMLE and SMLM), the Manpower and Transmigration Agency of Kalimantan Tengah Province which stated that the application of existing labor procedures is in accordance with the regulations and since 2020 until now there have been no labor issues.

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

Status:

3.6

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

3.6.1

The Company has had a policy of occupational safety and health were written in Bahasa. The policy has been legalized. This policy is designed to control hazards in every activity that is in the working environment to prevent accidents and occupational diseases. Management have work program of occupational health safety every year. Realization of the program of work will be monitored through regular meetings Guiding Committee of Occupational Safety & Health (P2K3) every month. This work program applies generally to all workers in the workplace. If the plans have been made yet on target then will be evaluated in the regular meetings to assess effectiveness.

Company have document of hazard identification, risk assessment and risk control (HIRAC) 2021 which issued on Januari (SMLM & SMLE), Februari (PURE), March (MNAE), April (SRDE).

It will be reviewed if any occupational accident happen. The document describes the description/activity, potential hazards, risk assessment and risk control.

Based on site observation at boiler and engine room in SMLM, harvesting and spraying activity in estate (SMLE, SRDE, MNAE, PURE) it was clearly confirmed that workers had been aware related potential risk and hazards in the work place. Following up on this, the company has been reduce the potential risk by routine socialization about OHS, providing PPE, and OHS signboard are available in workplace.

Interviews with estate workers (harvester and sprayer) and mill workers (mill operators) can be concluded that workers understand the OHS policy and it's recognized that every morning meeting is always affirmed about the importance of safety and the use of PPE in work.

For example mill employees exposed to high noise such as boiler employees and engine rooms who have used a complete hearing protection device according to risk analysis, namely ear muff and ear plug. There is no complaints from employees exposed to high noise exposure. To ensure that every workers are in good health then Company do the medical check up. The results of each employee's health examination have been properly stored. Last medical checkups conducted in December 2020 (Cholinesterase) and March 2021 (Audiometri). The result of medical test showed that workers were in good health and fit to work.

3.6.2

Realization of the program of work will be monitored through regular meetings Guiding Committee of Occupational Safety & Health (P2K3) every month. This work program applies generally to all workers in the workplace. If the plans have been made yet on target then will be evaluated in the regular meetings to assess effectiveness. The following are examples of the realization by the Company in 2020 until May 2021 including:

- OHS inspection of PPE compliance of workers and other equipment that has been every month since 2019 until now. For example, the inspections on December 2019, December 2020 and May 2021 were conducted inspection in work locations found that there were all workers whose has been using an appropriate PPE.
- Dissemination of the dangers of drugs/childe workers to workers and residents of housing by installing warnings of the dangers of drugs in every employee's housing, office and other areas.
- Identification of areas with potential emergency hazards such as areas prone to fire, explosion, land / water pollution, and workplace accidents and the results of monitoring conducted every months. The last examination was in

December 2019, December 2020 and May 2021.

- Inspection of the availability and condition of first aid boxes conducted (every month) with the results of all first aid boxes carried by each field foreman, first aid kit in the office and in the warehousing area are still in good condition and available in 21 types of items in accordance with applicable laws and regulations. If there is item that had not available, the first aid officer will immediately added new item.
- Unit certification always holds routine *P2K3* meetings every month to monitor and evaluate the implementation of OHS that has been carried out. The last *P2K3* Meeting in May 6, 2021 on which discussed the preparation for the dry season, PPE inspection, new varian covid and others attended by *P2K3* officers.
- Based on interview & observed with pesticide applicator in Estate and process operators at mill, Company has been provide adequate and appropriate protective equipment available to all workers at the place of work to cover all potentially hazardous operations. For example, engine room operators that has been provide PPE such as safety shoes, helmet, ear muff & gloves.
- The Company has carried out the socialization of Safety induction to all workers (include contractors). In addition, there are also warnings related to safety induction in several locations of offices, mills, housing and also oral delivery during muster morning to all workers every day. Guests and outside parties (including auditors) who will visit each operational area at PT Tapan Nadenggan & PT BAS, will be given a safety briefing and given PPE before making a visit.
- Identify and monitor the needs of workers who need special competence / expertise to operate heavy equipment or machines in the plantation or mill unit. Monitoring in 2020/2021, it is known that there are several workers with special competencies that have expired and in 2020 have completed their extension arrangements at the relevant agencies.

Based on the results of the document review, it is known that the Company has carried out routine annual OHS evaluations in each unit by carrying out RSPO internal audit activities in 2020 and 2021, the result is that there are several records related to the implementation carried out in these years but in less than a months have completed those records.

Based on the results of interviews with workers (harvester, pesticide applicator, and process operator) at SMLE, SRDE, MNAE, PURE and SMLM, it is known that every day when the morning muster is carried out, the supervisor will check the completeness of the PPE of the workers and will deliver a safety briefing. Meanwhile, every month and OHS inspection is held to see how it applies to all units.

Based on the explanation above, it can be concluded that the Company has monitored the effectiveness of the OHS plan to handle OHS risk in people.

Status: Comply

3.7

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

3.7.1; 3.7.2

The unit of certification has a training program that is organized annually based on identifying employee training needs. The training program compiled by SPO in each unit such as the socialization of the harvesting, spraying, GSEP, emergency response preparedness, Integrated Pest Management, SCCS, First Aid, Human Rights Policy, Sexual Harassment, Industrial Relations, HCV, minimum age limit, Freedom of Association Policy, Reproductive Protection for Women, Prohibition of Women spraying for pregnant and breastfeeding mothers, collective labor agreement socialization, Company Code of Conduct, SOP for stakeholder involvement, SOP for Conflict Management, SOP for Complaints and Dissatisfaction, SOP for Communication and Consultation.

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

In addition, the Company has been giving a training/socialization for relevant stakeholders (contractors, suppliers, local communities and smallholders). These programs include the following:

- Socialization of PPE and OHS.
- Socialization of company policies such as code of conduct, human rights, no child worker and others.

- Socialization of emergency response.

The Company has properly documented every training activity and socialization that has been carried out to workers and related stakeholders. The following is an example of training/socialization documentation that has been carried out, namely:

- RSPO, ISPO, SCCS, CCP dan ISCC socialization on June 03, 2021 which was attended by 12 participants.
- ISBPR, MSDS, dangerous waste management, PPE, First Aid socialization on March 18, 2021 which was attended by 8 participants.
- Emergency response simulation (fire and earthquake) on February 22, 2021 which was attended by 50 participants.
- Socialization of SOP for Communication and Information, CLA, Complaint Procedure, Business and Human Right Policy, Code of Ethics, and Handling of Sexual Harassment on May 22, 2021 at Emplacement PURE and was attended by 113 participants.
- Training on the use of lights fire extinguishers which was held on April 30, 2021 and was attended by 13 participants.
- GSEP, communication and grivience/complain procedure socialization to surrounding community (Pantap Village) on January 11, 2021 which was attended by 22 participants.
- GSEP, communication and grivience/complain procedure socialization to surrounding community (Rungau Raya Village) on March 10, 2021) which was attended by 9 participants.
- Socialization of company policies including OSH, Environmental, Social (GSEP), Procedur for complaints and other policies to contractors on January 14, 2021 at SMLM.
- Safety Induction to SMLM CPO Transport contractors on March 16, 2021.
- Socialization of OSH requirements to contractors and Contractors Control Procedures on January 4, 2021 at SRDE.
- OSH Program for Contractors related to understanding Procedure and Policies on March 2021 in Semilar Estate.
- Socialization of work safety policies and contractor control procedures on April 14, 2021 at Puri Estate.

Field observations and interviews with workers (harvesters, sprayers and mill operators), it is known that workers have understood their work in accordance with the procedures set by the company and their understanding of the duties and responsibilities for each job has been carried out quite well. Meanwhile, the results of interviews with representatives of contractors and the surrounding community revealed that they had received routine socialization related to company policies, code of conduct, PPE, communication procedures and complaints were routinely provided by the Company.

Based on the foregoing, it can be concluded that the Company has a training program for all workers including stakeholders (contractors, suppliers, local communities and smallholders) related to the RSPO P&C and all of them have been well documented.

Meanwhile, the results of interviews with representatives of contractors and the surrounding community revealed that they had received routine socialization related to company policies, code of conduct, PPE, communication procedures and complaints were routinely provided by the Company.

They also said that the socialization and training materials provided by the company were in accordance with their working relationship with the company so they felt it was effective in their understanding after receiving the training/socialization.

3.7.3

Company provided an understanding of SCCS to weighbridge operators, sorting, sustainability, security, and laboratory on June 03, 2021. The materials discussed included the definition of RSPO SCCS, new standards for RSPO SCCS, principles for compliance with RSPO SCCS .

Based on interviews with weighbridge operators and security, it is known that they understand the supply chain process

	Status: Comply	
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3.8 Supply Chain Requirements for Mills

3.8.1, 3.8.2
Based on the RSPO Certificate, the Mill can implement both IP and MB modules. However, since 1 April 2019 until current audit the Mill only implement IP module, that only received FFB from certified unit.

3.8.3

Estimated certified product recorded in the last Assessment Report and Certificate and has been updated in the RSPO Palm Trace. Actual certified produced has been verified during this assessment, and not exceed the estimate. The estimates of certified production for the next license period also have been set, in reasonable amount considering the last year's production. Since 1 April 2019 until this audit, the Mill only implement IP module, that is only receive FFB from certified unit.

The data are shown in the following table:

Product	Last Year Projected Certified Volume (MT)		Last Year Actual Certified Volume (September 2019 to April 2021) (MT)		Next Year Projected Certified Volume (12 months) (MT)	
	IP	MB	IP	MB	IP	MB
FFB	755,239	77,199	697,284.49	0	326,000	83,000
CSPO	178,304	18,528	165,565.95	0	78,300	19,300
CSPK	44,652	4,323	42,392.84	0	19,600	5,000

3.8.4

The Mill has been registered as RSPO member under GAR (as a parent company) membership number: 1-0096-11-000-00. The mill also has been registered on RSPO IT Platform, with the license ID CB92465 and member ID RSPO_PO1000001156.

3.8.5

The company has had the SOP Supply Chain of Identity Preserve Module (No. TN-SMLM-SCCS/SOP/01 dated 25 May 2020) and SOP Supply Chain of Mass Balance Module (No. TN-SMLM-SCCS/SOP/03 dated 25 May 2020). The procedures established and covering all elements of the supply chain model requirements in the P&C of 2018 such as the announcement in RSPO Palmtrace not later than 3 months after dispatch, receiving and recording that identify the traceability of RSPO certified and uncertified source and products (mass balance record), FFB processing, key persons and job descriptions, internal audit, training, etc. The Mill only has a single processing line. If the Mill want to change the model from IP to MB, and particularly from MB to IP, all the processing line started from loading ramp until clarification will be flushed to ensure the certified products not contaminated with uncertified products, including the storage tank will be separated completely between IP products and MB products.

The regular dissemination and training of the procedures has been conducted on 3 June 2021. Based on field observation, obtained information that key persons for SSCS implementation (such as weighbridge operators, security, and Head of Administration) have understood the supply chain implementation. The Mill has had a system to differentiate FFB from certified and uncertified sources.

3.8.6

The procedure to conduct supply chain internal audit already set in the SOP of supply chain. In the SOP mentioned that internal audit will be conducted annually. Internal audit of RSPO supply chain conducted simultaneously with P&C audit on 8 – 17 February 2021. All of supply chain standard and rules on market communication and claim has been assessed, and the CARs have been complied.

Management Review of RSPO SCCS implementation conducted on 29 April 2021. The management review discussion has covered the input from internal audit result, correction and corrective action, customer feedback, process performance and product compliance, follow up of previous management review, and recommendation for improvement.

3.8.7

The Mill has maintain the record of Mass Balance data, that informed amount and sources of FFB certified and uncertified received, as well as the certified products (CSPO and CSPK). Since 1 April 2019 until this audit, the Mill only implement IP module, that is only receive FFB from certified unit. The data is shown as follow:

Month	FFB (MT)
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	RSPO Certified	Non-Certified	Total
Sep-19	31,713.16	-	31,713.16
Oct-19	32,193.26	-	32,193.26
Nov-19	32,982.01	-	32,982.01
Dec-19	28,047.89	-	28,047.89
Jan-20	33,504.79	-	33,504.79
Feb-20	31,845.03	-	31,845.03
Mar-20	32,214.83	-	32,214.83
Apr-20	33,693.06	-	33,693.06
May-20	31,713.64	-	31,713.64
Jun-20	33,164.43	-	33,164.43
Jul-20	29,829.32	-	29,829.32
Aug-20	33,388.15	-	33,388.15
Sep-20	39,313.74	-	39,313.74
Oct-20	41,057.38	-	41,057.38
Nov-20	38,040.11	-	38,040.11
Dec-20	42,505.90	-	42,505.90
Jan-21	40,816.33	-	40,816.33
Feb-21	33,380.75	-	33,380.75
Mar-21	40,204.12	-	40,204.12
Apr-21	37,676.59	-	37,676.59
Total	697,284.49	-	697,284.49

Product	Last Year Projected Certified Volume (MT)		Last Year Actual Certified Volume (September 2019 to April 2021) (MT)	
	IP	MB	IP	MB
FFB	755,239	77,199	697,284.49	0
CSPO	178,304	18,528	165,565.95	0
CSPK	44,652	4,323	42,392.84	0

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

Related for handling non-conforming oil palm products, has been set in the SOP of Complaints and Grievance Handling (No. SOP/SMART/GIMS-SCMD/USDV/II/001 dated 02 June 2016 revised 11 April 2017). This procedure is generally applied to all complaints aspects, including complaints and non-conforming products from customers/buyers. During the audit, there is no written complaint from stakeholders related to nonconforming products.

3.8.8

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

Delivery number: 2850111561.

Delivery date: 22 April 2021.

Reference number: 2850106735

Reference date: 22 April 2021.
 Product: CSPO
 Quantity: 30 tons.
 Product description: RSPO IP QUALITY-RSPO / 028.

3.8.9

The Mill outsources its products transportation to the third party that has had contractual agreement. CSPO and PK transporter handled by PT Satrindo Jaya Agropalma with agreement No. 002/TN/SMLM/01/2019-CPO dated 2 January 2019, valid until 31 December 2021.

To ensure the contractors complies with the RSPO Supply Chain, in the agreement, there were clauses that set obligations of the contractor to comply with the supply chain rules. For instance, the responsibility to deliver products only from Semilar Mill, as well as the willingness to observe by Certification Body in order to verify the compliance. Other than that, the Mill has had SOP of Contractor Control (No. SOP/SMART/UMUM/SADV//006 dated 1 July 2014). One of the mechanisms to ensure that the products delivered only from the Mill, in the vehicle is mounted on a seal that can only be opened at the buyer's location.

3.8.10, 3.8.11

The Mill has the record of details of the contractor of PT Satrindo Jaya Agropalma, covers the contractor's company profile, address, contact person, email and phone number, contract agreement and period, and list of vehicles. There is no new contractors and transporter since ASA 1.1 to this ASA 1.2 and ASA 1.3.

3.8.12

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

The Mill balancing the certified products and dispatch on a three-monthly basis. Since 1 April 2019 until this audit, the Mill only implement IP module, that is only receive FFB from certified unit. The summary of Mass Balance data 24 months previous the audit can be seen on the table below:

Mass Balance record of CPO

Period	All CPO Production (MT)			CSPO Dispatch (MT)			
	CSPO	Non Cert CPO	Total	RSPO	Other Scheme (ISCC)	As Non Cert	Total CSPO Dispatch
Sept 2019 to Apr 2021	165,565.95	-	165,565.95	50,333.72	115,223.98	-	165,557.70

Mass Balance record of PK

Period	All PK Production (MT)			CSPK Dispatch (MT)			
	CSPK	Non Cert PK	Total	RSPO	Other Scheme (ISCC)	As Non Cert	Total CSPK Dispatch
Sept 2019 to Apr 2021	42,392.84	-	42,392.84	33,471.51	-	8,909.25	42,380.76

The company has an opportunity for improvement regarding the details of the 'Dual ID' of RSPO and ISCC certified CPO sales variable in the supply chain Mass Balance Data. Therefore, the traceability can be monitored directly from mass balance data. Currently, it is only can be breakdown separately by calculating the announcement and remove in Palm

Trace. OFI.

3.8.13, 3.8.14

The conversion rate of production of CSPO (OER) and CSPK (KER) are stated based on previous actual production data. The company will update the budget rate for the next license period. The actual previous budget rate, previous actual rate and budget rate for next license can be seen on table below:

Variable	Budget rate of previous license	Actual rate from 12 months data previous the audit	Budget rate for next license
OER	24.00	23.53	24.00
KER	5.60	6.02	6.00

3.8.15

The procedure of supply chain IP module has been set the mechanism to ensure the uncertified FFB not mixed with the certified FFB. The Mill only has one line of processing, and since 1 April 2019 until the audit only implement IP module. In the transporter agreements has been set the obligation to keep the purity of IP certified products. One of the mechanisms, in the vehicle is mounted on a seal that can only be opened at the buyer's location.

3.8.16

Based on delivery and transaction document review, it was known that announcement is carried out less than three months after delivery date. The status of announcements has been 'confirmed' by the buyer. The stock removing of RSPO certified product which sold as conventional are properly conducted by the Mill. The supply chain PIC has known that for P&C 2018 (included supply chain standard) the announcement should be conducted within three months after the delivery date. For example, the sales of CSPO on April 2021 amount of 8,142.75 MT, has been announced on the same month with transaction No. ST-TR-42b9db07-0981 dated 16 April 2021 and has been confirmed by the buyer.

3.8.17

The products were claimed as IP module. The Mill does not use RSPO trademark on product or off product.

Status: Comply

PRINCIPLE #4 RESPECT COMMUNITY AND HUMAN RIGHTS AND DELIVER BENEFITS

4.1

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

4.1.1

The unit of certification has social and environmental policy (No. 047/PD/X/2015 dated 29 October 2015), said that the company will respect general statements about human rights, FPIC for indigenous peoples and local communities, handle complaints and dissatisfaction responsibly. The company will also build economic, social and community positively. The company committed to recognizing, respecting and strengthening all workers' rights.

The unit of certification policy regarding respect to Human Rights described in the GAR of Social and Environmental Policy (GSEP) in point 2.2.3 which stated that the company committed to stand and promote statement of the human right of UN for all workers, contractor, customary society, the local community in all company operation. Furthermore on those policy also described about prohibiting retaliation against Human Rights Defenders (HRDs) as well as prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.

During the audit carried out, the team auditor has been trying to ensure this policy has been communicated and implemented through stakeholder consultation.

Based on interviews with workers, the surrounding community (village head, community leaders, smallholder's representative), and contractors known that the company has socialized company policies regularly including policies on

human rights. Socialization is done by sticking to the policy in offices, socializing in the housing, and socializing with workers during the morning briefing before the activities started.

Based on document verification the unit of certification can presented the policy has been disseminated to stakeholders for example on May 22, 2021 for PURE workers; March 10, 2021 to representative village of Rungau Raya; June 03, 2021 for Semilar Mill; March 16, 2021 for contractors.

4.1.2

Until this assessment there were no conflicts and land disputes within the PT TN & PT BAS area (SMLE, SRDE, SMLM, PURE and MNAE). This is also in line with the results of interviews with surrounding communities and related agencies during a public consultation, which stating that there were no land conflicts in the company's HGU.

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, 4.2.4

The company has had the system to handling complaints and grievances in the SOP of Complaints and Grievance Handling No. SOP/SMART/GIMS-SCMD/USDV/II/001 dated 02 June 2016 revised on 11 April 2017. The procedure has set the dispute resolution in an appropriate manner, ensuring the anonymity of complainants, protecting the Human Rights Defenders, community spoke persons, and whistle blowers where requested. The system ensures that there is no risk of reprisal or intimidation to the complainants. If no deal achieved, every party might deliver the case to the lawsuits or RSPO complaint panel. The person who responsible to handle the grievances are the respective division leader. For instance, the grievance related employment will be handled by Head of Administration.

4.2.2

The grievance handling procedure was in place and was disseminated annually, targeted to all workers in the Mill and Estates as well as relevant stakeholders (sub-district / village / village officials, community leaders, partners, contractors and others) on 13th February 2020 which was attended by surrounding community and stakeholder. The dissemination conducted in written and verbally, as well as using picture in the housing complex, office, and storage complex, to ensure illiterate person can understood the mechanism.

Based on interview with the workers and stakeholders was known that the stakeholders already known the complaint submission through written or mailbox.

4.2.3

Based on document review and interview with the workers and stakeholders, has obtained information that in the period of 2020 to 2021 there is no complaint or grievance officially submitted by the stakeholder.

Status: Comply

4.3

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

4.3.1

Contribution to community development refers to the results of the social impact assessment based on a 2012 assessment. The document describes the impact of the company's operations that have positive and negative impacts on workers and the surrounding community.

Efforts to overcome negative issues and maintain/enhance positive aspects are outlined in the biennial period Social Impact Management and Monitoring Plan (RKS/RPS) as well as in CSR program for the period 2020 and 2021.

Based on Social Impact Management and Monitoring Plan, the activity to increase the positive impact and community development is to accept local workers, use local contractors and local purchases, as well as CSR aspects, contractor empowerment, road infrastructure improvement, *posyandu*, commemoration of independence day, assistance for

honorary teachers, and etc.

Based on interviews with village officials around the company (Sebabi, Rungau Raya, Pantap, Sumber Makmur), it is known that the company in general has made efforts to improve the quality of life and the environment that is beneficial for employees and the surrounding community, recruiting workers local work, local contractors, local purchasing, as well as implementing CSR programs.

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

Company's operational area covering 17,088.00 ha and is entirely covered in RSPO Certification scope. It is consist of PT Tapan Nadenggan (Semilar Estate and Sei Rindu Estate) totaled 8,279.23 ha and PT Buana Artha Sejahtera (Mandang Estate and Puri Estate) totaled 8,808.77 ha.

The detail of legality documents is described as follows:

PT Tapan Nadenggan

- Location Permit (*Izin Lokas*) No. 1084.460.42 dated 10 October 1995 amount if 10,000 ha.
- Land Title / HGU Certificate No. 12 dated 5 October 2005, valid until 5 October 2040, amount of **3,561.84 ha**. The certificate was issued based on HGU Decree No. 15/HGU/BPN/2005 dated 18 February 2005.
- Land Title / HGU Certificate No. 29 dated 5 October 2005, valid until 5 October 2040, amount of **4,717.39 ha**. The certificate was issued based on HGU Decree No. 16/HGU/BPN/2005 dated 18 February 2005.
- Plantation Business Permit (IUP) No. 368 of 2004 dated 29 September 2004 for oil palm plantation amount of ± 7,300 ha area and Mill's capacity of 80 ton FFB/hour.

PT Buana Artha Sejahtera

- Location Permit (*Izin Lokas*) No. 176.460.42 dated 8 April 2004 amount if 14,300 ha.
- Plantation Business Permit (IUP) No. 407 of 2004 dated 22 November 2004 for oil palm plantation amount of ± 14,300 ha area.
- The land title of PT Buana Artha Sejahtera is being processed of HGU covering an area of 8,808.77 ha. Currently is hampered due to the proposed land is overlapped with the forest area.

The last progress of the HGU of PT BAS is the completion of files to exchange forest areas. There are Decree of Forest and Environment Minister No. SK.597/MENLHK/PLA.2/10/2017 dated 31 October 2017 about Establishment of an integrated team for the assessment of the application of exchange of forest areas for the development of oil palm plantations PT Buana Artha Sejahtera, formed Production Forest Area (± 7,826 Ha) Regency of Kotawaringin Timur and Seruyan, Kalimantan Tengah Province.

The company has shown positive progress regarding the exchange of plantation areas that are included in forest areas for the HGU process. Up to the time of the ASA 1.2 & 1.3 audit, the delineation of that area amount of ± 7,728 ha which had been determined based on the Letter of the Minister of Environment and Forestry No. S.566/Menlhk/Setjen/PLA.2/8/2019. A meeting was held between the company and the Forest Area Consolidation Center (*Balai Pemantapan Kawasan Hutan/BPKH*) on 6 December 2020 regarding the discussion of the measurement results. Based on an interview with management, the results of the meeting have been brought to the Ministry and are awaiting further decisions. Based interview with the Land Agency Official, the HGU process could not be followed up before the proposed area has been cleared from forest area. This is become an opportunity for improvement related to the follow-up of swap of forest area. **OFI**.

4.4.2, 4.4.3, 4.4.4, 4.4.5, 4.4.6

Land map is documented together in the documents of compensation so that it has been known and agreed by the land owner. The land acquisition and compensation process was carried out from August 2006 - 2010 in PT TN and in PT BAS in the period of March 2007 – 2010. Then from the results of verification from HCV document, SIA and environmental documents there was no identification of the land managed by the company from customary land.

Based on sample of land acquisition documentation and consultation with Villages Officials, it was known that the land acquisition has been made in FPIC manner. The documents have been made in Indonesian language, also has involved and witnessed by community representatives such as boundary lands-owner, Village Heads, and Sub-District Heads. The auditor and the auditee have tried to contact available previous land-owner. However, not succeed to gather them regarding many factors, such as ha been passed away, moving to another places, or not willing to be contacted. Therefore, auditor collected information about previous land owner opinion, and stated that by far there is no complaint related land acquisition or FPIC process.

Since the last compensation conducted in 2010, the evaluation of FPIC process has been put in the development of FPIC and compensation procedures. The FPIC mechanism is set in Social Conflict Management Document No. SOP / SMART / SENS-CSR / SADV / I / 002 dated July 1, 2014. Then also available Land / Land Compensation SOP No. SOP / NP / SMART / VII / D & L. 002, published on July 1, 2010 is valid starting July 1, 2010. These SOP will be used as a main guidance for further land identification, acquisition, and compensation.

Status: Comply

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

4.5.1 to 4.5.8
 Based on document review, field observation, and stakeholder consultation, is known that there is no land compensation since 2010. The latest planting was conducted in 2011.

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 to 4.6.4
 The land acquisition and compensation process was carried out from August 2006 - 2010 in PT TN and in PT BAS in the period of March 2007 – 2010. Based on sample of land acquisition documentation and consultation with Villages Officials, it was known that the land acquisition has been made in FPIC manner. The documents have been made in Indonesian language, also has involved and witnessed by community representatives such as boundary lands-owner, Village Heads, and Sub-District Heads.

Since the last compensation conducted in 2010, the evaluation of FPIC process has been put in the development of FPIC and compensation procedures. The FPIC mechanism is set in Social Conflict Management Document No. SOP / SMART / SENS-CSR / SADV / I / 002 dated July 1, 2014. Then also available Land / Land Compensation SOP No. SOP / NP / SMART / VII / D & L. 002, published on July 1, 2010 is valid starting July 1, 2010. These SOP will be used as a main guidance for further land identification, acquisition, and compensation.

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 to 4.7.3
 The land acquisition and compensation process was carried out from August 2006 - 2010 in PT TN and in PT BAS in the period of March 2007 – 2010. Based on sample of land acquisition documentation and consultation with Villages Officials, it was known that the land acquisition has been made in FPIC manner. The documents have been made in Indonesian language, also has involved and witnessed by community representatives such as boundary lands-owner, Village Heads, and Sub-District Heads.

Since the last compensation conducted in 2010, the evaluation of FPIC process has been put in the development of FPIC and compensation procedures. The FPIC mechanism is set in Social Conflict Management Document No. SOP / SMART / SENS-CSR / SADV / I / 002 dated July 1, 2014. Then also available Land / Land Compensation SOP No. SOP / NP / SMART / VII / D & L. 002, published on July 1, 2010 is valid starting July 1, 2010. These SOP will be used as a main guidance for further land identification, acquisition, and compensation.

Status: Comply

4.8
The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrate that they have legal, customary, or user rights.

4.8.1 to 4.8.4
 Based on document review, field observation, and stakeholder consultation, was obtained information that currently there is no land dispute in the company's operational area. The latest land dispute occurred in 2011 and has been resolved in 2016.

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, 5.1.6
 The company has no transaction of buying FFB from independent smallholder nor scheme smallholder. All FFB supplied to Semilar POM originated own estate RSPO certified area.

5.1.5, 5.1.8
 The company does not purchase FFB from independent smallholders or plasma farmers around the company.

5.1.7
 Equipment for weighing is verified periodically by an independent third party, as evidenced in the Minutes of Recalibration by PT Mugi and Metrology, dated 19 May 2021, for 2 units of the Semilar Mill weighbridge with the specifications stated in the official report document.

5.1.9
 The company already has a complaint handling SOP with SOP / SMART / GIMS-SCMD / USDV / I / 001 number revised 11 April 2017; an explanation of the timeframe is available at point 2.2.2, recovery of impact at point 1.4.2, anonymity, reducing the risk of revenge, and whistle-blower at point 2.2.1. Conflict Management SOP no SOP / SMART / SENS-CSR / SADV / I / 002 is also available. The company provides suggestion boxes in several locations, and monitors suggestion boxes.

In addition, the company shows the existence of communication standards and consultation procedures as indicated by the SOP-SMART-GENERAL SADP-I-004 SOP-communication and consultation, which was ratified on July 1, 2014 concerning Communication and Consultation. The deadline for responses to requests for information or conflicts is 1 week after the letter is received (from the Unit Head to the relevant Department). Responses no later than 3 weeks after the letter is received.

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 to 5.2.5
 The company does not purchase FFB from independent smallholders or plasma farmers around the company, so the company does not consult with farmers regarding RSPO certification

Status: Comply

PRINCIPLE #6 RESPECT WORKERS' RIGHTS AND CONDITIONS

6.1

Any form of discrimination is prohibited.

6.1.1; 6.1.2; 6.1.3

Unit certification have GAR Social Environment Policy dated September 2015 which explained that Sinarmas did not discriminate against gender, race or ethnicity, disability, sexual orientation, age, or belief.

Based on the employee registration document, unit certification has provided equal opportunities and treatment in employment opportunities. This is evidenced by the diversity of ethnic accepted to work.

The results of interviews with workers during field visits and interviews with labor unions and representatives of the Gender Committee also obtained information that there was no indication of acts of discrimination based on religion, ethnicity, gender and regional origin in the process of accepting work.

The results of the employment document review prove that Company does not discriminate and treat all workers equally, the following is evidence that can be shown by the company:

- The composition of workers consisting of various ethnic groups (6-15 ethnic), religions (5 religion), gender (2 gender) and workers' origins.
- Recruitment of workers based on the results of selection, performance appraisal, ability and expertise of workers. For example harvesting worker who have permanent contract No. 143/MNAE/EM-PROM/VI/2020 dated June 01, 2020 received based on the results of the selection of job application files, results of health checks and results of interviews. The worker also passed the assessment and has been accepted as permanent worker.
- There are examples of recruitment of workers in Mandang Estate who start to work on March 1, 2021 as many as 3 employees with positions as operator pesticides and loose fruits pickers. Based on the review of documents related recruitment it can be seen that the workers recruitment is based on ability, skills, quality, health conditions an procedure that owned.
- Worker placement and training are carried out in accordance with their expertise / type of work, such as prospective harvest workers are placed as harvest workers and receive regular harvest training.
- Women workers are given equal rights, wages and opportunities to get promotions with male workers of the same type of work, for example there are several maintenance foreman who are female workers.

Based on the results of interviews with workers (harvester, pesticide applicator, and process operator) at SMLE, SRDE, PURE, MNAE and SMLM, it is known that workers have never felt that the company has discriminated against since 2019 until now. This is because all activities from recruitment, performance appraisal, promotion, and union, each worker is given the same opportunity regardless of ethnicity, caste, nationality, religion, disability, gender, sexual orientation, gender identity, membership in trade unions, affiliations. politics, or age. This has resulted in the absence of discrimination issues from 2019 to the present.

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

6.1.4

A pregnancy test for workers is carried out every month just to ensure that pregnant workers are not allowed to do work with chemicals, not as a basis for discriminating against these workers. If declared pregnant, the worker will be transferred to a safer job but still equal in terms of wages and other benefits, so that there is no discriminatory action.

This is made clear by the results of interviews with women workers in the SRDE, SMLE, PURE and MNAE in spraying activities stating that female workers are required to have monthly pregnancy testing at the clinic to ensure that no female workers working with chemicals are pregnant / breastfeeding and testing the pregnancy is not a discriminatory measure given by the Company.

6.1.5

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

The workers also knew of the existence of the gender committee because it had been routinely socialized by its management, the last socialization related to the gender committee and the activity was carried out on Februari 08, 2021 which was attended by female workers and housing residents.

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

6.1.6

Equal payment of wages has been made by Company properly, taking into account the ability, performance, expertise, length of work and other factors as a basis for remuneration. So that the payment of wages provided is in accordance with the burden / duties / types of work respectively. For example, workers with Employee Number 20065 (below 1 year working) and 13084 (above 5 years working) who get wages in April 2021, whose value is above the minimum wage, but with different amounts based on years of service, ability, attendance and job performance (structure and scale wage).

In addition, based on the results of review of structure and scale wage, it was found that the Company already has a wage scale structure for each worker based on position, class, work performance, and not based on gender differences or origins. For example, the lowest wage scale is for permanent worker (PT Class) is PT 4 Class T1 and the highest wage is PT 1 Class A5.

The results of interviews with workers (harvesting, spraying and mill operators) in SMLE, SRDE, PURE, MNAE, and SMLM note that workers already know that there is a wage scale structure for each level of workers and this has been proven by the difference in the monthly wage income presented on the pay slip. The monthly wages received are in accordance with the grade owned by each worker and so far there have been no complaints / errors regarding this matter.

Status: Comply

6.2

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

6.2.1

The Company has procedures related to recruitment, selection, employment, promotion, retirement and termination of employment which are generally described in the Collective Labor Agreement period 2021-2023 written in Bahasa. This Collective Labor Agreement explains the working conditions and rights / obligations of workers such as, recruitment, selection, transfer, promotion, performance appraisal, remuneration, discipline, overtime, and other provisions. The company regulation has been routinely disseminated by the Company to all employees, one example of the socialization that was carried out was on April 19, 2021 which was attended by 547 participants.

The Company still have workers with contract status (PKWT), Regular Workers (worker PT class 1-4) and Staff (above worker PT class). All the rights for each employment status have been distinguished. For workers with contract status (PKWT), Company also registered the worker with to Manpower and Transmigration Agency of Seruyan District, for example the recording of PKWT Puri Estate on March 03, 2021.

The results of interviews with workers (harvesters, pesticide operator and mill operators) and union representatives know that workers have a sufficient understanding of their rights (wages, overtime, incentives, fines, etc.) listed in the Collective Labor Agreement and in accordance with routine socialization provided by the Company. Workers' wages in 2019, 2020

and 2021 have been above the minimum wage set by the government and there are no late payments every month. A review of the April 2021 wage document for harvest workers, pesticides operator and mill operators proves that the wages received are above the minimum wage and in accordance with the wage scale structure determined by the Company for 2019, 2020 and 2021. For example, workers wages with the Employee Number 19101 (MNAE worker), 19025 (PURE worker), 20002 (SMLM worker) have a different based on wage scale structure 2019/2020.

In addition, the payment of premiums, allowances, overtime and other incentives is in accordance with the regulations and collective labor agreements currently at the company.

Interviews with estate, mill workers, and contractors explained that the wages received, whether basic salary, overtime and other incentives, were in accordance with and above the minimum wage provisions, in addition to explanations from the contractors also stated that their salaries had adjusted to the minimum wage provisions. There are no complaints regarding the payment of contractor salaries by the company.

Based on the above explanation it can be concluded that the workers have understood the work requirements that have been socialized by the Company in an understandable language.

6.2.2; 6.2.3

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

- Decree of the CEO KaltengSel No.010/HRPSMKALTENGSEL/CEO/01/2021 concerning Wage Scale Structure in 2021 is Rp 3,194,250/month (minimum) determined based on Kalimantan Tengah Province Minimum Wage Determination in 2021. For workers with the lowest wages are employees with PT 4 class 1 T status and the highest wages for workers with PT 1 class 5A status.
- Decree of the Seruyan and Kotim District established by the Governor of Kalimantan Tengah in November 2020 about the implementation of the minimum wage in 2021.
- Employment contract for contract workers (PKWT), which explains the hours of work, wages, BPJS, leave, overtime, and others.
- April 2021 salary slips with the Employee Number 19101 (MNAE worker), 19025 (PURE worker), 20002 (SMLM worker) have a different based on wage scale structure 2020/2021 and all wages above the minimum wage.
- Overtime payment in April 2021 that has been accordance with applicable laws for workers with Employee Number 13052 (SRDE security), 06018 (SMLE office), 10069 (MNAE LA operator) and 16022 (process Mill)
- List of women workers that has been given maternity leave and pregnant workers in 2019, 2020 and until May 2021.
- There is no deduction/penalty to workers.
- Payroll documents give accurate information about compensation for all work performed, for example payment of overtime hours is in accordance with applicable regulations.

The results of interviews with workers (harvesters, sprayers, and mill operators) and union representatives know that workers have a sufficient understanding of their rights (wages, overtime, incentives, deductive, fines, etc.) listed in the Collective Labor Agreement and in accordance with routine socialization provided by the Company. Workers' wages in 2019, 2020 and 2021 have been above the minimum wage set by the government and there are no late payments every month, working hours is seven (7) hour a day with 6 days in a week and for the overtime has been paid in accordance with applicable regulations.

A review of the December 2019, December 2020 and April 2021 wage document for harvest workers, pesticides, sprayers and mill operators proves that the wages received are above the minimum wage and in accordance with the wage scale structure determined by the Company for 2019/2020. For example, workers wages with the Employee Number 19101 (MNAE worker), 19025 (PURE worker), 20002 (SMLM worker) have a different based on wage scale structure 2019/2020 and all wages above the minimum wage.

Based on these explanations, it can be concluded that the Company has carried out work requirements in accordance

with applicable laws and regulations in Indonesia.

6.2.4

The Company has provided welfare facilities to occupants in the form of housing, clinics, water supply, electricity, education, transportation and other facilities.

The results of the field visit in the housing area revealed that workers were provided with adequate housing facilities with 2 bedrooms, 1 bathroom and there were daycare for children. The house is inhabited by 1 family and specifically for workers who are not married then 1 house will be filled by 2 workers.

This is in line with the results of interviews with housing residents stating that the facilities provided by the Company are houses, electricity, availability of clean water, transportation of school, elementary & middle school (for high schools located in surrounding community), child daycare, places of worship (mosque & church), sport facilities, shop for rent and others. In general, the facilities provided by the Company are good / suitable for use by workers and their families.

6.2.5

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

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

6.2.6

In Indonesia there is no set standard of living wage, so the Company still applies the national minimum wage for all workers. In addition to the payment of the minimum wage, the unit of certification has an assessment of the implementation of applicable wages and benefits in kind provided to workers in the unit of certification which are in line with the RSPO Guidelines for Implementing Living Wages.

Referring to the minimum wage provisions for Seruyan and Kotim District in 2021, it is known that it is IDR 3,193,750 (Seruyan District) and IDR 2,991,946. Based on the results of the document review the company has conducted a simulation of the applicable wage assessment and all types of benefits for the DLW (Decent Living Wage) simulation in 2021. This calculation is shown in the Prevailing Wage Calculation document for Fiscal Year 2021 PT TN-BAS compiled by HROPS 2 Head and approved by CEO KaltengSel on May 28, 2021. From the calculations carried out the types of allowances in the form of goods that are included in the calculation include rice allowances, housing facilities, electricity facilities, water facilities, schools and health facilities (polyclinics) and Child Care Centers.

Referring to the calculations that are simulated by the management unit, it is known that the DLW standard currently provided/simulated by the certification unit is above the minimum wage requirement (Seruyan minimum wage in 2021 IDR 2,991,946) IDR 2,992,446 (lowest for PKWT) - IDR 3,410,462 (highest for PT 1).

Referring to the calculations simulated by the management unit, it is known that the DLW standards currently provided / simulated by the Company are above the minimum wage provisions.

6.2.7

The Company still have workers with Contract Workers (PKWT), Regular Workers (worker PT class 1-4) and Staff (above worker PT class). All the rights for each employment status has been distinguished. For workers with contract status for contract status (PKWT), certification unit also registered the worker with to Manpower and Transmigration Agency of Seruyan District example in Januari 06, 2021 for 11 contract workers of Mandang Estate .

In the 2021 assessment, the Company still has a program to recruit workers from contract worker status (PKWT) to permanent workers. Based on the results of the study of the document. However, their performance is still being monitored

to be appointed as permanent workers.

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

Based on the results of interviews with contract workers in the SRDE unit, it is known that workers do not care about their status. In terms of wages, it is in accordance with the minimum wage standard and workers have also received BPJS and PPE from the Company.

Status: Comply

6.3

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

6.3.1

The unit of certification has a policy related to Labor Union, there is a statement of recognition of freedom of association. The document is published in Bahasa which can be understood by all employees. The establishment of the union is in accordance with the applicable laws and regulations and has been recorded at the office.

Semilar Mill, Semilar Estate, Sei Rindu Estate, Mandang Estate and Puri Estate has an own Labor Union. They already have decree related organization structure and letter of registration to Labour Agency such as in 2018 (SMLE, SMLM, MNAE and PURE).

The document is published in Bahasa which can be understood by all employees. In addition, the Company has a Collective Labor Agreement which states that employees have the right to establish trade unions and become members / leaders of trade unions in accordance with applicable regulations. The information on freedom of association listed in the Collective Labor Agreement was carried out regularly and the last socialization was held on April 2021.

Based on interviews with labor union representatives who explained that the company had given freedom of association and at present labor unions have been formed. The establishment of the union is in accordance with the applicable laws and regulations and has been recorded at the Manpower Office. Company is giving freedom for worker to express their opinion and also, Company did not give any intervention related to labor union activity. Labor union has registered to Manpower Agency of Seruyan District with register No. 560/612/Disnaketranspar/V/2015 for labor union in Semilar Mill and No. 560/1066/NAKTRAN/VII/2011 for labor union in Semilar Estate.

6.3.2

The Company has a list of workers who have joined the union. In addition to properly documenting the list of members, the Company also has records of meetings between trade unions and management representatives as well as with internal unions. The following are examples of records of meetings conducted by labour unions in 2019, namely:

- The meeting between the union with management representative on April 15, 2021 a discussion about socialization for Eid Holidays.
- The meeting between the union management on May 28, 2021 to discuss the post Eid work and preparation for the dry season with fire and health preparations.

Based on the results of interviews with labor union representatives in SMLM and SMLE, it is known that the union lobby holds meetings every month with those accommodated in Bipartite LKS meetings between worker representatives and management representatives and since 2019 until now there has been no labor issue. which exists. This is also supported by the results of a review of worker complaint documents and the absence of complaints submitted to trade union representatives.

6.3.3

The absence of unit certification interference in the selection or operation of labor union activities, this is evidenced by the

results of interviews with workers and union representatives stating that in the process of selecting / making decisions and planning activities, members provide input / aspirations to their representatives each to make an election / decision-making and no management has a position as staff / managerial (assistant and above). The employee who currently serves as the Chairman of the Labour Union is Foreman at mill and estate.

The explanation has reinforced the fact that management did not interfere directly / indirectly with the taking decisions and activities carried out by labor unions.

Based on interviews with labor union representatives who explained that the company had given freedom of association and at present labor unions have been formed. The establishment of the union is in accordance with the applicable laws and regulations and has been recorded at the Manpower Office. Company is giving freedom for worker to express their opinion and also, Company did not give any intervention related to labor union activity.

Status: Comply

**6.4
Children are not employed or exploited.**

6.4.1; 6.4.2; 6.4.3; 6.4.4

Company has policy regarding the age requirements of workers is contained in Collective Labor Agreement states that the requirement for accepting workers is at least 18 years old. Policies regarding the age of workers are also available in GAR Social Environment Policy concerning which states that it is forbidden to employ child labor and under the age of 18 (eighteen) years, this is evidenced by the Identity Card (KTP) at the time of employee recruitment.

This policy regarding the age requirements of workers is contained in Circular from HR Director regarding the minimum age limit. Document verification results reveal that there are no workers under the age of 18. The process of hiring employees this is evidenced by the Identity Cards at the time of employee recruitment.

In addition to having a policy governing the minimum age of workers for workers, the company also includes a clause on child protection and a prohibition on employing workers under the age of 18 in any agreement with the contractor. The results of the verification of documents revealed that there were no workers under the age of 18. In addition to having a policy governing the minimum age for workers for workers, the Company also includes clauses on child protection and prohibitions on hiring workers under the age of 18 in any agreement with the contractor. The policy was socialized to workers on May 22, 2021 and to the contractor when signing the work agreement.

Based on field visits and interviews with workers in the fields of SMLM, SMLE, SRDE, PURE and MNAE it is known that the minimum age for work is 18 years, and no workers found below the minimum age specified. This is supported by the results of a review of company and contractor workers' document which proves that there are no workers under the age of 18 at the time of entering work, the youngest age of workers is 21 years when entering work.

Based on the results of the review of the cooperation agreement document with the contractor for the transportation of FFB 013/SRDE/SPK-LKL/IV/2021-ATBS and CPO (Agreement No. 002/TN/SMLM/01/2019-CPO), it is known that in the agreement has a separate clause to ensure that the contractor does not employ minors (under 18 years old) and complies with the prevailing laws and regulations in Indonesia.

Based on this, it can be concluded that the unit of certification has a policy on child protection including the prohibition of child labor and has been well documented and known to all workers.

Status: Comply

**6.5
There is no harassment or abuse in the workplace, and reproductive rights are protected.**

6.5.1; 6.5.2

The Company have a policy to protect reproductive rights and prevent all forms of sexual harassment and violence. The policy explains that every worker is entitled to receive protection against sexual harassment in the workplace and Sexual harassment is an offense and if convicted of sexual abuse offenders will be penalized in accordance with applicable regulations. The committee gender has socialized to the employees and the representatives of the committee gender are

available in each division.

Policies regarding the sexual harassment and violence are also available in GAR Social Environment Policy. It explains that every worker is entitled to receive protection against sexual harassment in the workplace and Sexual harassment is an offense and if convicted of sexual abuse offenders will be penalized in accordance with applicable regulations.

The committee gender & Company has socialized to the employees, for example on Februari 08, 2021 and the representatives of the committee gender are available in each division.

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

6.5.3

The Company has Policy No. KHI-SMART/005-00 dated 01 August 2017 concerning Pregnant and Breastfeeding Women Workers. The policy explains about giving mothers special time to breastfeed their children, prohibiting pregnant / breastfeeding women workers from working with chemicals, providing light work / which does not endanger the mother / obstetric / child, and providing a special room for breastfeeding her child.

Based on interviews with women workers and gender committee representatives, it is known that the Company has provided a special place for breastfeeding at child daycare with special time to breastfeed. There is no prohibition from supervisors in the field related to this matter and specifically workers in the field who do not bring a vehicle will be delivered / picked up by the foreman at these times.

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

6.5.4

Complaint mechanism of workers was contained in Procedure (No. SOP/SMART/GIMS-SCMD/USDV/001 dated 02 June 2016 revised 11 April 2017). The procedure aims to accommodate complaints and grievance from employees. In the procedure described that if requested, the company guarantees the confidentiality of the reporting identity and the disclosure of disgrace or incident (whistleblower).

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

Status: Comply

6.6

No forms of forced or trafficked labour are used.

6.6.1; 6.6.2

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

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

There is no significant obstacles related to employment or violations of company regulations. For example, for the harvesters works daily based in 7 working hours. Company provides output targets that can be obtained in less than 7 hours of work. If the harvester obtains more output within or more than 7 working hours, then the harvester will get the

harvest premium payment. No penalty is given to the harvester if it does not get output due to natural factors such as rain. Based on payment list, the harvesters have earned above the minimum wage.

Status: Comply

6.7

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

6.7.1

The Company have persons that responsible for the OHS program within the organizational structure of Committee of Occupational Health and Safety (*P2K3*) established in each management unit. The *P2K3* team has received approval from the Head of Manpower and Transmigration of the Province of Kalimantan Tengah and the *P2K3* secretary is a certified occupational health and safety expert. This is the OHS Committee that has been ratified by related agencies:

- The establishment of the P2K3 (OHS Committee) for PT TN-SMLM (Decree No. 04/DISNAKERTRANS//2021) and PT BAS-MNDE (Decree No. 1/DISNAKERTRANS//2020) which were endorsed by Governor of Kalimantan Tengah.
- The establishment of the P2K3 (OHS Committee) for PT TN-SMLE Decree No. KEP.2/DISNAKERTRANS//2020) and SRDE (Decree No. KEP.3/DISNAKERTRANS//2020) which were endorsed by Governor of Kalimantan Tengah.

OHS committee routinely conducts monthly meetings on OHS issues in the workplace. The documentation of the meeting was recorded and stored well.

Based on interviews to workers who are members of the P2K3 organization it is known that monthly meetings are always routinely conducted to discuss about OHS such as consistency of PPE usage, work accident analysis, report, firefighting simulation, checking of emergency response equipment, OHS sign board, safety patrol, etc.

The last *P2K3* Meeting in May 6 and 28, 2021 on which discussed the evaluation of the annual evaluation of OSH implementation, preparation of insection, and others attended by *P2K3* officers. The Company has also routinely reported P2K3 reports to relevant agencies, such as the following example:

- P2K3 Sei Rindu Estate unit reports for the 1st Quarter of 2021 which have been reported to the Manpower and Transmigration Agency of Kalimantan Tengah Province on April 9, 2021.
- P2K3 Semilar Mill unit reports for the 1st Quarter of 2021 which have been reported to the Manpower and Transmigration Agency of Kalimantan Tengah Province on April 5, 2021.
- P2K3 Semilar Estate unit reports for the 1st Quarter of 2021 which have been reported to the Manpower and Transmigration Agency of Kalimantan Tengah Province on April 3, 2021.
- P2K3 Mandang Estate unit reports for the 1st Quarter of 2021 which have been reported to the Manpower and Transmigration Agency of Kalimantan Tengah Province on April 5, 2021.
- P2K3 Puri Estate unit reports for the 1st Quarter of 2021 which have been reported to the Manpower and Transmigration Agency of Kalimantan Tengah Province on April 9, 2021.

6.7.2

The company has an Procedure Emergency Preparedness, Response and Recovery (SOP/SMART/UMUM/SADV//005), Management of Accidents and Occupational Diseases Procedure (SOP/SMART/HESS-EHSD/SADV//005) has been ratified by Company. In that procedure has explained the handling of accidents from reporting to coordination. Simulation was performed regularly to ensure the preparedness of emergency response equipment in the Company. The routinely emergency simulation that has been conducted by Company for example:

- Emergency response simulation and first aid for first aid officer on March 18, 2021 which was attended by 8 participants.
- Emergency response simulation on February 22, 2021 which was attended by 30 participants.

The last first aid training has been conducted in March 18, 2021 and Company has 15 workers with licensed first aid officers. Company also has a first aid box in each unit and based on document review, it's concluded that the contents in the first aid box are sufficient (21 items) and certification have first aid kit in every unit (estate & mill). There is also a checklist of observations of the contents of first aid boxes routinely performed every month by first aid officers.

The company records work accidents in the monthly work accident report recapitulation form which describes the time of accident, name of the worker, gender, age of the victim, the result of the accident, accident factors, type of accident,

estimated losses and the cause of the accident.

Based on interviews with workers in the fields of SRDE, SMLE, PURE, MNAE and SMLM it is known that if an accident occurs in the field, the company has provided first aid services equipped by each foreman as first aid before further examination performed at the nearest clinic or hospital. . In addition, the company also provides emergency gathering facilities and directs evacuation signs in the plantation and mill office areas in case of emergency events such as fires and earthquakes.

6.7.3

Based on the results of field visits and interviews with workers (harvester, pesticide applicator and mill operators) in the SMLM, SMLE, SRDE, MNAE and PURE units, it is known that workers have received PPE for free every year according to their respective types of work and if there is PPE damaged, it can be immediately reported to the direct supervisor for replacement. At the time of the audit, all workers were seen to have used PPE in accordance with existing standards and the level of risk, such as pesticide applicators using aprons, masks, face shields, gloves, boots, and others. In addition, the Company also has proof of the delivery of PPE to all workers every year and replacement of PPE that is damaged, for example the delivery of PPE in the form of safety boot on April 30, 2021.

The Company also has a sanitation facility for a pesticide applicator in each unit which is used as a storage, cleaning and replacement area when coming from work to home from work. This is done to ensure that workers arrive clean and come home clean without bringing hazardous chemicals to the home location.

Based on the results of field visits to pesticide sanitation facilities in SRDE, SMLE, MNAE and PURE, it was found that the facilities were clean and well organized, there were room which were used for bathing and cleaning PPE separately.

6.7.4

The company established the company's clinic, as well as its licensed company's doctor and paramedics. All workers including contractor's workers can use this facility. For further or un-handled medical care covered in government employment and health insurance (*BPJS Ketenagakerjaan & BPJS Kesehatan*). This insurance has been paid monthly based on document review according to the applicable rule.

Based on interview with the workers and Labor Union, there is no issue related medical care. If the clinic can not handle the medical care, the patient will be brought to the partner hospital in the city. For contractor's workers, based on document review and interview with contractor representative, it is known that the accident insurance for workers is covered by the contractors. Based on document review, the worker accident has been claimed by employment insurance with proper documentation and coverage.

6.7.5

The company is still consistent in monitoring the recording of occupational accidents by calculating the lost time accident (LTA). Recapitulation of work accidents with a formula to find the level of severity and frequency of accidents. This document informs the time period, the number of working days, the number of no effective working days, overtime, hours of work in total, the number of accidents, the number of working days lost, hours of work a year, the number of accidents a year, lost days a year. Calculation of Severity Rate and Frequency Rate is reviewed regularly and monitoring will be evaluated at the monthly meeting of Committee of Occupational Health and Safety. For examples in period of 2021 until April 2021 Company has calculation of SR 131 and FR 91 for Sei Rindu Estate.

	Status: Comply	
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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 Integrated pest management plans are contained in Agronomy and Research Management Committee (MCAR) document which aims as a guide in Integrated Pest Management (IPM) activities as one of the activities in the

process of caring for oil palm. The integrated strategy for pest and disease management has been established in agronomy procedures on pest and disease control, or in other related procedures. The strategies include early warning system (cencus), the planting of beneficial plants (*Turnera subulata*, *Cassia cobanensis*, and *Antigonon leptosus*), selective weeding to establish soft weeds to suppress leaf eater caterpillar, build and monitoring barn owl boxes to suppress infestation of rats. The early warning system is conducted in the form of census every three months to monitor the infestation of potential pests and diseases such as leaf eater caterpillar, rats, ganoderma, termites, and oryctes. Appointed cencus workers have been trained annually.

OPT control has been carried out in an integrated manner (integrated pest control/ IPM), which combines various biological and chemical control techniques. Biological control is carried out by using owls to control rat pests and planting Biological Control Agencies such as *Turnera subulata* to develop natural enemies of caterpillars that eat oil palm leaves. Chemical control is carried out if the attack level exceeds the threshold value. Owl activity monitoring documents are available, including those listed in the 2021 SMLE Gupon Data Recapitulation, updated on June 3, 2021, which explains the May 2021 gupon data, namely the gupon target of 138 units (29.02 ha/unit) and 138 units have been realized with an active percentage of 100. %.

7.1.2

The unit of certification uses invasive species introduced in accordance with applicable regulations (Invasive species refers to the applicable regulations: Permen LHK No.P. 94/MENLHK/SEKJEN/KUM.1/12/2016 concerning Invasive Types.) in managed areas, which are shown based on the document "List of Invasive Species in accordance with PermenLHK No. P.94/MENLKH/SETJEN/KUM.1/12/2016 on the Mandang Estate Plantation in 2021 (update 4 May 2021). Based on the document, it is known that there are invasive species used as biological control agency plants such as *Cassia tora*, *Jatropha gossypifolia* L. (Red Distance), *Turnera ulmifolia* and *Urena lobata*.

7.1.3

There is no use of fire for pest control, except in exceptional circumstances, i.e. circumstances where no other method is effective, and with prior approval from the competent authority.

	Status: Comply	
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7.2

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

7.2.1

The company has a policy regarding safety in using chemicals, including those listed in Weed Control Procedure, document number SOP / SMART / MCAR / VIII / TA-PGM dated June 12, 2012, which explains about weed control. This procedure explains the steps that need to be taken to control weeds in oil palm plantations in nurseries, immature plant and mature plant as well as the selection of herbicides to be used, general guidelines on the safety of working with pesticides and pesticide monitoring. In addition, Material Safety Data Sheets are also found in pesticide and fertilizer storage warehouses for each type that explain the instructions for storing and handling materials, handling in the event of an accident (first aid effort) and so forth.

Steps to avoid the development of resistance by the Company are explained by the research staff including replacing pesticides that are used regularly to avoid the emergence of resistance. The Company also has a list of all types of pesticides and target species as well as justification for use, including the trademark Rolifos 150 SL with active ingredients Ammonium glufosinat and target species namely broad leaf weeds and narrow leaves.

7.2.2

The company records every use of pesticides for all units (JLYE, PMSE, LBLE and BSRE) listed in the Agrochemical Use Toxicity Data document which describes the Pesticide Brand, the amount of pesticide used, the active ingredient content, LD50, the area of pesticide application (Ha), and total active ingredients per Ha. For example, for the use of Garlon 670 EC pesticides in the BSRE unit until November 2020 as follows:

Brand	: Roll Up 480 EC
Quantity (L)	: 414.21
Active Ingredients	: Isopropyl Amine Glyphosate 480 g/l
% Active Ingredients:	: 41
LD50 (mg/kg)	: 5000

Total Active Ingredients (kg): 169.83 Kg
Ha Application : 1,721.89
Active Ingredients/Ha : 0.00009863

7.2.3

As part of reducing the use of pesticides, the company has integrated biological control in pest control, for example by using beneficial plants aimed at controlling UPDKS pests and *Tyto alba* for controlling rats. Based on the study of the UPDKS pest census document and rat pests, it was found that there were no pest attacks that exceeded the threshold, this is in line with the results of the study of pesticide use documents and visits to the pesticide warehouse where no use of pesticides was found for controlling animal pests. Onsite:

For example, the trend in the use of pesticides in 2019-2021 SRDE units for example the active ingredient Methyl Metsulfuron 20% (Kg) in 2019 116.26 kg, in 2020 115.35 kg and in 2021 45.38 kg.

7.2.4

There is no preventive use of pesticides for the prevention of pests and diseases (prophylactic use). This is evidenced by, among others, the selection of specific ingredients used/ not by the company, which are listed in the list of pesticides used, such as those in SRDE, PURE and MNAE. For example, the pesticide Roll Up 480 SL, with the active ingredient *Isopropyl Amine Glyphosate*, targets Broadleaf weed (*Borreria alata*) and Narrow-leaved weeds (*Ottlochloa nodosa*, *Imperata cylindrica*, *Scleria sumatensis*).

The Company has an integrated pest control plan listed in the integrated pest control SOP, namely for the UPDKS census once a month, horn beetles every 2 weeks, rat pests once a month and monitoring owl nests once a month. The census is carried out regularly by trained employees and reported to the Plantation Manager. The use of chemicals is carried out in the event of an attack that exceeds the threshold value.

The company uses natural enemies to control existing pests, such as *Antigonon leptopus* for oil palm leaf-eating caterpillars and *Tyto alba* for controlling rats.

7.2.5

The company has a complete list of Pesticides that are in the category of World Health Organization (group 1A or 1B), or listed in the Stockholm or Rotterdam Conventions shown in the WHO Recommended Classification of Pesticides by Hazards document by the International Programmed on Chemical Safety) and guidelines for classification 2004, and a complete list of pesticides included in IA or IB. Based on the identification documents, the company does not own and use the type of pesticide that is included in the WHO class 1A and 1B list.

Based on the results of the document review regarding policies, procedures or management plans to minimize and eliminate the use of pesticides (WHO groups 1A and 1B) and paraquat, it is known that there is no change from the previous assessment, including Memorandum No: 032 / PD / VIII / 2016 dated August 13, 2016 by the President Director, regarding a ban on the use of paraquat.

Based on the results of the study of the list of pesticides used in 2020 and 2021 as well as the results of field observations on spraying activities and visits to pesticide storage warehouses, it was found that there was no use of pesticides (WHO groups 1A and 1B) or paraquat.

7.2.6

Based on the results of field observations and interviews with pesticide applicators at SMLE, SRDE, MNAE and PURE, it is known that pesticides are handled, used or applied only by people who have completed the necessary training, which is shown as follows:

- The head of the SMLE warehouse has received training in handling pesticides and handling hazardous material and hazardous waste as well as MSDS.
- Herbicide application training at Mandang Estate, 15 June 2020, which was attended by 43 participants.
- Herbicide application training at Semilar Estate, 22 August 2020
- MSDS Socialization and Hazardous Spill Management at Sei Rndu Estate, April 6, 2020
- B3 Spill Response Simulation in Sei Rindu, May 6, 2020
- MSDS Socialization and Hazardous Spill Management in Sei Rindu, March 12, 2021

Based on field observations at SMLE, SRDE, MNAE and PURE, it is known that pesticides are applied according to product labels, such as the use of complete PPE in the form of face shields, respirators, gloves, masks, spray clothes and boots.

All warning information affixed to the product is properly observed, applied and understood by workers. Sprayers and packaging for transporting materials and vehicles for transporting materials are equipped with the appropriate hazard symbols and an MSDS is available.

7.2.7

Based on the results of field observations at the SMLE, SRDE, MNAE and PURE agrochemical warehouses, it is known that the storage of all pesticides is in accordance with recognized best practices, which refers to PP. 74 of 2001 concerning Management of Hazardous and Toxic Materials. Based on the results of these field observations, it can be explained that the storage area has been equipped with B3 symbols, MSDS, ventilation, pesticide spills, eyewash and showers, fire extinguishers, first aid kits, emergency handling flows, racks according to packaging and others.

7.2.8

The company has a procedure for handling pesticide waste contained in the procedure with the document number SOP/SMART/LEMS-EHSD/SADV/002 dated July 1, 2014. Based on this document, the used pesticide packaging is washed 3 times (according to the MSDS) and used washing water is used for the spraying process.

The company also has a Work Instruction for Washing and Cleaning Pesticide and Fertilizer Packaging with document number IK/SMART/LEMS-EHSD/SADV/002/001. Based on the WI, the used pesticide packaging is washed 3 times (according to the MSDS) and reused the used laundry for spraying. As for the washing of fertilizer sacks, it is done by soaking for 30 minutes and using water from washing up to be sprinkled on oil palm plants or plants in the yard.

Based on field visits to employee housing in Semilar, Sei Rindu, Puri, and Mandang Estate, it was found that there was no reuse of used pesticide packaging. The empty pesticide containers are disposed to the hazardous waste storage

7.2.9

Based on the results of document review, interviews with management and field observations, it is known that the Company does not spray pesticides through the air

7.2.10

The Company regularly have a medical examination for manuring and pesticide operator Semilar Estate, Sei Rindu Estate, Mandang Esatate and Puri Estate base on the lates list of manuring and pesticide operator.

All spraying workers has examined health through inspection types of medical checkup, cholinesterase and spirometri, to ascertain the condition of workers in good health. The last examination in semester 2 was conducted in December 2020 for all units. Examination results stating that all workers spray is in a healthy condition. Auditor conduct interviews with spraying workers in SRDE, SMLE, MNAE and PURE and they admit that they have not been exposed to skin disease and itches because they always use PPE while working.

7.2.11

Based on field observation and interview with pesticide operator in Semilar Estate, Sei Rindu Estate (PT TN) and Mandang Estate, Puri Estate (PT BAS) known that there was no worker age under 18 years old that worked in chemical activity. The pregnant and breastfeeding women prohibited to work in chemical. The monitoring conducted through monthly pregnancy test. If founded expectant mother, she will be transferred to light non chemical activity.

Status: Comply

7.3

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

7.3.1 & 7.3.2

The company has SOPs related to waste management, covering all liquid and solid wastes, namely in the form of SOPs

for Waste Management with the document number SOP/ SMART/LEMS-EHSD/SADV/I/002 which was legalized and enforced by the Sustainability Division Head and Head of Upstream in 2014. The SOP describes:

- Waste Management from Mill
- Waste Management from Estate
- Waste Management from Clinic
- Domestic Waste Management (solid and liquid)

The SOP explains that hazardous waste from estate and mill (such as used oil, cloth contaminated with hazardous waste, used oil filters, used batteries, used TL lamps, etc.) is stored in licensed hazardous waste temporary storage and then handed over to third parties (collectors) authorized. Agrochemical waste containers are washed three times and stored in warehouses to be returned to suppliers, while clinical infectious waste is destroyed by a licensed third party.

Work instructions for washing and cleaning used pesticide and fertilizer packages. The used pesticide packaging was washed 3 times (according to the MSDS) and the used water was reused for spraying. The used pesticide packaging that has been washed is returned to the Supplier.

Based on field visits to employee housing in Semilar, Sei Rindu, Puri, and Mandang Estate, no hazardous waste reuse was found. The company also has a landfill area in each estate for the management of inorganic domestic waste. Based on a visit to the landfill at Mandang Estate Division III Block G43, it is known that inorganic waste is collected in holes and will be stockpiled when it is full. As for domestic organic waste, it is collected behind each employee's house and stockpiled when it is filled. Then for hazardous waste, the company already has a licensed hazardous waste temporary storage in each unit. Hazardous waste from the company's operational activities are collected at the temporary storage and then transported by the hazardous waste transporter.

Based on interview with management also known that the disposal of waste, such as domestic waste is carried out by two methods. Inorganic waste is collected in holes and will be stockpiled when it is full. As for domestic organic waste, it is collected behind each employee's house and stockpiled when it is filled.

The types of hazardous waste that can be stored include used oil, used filters, used B3 packaging, medical waste, expired chemicals, printer ribbons, used cartridges, and LB 3 produced from the company's operational activities. The hazardous waste transportation was carried out on 22 December 2020 and the latest transportation on March 30, 2021 for PT TN and PT BAS. The company shows an example of an hazardous waste transport manifest, for example:

PT Tapan Nadenggan

- Electronic manifest No. KLHK-1618012613 for 1.901 tons of used lubricating oil transported on March 30, 2021
- Electronic manifest No. KLHK-1618013208 for used cloth of 0.17 tons transported on March 30, 2021
- Electronic manifest No. KLHK-1618013734 for used batteries of 0.12 tons transported on March 30, 2021
- Electronic manifest No. KLHK-1618014028 for used cloth of 0.106 tons transported on March 30, 2021
- Electronic manifest No. KLHK-1618013914 for 1.011 tons of used hazardous material packaging transported on March 30, 2021

PT Buana Artha Sejahtera

- Electronic manifest No. KLHK-1618025033 for used lubricating oil of 0.176 tons transported on March 30, 2021
- Electronic manifest No. KLHK-1618024825 for used oil filters of 0.054 tons transported on March 30, 2021
- Electronic manifest No. KLHK-1618024550 for used batteries of 0.223 tons transported on March 30, 2021
- Electronic manifest No. KLHK-1618024965 for 0.052 tons of used cloth transported on March 30, 2021
- Electronic manifest No. KLHK-1618024728 for used hazardous material packaging of 0.383 tons transported on March 30, 2021

The company documents the waste entering and leaving each temporary storage in the Hazardous Waste Logbook document. The logbook documents every type of waste, such as used oil, used filters, used rags, used B3 packaging, and used batteries.

7.3.3

Based on field visits to employee housing in Semilar, Sei Rindu, Puri, and Mandang Estate, no domestic waste burning was found. In addition, based on a visit to the landfill at Mandang Estate Division III Block G43, it is known that inorganic waste is collected in holes and will be stockpiled when it is full.

Status: Comply

7.4

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

7.4.1

The unit of certification shows procedures related to the management of soil fertility so that harvest yields are optimal and have minimal impact on the environment, which are stated in the document:

- SOP for Fertilization (SOP/SMART/MCAR/IX/TA-PPK)
- IK Compost Fertilization (IK/SMART/MCAR/IX/TA-PPK/12-TM Compost)
- IK Fertilization of oil palm bunch ash (IK/SMART/MCAR/IX/TA-PPK/13-TM Bunch Ash)
- IK POM Liquid Waste Fertilization IK/SMART/MCAR/IX/TA-PPK/16- LCPKS Environmental Control

The unit of certification shows a record of the implementation of practices according to established procedures, including:

- Preparation of fertilizer recommendations based on leaf and soil nutrient levels in 2020 and the results of field observations including symptoms of nutrient deficiency in plants, which are described in indicator 7.4.2.
- Application of organic fertilizers (factory waste) such as empty fruit bunches and palm oil mill effluent, which is described in indicator 7.4.3.
- Documentation of fertilizer recommendations and realization in 2020, which is explained in indicator 7.4.4.

7.4.2

There are records of leaf and soil sample analysis activities on a regular basis to monitor and manage changes in soil fertility and plant health, which are shown as follows:

SMLE

Results of Leaf Sample Analysis, from SMARTRI, Accepted Date June 16, 2020, Started Analysis June 29, 2020, Total Sample 32 Samples (Lab No. 15893-15924), Request for Analysis N, P, K, Mg, Ca, B, Cl (Lab No. 15918 : Rutin, Fe, Cl). For example, Sample Code SMLE 1 J-70 N is 2.51%, P 0.173 %, K 0.72%, Mg 0.44%, Ca 0.69 %, and B 24 ppm.

MNAE

- Soil Sample Analysis Results, from SMARTRI, Acceptance Date May 18, 2020, Start Analysis June 09 2020, Total Samples 180 Samples (Lab No. 2185-2364), Request for Texture Analysis, pH,N,C-Organic,P2O5,CEC ,Base Exchangeable,Al & H.
- Results of Leaf Sample Analysis, from SMARTRI, Date of Receipt June 11, 2020, Start of Analysis June 17, 2020, Number of Samples 96 Samples (Lab No. 14735-14830), Request for Analysis N, P, K, Mg, Ca, B, Cl (Lab No. 14825: Rutin, Fe, Cl). For example, Sample Code MNAE 1 F-26 N is 3.02 %, P 0.172 %, K 0.87%, Mg 0.30%, Ca 0.57 %, and B 22 ppm.

7.4.3

Nutrient recycling strategies are available, which include recycling empty fruit bunches, POME and optimizing non-organic fertilizers. These are shown in the following documents:

- MNAE 2020 Empty Fruit Bunch Application Data (updated January 4, 2021), which explains that during the 2020 period, 15,173 tons of empty fruit bunch applications have been realized.
- Palm Oil Mill Effluent (POME) Semilar Mill is used by the company to be applied to land in the Mandang Estate (PT Buana Artha Sejahtera). The POME is documented every month and also reported to the relevant agencies through the Laporan Pemanfaatan Limbah Cair every 3 months. The average POME discharge per month (October - December 2020) is 1344 m3/Month

7.4.4

Records of fertilizer use are maintained and can be shown during audit activities, for example:

- For the MNAE unit, it shows the Fertilization Recommendation document for Semester I & Semester II of 2020, which explains the recommendation and actualization of fertilization in detail starting from information on division, complex, block, type of fertilization (manual or mechanical), soil type code, area, trees amount, dose per type of fertilizer, total tonnage and date of application.
 - For example, on June 10, 2020, urea fertilizer was applied at a dose of 1.5 kg/tree in the N41 Division 5 block covering an area of 7.94 ha manually.
 - For example, on September 8, 2020, MOP fertilizer was applied at a dose of 0.5 kg/tree in block L58 Division 6 covering an area of 15.65 ha using a fertilizer spreader.
- For the SMLE unit shows the Fertilization Recommendation for Semester I 2021 document, which explains the recommendations and actualization of fertilization in detail starting from information on division, complex, block, type of fertilization (manual or mechanical), soil type code, area, trees amount, dose per type of fertilizer, total tonnage and date of application. For example, on April 13, 2021, RP fertilizer was applied at a dose of 2 kg/tree in block K57 Division 3 covering an area of 6.27 ha manually and on April 9, 2021, RP fertilizer was applied at a dose of 2 kg/tree in block K57 Division 3 covering an area of 15.86 ha using a fertilizer spreader.

Based on the explanation above, it is known that the fertilization realization is in accordance with the recommendations, as described in the summary.

Status: Comply

7.5

Practices minimise and control erosion and degradation of soils.

7.5.1

The company has a Land Map – Semi Detailed Land Survey for each estate with a scale of 1:50,000. The map informs the soil classification, slope level, soil texture, depth, drainage, limiting factors, and land area.

Based on the document review (land map), it can be seen that the land suitability class cultivated by the Company (SMLE, SRDE and PURE) is S2 (Fairly Sufficient) 9,956.63 Hectares or about 83.54%, S3 (Appropriate / Marginal) 1,345.12 Hectares or about 11.28% and N (not appropriate) 615.90 Hectares or about 5.18%. The average drainage is quite good with the limiting factor is topography / relief.

7.5.2

There is no replanting in PT TN or PT BAS. Based on field visits to operational activities in Semilar, Sei Rindu, Puri, and Mandang Estate, there were no areas with steep slopes (>40%).

7.5.3

There are no new plantings in PT TN or PT BAS. The latest planting was on 2011. Based on field visits to operational activities in Semilar, Sei Rindu, Puri, and Mandang Estate, there were no areas with steep slopes (>40%).

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

The company has a Detailed Soil Map containing a land map and contains information on: soil classification, texture, depth, and drainage, limiting factor, rocks and conformity information for oil palm plantation development, i.e. map and land classification Semilar Estate, Sei Rindu Estate and Puri Estate presented on a scale of 1: 75,000. The map is equipped with a Table of Soil Characteristics and Land Suitability Assessment of Palm Crop Land.

Based on the document review (land map), it can be seen that the land suitability class cultivated by the Company (SMLE, SRDE and PURE) is S2 (Fairly Sufficient) 9,907.39 Hectares or about 83.13%, S3 (Appropriate / Marginal) 1,394.34

Hectares or about 11.70% and N (not appropriate) 615.90 Hectares or about 5.17%. The average drainage is quite good with the limiting factor is topography / relief.

7.6.2 & 7.6.3

Based on a review of the 2020-2021 area statement document, it is known that the company did not develop new areas, the last planting was in 2011.

The above has been confirmed during field observations to SMLE, SRDE, MNAE and PURE, where it is known that there is no new area development in the operational area of PT TN & PT BAS.

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 and 7.7.7

Base on hectare statement data of 2020 – 2021 planting years on own estate is 1998 until 2011. Based on verification of semi-detailed land survey map documents carried out by PMNP in 2008 and 2009, for Semilar, Sei Rindu, Puri and Mandang Estate, it is known no peat on operational areas. The conclusion no new planting and development areas after 15 November 2018 on peat.

This was confirmed during field observations to SMLE, SRDE, MNAE and PURE that there was no peat soil in the operational area of PT TN & PT BAS.

Status: Comply

7.8

Practices maintain the quality and availability of surface and ground water

7.8.1

The company has SOPs for identification, management and maintenance of water sources and quality contained in the SOP for Protection of River Border Areas (SOP/SPO/SMART/LH-06 – 07), effective July 1, 2010 where the types of activities are:

- Prohibit the planting of oil palm along the 50 m wide river border to the left and right of the river
- Prohibits cultivating land bordered by rivers by posting announcements
- Create trails in managed/planted areas with protected areas.
- When carrying out plant maintenance, on 5 (five) oil palm trees located on the protected river border 50 meters wide, the left and right of the river are prohibited from using chemicals but done manually.
- When fertilizing plants, 5 (five) oil palm trees on a protected river border with a width of 50 meters to the left and right of the river, it is prohibited to use a plane or a spreader, but it is done manually.
- On riverbanks that are prone to landslides, plant erosion prevention plants

Based on the results of visits to the Ruko River Border in Mandang Estate and the Tajahan River in Semilar Estate, it is known that the management of water sources has complied with applicable procedures. There is no indication of chemical spraying on the river border.

The water quality monitoring program also refers to the RKL RPL matrix owned by the company. Based on the RKL RPL matrix, the monitoring program for river water quality includes testing water samples from the Ruko River, Tajahan River, Serindu River, and Sei Biru River every 2 times a year. The company shows the results of surface water quality testing for the 2020 period and the test results in the first semester of 2021. Based on the test results, it is known that there are several parameters that are more/bigger than the established quality standards, for example for the TSS parameter in the Serindu Hilir River and the Seibiru River in the testing period of Semester II 2020 exceeds the predetermined quality standards. The quality standard for testing surface water quality refers to PP No. 22 of 2021, attachment VI (Class II)

Related to this, the company has evaluated the causes of the high TSS value, among others, can be caused by weather factors, rainfall, or the accumulation of organic matter. The company's follow-up to the evaluation results is to maintain reforestation on the river border, not fertilizing and spraying at least 50 meters from the riverbank. Based on field visits to the Serindu River border, it is known that there is no indication of chemical spraying at the river bank.

7.8.2

Based on field visit to the Ruko and Tajahan rivers, it was found that the company did not spray chemicals on the riverbanks. The limit of spraying is about 5 oil palm trees from the river border. The company also planted woody plants on the river border.

7.8.3

The company has conducted a monthly quality test of liquid waste carried out by a Testing Laboratory that has been accredited by KAN (LP-966-IDN). Parameters tested include BOD, COD, pH, oil and fat, and others. The quality standard used refers to KepmenLH No. 29 of 2003. The company has tested the period from 2020 to March 2021. The following are examples of test results for January – March 2021.

Parameter	Unit	Threshold value	Result		
			January 2021	February 2021	March 2021
BOD	Mg/liter	5000	3,194	1,683	3,124
pH	-	6 – 9	7.79	7.76	7.81

Based on the table above, it is known that there are no parameters that exceed the quality standard, it is the same for other parameters for the 2020 test.

The company has also shown a permit for the use of waste water from the palm oil industry on the ground (land application) for PT Tapian Nadenggan based on the Recommendation for Utilization of Wastewater by Application to the Land (land application) number 660/541 / DLH.II / VII / 2020 dated 27 July 2020 which was signed by the Head of the Seruyan Regency Environmental Agency and is valid for 5 years.

The area of utilization land at the PT Tapian Nadenggan location with a total land area of 919.38 hectares is located at the location of PT Buana Artha Sejahtera (BAS) Mandang Esatae blocks I-32, I-33, I-34, I-35, I-36, I-39, I-40, J-32, J-33, J-34, J-35, J-36, J-37, J-38, J-39, J-41, J-42, K- 35, K-36, K-37, K-38 K-39, K42 L-35, L-36, L-37 and L-38 covering an area of 619.47 hectares with control land on Block K-40 with an area of 29, 5 Ha and at PT Binasawit Abadipratama (PT BAP) Tanggar Estate Blok O - 46, O-47, O-48, O-49, O -51, O-52, O-53 , O-56, O-57, P-45, P-46, P-47, P-48, P-49, P-50, P-51, P52, P-53, P-55, P-56 and P-57 covering an area of 299.91 hectares with control land on block P-44 with an area of 33.20 Ha.

7.8.4

The company shows water usage and distribution documents for Semilar Mill for the period 2020 and 2021 in the Water Usage and Distribution Recapitulation document. The following is a summary for water use for the period January – April 2021:

Description	Total (January – April 2020)
FFB process (ton) (actual)	151,498
FFB proses (budget)	117,642
Use of process water (m3)	125,949
Total m3 air (actual)	139,612
M3 air proses/ ton FFB (actual)	0.83
Total m3 of water (budget)	112,936.32
Process water / ton FFB (budget)	0.96

The company already has a water use permit based on the Decree of the Head of the Kalimantan Tengah Province Investment and One Stop Service Office No. 570/8/PU-AIR/II/DPMPSTP-2021 concerning Permit for Concession of Surface Water in Ruko Rivers, which was issued on January 4, 2021. This permit is valid for 3 years. The permit explains the obligations that must be carried out related to the use of surface water, one of which is to pay the cost of water resources management services and pay other financial obligations. Then, the company shows proof of payment of

surface water retribution for the period January – December 2020 which was paid to the Regional Revenue Agency of Central Kalimantan Province on February 6, 2021.

Status: Comply

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

7.9.1

The company has procedures for utilizing waste (solid, liquid and air) contained in the Waste Management SOP with No. Document: SOP/ SMART/LEMS-EHSD/SADV/II/002 which was legalized and enforced by the Sustainability Division Head and Head of Upstream in 2014. The SOP regulates:

- Waste Management from mill
- Waste Management from Estate
- Waste Management from clinic
- Domestic Waste Management (solid and liquid)

Solid waste such as shells and fiber are reused as boiler fuel, instead of using diesel. The company shows documents on the use of shells and fiber for the period 2020 and January - April 2021. During 2020, fiber used as boiler fuel as much as 50,901 tons and shell used as boiler fuel as much as 13,582 tons. For the period January - April 2021, 18,920 tons of fiber used and 3,352 tons of shells used.

The company also shows a table of the efficiency obtained by using renewable fuels (shell and fiber). The following is an example for the efficiency of using renewable fuels for the period January – April 2021.

	Month - 2021				2020
	Jan	Feb	Mar	April	
Total KWH	768,100	677,460	777,510	722,430	5,493,153
Solar usage standards (KWH/L)	3.5	3.5	3.5	3.5	3.5
Solar needed (Liter)	219,457	193,560	222,146	206,409	1,569.470

The total FFB processed during the January – April 2021 period is 151,497 tons. So based on the table above, the efficiency of using shell and fiber as a substitute for diesel fuel for boiler fuel is 5.5 liters/ton FFB or 19.44 KWH/ton FFB for electricity use. Also during 2020, total FFB processed is 420,270. So based on the table above, the efficiency of using shell and fiber as a substitute for diesel fuel for boiler fuel is 3.7 liters/ton FFB or 13.07 KWH/ton FFB for electricity use.

Status: Comply

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

7.10.1

The company has an inventory of GHG emission sources listed in the document identification of sources of greenhouse gas emissions for the period 2019, including:

Source of GHG emissions produced by the Plantation

- GHG from N fertilizers
- GHG from P2O5 fertilizer
- GHG from MgO fertilizer
- GHG from K2O fertilizer
- GHG from CaO fertilizer
- GHG from Borite fertilizer
- GHG from ZnSO4 fertilizer
- GHG from CuSO4 fertilizer
- GHG from MgSO4 fertilizer
- GHG from CaCO3 fertilizer
- CO2 from herbicides, pesticides and rodenticides
- CO2 from using diesel in gardens

- CO2 from the grid
- CO2 from using diesel for transport to the Indrasakti mill

Sources of GHG emissions produced by Mill

- CO2 from energy production
- Fossil CO2 from electricity
- Fossil CO2 from diesel consumption
- CH4 from POME management
- CO2 from using NaOH
- CO2 from Phosphate use
- CO2 from EDTA use
- CO2 from Sulfite usage
- CO2 from using alum
- CO2 from using Sodium carbonate
- CO2 from using CaCO3
- CO2 from using diesel for CPO transport

Based on the documents above, it can be concluded that the company has identified the sources of GHG produced by PT Tapan Nadenggan and PT Buana Artha Sejahtera

The company shows identification documents of activities that produce emissions for the period 2020 for Mill and Estate. Sighted the result of identification of emissions and pollution as well as its sources, such as in estate emissions sources are from fossil fuel usage for transportation and generator, emission from fertilizer usage, pesticide usage and electricity usage. Identified the sources of emission and pollution from mill such as fossil fuel usage, electricity usage and WWTP.

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

Calculation of GHG and its monitoring has conducted by sustainable department. GHG emission calculated using RSPO palm GHG calculator 4.0 Summary of GHG emission for Semilar POM and its supply base for 2021 are listed as follows :
Summary Emission

Emmission per product	tCO2e/tProduct
CPO	0.08
PK	0.08

Production	t/yr
FFB processed	420,271.06
CPO produced	98,375
PK produced	24,943

Extraction	%
OER	23.41
KER	5.93

Land use	Ha
Planted area	15,280.82
Planted on peat	0.00
Conservation Area (Forested)	158.52
Conservation Area (non forested)	584.06

Summary of field emission and Sinks

Description	Own crop			Group			Total
	Emissions Sources	tCO2e	tCO2e/ha	tCO2e/tFFB	tCO2e	tCO2e/ha	
Land conversion	108,764.8	7.12	0.26	0.00	0.00	0.00	108,764.8
CO2 emmissions from fertilizer	13,336.53	0.87	0.00	0.00	0.00	0.00	13,336.53
N2O emissions from Peat	0.00	0.00	0.00	0.00	0.00	0.00	
N2O emissions from Fertilizer	12,494.16	0.82	0.03	0.00	0.00	0.00	12,494.16
Fuel consumption	3,550.87	0.23	0.01	0.00	0.00	0.00	3,550.87
Peat oxidation	0.00	0.00	0.00	0.00	0.00	0.00	
Sinks							
Crop sequestration	-143,054.97	-9.36	-0.34	0.00	0.00	0.00	-143,054.97
Sequestration in Conservation area	-1,453.63	-0.10	-0.00	0.00	0.00	0.00	-1,453.63
Total	-6,362.23	-0.42	-0.02	0.00	0.00	0.00	-6,362.23

Summary Oil Mill Emissions and Credits

Remarks	tCO2e	tCO2e/t FFB
Emissions sources		
POME	15,569.87	0.04
Fuel consumption	951.23	0.00
Grid electricity	0.00	0.00
Credits		
Export of grid electricity	0.00	0.00
Sales of PKS	0.00	0.00
Sales of EFB	0.00	0.00
Total	16,521.10	0.04

Palm Oil Mill Effluent (POME) Treatment

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

POME Divert to Anaerobic Digestion

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

The HCV area listed in the basic info is the HCV area in the form of forest. While the HCV area of 584.06 is not listed in the basic info because the area is a river border whose condition is currently planted with oil palm which is located in every estate.

As compared with the GHG calculation for 2020, there are a lot differences because in 2019, Semilar POM also received other FFB from the same group, such as Bukit Tiga Estate, Lenggana Estate, Muara Dua Estate, Sungai Rungau Estate, and Tangar Estate. So, the total area and conservation/HCV area is changed and also the emission and sink of the field also changed. Below is the summary of GHG emission for Semilar POM and its supply base for 2021,

Summary Emission

Emmision per product	tCO2e/tProduct
CPO	0.75
PK	0.75

Production	t/yr
FFB processed	389,169.99
CPO produced	23947.93
PK produced	5235.4

Extraction	%
OER	23.81
KER	6.15

Land use	Ha
Planted area	37417.68
Planted on peat	0.00
Conservation Area (Forested)	1679.37
Conservation Area (non forested)	1646.97

Summary of field emission and Sinks

Description	Own crop			Group			Total
	tCO2e	tCO2e/ha	tCO2e/tFFB	tCO2e	tCO2e/ha	tCO2e/tFFB	
Emissions Sources							
Land conversion	193344.43	12.79	0.52	4553.58	0.20	0.25	197898.01
CO2 emmisions from fertilizer	13591.57	0.90	0.04	587.97	0.03	0.03	14179.54
N2O emissions from Peat	0.00	0.00	0.00	0.00	0.00	0.00	0.00
N2O emissions from Fertilizer	11993.12	0.76	0.03	540.36	0.02	0.03	12533.48
Fuel consumption	2278.58	0.14	0.01	58.97	0.00	0.00	2337.55
Peat oxidation	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Sinks							
Crop sequestration	-	-9.36	-0.40	-	-0.27	-0.33	-154014.29
Sequestration in Conservation area	0.00	0.00	0.00	-507.97	-0.02	-0.03	-507.97
Total	73182.59	4.63	0.20	-756.27	-0.03	-0.04	72426.32

Summary Oil Mill Emissions and Credits

Remarks	tCO2e	tCO2e/t FFB
Emissions sources		
POME	14417.66	0.04
Fuel consumption	778.23	0.00

Grid electricity	0.00	0.00
Credits		
Export of grid electricity	0.00	0.00
Sales of PKS	0.00	0.00
Sales of EFB	0.00	0.00
Total	15195.89	15195.89

Palm Oil Mill Effluent (POME) Treatment

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

POME Divert to Anaerobic Digestion

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

7.10.2

Based on interview with company management, it is known that there has been no new land clearing since 2014.

7.10.3

All plantation units and mills can show identification documents of GHG emission sources and mitigation plans that explain the type of activity, management activities, schedule, PIC and suggested activities.

Activities that become sources of emissions include:

- Chemical fertilizer application
- Use of pesticides
- Use of fossil fuels
- Electricity usage
- Burnt trash
- POME / effluent

The mitigation implementation plan includes:

- Optimizing the use of EFB, using the right fertilizer dose
- Optimizing the IPM method, using licensed pesticides and in accordance with the dosage
- Maintenance of generators and heavy equipment, supervision of fuel use
- Using energy-saving lamps, socializing electricity savings
- Socialization of the prohibition of burning, separation of organic and inorganic waste
- Utilizing POME to land application areas and methane capture

Records of mitigation implementation can be shown for example:

- The company conducts quality testing of emissions from stationary sources such as ambient air, noise, boiler emissions, generator emissions, engine gas emissions every 6 months and reported to the government.
- Management is an important effort that must be made to minimize emissions from generators and boilers by means of periodic maintenance at least once a year.
- The company uses POME to land application areas and methane capture

Status: Comply

7.11

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

7.11.1

Based on field visits to operational areas in Semilar, Sei Rindu, Puri, and Mandang Estate, it was found that there was no new land clearing or replanting..

7.11.2

Based on field visit to operational areas in Semilar, Sei Rindu, Puri, and Mandang Estate, it was found that there was no new land clearing or replanting.

The company has SOP for Prevention and Handling of Land Fires with no. document: SOP/SMART/HV MS-EV MD/USDV/II/2015 which was revised on 9 December 2016 and ratified on 1 March 2017. The procedures for preventing and handling land fires can be explained, among others:

- Preparation of land fire prevention and management plans
- Review of land fire prevention and management
- Implementation of plans and handling of land fires (prevention, preparedness actions, implementation of warning systems and early detection of land fires)
- Hotspot monitoring
- Identification of land fire hazards
- Hot spot verification
- Be prepared to anticipate land fires
- State of emergency
- Handling land fires
- Confirmation of hotspots and/or fire management reports
- Hotspot recapitulation
- Mapping of fire points and fire events
- Analysis of land fire management
- Evaluation.

7.11.3

The company shows records of fire training to workers (including emergency response teams) and residents of housing, including:

- Fire simulation on February 22, 2021 at SMLM. The activity was attended by the Emergency Response Team and 30 employees.
- Fire simulation using *APAR* on April 30, 2021 at the estate workshop. The activity was attended by 13 people from the Emergency Response Team.

Based on the results of interviews with representatives of Pantap and Sumber Makmur Villages, it is known that there were no cases of land fires during 2020 to May 2021. The company also conducted socialization related to fire-fighting to surrounding villages.

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

Based on the results of the previous audit, it was found that company conducted new land clearing after 1 Nov 2005 without prior HCV identification activities. HCV identification activities were carried out by the Company in 2012.

LUCA analysis activities are carried out separately from HCV identification. LUCA reports were submitted to the RSPO in 2014 for all of GAR's subsidiaries. LUCA's activities have been carried out following the proxies set by the RSPO.

Regarding the progress of the RaCP which must be completed by PT Tapan Nadenggan and PT Buana Artha Sejahtera, when the ASA 1.3 audit was carried out, it was known as follows

PT Tapan Nadenggan

LUCA Pass status with FCL - 0 Ha and environmental remediation (riparian) covering an area of 82.88 Ha

PT Buana Artha Sejahtera

FCL 5 Ha, Concept Note approve

Related to the RaCP process, it has been described in indicator 7.8.12.

7.12.2

HCV document compiled in 2012 has listed protected animal species, their protection status and also the details of conservation area. There are 3 types of birds protected according to Government Regulation No.7 of 1999 (check claws / *Halycon smyrensis*; honeybirds / *Anthreptes* sp; small pijantung / *arachnotera longirostrata*), and according to CITES (monitor lizards / *Varanus salvator*; cobra / *Naja sumatrana*) and none protected flora.

The assessment was carried out by an HCV assessor that has been approved by RSPO, using the HCV toolkit in 2008 and peer review has been carried out by Resit Sozer in May 2012. The total HCV for PT BAS is: 497.6 Ha, while for PT TN is: 244.98 ha. In conclusion, total HCV area is 742.58 Ha which consist of 158.52 Ha in form of forest and 584.06 Ha in form of nonforest. In area statement, the HCV area in form of nonforest (584.06 Ha) is included in planted area.

There is evidence of the implementation of a public consultation at the time of HCV preparation contained in the HCV document in the form of minutes of public consultation results on 19 October 2012 at the Sungai Rungai Training Center for PT TN and PT BAS.

The company did not develop new plantations after 15 November 2018 so the HCS is not applied for this assessment.

7.12.3

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

7.12.4

PT Tapan Nadenggan and PT Buana Artha Sejahtera have established a management and monitoring plan for the HCV area for the 2019-2021 period which informs the types of programs, targets, stages of activities, indicators of success, location, year (1, 2, 3, 4, 5), person in charge, implementer, supporters and information. The defined management programs are:

The defined management programs are:

- River border management of HCV areas (demarcation, maintenance of boundary signs, installation of spray markers, socialization to employees, maintenance of warning boards, rehabilitation, security of HCV areas, conservation of natural resources.
- Endangered species management (socialization to employees, installation of socialization media, maintenance of warnings and security)
- HCV and RTE monitoring (attribute monitoring, HCVC condition monitoring, RTE species monitoring, rehabilitation monitoring)

The realization of HCV management and monitoring in 2019 and 2020 is documented in Management and Monitoring HCV Report of PT TN and PT BAS and also submitted to *BKSDA* on 4 June 2021. The report informed about:

- Review of HCV management
- Review of HCV monitoring activity
- List of flora in PT BAS
- List of fauna in PT BAS until 2020
- Data analysis of animal encounters at PT TN in 2020

Company also has socialized the HCV Management and Monitoring plan for 5 years periode, for example: Integrated High Conservation Value and High Carbon Stock Management and Monitoring Master Plan 2014 – 2024 PT Buana Artha Sejahtera. The master plan explain the management plan and target for 5 years and also the monitoring plan for Mandang and Puri Estate. This master plan document has submitted to the relevant stakeholder, for example to Head of Rungau Raya Village on 20 July 2020, *BKSDA* of Kalimantan Tengah Province on 19 June 2020, and to Environment Agency of Seruyan Village on 19 June 2020.

7.12.5

There was no land clearing after 2018. The company also conducted an HCV assessment in 2012.

7.12.6

The company demonstrates the protection policy for rare and endangered wildlife which was established on June 25, 2012 by the Managing Director of PT Smart TBK. Sanctions for employees who catch, hunt and maintain RTE are adopted by the company based on Law No. 5 of 90 article 40. Based on interview with workers, it is known that they know about RTE species and the sanction who catch the RTE species. There also signboard about RTE in estates.

PT Tapian Nadenggan and PT Buana Artha Sejahtera have also conducted outreach to employees regarding the protection of endangered animals and plants, for example as follows:

- Socialization of HCV including protection of protected animals and plants to Sei Rindu Estate employees on February 19, 2020.
- Socialization of HCV including protection of protected animals and plants to the people of Pantap Village on January 8, 2020
- Socialization of HCV including protection of protected animals and plants to the people of Rungau Raya Village on March 8, 2020
- Socialization of HCV including protection of protected animals and plants to Puri estate employees on February 15, 2021
- Socialization of HCV including protection of protected animals and plants to the people of Biru Maju Village on October 10, 2020.

7.12.7

There was no land clearing after 2018. The company also conducted an HCV assessment in 2012

Company has implement the management and monitoring plan. The existence of protected species is maintained and is still found in the plantation area. The result of HCV monitoring become feedback to the HCV management plan. The follow up from evaluation of HCV monitoring is:

- Maintain to carry out HCV management activities in accordance with SOPs.
- Repairing warning boards and other HCV attributes that have been damaged and that are not in accordance with the SOP and update the status of animal protection on the protected animal poster according to Permen LHK No. 106 of 2018.
- Inserting rehabilitation plants
- Conducting socialization on HCV to staff, estate and mill employees, and the community regularly.

7.12.8

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

1. Email from Mutu Agung to RSPO dated July 29, 2020 asking about progress regarding the status of LUCA and RaCP of PT Tapian Nadenggan and PT BAS in accordance with the information obtained from GAR management that:

- PT Tapian Nadenggan
LUCA status - Pass
FCL - 0 ha
Environmental remediation (riparian) - 82.88 ha

- PT Buana Artha Sejahtera
FCL 5 Ha, concept note approve

2. Based on an email from RSPO (khing.suli@rspo.org) on August 10, 2020 which states the following: "I have had an internal discussion with Ms. Aminah. As GAR is now in the final stages of preparing the compensation plan for submission and evaluation, PT TN and PT BAS should be able to complete the RaCP process by next year. On behalf of Ibu Aminah, with regards to the NC raised to the units with FCL value, the NC can be left open until the next ASA in which the compensation plan needs to be approved by then. "

Until the surveillance-1.2 audit is conducted, the Company has not been able to demonstrate that the HCV Compensation Plan (RaCP) has been received by RSPO.

Verification on 11 June 2020

Based on interviews with management, it is known that up to ASA 1.3 PT TN and PT BAS are still in the process of preparing the Remediation and Compensation Proposal. In this regard, the company shows an email from RSPO to CB dated March 26, 2021 regarding Advisory Note No: 0002/03/21 Assurance - Integrity for GAR subsidiaries related to the RaCP process. In the Recommendations and Decisions section, it is explained that:

- Approval to continue certification can only be made for Companies whose certificate license expires 6 months from the issuance of the Advisory Note (since March 25, 2021). Non-conformities that arise are allowed to remain open until the next surveillance/recertification audit.
- For units whose license expires from October 2021, it is necessary to continue to follow up with the RSPO regarding the status of RaCP and its completion on an ongoing basis.
- For units at the initial certification stage, certificate issuance can only be carried out after the compensation plan has been approved.

Based on this document, this discrepancy is still open and will be re-verified at the next audit (ASA 1.4). **Non Conformity No. 2021.01 with critical category.**

7.12.8

Status: Non Conformity No. 2021.01 with critical category.

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 √
Onsite ASA 1.2 & ASA .13	The company has certified no certificate: MUTU-RSPO/052.	√
	Status: Comply	
2.	Implementation of certificate and trademark used by Client comply with size and type (shape) against Guideline of trademark Use	X or √
Onsite ASA 1.2 & ASA .13	The company does not use RSPO logo.	√
	Status: Comply	
3.	Implementation of Certificate and Trademark is not used on product	X or √
Onsite ASA 1.2 & ASA .13	The company does not use RSPO logo.	√
	Status: Comply	
4.	Controlling of Certificate and Trademark, including withdrawing inappropriate trademark.	X or √
Onsite ASA 1.2 & ASA .13	The company does not use RSPO logo.	√
	Status: Comply	

3.3 Summary of RSPO Partial Certification.

Compliance of the uncertified management units of Golden Agri-Resources, Ltd against the rules for partial certification was determined through Self-Assessment in accordance with RSPO Certification System clause 5.5.3. A summary of findings is as stated below.

Golden Agri-Resources, Ltd Time Bound Plan (TBP) is explained in table 1.5. Golden Agri-Resources run forty-seven (47) mills and one hundred and thirty-six (166) estates (own and smallholders) in Indonesia and has achieved RSPO certified for thirty-one (31) mills and supply base in Indonesia. Golden Agri-Resources, Ltd has informed the TBP progress, MUTU has considered that Golden Agri-Resources, Ltd is comply with the RSPO requirement for TBP. The Time Bound Plan was revised and declared by Golden Agri-Resources, Ltd on 21 January 2021 made by Head of Sub Div SPO Certification and Low GHG Strategy.

MUTU has verified partial certification for uncertified unit's subsidiary of Golden Agri-Resources, Ltd based on their Time Bound Plan. There are sixteen (16) uncertified management unit of GAR. MUTU Auditor verified positive assurance against the company internal audit and supporting evidence as well as any information from others sources.

MUTU Auditor has verified company partial certification and concludes that:

- There is no significant land conflicts which have not been declared above.
- The company has followed RSPO requirements regarding the New Planting Procedure and Remediation and Compensation Procedure.
- There is no labor disputes that are not resolved through an agreed process.
- All plantations established since 2005 have been carried out in accordance with applicable laws in the country and there is no evidence of non-compliance with the law in any of the non-certified holdings that have 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: The company has carried out a Compliance Audit / Internal Compliance Verification (ICV) to see compliance with RSPO standards and also the Set up System in the Company's units to be certified.</p> <p>There are Compliance Audit (ICV) reports for each company including:</p> <ol style="list-style-type: none"> 1. PT Sawitakarya Manunggul – Sawita Mill : Pre Audit 2015, Compliance Audit 15 June 2020 2. PT Smart Tbk – Bukit Kapur Mill: Pre Audit 2015, Compliance Audit 05 October 2020 3. PT Sinar Kencana Inti Perkasa – Kasuari Mill: Pre Audit 2015, Compliance Audit 19 October 2020 4. PT Agrolestari Mandiri – Pekawai Mill: Pre Audit 2015, Compliance Audit 06 July 2020 5. PT Binasawit Abadi Pratama – Perdana Mill: 08 June 2020 <i>Compliance Audit By System GSIS</i> 6. PT Agrokarya Prima Lestari – Kuayan Mill: Pre Audit 2014, Compliance Audit 21 September 2020 7. PT Mitrakarya Agroindo – Tangar Mill: Pre Audit 2015, Compliance Audit 13 July 2020 8. PT Paramita Internusa Pratama – Belian Mill: Pre Audit 2015, Compliance Audit 13 July 2020 9. PT Kresna Duta Agroindo – Rantau Panjang Mill: Compliance Audit 09 November 2020

		<p>10. PT Kresna Duta Agroindo – Gunung Kombeng Mill: Compliance Audit 10 February 2020</p> <p>11. PT Sawit Mas Sejahtera – Sungai Kikim Mill: <i>Setup System</i>. Compliance Audit 02 March 2020</p> <p>12. Sinar Kencana Inti Perkasa – Sungai Magalau Mill: Compliance Audit 14 September 2020.</p> <p>13. PT Bahana Karya Semesta – Sungai Air Jernih Mill: Compliance Audit 07 December 2020</p> <p>14. PT Agrolestari Sentosa – Jalemo Mill: <u>Setup System</u> : Compliance Audit 20 January 2020</p> <p>15. PT Adi Tunggal Mahajaya – Sako Mill: Compliance Audit 17 November 2020.</p> <p>16. PT Bangun Nusa Mandiri – KNRM: Akan diaudit tahun 2021 (the Mill still in Commissioning process)</p> <p>Auditor Verification: Internal Audit report available for uncertified management unit:</p> <ol style="list-style-type: none"> 1. PT Sinar Kencana Inti Perkasa (Kasuari Mill and supply base) compliance audit on 19-30 October 2020. 2. PT Agrolestari Mandiri (Pekawai Mill and supply base) compliance audit on 6-15 July 2020. 3. PT Binasawit Abadi Pratama (Perdana Mill and supply base) compliance audit on 8-16 June 2020. 4. PT Agrokarya Prima Lestari (Kuayan Mill and supply base) compliance audit on 21 September 2020 – 2 October 2020. 5. PT Mitra Karya Agroindo (Tangar Mill and supply base) compliance audit on 13-23 July 2020. 6. PT Paramitra Internusa Pratama (Belian Mill and supply base) compliance audit on 13-24 July 2020. 7. PT Sawit Mas Sejahtera (Sungai Kikim and supply base) compliance audit on 2-11 March 2020. 8. PT Sinar Kencana Inti Perkasa (Sungai Magalau Mill and supply base) compliance audit on 14-18 September 2020. 9. PT Agro Lestari Sentosa (Jalemo Mill and supply base) compliance audit on 20-24 January 2020. 10. PT Adi Tunggal Mahajaya (Sako Mill and supply base) compliance audit on 17-27 November 2020. 11. PT SMART (Bukit Kapur Mill and supply base) compliance audit on 5-9 October 2020. 12. PT Kresna Duta Agroindo (Rantau Panjang Mill and supply base) compliance audit on 9-13 November 2020. 13. PT Kresna Duta Agroindo (Gunung Kombeng Mill and supply base) compliance audit on 1-15 February 2020. 14. PT Sawitakarya Manunggul (Sawita Mill and supply base) compliance audit on 15-26 June 2020. 15. PT Bahana Karya Semesta (Sungai Air Jernih Mill and supply base) compliance audit on 7-21 December 2020. <p>There is 1 management unit which under system development i.e PT Bangun Nusa Mandiri. PT Bangun Nusa Mandiri is on process to construct the mill (Kenari Mill), so an internal audit has not been carried out because the Mill is still in commissioning.</p>
2.2.2	No replacement of primary forest or any area identified	Company Group/Holding Statement:

	<p>as containing High Conservation Values (HCVs) or required to maintain or enhance HCVs in accordance with RSPO criterion 7.12</p>	<p>Several companies under GAR were planted above November 2005, while the HCV assessment process was conducted in the period 2010 – 2013.</p> <p>GAR and its subsidiaries have been reporting disclosure and zero liability to RSPO by email dated August 29, 2014.</p> <p>25 companies have been developed after November 2005, from 25 companies made to 29 reports and are currently following the RaCP process with progress as of January 18, 2021 as follows:</p> <p>a) 5 concept notes have been accepted by RSPO including:</p> <ol style="list-style-type: none"> 1. PT Kresna Duta Agroindo – Kalimantan Timur 2. PT Agrolestari Sentosa – Kalimantan Tengah 3. PT Sumber Indah Perkasa – Papua 4. PT Kencana Graha Permai – Kalimantan Barat 5. PT Buana Arta Sejahtera – Kalimantan Tengah <p>b) 1 LUCA report has been accepted by RSPO the report is PT Tapian Nadenggan – Kalimantan Tengah with a total Compensation Liability covering an area of 1428.43 ha and HCV Remediation covering an area of 1009.87 ha. Submission of the revised Concept Note to RSPO will take place on 2 December 2019</p> <p>c) 16 LUCA report still in the process of being reviewed by the RSPO:</p> <ol style="list-style-type: none"> 1. PT Cahaya Nusa Gemilang – Kalimantan Barat 2. PT Bumi Sawit Permai – Sumatera Selatan 3. PT Satya Kisma Usaha (Sungai Bengkal Estate) - Jambi 4. PT Satya Kisma Usaha (Batang Gading Estate) - Jambi 5. PT Satya Kisma Usaha (Kilis Estate) – Jambi 6. PT Satya Kisma Usaha (Sungai Bengkal KKPA) – Jambi 7. PT Tapian Nadenggan (JLYE, BSRE, LBLE) – Kalimantan Timur 8. PT Tapian Nadenggan (BSRE) – Kalimantan Timur 9. PT Paramitra Internusa Pratama – Kalimantan Barat 10. PT Sawita Karya Manunggal – Kalimantan Selatan 11. PT Bangun Nusa Mandiri – Kalimantan Barat 12. PT Kartika Prima Cipta – Kalimantan Barat 13. PT Binasawit Abadi Pratama – Kalimantan Tengah 14. PT Aditunggal Mahajaya – Kalimantan Tengah 15. PT Mitrakarya Agroindo – Kalimantan Tengah 16. PT Agrokarya Primalestari – Kalimantan Tengah <p>d) 6 reports are in the process of being revised and will be sent to RSPO:</p> <ol style="list-style-type: none"> 1. PT Tapian Nadenggan (Hanau Mill) – Kalimantan Tengah 2. PT Agrolestari Mandiri – Kalimantan Barat 3. PT Persada Graha Mandiri – Kalimantan Barat 4. PT Satya Kisma Usaha – Kalimantan Barat 5. PT Buana Adhithama – Kalimantan Barat 6. PT Sinar Kencana Inti Perkasa – Kalimantan Selatan <p>e) 1 LUCA report is proposed to be postponed until the HCV HCS Integrated Report gets a Satisfactory status from the HCVRN, namely PT Sawit Mas Sejahtera - Sumatera Selatan.</p>
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2.2.3	Any new plantings since January 1 st 2010 must comply with the RSPO New Plantings Procedure.	<p>Company Group/Holding Statement: GAR and its subsidiaries planted oil palm plantation after January 2010. There were 18 companies that had conducted NPPs and had gone through a public consultation process in April 2014. The companies were:</p> <ol style="list-style-type: none"> 1. PT Satya Kisma Usaha – Jambi 2. PT Bumi Sawit Permai – Sumatera Selatan

		<ol style="list-style-type: none"> 3. PT Tapian Nadenggan – Kalimantan Timur 4. PT Kresna Duta Agroindo – Kalimantan Timur 5. PT Mitra Karya Agroindo – Kalimantan Tengah 6. PT Binasawit Abadipratama – Kalimantan Tengah 7. PT Aditunggal Mahajaya – Kalimantan Tengah 8. PT Agrolestari Sentosa – Kalimantan Tengah 9. PT Agrokarya Primalestari – Kalimantan Tengah 10. PT Buana Adhitama – Kalimantan Tengah 11. PT Buana Artha Sejahtera – Kalimantan Tengah 12. PT Agrolestari Mandiri – Kalimantan Barat 13. PT Paramitra Internusa Persada – Kalimantan Barat 14. PT Persada Graha Mandiri – Kalimantan Barat 15. PT Bangun Nusa Mandiri – Kalimantan Barat 16. PT Kartika Pria Cipta – Kalimantan Barat 17. PT Kencana Graha Mandiri – Kalimantan Barat 18. PT Cahaya Nusa Gemilang – Kalimantan Barat <p>Auditor Verification: Based on auditor verification, not all uncertified unit conduct new clearing after January 2010 but for all uncertified unit with land clearing after January 2010 has follow NPP. Detail information of uncertified unit are:</p> <ol style="list-style-type: none"> 1. PT Sinar Kencana Inti Perkasa (Kasuari Mill and supply base): there is no new land clearing after January 2010 2. PT Agrolestari Mandiri (Pekawai Mill and supply base): NPP on 26 April 2014 3. PT Binasawit Abadi Pratama (Perdana Mill and supply base): NPP on 8 July 2014 4. PT Agrokarya Prima Lestari (Kuayan Mill and supply base): NPP on 26 April 2014 and PT Buana Adhitama (supply base) conduct NPP on 4 June 2014. 5. PT Mitra Karya Agroindo (Tangar Mill and supply base): NPP on 26 April 2014 6. PT Paramitra Internusa Pratama (Belian Mill and supply base): NPP on 3 June 2014, PT Kartika Prima Cipta (supply base) conduct NPP on 8 July 2014 And PT Persada Graha Mandiri (Supply base) conduct NPP on 6 June 2014. 7. PT Sawit Mas Sejahtera (Sungai Kikim and supply base): there is new planting after January 2010 in Sungai Kikim Estate and Sungai Saling Estate, the company not conduct NPP. This is become subject of sanction. For PT Buana Sawit Mas (supply base) conduct NPP on 8 July 2014. 8. PT Sinar Kencana Inti Perkasa (Sungai Magalau Mill and supply base): there is no new land clearing after January 2010. 9. PT Agro Lestari Sentosa (Jalemo Mill and supply base): NPP on 26 April 2014 10. PT Adi Tunggal Mahajaya (Sako Mill) (under construction): NPP on 25 April 2014, PT Agrokarya Prima Lestari (supply base) conduct NPP on 26 April 2014 and PT Mitra Karya Agroindo (supply base) conduct NPP on 26 April 2014. 11. PT SMART (Bukit Kapur Mill and supply base): there is no new land clearing after January 2010. 12. PT Kresna Duta Agroindo (Rantau Panjang Mill and supply base): NPP on 8 July 2014
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		<p>13. PT Kresna Duta Agroindo (Gunung Kombeng Mill and supply base): NPP on 8 July 2014</p> <p>14. PT Sawitakarya Manunggul (Sawita Mill and supply base): there is new land clearing after January 2010 in Sawita KKPA and company not conduct NPP. This is become subject of sanction.</p>
<p>2.2.4</p>	<p>Land conflicts, if any, are being resolved through a mutually agreed process, such as the RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 4.4, 4.5, 4.6, 4.7 and 4.8</p>	<p>Company Group/Holding Statement: No land conflicts. The company has a land conflict resolution mechanism in accordance with the RSPO criteria 4.2, 4.6, 4.7 and 4.8. This procedure is contained in the SOP for handling social conflicts with the registration number SOP/SMART/SCRD/NSDV/I/002 revision 1 dated 18 May 2016 and SOP for Handling Complaints and Dissatisfaction no SOP/SMART/GIMSSCMD/USDV/I/001 revision 2 dates April 11, 2017. This procedure regulates mutually agreed upon social conflict resolution. Conflict resolution can be done in a participatory manner and can also be done with a third party (mediator).</p> <p>The company also has a procedure for handling complaints before they develop into conflict. The process in question is SOP/SMART/GIMSSCMD/USDV/I/001 revision 2 dated 11 April 2017, handling complaints appropriately and quickly. GAR has initiated to become a member of the RSPO DSF as a "Grower" category.</p> <p>Here recap of complaint progress related to GAR which publish in RSPO Website:</p> <ol style="list-style-type: none"> 1. PT Kartika Prima Cipta: Complaints by FPP regarding the FPIC process Another 6 issues in 2014: RSPO with the approval of GAR and FPP divides the conflict resolution verification process into 5 phases. Currently it has been completed until phase 3 (phase 1 related to NPP, maximum land holding and new land development, phase 2 related to legality, phase 3 related to smallholders). As of January 3, 2021, GAR has sent additional explanations and supporting evidence related to the fulfillment of the related issues. Phases 4 and 5 will begin in February 2021. 2. Kapuas Hulu Region (PT KPC, PT PGM and PT PIP) regarding the legality of 2018: that the legal review process is still ongoing. Until January 15, 2021 there has been no progress from the RSPO regarding the results of the legal review. 3. Eight company in Central Kalimantan (PT TN, PT BAP, PT BAS, PT ATM, PT AKPL, PT BAT, PT MKA, PT ALS): complaint from FPP in 2020 regarding land legality and bribery case that GAR has replied to the RSPO email related to GIS analysis of the location of the land on 22 December 2020. Until now, it is still waiting for further decisions from the RSPO. 4. The results of the Compliance Audit carried out in the 2020 period in the uncertified unit had no land conflicts and the unit had disseminated the SOP for handling complaints and grievances, Human Rights Policies and SOPs for handling social conflicts both internal and external, in general the FPIC process has been carried out according to procedures, so that there is no land or social conflicts. <p>Auditor Verification:</p>

		<p>Auditor has verified the supporting evidence of above the company statement. There is no land conflicts in the following uncertified management unit:</p> <ol style="list-style-type: none"> 1. PT Sinar Kencana Inti Perkasa (Kasuari Mill and supply base) 2. PT Agrolestari Mandiri (Pekawai Mill and supply base). 3. PT Mitra Karya Agroindo (Tangar Mill and supply base) 4. PT Sawit Mas Sejahtera (Sungai Kikim and supply base) 5. PT Sinar Kencana Inti Perkasa (Sungai Magalau Mill and supply base) 6. PT Adi Tunggul Mahajaya (Sako Mill and supply base) 7. PT SMART (Bukit Kapur Mill and supply base) 8. PT Kresna Duta Agroindo (Rantau Panjang Mill and supply base) 9. PT Kresna Duta Agroindo (Gunung Kombeng Mill and supply base) 10. PT Sawitakarya Manunggul (Sawita Mill and supply base) 11. PT Bahana Karya Semesta (Sungai Air Jernih Mill and supply base) 12. PT Bangun Nusa Mandiri (Kenari Mill and supply base) <p>There is a land conflict but was in the process of completion for PT Paramitra Internusa Pratama (Belian Mill and supply base). The supply base of Belian mill are PT Kartika Prima Cipta and PT Persada Graha Mandiri.</p> <p>There is complaint to RSPO Complaint Panel regarding land legality to the uncertified management unit such as PT Agrokarya Prima Lestari (AKPL), PT Binasawit Abadi Pratama (BAP) and PT Agro Lestari Sentosa (ALS). The updated progress is that GAR has submitted additional documents on GIS Analysis. Until now, it is still waiting for further decisions from the RSPO. The progress regarding the settlement of the complaint in detail at the following link: https://askrspo.force.com/Complaint/s/case/5000o00002u2QR1AAM/detail</p>
2.2.5	<p>Labour disputes, if any, are being resolved through a mutually agreed process, in accordance with RSPO criterion 4.2</p>	<p>Company Group/Holding Statement:</p> <p>The company has a procedure for handling employee complaints before they develop into conflicts. The process in question is SOP / SMART / SCRD / NSDV / I / 002 revision 1 dated 18 May 2016.</p> <p>Procedures related to employee problems are regulated in the internal flow form because employees are included in the category of internal stakeholders. The complaint medium used is an official letter submitted through the union or put in the suggestion box provided in strategic locations.</p> <p>Here recap of complaint progress related to GAR which publish in RSPO Website:</p> <ol style="list-style-type: none"> 1. PT AMNL, West Kalimantan, complained by the Ketapang Regency Indonesian Prosperity Labor Union (<i>Serikat Buruh Sejahtera Indonesia</i>) on August 30, 2018, Complaints related to the company allegedly dismissing workers in violation of Indonesian labor law. Current status complaint is closed (Based on a letter from RSPO No. RSPO / 2018/15 / SW dated 11 August 2020 in response to the Complaints Panel's decision on PT Agrolestari Mandiri "to reject the complaint" in accordance with the available evidence and sent to RSPO - Attached Letter).

		<p>2. PT SMART, North Sumatra, Complaints by 56 PT SMART Workers and local communities in Dusun Belongkut I, II and III, dated 18 October 2018, regarding.</p> <ol style="list-style-type: none"> The company is suspected of not paying severance pay in accordance with labor law No. 13 of 2003 to 56 former workers. Workers suspect that the company does not comply with regulations related to CSR, especially in the environmental sector. Current status complaint is closed (Based on a letter from RSPO No.RSPO / 2018/22 / SW dated 1 October 2020 against complaints directed by Dusun X, Belongkut Village to PT SMART TBK and based on a decision from the RSPO Complaints Panel and existing evidence it is decided that the complaint has been declared "reject the complaint") <p>3. PT SMART Tbk, PT MPLWI North Sumatra, Complaints from the Branch Consulate of the Federation of Indonesian Metal Workers Union (KC-FSPMI) regarding Discrimination against female workers and workers who are not provided with safety equipment and do not get maternity and maternity leave. Current status complaint is closed (Based on a letter from the RSPO dated January 29, 2020, addressed to the Branch Consulate of the Indonesian Metal Workers Union Federation (KC-FSPMI) regarding the complaint addressed to PT SMART TBK that the complaint has been followed up by both parties and has received agreement on October 5, 2019. In accordance with the letter stated that the complaint has been declared closed "closed")</p> <p>Auditor Verification: There is information from public source and RSPO website on any labour conflict for uncertified unit of the group subsidiaries, consist of:</p> <ul style="list-style-type: none"> Complaints from the Indonesian Prosperity Labor Union to PT Agrolestari Mandiri through the RSPO complaint panel and as explained by the company above that the case has been closed. Based on a letter from RSPO No. RSPO / 2018/15 / SW dated 11 August 2020. PT Sawitakarya Manunggul: https://dutatv.com/buruh-pt-sawita-karya-manunggul-mengadu-ke-dprd/. Regarding the news, the company explained that it was about reducing employees in terms of company efficiency policies. The company also showed evidence that it had attended an invitation to a hearing regarding the matter from the Kotabaru Regency Regional House of Representatives (DPRD) on 10 February 2020. From this meeting the company decided to proceed to the industrial relations court so that the matter could get legal certainty but until now part of the employee's party did not continue the problem to the industrial relations court. <p>There is no labor issue in other uncertified management unit.</p>
2.2.6	Legal non-compliance, if any, is being addressed through measures consistent with the requirements of RSPO P&C criterion 2.1	<p>Company Group/Holding Statement: Companies comply with the regulations in accordance with the requirements of the RSPO 2.1 where there is no violation of the rules that are relevant to the plantation. The company has a mechanism to evaluate compliance with regulations, namely SOP/SMART/UMUM/SADV/II/002. In SOP describes procedures for compliance, completeness and groove sections which explain in detail to evaluate compliance with the legislation.</p>

		<p>Subsidiaries of GAR which still on going to process HGU consist of:</p> <ol style="list-style-type: none"> 1. PT Djuandasawit Lestari (Muara Wahau Estate / Muara Tawas Estate) 2. PT Sawit Mas Sejahtera (Sawit Mas Estate) 3. PT Bumi Sawit Permai (Bumi Sawit Estate) 4. PT Forestralestari Dwikarya (Tanjung Rusa Estate) 5. PT Sumber Indah Perkasa (Sungai Buaya Estate, Sungai Merah Estate) 6. PT Ivo Mas Tunggal (Samsam Estate, Kandista Estate, Nenggala Estate, Sei Rokan Estate, Ujung Tanjung Estate) 7. PT Buana Wiralestari Mas (Nagasakti Estate; Nagamas Estate and Kijang Estate) 8. PT Ramajaya Pramukti (Ramarama Estate) 9. PT Binasawit Abadipratama (Perdana Estate, Lenggana Estate, Semandau Estate, Muara Dua Estate, Perdana Mill) 10. PT Agrokarya Prima Lestari (Mentaya Estate, Kuayan Estate, Bukit Santuhai Estate, Tajur Beras Estate, Seranau Estate) 11. PT Buana Adhitama (Sapiri Estate) 12. PT Agrolestari Sentosa (Manuhing Estate, Kajui Estate) 13. PT Mitra Karya Agroindo (Sungai Nusa Estate) 14. PT Aditunggal Mahajaya (Sako Mill, Sungai Ayawan Estate) 15. PT Satya Kisma Usaha (Medang Sari Estate) 16. PT Agrokarya Prima Lestari (Kuayan Mill) 17. PT Buana Adhitama (Bukit Dua Estate) 18. PT Agrolestari Sentosa (Jalemo Mill, Jalemo Estate) 19. PT Agrokarya Prima Lestari (Kuayan Mill) 20. PT Mitrakarya Agroindo (Tangar Mill) 21. PT SMART Tbk (Sungai Cantung Estate, Bukit Kapur Estate, Bukit Kapur Mill) 22. PT Bangun Nusa Mandiri (Gaharu Estate, Kenari Estate, Keranji Estate, Gaharu Plasma, Kenari Plasma) <p>Beside that, there are some unit still on process the land certificate (SHM) consist of:</p> <ol style="list-style-type: none"> 1. PT Kresna Duta Agroindo (Gunung Kombeng Mill, Gunung Kombeng KKPA) 2. PT Ramajaya Pramukti (Ramarama KKPA) 3. PT Kresna Duta Agroindo (Tiga Serumpun Estate) 4. PT Satya Kisma Usaha (Batang Gading KKPA, KILA) 5. PT Agrokarya Prima Lestari (Sungai Sambon Plasma) 6. PT Djuandasawit Lestari (Pandawa KKPA) 7. PT Forestra Lestari Dwikarya (Tanjung Rusa KKPA) 8. PT Sinar Kencana Inti Perkasa (Sungai Kupang KKPA) 9. PT Sawitakarya Manunggul (Sawita KKPA) 10. PT Kresna Duta Agroindo (Jakluay KKPA, Bukit Subur KKPA) 11. PT Kresna Duta Agroindo (Rantau Panjang KKPA) 12. PT Kencana Graha Permai (Kayung Kemitraan, Kencana Kemitraan, Kenanga Kemitraan) 13. PT Paramitra Internusa Pratama (Belian KKPA, Muara Tawang KKPA, Kapuas Hulu KKPA) 14. PT Mitrakarya Agroindo (Sulin Plasma) 15. PT Agrokarya Prima Lestari (Sapiri Plasma) 16. PT Adi Tunggal Mahajaya (Sako Plasma)
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		<p>There are 4 companies which still on process to revise EIA document and temporary storage place for hazardous and toxic waste, consist of:</p> <ol style="list-style-type: none"> 1. PT Sinar Kencana Inti Perkasa 2. PT Sumber Indah Perkasa 3. PT Sawit Mas Sejahtera 4. PT Bumi Sawit Permai <p>Auditor Verification:</p> <p>Legal process is still going on and there is a detail update progress documented by the company for each year.</p> <ul style="list-style-type: none"> - PT Sinar Kencana Inti Perkasa (Kasuari Mill and supply base), there is a legal non-compliance. Supply base for Kasuari Mill are PT Sinar Kencana Inti Perkasa and PT Sumber Indah Perkasa. The legal non compliance which still on process is EIA revision in PT Sumber Indah Perkasa and Hazardous waste permit in PT Sinar Kencana Inti Perkasa. - PT Binasawit Abadi Pratama (Perdana Mill and supply base), doesn't have land use title (HGU), the HGU is still on process. - PT Agrokarya Prima Lestari (Kuayan Mill and supply base, doesn't have land use title (HGU), the HGU is still on process. Supply base for Kuayan Mill are PT Agrokarya Prima Lestari and PT Buana Adhitama. - PT Mitrakarya Agroindo (Tangar Mill and supply base, doesn't have land use title (HGU), the HGU is still on process. - PT Sawit Mas Sejahtera (Sungai Kikim Mill and supply base), there is a legal non-compliance. Supply base for Sungai Kikim Mill are PT Sawit Mas Sejahtera and PT Bumi Sawit Permai. The legal non compliance which still on process is EIA revision. - PT Agrolestari Sentosa (Jalemo Mill and supply base), doesn't have land use title (HGU), the HGU is still on process. - PT Adi Tunggal Mahajaya (Sako Mill and supply base), there is a legal non-compliance. Supply base for Sako Mill are PT Adi Tunggal Mahajaya, PT Mitra Karya Agroindo and PT Agrokarya Prima Lestari. The legal non compliance which still on process is Land Use Title (HGU). - PT SMART Tbk (Bukit Kapur Mill and supply base), doesn't have land use title (HGU), the HGU is still on process. - PT Kresna Duta Agroindo (Gunung Kombeng Mill and supply base, doesn't have land use title (SHM), the SHM is still on process. Supply base for Gunung Kombeng Mill is communities plantation. - PT Bangun Nusa Mandiri (Kenari Mill and supply base), doesn't have land use title (HGU), the HGU is still on process. - PT Djuandasawit Lestari: there is an area is still in process for HGU in Muara Wahau Estate (574.58 Ha) - PT Satya Kisma Usaha – Kalimantan Tengah: there is an area is still in process for HGU in Medang Sari Estate (24,41 Ha) - PT Sawit Mas Sejahtera: there is an area is still in process for HGU in Sawit Mas Sejahtera Estate (2,291 Ha) - PT Bumi Sawit Mas: there is an area is still in process for HGU in Bumi Sawit Mas Estate (773 Ha) - PT Sumber Indah Perkasa: there is an area is still in process for HGU in Sungai Buaya Estate (155.46 Ha) and Sungai Merah Estate (241.54 Ha) - PT Ivomas Tunggal: there is an area still in process for HGU Samsam Estate (29.09 Ha), Kandista Estate (158.46 Ha), Nenggala Estate
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		<p>(419.9 Ha), Sei Rokan Estate (102.7 Ha), Ujung Tanjung Estate (557.3 Ha)</p> <ul style="list-style-type: none"> - PT Buana Wiralestari Mas: there is area is still in process for HGU Naga Mas Estate (253.39 Ha), Naga Sakti Estate (59.79 Ha), Kijang Mas Estate (56.07 Ha) - PT Ramajaya Pramukti: there is an area still in process for HGU Rama Rama Estate (318.76 Ha) - PT Bumipalma Lestari Persada: there is an area still in process for HGU Bumi Palma Estate (39.21 Ha) <p>There are companies that already comply with regulation, consist of:</p> <ul style="list-style-type: none"> • PT Agrolestari Mandiri (Pekawai Mill and supply base). • PT Sinar Kencana Inti Perkasa (Sungai Magalau Mill and supply base). • PT Kresna Duta Agroindo (Rantau Panjang Mill and supply base). • PT Sawitakarya Manunggul (Sawita Mill and supply base). • PT Paramitra Internusa Pratama (Belian Mill supply base)
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3.4 Identification of Findings, Corrective Action, Observations, Opportunity for Improvement and Noteworthy Positive Components.

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

NCR No.	: 2020.01.	Issued by	: Radytio Puspanjana
Date Issued	: 7.12.8	Time Limit	: ASA 1.3
NC Grade	: Critical	Date of Closing	: -
Standard Ref. & Requirement	7.12.8 Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018, the Remediation and Compensation Procedure (RaCP) applies.		
<p>Evidence observed (filled by auditor): Based on the results of the previous audit, it was found that the company cleared new land after 1 Nov 2005 without prior HCV identification activities (HCV identification activities were carried out by the company in 2012.). The disclosure process has been carried out and the RaCP fulfillment process is still ongoing until RC's assessment, when RC received a statement from the RSPO that PT TN-BAS was given a grace period of 1 year (verified in ASA 1.1)</p> <p>In response to this, the Company shows the chronology regarding compliance with RaCP, as follows:</p> <ul style="list-style-type: none"> - January 28, 2019: The company sent an email to RSPO regarding LUCA status and Concept Note. (to: khing.suli@rspo.org) - February 1, 2019: The company reminded RSPO via email for an earlier email response. (to: khing.suli@rspo.org) - February 13, 2019: Continuing communication via telephone, the company sent an email to RSPO regarding NC related to LUCA in several company-owned units. (to: salahudin.yacob@rspo.org) - February 20, 2019: RSPO responded with the answer "I am working with the LUCA reviewers to get the reviews finalized based on the cloud cover justification asap so that we can proceed and address the NC issues." (From: Khing.suli@rspo.org) - April 30, 2019: RSPO sends the results of the LUCA review sent by the company. The RSPO asks the company for further clarification regarding the data sent. " (From: Khing.suli@rspo.org) - 23 June 2019: The company sent further documents related to the results of the previous clarification requested by the RSPO. (LUCA review) (to: khing.suli@rspo.org) and has been responded to on June 28, 2019, which states that the clarification has been received by the RSPO. <p>However, until the surveillance-1.1 audit was conducted, there was no further response from the RSPO stating that the HCV compensation plan (RaCP) that had been prepared had been received by RSPO.</p> <p>Verification on September, 26th 2019 Based on e-mail respons from RSPO secretariat (from aminah.ang@rspo.org) on September, 26th 2019, it explained : <i>"Based on our internal discussion, we agreed that the NC raised on both unit mentioned in your email can be left open until the next audit next year. We do hope that the process of completing the RaCP can be completed by then. Please inform your client that they need to monitor the progress closely to ensure that the NC can be closed in the next audit"</i></p> <p>Based on that explanation, the non-conformity can be left open until next assessment (ASA-1.2).</p> <p>Verification on ASA 1.2 Based on the results of document review, it is known that:</p>			

1. Email from Mutu Agung to RSPO on July 29, 2020 asking about progress regarding the status of LUCA and RaCP of PT Tapian Nadenggan and PT BAS in accordance with the information obtained from GAR management that:
 - PT Tapian Nadenggan
LUCA status - Pass
FCL - 0 ha
Environmental remediation (riparian) - 82.88 ha
 - PT Buana Artha Sejahtera
FCL 5 Ha, concept note approve
2. Based on an email from RSPO (kHING.suli@rspo.org) on August 10, 2020 which states the following: "I have had an internal discussion with Ms. Aminah. As GAR is now in the final stages of preparing the compensation plan for submission and evaluation, PT TN and PT BAS should be able to complete the RaCP process by next year. On behalf of Ibu Aminah, with regards to the NC raised to the units with FCL value, the NC can be left open until the next ASA in which the compensation plan needs to be approved by then. "

Non-Conformance Description (filled by auditor):

Until the surveillance-1.2 audit is conducted, the Company has not been able to demonstrate that the HCV Compensation Plan (RaCP) has been received by RSPO.

However, based on the explanation from the RSPO, the non-conformity can be left open until next assessment (ASA-1.3).

Root Cause Analysis (filled by organization audited):

PT. TN and PT BAS is currently still in the preparation of the Remediation and Compensation Proposal. So for the certification process in 2021, company has communicated with the RSPO regarding the problems with the RACP completion process.

Correction (filled by organization audited):

The company communicates with the RSPO regarding the process of remediation and compensation proposals. RSPO issues: RACP Advisory Note on GAR's RaCP process From RSPO on March 25, 2021 No: 0002/03/21 Assurance - Integrity which in the Note states RACP is left open until further Surveillance audit certification.

Corrective Action (filled by organization audited):

Continue the process of completing the remediation and compensation proposal preparation and communicating with the RSPO within the next 1 year period.

Assessor Evaluation and Conclusion (filled by auditor):

Verification Onsite ASA 1.2 & ASA-1.3 (11 June 2021)

Based on interviews with management, it is known that up to ASA 1.3 PT TN and PT BAS are still in the process of preparing the Remediation and Compensation Proposal. In this regard, the company shows an email from RSPO to CB dated March 26, 2021 regarding Advisory Note No: 0002/03/21 Assurance - Integrity for GAR subsidiaries related to the RaCP process. In the Recommendations and Decisions section, it is explained that:

- Approval to continue certification can only be made for Companies whose certificate license expires 6 months from the issuance of the Advisory Note (since March 25, 2021). Non-conformities that arise are allowed to remain open until the next surveillance/recertification audit.
- For units whose license expires from October 2021, it is necessary to continue to follow up with the RSPO regarding the status of RaCP and its completion on an ongoing basis.
- For units at the initial certification stage, certificate issuance can only be carried out after the compensation plan has been approved.

Based on this document, this discrepancy is still open and will be re-verified at the next audit (ASA 1.4)

Verified by : -

3.4.2. Identification of Findings, Corrective Actions and Observations at Onsite Audit of RSPO ASA 1.2 + ASA 1.3 Assessment

NCR No.	: 2021.01	Issued by	: Asystasya Aishah Silalahi
Date Issued	: 7.12.8	Time Limit	: ASA 1.4
NC Grade	: Critical	Date of Closing	: -
Standard Ref. & Requirement	7.12.8 Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018, the Remediation and Compensation Procedure (RaCP) applies.		
<p>Evidence observed (filled by auditor): Based on the results of the previous audit, it was found that the company cleared new land after 1 Nov 2005 without prior HCV identification activities (HCV identification activities were carried out by the company in 2012.). The disclosure process has been carried out and the RaCP fulfillment process is still ongoing until RC's assessment, when RC received a statement from the RSPO that PT TN-BAS was given a grace period of 1 year (verified in ASA 1.1)</p> <p>In response to this, the Company shows the chronology regarding compliance with RaCP, as follows:</p> <ul style="list-style-type: none"> - January 28, 2019: The company sent an email to RSPO regarding LUCA status and Concept Note. (to: khing.suli@rspo.org) - February 1, 2019: The company reminded RSPO via email for an earlier email response. (to: khing.suli@rspo.org) - February 13, 2019: Continuing communication via telephone, the company sent an email to RSPO regarding NC related to LUCA in several company-owned units. (to: salahudin.yaacob@rspo.org) - February 20, 2019: RSPO responded with the answer "I am working with the LUCA reviewers to get the reviews finalized based on the cloud cover justification asap so that we can proceed and address the NC issues." (From: Khing.suli@rspo.org) - April 30, 2019: RSPO sends the results of the LUCA review sent by the company. The RSPO asks the company for further clarification regarding the data sent. " (From: Khing.suli@rspo.org) - 23 June 2019: The company sent further documents related to the results of the previous clarification requested by the RSPO. (LUCA review) (to: khing.suli@rspo.org) and has been responded to on June 28, 2019, which states that the clarification has been received by the RSPO. <p>However, until the surveillance-1.1 audit was conducted, there was no further response from the RSPO stating that the HCV compensation plan (RaCP) that had been prepared had been received by RSPO.</p> <p>Verification on September, 26th 2019 Based on e-mail respons from RSPO secretariat (from aminah.ang@rspo.org) on September, 26th 2019, it explained : <i>"Based on our internal discussion, we agreed that the NC raised on both unit mentioned in your email can be left open until the next audit next year. We do hope that the process of completing the RaCP can be completed by then. Please inform your client that they need to monitor the progress closely to ensure that the NC can be closed in the next audit"</i></p> <p>Based on that explanation, the non-conformity can be left open until next assessment (ASA-1.2).</p> <p>Verification on ASA 1.2 Based on the results of document review, it is known that: 3. Email from Mutu Agung to RSPO on July 29, 2020 asking about progress regarding the status of LUCA and RaCP of PT Tapan Nadenggan and PT BAS in accordance with the information obtained from GAR management that:</p>			

- PT Tapan Nadenggan
LUCA status - Pass
FCL - 0 ha
Environmental remediation (riparian) - 82.88 ha
- PT Buana Artha Sejahtera
FCL 5 Ha, concept note approve

4. Based on an email from RSPO (khing.suli@rspo.org) on August 10, 2020 which states the following: "I have had an internal discussion with Ms. Aminah. As GAR is now in the final stages of preparing the compensation plan for submission and evaluation, PT TN and PT BAS should be able to complete the RaCP process by next year. On behalf of Ibu Aminah, with regards to the NC raised to the units with FCL value, the NC can be left open until the next ASA in which the compensation plan needs to be approved by then. "

Non-Conformance Description (filled by auditor):

Until the surveillance-1.2 audit is conducted, the Company has not been able to demonstrate that the HCV Compensation Plan (RaCP) has been received by RSPO.

However, based on the explanation from the RSPO, the non-conformity can be left open until next assessment (ASA-1.3).

Root Cause Analysis (filled by organization audited):

PT. TN and PT BAS is currently still in the preparation of the Remediation and Compensation Proposal. So for the certification process in 2021, company has communicated with the RSPO regarding the problems with the RACP completion process.

Correction (filled by organization audited):

The company communicates with the RSPO regarding the process of remediation and compensation proposals. RSPO issues: RACP Advisory Note on GAR's RaCP process From RSPO on March 25, 2021 No: 0002/03/21 Assurance - Integrity which in the Note states RACP is left open until further Surveillance audit certification.

Corrective Action (filled by organization audited):

Continue the process of completing the remediation and compensation proposal preparation and communicating with the RSPO within the next 1 year period.

Assessor Evaluation and Conclusion (filled by auditor):

Verification Onsite ASA 1.2 & ASA-1.3 (11 June 2021)

Based on interviews with management, it is known that up to ASA 1.3 PT TN and PT BAS are still in the process of preparing the Remediation and Compensation Proposal. In this regard, the company shows an email from RSPO to CB dated March 26, 2021 regarding Advisory Note No: 0002/03/21 Assurance - Integrity for GAR subsidiaries related to the RaCP process. In the Recommendations and Decisions section, it is explained that:

- Approval to continue certification can only be made for Companies whose certificate license expires 6 months from the issuance of the Advisory Note (since March 25, 2021). Non-conformities that arise are allowed to remain open until the next surveillance/recertification audit.
- For units whose license expires from October 2021, it is necessary to continue to follow up with the RSPO regarding the status of RaCP and its completion on an ongoing basis.
- For units at the initial certification stage, certificate issuance can only be carried out after the compensation plan has been approved.

Based on this document, this discrepancy is still open and will be re-verified at the next audit (ASA 1.4)

Verified by : **Asystasya Aishah Silalahi**

3.4.3. Opportunity for Improvement

No	Ref. Std.	Description
1	3.2.2	<p>The unit of certification shows the RSPO P&C Metrics Template just before the closing meeting, so the Auditor Team does not have time to verify the completeness and accuracy of the data that has been filled in the RSPO P&C Metrics Template.</p> <p>In accordance with the guidelines in the RSPO P&C Metrics Template, it is stated that the RSPO P&C Metrics Template will be completed at the unit level of certification and must be submitted to the certification body prior to RSPO certification, recertification or annual surveillance audits.</p> <p>In this regard, the certification unit needs to ensure that the RSPO P&C Metrics Template must be completed at the certification unit level and must be submitted to the certification body prior to the audit activity so that the data auditor can verify its completeness and accuracy along with the audit activities carried out.</p>
2	3.8.12	<p>The company has an opportunity for improvement regarding the details of the 'Dual ID' of RSPO and ISCC certified CPO sales variable in the supply chain Mass Balance Data. Therefore, the traceability can be monitored directly from mass balance data. Currently, it is only can be breakdown separately by calculating the announcement and remove in Palm Trace.</p>
3	4.4.1	<p>Since Initial Certification, PT BAS's HGU is being processed. The HGU process was hampered in 2005 due to changes in regulations regarding forest areas, that some part of the area proposed for obtaining HGU was included in limited production forest areas (<i>Hutan Produksi Terbatas/HPT</i>), so it was necessary to implement an area exchange mechanism based on governmental law.</p> <p>The company has shown positive progress regarding the exchange of plantation areas that are included in forest areas for the HGU process. Up to the time of the ASA 1.2 & ASA 1.3 audit, the delineation of that area amount of ± 7,728 ha which had been determined based on the Letter of the Minister of Environment and Forestry No. S.566/Menlhk/Setjen/PLA.2/8/2019. A meeting was held between the company and the Forest Area Consolidation Center (<i>Balai Pemantapan Kawasan Hutan/BPKH</i>) on 6 December 2020 regarding the discussion of the measurement results. Based on an interview with management, the results of the meeting have been brought to the Ministry and are awaiting further decisions. Based interview with the Land Agency Official, the HGU process can not be followed up before the proposed area has been cleared from forest area.</p> <p>The company has the opportunity for improvement related to the follow-up of swap of forest area.</p>

3.4.4. Noteworthy Positive Components

No	Ref. Std.	Description
1	-	Implementing other sustainable palm oil certification schemes such as ISPO, ISCC and RSG
2	-	Implementing an e-fact system on the administration system for FFB delivery from the plantation to the Mill
3	-	Owl monitoring using camera



3.5 Summary of Arising Issues from Public and Auditor Verification

Public Issues (Institution/ NGO/Community)	Auditor Verification
<p>Labor Agency In general, the Agency considers that the Company has fulfilled obligations as a business entity in implementing labor regulations to employees such as minimum wage standard, accident and healthy insurance, housing, facilities, freedom of association, and improving the ability of workers.</p> <p>There are no issues from the community or employees related Employment.</p>	<p>There are no negative issues that need further verification.</p>
<p>Semilar Estate Employee Cooperative</p> <ul style="list-style-type: none"> • Employee cooperative named Koeprasi Semilar Sejahtera which was founded in 2013 • Type of business in the form of savings and loans • RAT is conducted every 6 months. The last RAT was carried out in December 2020 for the financial year Semester 2 2020 and is planned to be carried out again in June 2021 for the financial year Semester 1 2021. • The number of members as of May 2021 is 552 workers • Forms of company support for employee cooperatives include providing a cooperative office, providing transportation facilities and being assisted in payroll deductions by showing a power of attorney for deductions. 	<p>There are no negative issues that need further verification.</p>
<p>Sei Rindu Estate Gender Committee</p> <ul style="list-style-type: none"> • No cases of sexual harassment and domestic violence in the last 2 years • Many program activities cannot run due to the Covid-19 pandemic. • Monthly Posyandu activities are carried out using a queue number. • Participate in the needs assessment of new mothers. • New mothers can leave work to breastfeed. • There is a lactation room at the Child Care Center • Have an understanding of gender equality • Availability of reproductive protection policies such as menstrual permits and birth permits. • Submission of reports/complaints can be through private lines via telephone, WhatsApp and others so that the complainant feels safe. 	<p>There are no negative issues that need further verification.</p>
<p>Seruyan Regency Food and Agriculture Security Service</p> <ul style="list-style-type: none"> • There are no complaints or complaints from the public regarding the company's operations • Reporting is orderly, namely LPUP every 3 months and includes CSR reports and reports on land and garden fires. • Fulfillment of fire fighting infrastructure is sufficient in 	<p>There are no negative issues that need further verification.</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<p>accordance with Ministry of Agriculture Regulation number 5 of 2018.</p> <ul style="list-style-type: none"> • CSR programs already cover productive economic and social efforts for the community • Regarding the plasma plantation development plan, it is still in the process of being discussed. 	
<p>FFB Transporter Contractors SRDE</p> <p>Cooperation with contractor has been carried out since 2009. There is a clause on OHS and social insurance that has also socialized to contractors. There are no issues related to labor relations either the unit of certification or the contractor. Payment of work is done on time in accordance with the agreement that has been made. In addition, contractor workers have been provided with PPE by the contractor in accordance with the risk analysis that has been identified.</p>	<p>There are no negative issues that need further verification. The company has contributed in empowering local communities by collaborating with local contractors.</p>
<p>Labor Union – SPSI (SMLE and SMLM)</p> <p>Labor Union have been registered in the labor Agency Seruyan District and there has been no change in the record until this audit. The meeting discussed both company and the labor union has documented. Determination and payment of salaries is accordance with the Regency minimum wage in 2021. In addition, payment of salaries has been in accordance with the specified time and through the transfer. There are no issues related to employment.</p>	<p>There are no negative issues that need further verification. The company has given the freedom to associate and realize worker rights in accordance with the regulations.</p>
<p>Gender Committee (MNDE)</p> <p>The Gender Committee are still active in the company until the audit is conducted. Gender Committee activities include socialization of sexual harassment, complaints, general health and so on.</p> <p>There are no issues related to sexual harassment. Female workers are entitled to menstruation leave (H1) and maternity leave (H2). In addition, the Company has identified the needs of young mothers at work, such as providing a place for breastfeeding while working.</p> <p>The rights of women workers which include reproductive health, handling sexual harassment, leave and working in a safe place have been continuously pursued by the Company.</p>	<p>There are no negative issues that need further verification. Gender Committee has been formed as a forum for the interest of the rights worker womens who have the work safely, healthy and protected in the Company.</p>
<p>Environment Agency of Seruyan Regency</p> <ul style="list-style-type: none"> - There is no revision of environment permit - All permit such as Hazardous waste temporary storage permit and land application permit is still valid. - The company has submitted mandatory reporting on a regular basis for the 2020 period, such as reporting on the 	<p>Auditor has verified the conformance towards environment and HCV aspect in some indicator, such as 3.4.1, 3.4.3, and 7.12.</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<p>implementation of RKL RPL, liquid waste, and Hazardous waste.</p> <ul style="list-style-type: none"> - The agency provides suggestions to further improve supervision of the conservation area (HCV) of PT Tapan Nadenggan - There are no environmental pollution issues 	
<p>Pantap Village Head of Pantap Village (also as previous land-owner representative).</p> <ul style="list-style-type: none"> - There are no disputes or land conflicts. - The company has provided assistance to the village, such as teacher fees and heavy equipment assistance. - There are no issues related to environmental pollution. - Social impact monitoring and HCV monitoring have not yet involved the Pantap village community. - There are indigenous peoples of the Dayak Kaharingan tribe. - There is no complaint from previous land owner related the land compensation or FPIC process. 	<p>Auditor has verified the conformance towards social and environment aspect. Company also showed the documentation of the review of social impact monitoring in form of questionnaire document from Pantap Village. It has been explained in 3.4.</p> <p>The auditor and the auditee have tried to contact available previous land-owner. However, not succeed to gather them regarding many factors, such as ha been passed away, moving to another places, or not willing to be contacted.</p>
<p>Sumber Makmur Village Head of Sumber Makmur Village (also as previous land-owner representative).</p> <ul style="list-style-type: none"> - There are no disputes or land conflicts. - There are no issues related to environmental pollution. - The company has provided assistance to the village, such as teacher fees and heavy equipment assistance - There is no complaint from previous land owner related the land compensation or FPIC process. - 	<p>There is no negative issue from Sumber Makmur Village. Auditor has Auditor has verified the conformance towards social and environment aspect</p> <p>The auditor and the auditee have tried to contact available previous land-owner. However, not succeed to gather them regarding many factors, such as ha been passed away, moving to another places, or not willing to be contacted.</p>
<p>Land Agency</p> <p>There are no issues of land disputes and the determination of abandoned land. HGU reports have been submitted regularly. Regarding the exchange of forest areas with the Ministry of Forestry, this is still a bilateral matter between the two parties.</p>	<p>There are no specific issues. The exchange of forest areas has been followed up by management and is waiting for a follow-up from the Ministry of Forestry.</p>
<p>Village Head of Rungau Raya and Sebabi (also as previous land-owner representative).</p> <p>There are no land disputes. The company in general has made efforts to improve the quality of life and the environment that is beneficial for employees and the surrounding community, such as by developing plasma plantations, hiring local workers, local contractors, local purchasing, and implementing CSR programs. There is no complaint from previous land owner related the land compensation or FPIC process.</p>	<p>The company has shown documentation of community empowerment around the plantation in the CSR Program Implementation Report. There are no negative issues.</p> <p>The auditor and the auditee have tried to contact available previous land-owner. However, not succeed to gather them regarding many factors, such as ha</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
	been passed away, moving to another places, or not willing to be contacted.

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 style="text-align: center;">Signed on behalf of:</p> <div style="display: flex; justify-content: space-around;"> <div style="text-align: center;"> <p>PT Tapan Nadenggan <i>Head of SPO Certification & Low GHG Emissions Strategy</i></p>  <p><u>Yahya Mustakim</u> Friday, 11 June 2021</p> </div> <div style="text-align: center;"> <p>Mutuagung Lestari Lead Auditor</p>  <p><u>Arif Faisal Simatupang</u> Friday, 11 June 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	Labour Agency of Seruyan Regency	Seruyan Regency	082250398899	Interview via phone	June 8, 2021	✓	
2	Environment Agency of Seruyan Regency	Seruyan Regency	082354661686	Interview via phone	June 8, 2021	✓	
3	Food and Agriculture Security Service	Seruyan Regency	082136979202	Interview via phone	June 8, 2021	✓	
4	Worker Union - SPP (SMLE)	PT Tapan Nadenggan	082154841205	Interview via phone	June 8, 2021	✓	
5	Semilar Estate Employee Cooperative	PT Tapan Nadenggan	0813 5290 6540	Interview via phone	June 8, 2021	✓	
6	Gender Committee (MNDE)	PT Buana Artha Sejahtera	082122623768	Interview via phone	June 8, 2021	✓	
7	Gender Committee (SRDE)	PT Tapan Nadenggan	0821 5700 2031	Interview via phone	June 8, 2021	✓	
8	Worker Union - SPP (SMLM)	PT Tapan Nadenggan	081338036952	Interview via phone	June 9, 2021	✓	
9	FFB Transporter Contractors	Seruyan Regency	082153489711	Interview via phone	June 9, 2021	✓	
10	Head of Pantap Village (previous land-owner representative).	Pantap Village, Seruyan Regency	082353107899	Interview via phone	8 June 2021	✓	
11	Head of Sebabi Village (previous land-owner representative).	Seruyan Regency	085252714239	Interview via phone	8 June 2021	✓	
12	Head of Rungau Raya Village (previous land-owner representative).	Seruyan Regency	085654051459	Interview via phone	8 June 2021	✓	
13	Head of Sumber Makmur Village (previous land-owner representative).	Sumber Makmur Village, Seruyan Regency	085390383169	Interview via phone	8 June 2021	✓	
14	Semilar Mill - Security post: 3 worker - Weightbridge Station: 2 worker - Grading station: 4 worker - Sterilizer station: 1 worker - Tippler Station: 1 worker - Clarificatioi Station: 2 worker - Press Station: 1 worker - Boiler Station: 1 worker - Power house: 2 worker - Hydrant No 7 (stasiun boiler): 3 pekerja Tim Tanggap Darurat	PT Tapan Nadenggan		Observasi dan wawancara langsung	June 9, 2021	✓	

	<ul style="list-style-type: none"> - WWTP worker: 2 worker - Workshop 2 worker - Storage: 2 worker 						
15	Semilar Estate <ul style="list-style-type: none"> - 1 harvester - 2 pesticide operator - 1 workers of daycare - 1 warehouse officer 	PT Tapian Nadenggan		Interview via phone	June 10, 2021	✓	
16	Puri Estate <ul style="list-style-type: none"> - 1 Supervisor of harvester - 1 harvester - 1 picky lost fruit worker - 2 pesticide operator - 2 workers of daycare - 2 of warehouse officer - 1 doctor and 2 medical staff. - 1 of emergency response team. - 1 of genset operator 	PT Buana Artha Sejahtera		Interview via phone	June 10, 2021	✓	
17	Sei Rindu Estate <ul style="list-style-type: none"> - loose fruit picker: 1 worker - Harvester: 1 worker - Manuring worker: 2 workers - Mechanic: 2 workers 	PT Tapian Nadenggan		Interview via phone	June 9, 2021	✓	
18	Mandang Estate <ul style="list-style-type: none"> - Land application operator: 4 worker - Harvester: 2 workers - loose fruit picker: 2 workers - spraying worker: 4 workers 	PT Buana Artha Sejahtera	-	Field observation	June 10, 2021	✓	
19	Mandang Estate <ul style="list-style-type: none"> - Land application operator: 1 worker - Harvester: 1 workers - Loose fruit picker: 1 workers - Spraying worker: 3 workers - Welder: 1 worker 	PT Buana Artha Sejahtera	-	Interview via phone	June 10, 2021	✓	
20	World Wide Fund Indonesia	-	wwf-indonesia@wwf.or.id	Email	31 May 2021		✓
21	Aliansi Masyarakat Adat Nusantara	-	rumahaman@cbn.net.id	Email	31 May 2021		✓
22	Sawit Watch	-	info@sawitwatch.or.id	Email	31 May 2021		✓
23	Save Our Borneo	-	info@saveourborneo.org	Email	31 May		✓

			orneo.org		2021		
24	Walhi	-	informasi@walhi.or.id	Email	31 May 2021		✓

Appendix 2. Assessment Program

Remote audit ASA 1.2 Assessment Program

DATE	14 – 16 September 2020	
PROGRAM	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
Monday, 14 September 2020		
08.00 – 09.00	<ul style="list-style-type: none"> • Opening Meeting via Skype 	<ul style="list-style-type: none"> • All Auditor
09.00 – 12.00	<ul style="list-style-type: none"> • Document Verification on OHS, Worker Welfare • Document Verification on Legality, Social, SCCS • Document Verification on Best Management Practices, GHG, Transparencies, Partial Certification, Time Bound Plan • Document Verification on Environment, Social, HCV 	<ul style="list-style-type: none"> • All Auditor
12.00 – 14.00	<ul style="list-style-type: none"> • Break 	<ul style="list-style-type: none"> • All Auditor
14.00 – 16.30	<ul style="list-style-type: none"> • Continuing document verification 	<ul style="list-style-type: none"> • All Auditor
16.30 – 17.00	<ul style="list-style-type: none"> • Daily progress via Skype 	<ul style="list-style-type: none"> • All Auditor
Tuesday, 15 September 2020		
08.00 – 12.00	<ul style="list-style-type: none"> • Document Verification on OHS, Worker Welfare • Document Verification on Legality, Social, SCCS • Document Verification on Best Management Practices, GHG, Transparencies, Partial Certification, Time Bound Plan • Document Verification on Environment, Social, HCV 	<ul style="list-style-type: none"> • All Auditor
12.00 – 14.00	Break	<ul style="list-style-type: none"> • All Auditor
14.00 – 16.30	Continuing document verification	<ul style="list-style-type: none"> • All Auditor
16.30 – 17.00	Daily progress via Skype	<ul style="list-style-type: none"> • All Auditor
Wednesday, 16 September 2020		
08.00 – 12.00	<ul style="list-style-type: none"> • Document Verification on OHS, Worker Welfare • Document Verification on Legality, Social, SCCS • Document Verification on Best Management Practices, GHG, Transparencies, Partial Certification, Time Bound Plan • Document Verification on Environment, Social, HCV 	<ul style="list-style-type: none"> • All Auditor
12.00 – 14.00	Break	<ul style="list-style-type: none"> • All Auditor
14.00 – 16.00	Preparation for Closing Meeting	<ul style="list-style-type: none"> • All Auditor
16.00 – 17.00	Closing Meeting Via Skype	<ul style="list-style-type: none"> • All Auditor

Onsite audit ASA 1.2 + 1.3 Assessment program

Date	06 – 12 June 2021	
Program	Clauses To Be Audited	Auditor
Sunday, 06 June 2021		
14.30 – 16.30	Flight from Jakarta to Palangkaraya Stay overnight in Palangkaraya	All Auditor All Auditor
Monday, 07 June 2021		
07.00 – 14.30	Traveling from Palangkaraya to PT Tapian Nadenggan	All Auditor
15.00 – 17.00	Opening Meeting (virtual) <ul style="list-style-type: none"> • Auditee speech (introduction of PIC, profile of Management Unit) • Auditor Team speech (introduction, audit objective, audit scope, audit plan discussion, determine of audit sample, transparency and confidentiality clarification) Document review	All Auditor
Tuesday, 08 June 2021		
08.00 – 12.00	Document review Virtual Stakeholder consultation/interview with: Government Agency (referring to the consultation letter), Local Communities, Contractors, Gender Committee, Worker Union, etc	All Auditor
12.00 – 14.00	Break	All Auditor
14.00 – 17.00	Document review Continue Virtual Stakeholder consultation/interview with: Government Agency (referring to the consultation letter), Local Communities, Contractors, Gender Committee, Worker Union, etc	All Auditor
Wednesday, 09 June 2021		
08.00 – 12.00	Field Observation of Semilar Estate <ul style="list-style-type: none"> • Observation of HGU poles, and land demarcation. • Observation the activity of harvesting & transportation, manuring, pesticides application, road maintenance, IPM, EFB application, etc) • Observation of chemical storage, fertilizer storage, hazardous waste storage, fire control facilities, waste management, etc). • Observation of workers facilities (housing, school, worship place, domestic waste management, etc). • Observation of HCV area & POME Land Application (if any) 	Afif Afif Dwi Dwi Afif/Dwi
08.00 – 12.00	Field Observation of Sei Rindu Estate <ul style="list-style-type: none"> • Observation of HGU poles, and land demarcation. • Observation the activity of harvesting & transportation, manuring, pesticides application, road maintenance, IPM, EFB application, etc) 	Faisal Faisal

	<ul style="list-style-type: none"> • Observation of chemical storage, fertilizer storage, hazardous waste storage, fire control facilities, waste management, etc). • Observation of workers facilities (housing, school, worship place, domestic waste management, etc). • Observation of HCV area & POME Land Application (if any) 	<p>Tasya</p> <p>Tasya</p> <p>Faisal/Tasya</p>
12.00 – 14.00	Break	All Auditor
14.00 – 17.00	<p>Field Observation of Semilar Mill</p> <ul style="list-style-type: none"> • Observation of supply chain (FFB receiving, weighbridge) • Observation of FFB grading, processing activity, product despatch • Observation of chemical storage, hazardous waste storage, fire control simulation, etc • Observation of WWTP, WTP, EBA 	<p>Faisal</p> <p>Faisal</p> <p>Afif</p> <p>Afif</p>
14.00 – 17.00	<p>Virtual interview with the Estate's workers</p> <p>Continue Virtual Stakeholder consultation/interview with: Government Agency (referring to the consultation letter), Local Communities, Contractors, Gender Committee, Worker Union, etc</p>	<p>Dwi / Tasya</p> <p>Dwi / Tasya</p>
Thursday, 10 June 2021		
08.00 – 12.00	<p>Field Observation of Mandang Estate</p> <ul style="list-style-type: none"> • Observation of HGU poles, and land demarcation. • Observation the activity of harvesting & transportation, manuring, pesticides application, road maintenance, IPM, EFB application, etc • Observation of chemical storage, fertilizer storage, hazardous waste storage, fire control facilities, waste management, etc). • Observation of workers facilities (housing, school, worship place, domestic waste management, etc). • Observation of HCV area 	<p>Faisal</p> <p>Faisal</p> <p>Tasya</p> <p>Tasya</p> <p>Faisal/Tasya</p>
08.00 – 12.00	<p>Field Observation of Puri Estate</p> <ul style="list-style-type: none"> • Observation of HGU poles, and land demarcation. • Observation the activity of harvesting & transportation, manuring, pesticides application, road maintenance, IPM, EFB application, etc). • Observation of chemical storage, fertilizer storage, hazardous waste storage, fire control facilities, waste management, etc). • Observation of workers facilities (housing, school, worship place, domestic waste management, etc). • Observation of HCV area. 	<p>Afif</p> <p>Afif</p> <p>Dwi</p> <p>Dwi</p> <p>Afif/Dwi</p>
12.00 – 14.00	Break	All Auditor
14.00 – 17.00	<p>Virtual interview with the Estate's workers</p> <p>Document review</p>	<p>All Auditor</p> <p>All Auditor</p>
Friday, 11 June 2021		
08.00 – 10.00	Auditor's Internal discussion of closing meeting preparation	All Auditor
10.00 – 11.30	<p>Closing Meeting (Virtual)</p> <ul style="list-style-type: none"> • Presentation of audit findings (noteworthy positive component, non conformities, OFI, timeline of CAR's, conclusion) • Comments, responses and questions 	All Auditor

13.00 – 20.00	Traveling from PT Tapan Nadenggan to Palangkaraya	All Auditor
Saturday, 12 June 2021		
17.30 – 19.30	Flight from Palangkaraya to Jakarta	All Auditor