

*Roundtable on Sustainable Palm Oil Certification  
RSPO*

**[ ✓ ]** Surveillance

Name of Management Organisation : Daya Labuhan Indah 2 Palm Oil Mill – PT Daya Labuhan Indah subsidiary of Wilmar International Limited

Plantation Name : PT Daya Labuhan Indah: Wonosari Estate & Sei Deras Estate  
PT Perkebunan Milano: Cabang Dua Estate

Location : Sei Tampang Village, Bilah Hilir Sub-District, Labuhanbatu District, Sumatera Utara Province, Indonesia

Certificate Code : MUTU-RSPO/047

Date of Initial Registration : 08 October 2014

Date of Certificate Issue : 21 October 2019                      Date of License Issue : 08 October 2021

Date of Certificate Expiry : 07 October 2024                      Date of License Expiry : 07 October 2022

Assessment	Assessment Date	PT. Mutuagung Lestari Auditor	Reviewed by	Approved by
ASA-1.2	15 to 18 June 2021	Trismadi Nurbayuto (Lead Auditor), Haikal Ramadhan Kharismansyah, Rindu Galih Rezza Rachmansyah, Septian Maulana (Auditor Trainee)	Ardiansyah	Octo H.P.N Nainggolan

Assessment	Approved by MUTUAGUNG LESTARI on:
ASA-1.2	16 July 2021

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Figure 1. Location Map of PT Daya Labuhan Indah and PT Perkebunan Milano

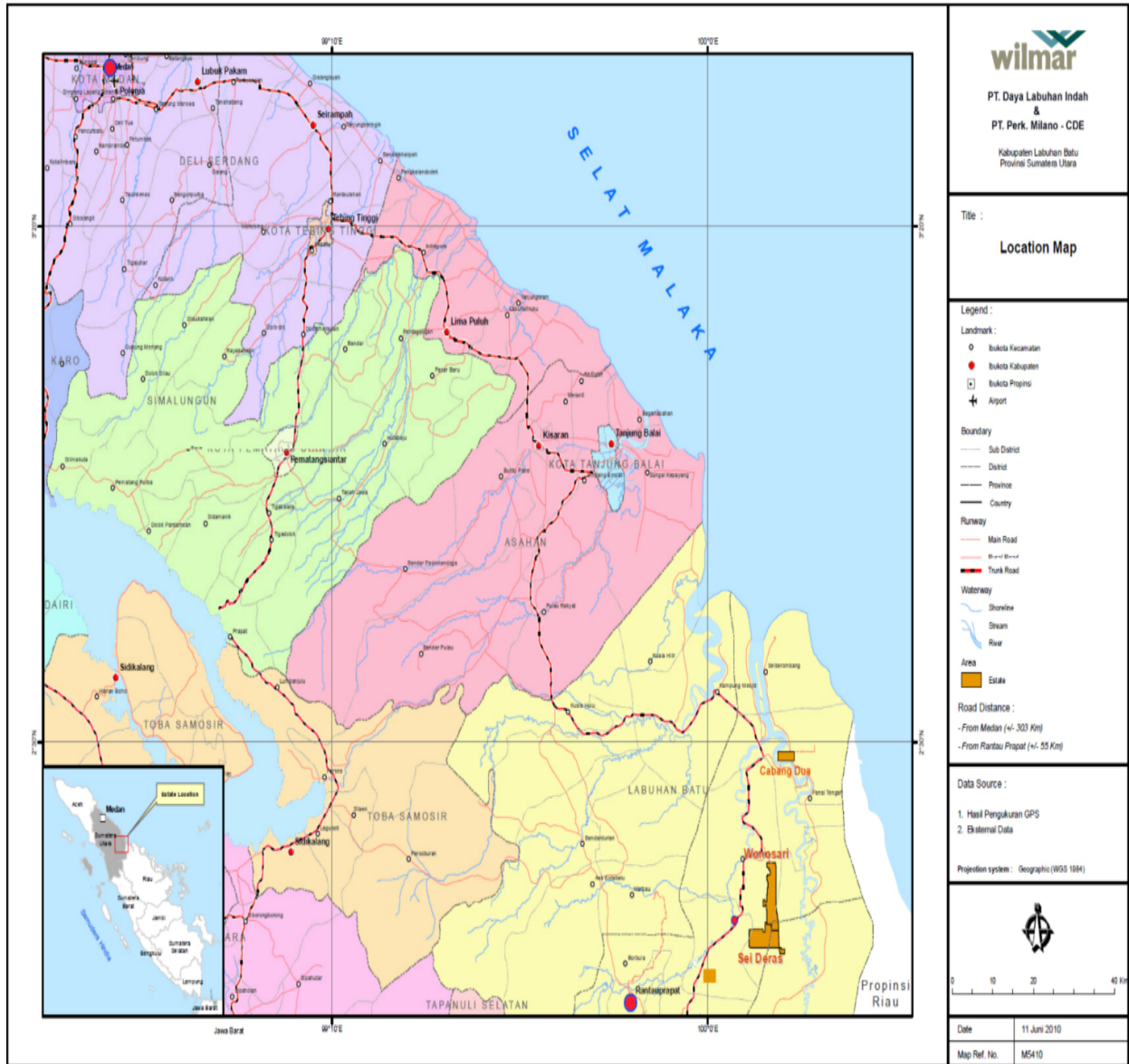


Figure 2. Operational Map of PT Daya Labuhan Indah – Wonosari Estate & Sei Deras Estate

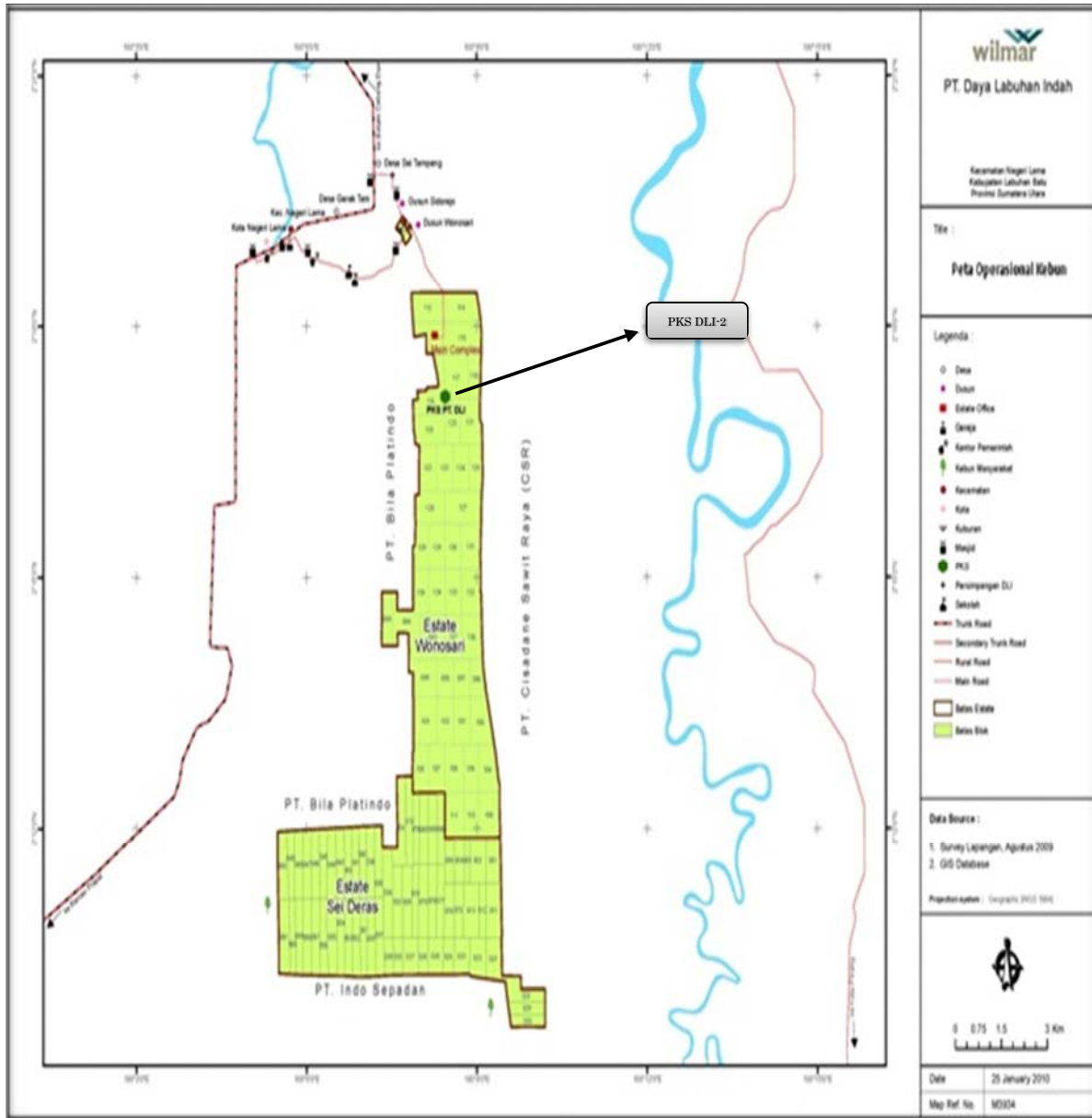
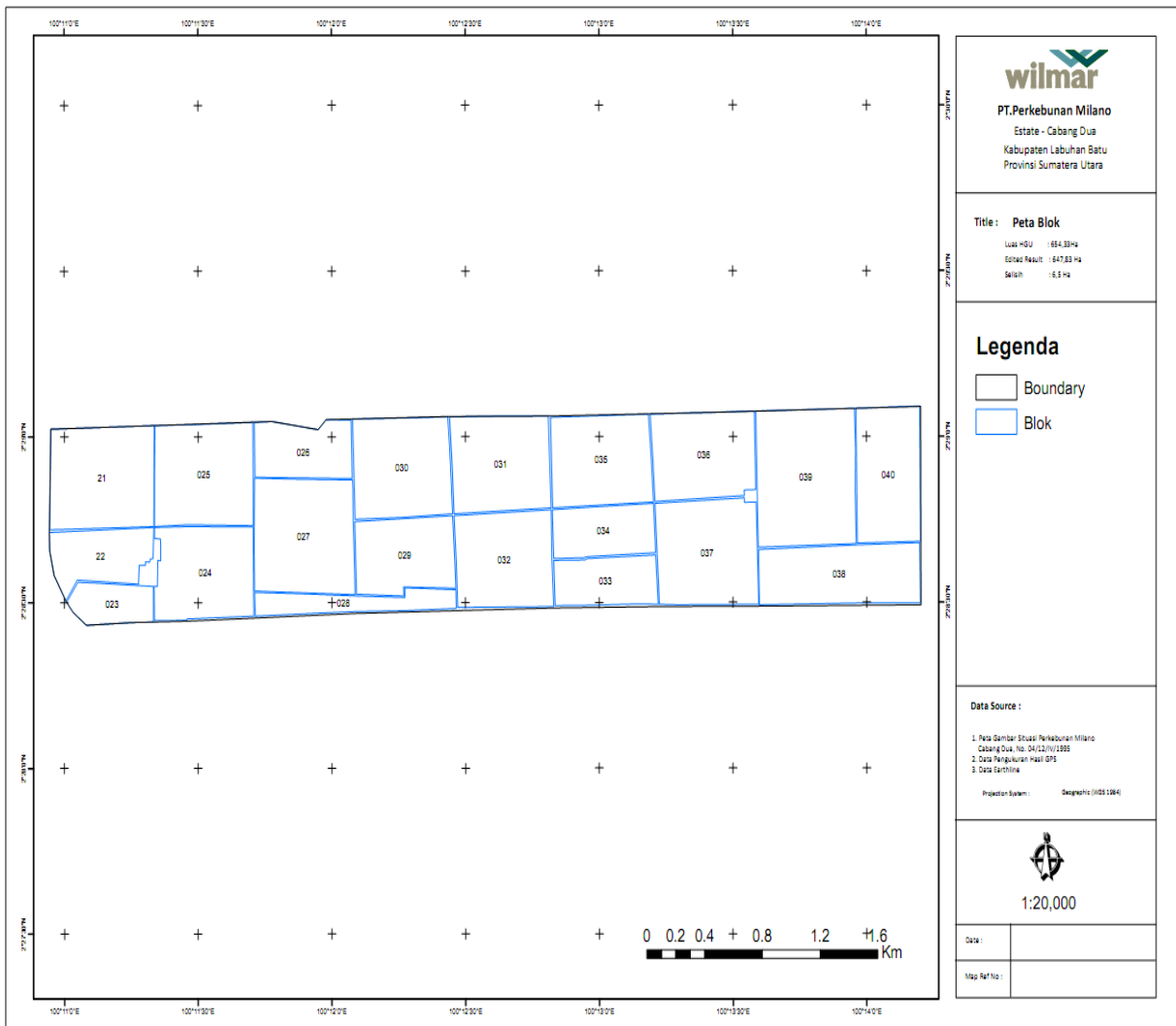


Figure 3. Operational Map of PT Perkebunan Milano – Cabang Dua Estate



Abbreviations Used

APAR	:	Fire Extinguisher (Alat Pemadam Api Ringan)
ASA	:	Annual Surveillance Assessment
BOD	:	Biochemical Oxygen Demand
BPS	:	<i>Badan Pusat Statistik</i> (Central Bureau of Statistic)
BPJS	:	<i>Badan Penyelenggara Jaminan Sosial</i> / Social Security Administrator
CB	:	Certification Body
CDE	:	Cabang Dua Estate
CLA	:	Collective Labor Agreement
COD	:	Chemical Oxygen Demand
CPO	:	Crude Palm Oil
CSPK	:	Certified Sustainable Palm Kernel
CSPO	:	Certified Sustainable Palm Oil
CSR	:	Cooperation Social Responsibility
DLI	:	Daya Labuhan Indah
DLW	:	Decent Living Wage
DO	:	Dissolved Oxygen
EFB	:	Empty Fruit Bunch
EHS	:	Environment, Health, and Safety
EIA	:	Environment Impact Assessment
EM	:	Estate Manager
FFB	:	Fresh Fruit Bunch
FGD	:	Focus Group Discussion
FPIC	:	Free, Prior, Informed, Consent
FR	:	Frequency Rate
FSPM	:	<i>Federasi Serikat Pekerja Metal Indonesia</i> or Indonesian Metal Worker Federation
GHG	:	Green House Gasses
GPS	:	Global Positioning System
HCV	:	High Conservation Value
HGU	:	Land Use Title
HIRAC	:	Hazard Identification Risk Assessment Control
HRD	:	Human Research Development
HRGA	:	Human Resource and General Affair
ILO	:	International Labour Organization
IP	:	Identity Preserved
IPLC	:	<i>Izin Pembuangan Limbah Cair</i> (Waste Water Disposal Permit)
IPM	:	Integrated Pest Management
IRC	:	Industrial Relation Conflict
ISPO	:	Indonesia Sustainable Palm Oil
IUP	:	License of Plantation
KCD	:	<i>Kebun Cabang Dua</i>
KSD	:	<i>Kebun Sei Deras</i>
KTU	:	<i>Kepala Tata Usaha</i> / Head of Administration
KWS	:	<i>Kebun Wonosari</i>
LB3	:	Scheduled Waste
LCC	:	Legume Cover Crop
LD50	:	Lethal Dose 50
LSU	:	Leaf Sampling Unit
LTA	:	Lost Time Accident

LUCA	:	Land Use Change Analysis
MB	:	Mass Balance
MSDS	:	Material Safety Data Sheet
MT	:	Metric Ton
MU	:	Mature Upkeep
NDPE	:	No Deforestation No Peat No Exploitation
NGO	:	Non-Government Organization
NIOSH	:	National for Occupational Safety and Health
OFI	:	Opportunity for Improvements
OHS	:	Occupational Health and Safety
P&C	:	Principles and Criteria
P2K3	:	<i>Panitia Pembina Keselamatan dan Kesehatan Kerja</i> / Occupational Health and Safety Committee
P3K	:	First Aid Kit
PGA	:	Personal General Affair
PIC	:	Person In Charge
PK	:	Palm Kernel
PKB	:	<i>Perjanjian Kerja Bersama</i> or Collective Labor Agreement
POM	:	Palm Oil Mill
POME	:	Palm Oil Mill Effluent
PPE	:	Personal Protective Equipment
PT DLI	:	PT Daya Labuhan Indah
RKL-RPL/UKL-UPL	:	Environment Management and Monitoring
RSPO	:	Roundtable on Sustainable Palm Oil
RTE	:	Rare, Threatened, and Endangered
SCCS	:	Supply Chain Certification System
SDE	:	Sungai Deras Estate
SERBUNDO	:	Serikat Buruh Perkebunan Indonesia or Indonesia Labour Plantation Union
SIA	:	Social Impact Assessment
SOP	:	Standard Operational Procedure
SPSI	:	<i>Serikat Pekerja Seluruh Indonesia</i> or Labour Union of Indonesia
SR	:	Severity Rate
SSU	:	Soil Sampling Unit
UMSK	:	<i>Upah Minimum Sektor Perkebunan Kabupaten</i> or District Minimum Wages of Plantation Sector
WSE	:	Wonosari Estate
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"> <li>Indonesia National Interpretation RSP0 Principles and Criteria for the Production of Sustainable Palm Oil 2018 Endorsed by the RSP0 Board of Governors on 20<sup>th</sup> April 2020</li> <li>RSP0 Certifications Systems for Principles &amp; Criteria and RSP0 Independent Smallholders Standard (Endorsed by RSP0 Board of Governors on 12 November 2020)</li> </ul>	
1.2	Organisation Information		
1.2.1	Organisation name listed in the certificate	Daya Labuhan Indah 2 Palm Oil Mill – PT Daya Labuhan Indah subsidiary of Wilmar International Limited	
1.2.2	Contact person	Jules Sonny Parapat	
1.2.3	Organisation address and site address	<u>Head Office</u> 56 Neil Road, Singapore 088830  <u>Official Liaison Office:</u> Multivison Tower Lt. 15 Jl. Kuningan Mulia Kav. 9B, Kuningan, Jakarta, 12980, ndonesia.	
1.2.4	Telephone	(62-21) 29380777	
1.2.5	Fax	-	
1.2.6	E-mail	<a href="mailto:jules.parapat@id.wilmar-intl.com">jules.parapat@id.wilmar-intl.com</a>	
1.2.7	Web page address	<a href="http://www.wilmar-international.com/">http://www.wilmar-international.com/</a>	
1.2.8	Management Representative who completed the application for certification	Jules Sonny (Certification Lead Indonesia)	
1.2.9	Registered as RSP0 member	2-0017-05-000-00 15 August 2005	
1.3	Type of Assessment		
1.3.1	Scope of Assessment and Number of Management Unit	Palm Oil Mill and supply base: Daya Labuhan Indah 2 Palm Oil Mill, Wonosari Estate, Sei Deras Estate and Cabang Dua 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
	Daya Labuhan Indah 2	Sei Tampang Village, Bilah Hilir Sub-district, Labuhanbatu District, Sumatera Utara Province, Indonesia	N 02° 17' 10" E 100° 08' 27"
1.4.2	Location of Certification Scope of Supply Base		
	Name of Supply Base	Location	Coordinate
			Latitude Longitude
	Wonosari Estate	Sei Tampang Village, Bilah Hilir Sub-district, Labuhanbatu District, Sumatera Utara Province, Indonesia	N 02° 17' 54" E 100° 08' 16"



	Sei Deras Estate	Bilah Village, Bilah Hilir Sub-district, Labuhanbatu District, Sumatera Utara Province, Indonesia		N 02° 10' 47"	E 100° 08' 08"		
	Cabang Dua Estate	Sei Nahodaris Village, Panai Tengah Sub-district, Labuhanbatu District, Sumatera Utara Province, Indonesia		N 02° 08' 36"	E 100° 11' 18"		
<b>1.5</b>	<b>Description of Area Statement</b>						
<b>1.5.1</b>	<b>Tenure</b>						
	<ul style="list-style-type: none"> <li>State</li> </ul>		6,226.58 Ha				
	PT Daya Labuhan Indah		5,572.25 Ha				
	PT Perkebunan Milano		654.33 Ha				
	<ul style="list-style-type: none"> <li>Community</li> </ul>		- Ha				
<b>1.5.2</b>	<b>Area Statement</b>						
		Wonosari Estate (Ha)	Sei Deras Estate (Ha)	Cabang Dua Estate (Ha)	Total (Ha)		
	Total area	2,944.59	2,627.66	654.33	6,226.58		
	Production area	2,581.65	2,483.29	612.90	5,677.84		
	Building and roads	350.03	34.21	38.82	423.06		
	Mill	12.91	-	-	12.91		
	HCV	-	9.12	2.61	11.73		
	Occupation area	-	101.04	-	101.04		
<b>1.6</b>	<b>Planting Year and Cycles</b>						
<b>1.6.1</b>	<b>Age profile of planting year</b>						
	<b>Planting Year</b>	<b>Hectarage (Ha)</b>					
		Wonosari Estate	Sei Deras Estate	Cabang Dua Estate	Total		
	2009	582.12	-	-	582.12		
	2010	904.23	-	-	904.23		
	2012	-	613.12	-	613.12		
	2013	-	995.11	71.65	1,066.76		
	2014	836.84	810.17	268.83	1,915.84		
	2015	258.46	64.89	-	323.35		
	2017	-	-	272.42	272.42		
	<b>TOTAL</b>	<b>2,581.65</b>	<b>2,483.29</b>	<b>612.90</b>	<b>5,677.84</b>		
1.6.2	New Planting area after January 2010		- Ha				
1.6.3	Planting Cycle		2 <sup>nd</sup> Cycle				
<b>1.7</b>	<b>Description of Mill and Supply Base</b>						
<b>1.7.1</b>	<b>Description of Mill</b>						
	<b>Name of Mill</b>	<b>Capacity (tonnes/ hour)</b>	<b>FFB Processed (tonnes/year)</b>	<b>CPO</b>		<b>Palm Kernel</b>	
				<b>Out put (tonnes)</b>	<b>Extraction (%)</b>	<b>Out put (tonnes)</b>	<b>Extraction (%)</b>
	Daya Labuhan Indah 2	30	148,299.68	30,632.84	20.66	5,414.62	3.60
	*Production data source from 12 months before assessment (June 2020 to May 2021)						

1.7.2	Description of Certification Scope of Supply Base						
	Name of Estate	Total Area (Ha)	Production Area (Ha)	FFB (tonnes/year)	Yield (tonnes/ha/year)	Supplied to Mill	
						FFB (tonnes/year)	%
	Wonosari Estate	2,944.59	2,581.65	57,582.47	22.30	57,582.47	100
	Sei Deras Estate	2,627.66	2,483.29	65,654.70	26.44	65,654.70	100
	Cabang Dua Estate	654.33	612.90	11,783.44	19.23	11,783.44	98.57
	<b>TOTAL</b>	<b>6,226.58</b>	<b>5,677.84</b>	<b>135,020.61</b>	<b>23.78</b>	<b>135,020.61</b>	<b>99.83</b>
	*Production data source from 12 months before assessment (June 2020 to May 2021) *In May 2021 CDE delivered 167.80 tons of FFB to the MPA POM						
1.7.3	FFB description from other source						
	Name of sources/Organisation	Type of Organisation	Number of smallholders	Production Area (Ha)	Supplied to Mill		
					FFB (tonnes/year)		
	Merbau Estate (RSPO certified)	PT Perkebunan Milano subsidiary of Wilmar International Ltd	-	974.77		13,487.12	
	<b>TOTAL</b>					<b>13,487.12</b>	
	*Production data source from 12 months before assessment (June 2020 to May 2021)						
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 (MT)	
	FFB Processed						
	• Identity Preserved			137,600		148,280.07	
	• Mass Balance			6,400		0	
	CPO Production						
	• Identity Preserved			31,060		30,969.12	
	• Mass Balance			1,440		0	
	Palm Kernel Production						
	• Identity Preserved			6,080		5,396.09	
	• Mass Balance			320		0	
	*Opening stock CSPO from previous period 336.33 MT *Opening stock CSPK from previous period 64.33 MT						
1.8.2	Product selling						
	Type of selling product			Actual selling product for last year (MT)			
	CSPO sold as RSPO certified product			IP : 30,672.33 MB : 0			
	CSPK sold as RSPO certified product			IP : 5,313.22 MB : 0			
	CSPO sold under other scheme			0			
	CSPK sold under other scheme			0			
	CSPO sold as conventional			0			

	CSPK sold as conventional	0						
1.8.3	Estimate of Certified FFB Claim							
	<b>Name of Estates</b>	<b>Total Area (Ha)</b>	<b>Planted Area (Ha)</b>	<b>FFB (tonnes/year)</b>	<b>Yield (tonnes/ha/ year)</b>			
	Wonosari Estate	2,944.59	2,581.65	67,035	25.97			
	Sei Deras Estate	2,627.66	2,483.29	76,469	29.79			
	Cabang Dua Estate	654.33	612.90	13,096	21.37			
	<b>TOTAL</b>	<b>6,226.58</b>	<b>5,677.84</b>	<b>156,600</b>	<b>27.58</b>			
	<i>*Projected FFB production for 8 October 2021 to 7 October 2022</i>							
1.8.4	Estimate of Certified Palm Product Claim							
	<b>Name of Mill</b>	<b>Capacity (tonnes/ hour)</b>	<b>FFB Processed (tonnes/year)</b>	<b>CPO</b>		<b>Palm Kernel</b>	<b>Supply Chain Module</b>	
				<b>Out put (tonnes)</b>	<b>Extraction (%)</b>	<b>Out put (tonnes)</b>	<b>Extraction (%)</b>	
	Daya Labuhan Indah 2	30	148,800	30,700	20.63	5,400	3.63	IP
			7,800	1,600		280		MB
	<i>*Projected CSPO and CSPK production for 8 October 2021 to 7 October 2022</i>							
1.9	Other Certifications							
	ISPO		MUTU-ISPO/092 valid 4 Aug 2017 – 3 Aug 2022					
1.10	Time Bound Plan							
1.10.1	Time Bound Plan for Other Management Units							
	<b>Management Unit</b>		<b>Estate (Supply Base)</b>	<b>Time Bound Plan</b>	<b>Location</b>	<b>Status</b>		
	<b>MILL</b>	<b>Time Bound Plan</b>						
	<b>Indonesia – Kalimantan Region</b>							
	Mustika Sembuluh 1 POM Mustika Sembuluh POM 2 (PT Mustika Sembuluh)	2010	Mustika Sembuluh 1	2010	Central Kalimantan	Certified		
			Mustika Sembuluh 2	2010	Central Kalimantan	Certified		
			Mustika Sembuluh 3	2010	Central Kalimantan	Certified		
			KUD Bitu Maju Bersama	2014	Central Kalimantan	Certified		
	Kerry Sawit Indonesia 1 POM	2011	Kerry Sawit Indonesia 1	2011	Central Kalimantan	Certified		
			Kerry Sawit Indonesia 2	2011	Central Kalimantan	Certified		
	Kerry Sawit Indonesia 2 POM (PT Kerry Sawit Indonesia)	2015	Kerry Sawit Indonesia 3	2011	Central Kalimantan	Certified		
			KUD Karya Bersama	2023	Central Kalimantan	Re Audit, initial certification to process after land title process		
			KUD Sejahtera Bersama	2023	Central Kalimantan			
			KUD Tabiku Makmur	2023	Central Kalimantan			
	KUD Kosudra	2023	Central Kalimantan					
	Bumi Sawit Kencana POM	2013	Bumi Sawit Kencana 1	2013	Central Kalimantan	Certified		
			Bumi Sawit Kencana 2	2013	Central Kalimantan	Certified		

	(PT Bumi Sawit Kencana)					
	POM 1 and POM 2 (PT Sarana Titian Permata)	2023	Sarana Titian Permata 1	2023	Central Kalimantan	-
Sarana Titian Permata 2			2023	Central Kalimantan	-	
Sarana Titian Permata 3			2023	Central Kalimantan	-	
	Mentaya Sawit Mas POM (PT Mentaya Sawit Mas)	2015	Mentaya Sawit Mas 1	2015	Central Kalimantan	Certified
Mentaya Sawit Mas 2			2015	Central Kalimantan	Certified	
KUD Karya Makmur Pahirangan			2023	Central Kalimantan	Land title issue	
	Rimba Harapan Sakti POM (PT Rimba Harapan Sakti)	2015	Rimba Harapan Sakti 1	2015	Central Kalimantan	Certified
Rimba Harapan Sakti 2			2015	Central Kalimantan	Certified	
KUD Makmur Sejahtera			2023	Central Kalimantan	Land title issue	
	Karunia Kencana Permaisejati POM (PT Karunia Kencana Permaisejati)	2017	Karunia Kencana Permaisejati 1	2017	Central Kalimantan	Certified
Karunia Kencana Permaisejati 2			2017	Central Kalimantan	Certified	
Karunia Kencana Permaisejati 3,			2017	Central Kalimantan	Certified	
	Agro Nusa Investama POM (PT Agro Nusa Investama (Sambas))	2019	Agro Nusa Investama (Sambas) Estate	2019	West Kalimantan	Certified
KUD Cempaka Biru			2019	West Kalimantan	Certified	
KUD Sentama Lestari			2019	West Kalimantan	Certified	
2023		Srimaram Estate	2023	West Kalimantan	Land title issue	
	Bumipratama Khatulistiwa POM (PT Bumi Pratama Khatulistiwa)	2016	Bumi Pratama Khatulistiwa Estate	2016	West Kalimantan	Certified
PT Buluh Cawang Plantation			2023	West Kalimantan	-	
KUD Tuah Jubata			2023	West Kalimantan	-	
	Agro Nusa Investama (Landak) POM (PT Agronusa Investama (Landak))	2023	Agro Nusa Investama (Landak) Estate	2023	West Kalimantan	-
Pratama Procentindo Estate (PT Pratama Procentindo)			2023	West Kalimantan	-	
	Agro Palindo Sakti POM (PT Agro Palindo Sakti 2)	2023	Agro Palindo Sakti Estate	2023	West Kalimantan	-
Putra Indotropical Estate (PT Putra Indotropical Estate)			2023	West Kalimantan	-	
Daya Landak Plantation Estate (PT Daya Landak Plantation)			2023	West Kalimantan	-	
Indoresin Putra Mandiri (PT Indoresin Putra Mandiri)			2023	West Kalimantan	-	
<b>Indonesia – Sumatera Region</b>						
	Pinang Awan POM (PT Perkebunan Milano)	2009	Sei Daun	2009	North Sumatra	Certified
Batang Saponggol			2009	North Sumatra	Certified	
Marbau			2009	North Sumatra	Certified	
	Tania Selatan POM (PT Tania Selatan)	2010	Burnai Barat	2010	South Sumatra	Certified
Burnai Timur			2010	South Sumatra	Certified	
	Kencana Sawit Indonesia POM	2020	Kencana Sawit Indonesia	2020	West Sumatra	Certified
KUD Swamata			2023	West Sumatra	-	

	(PT Kencana Sawit Indonesia)					
	AMP Plantation POM (PT AMP Plantation)	2011	AMP I	2011	West Sumatra	Certified
			AMP II	2011	West Sumatra	Certified
			AMP III	2011	West Sumatra	Certified
			AMP IV	2011	West Sumatra	Certified
			Primatama Mulia Jaya	2011	West Sumatra	Certified
			Koperasi Tompek Tapian Kandis	2014	West Sumatra	Certified
			Koperasi AWM	2014	West Sumatra	Certified
			Koperasi BST,	2014	West Sumatra	Certified
			Koperasi MSJ	2014	West Sumatra	Certified
	Buluh Cawang Plantation POM (PT Buluh Cawang Plantation)	2012	Bumi Arjo	2012	South Sumatra	Certified
			Dabuk Rejo	2012	South Sumatra	Certified
			Sukamulya	2012	South Sumatra	Certified
			Bambu Kuning	2012	South Sumatra	Certified
	Gersindo Minang Plantation POM (PT Gersindo Minang Plantation)	2012	Gersindo Minang Plantation	2012	West Sumatra	Certified
			Permata Hijau Plantation 1	2012	West Sumatra	Certified
			Permata Hijau Plantation 2	2012	West Sumatra	Certified
			PT Permata Hijau Pasaman (block 22)	2023	West Sumatra	-
	Daya Labuhan Indah POM (PT Daya Labuhan Indah)	2013	Wonosari	2013	North Sumatra	Certified
			Sei Deras	2013	North Sumatra	Certified
			Cabang Dua (PT Milano)	2013	North Sumatra	Certified
	Agro Palindo Sakti POM (PT Agro Palindo Sakti)	2014	Agro Palindo Sakti Estate	2014	South Sumatra	Certified (POM has been closed down)
	Murini Samsam POM (PT Murini Sam Sam)	2015	Murini Sam Sam Estate	2015	Riau	Certified
			Part of PT Murini Samsam areas (466 ha)	2023	Riau	-
	Musi Banyuasin POM (PT Musi Banyuasin Indah)	2023	Sei Selabu	2023	South Sumatera	-
			Sei Jarum	2023	South Sumatera	-
			KUD Karya Gatra	2023	South Sumatera	-
			KUD Karya Makmur Sriwijaya	2023	South Sumatera	-
			KUD Panca Karya Jaya	2023	South Sumatera	-
			KUD Sumber Makmur	2023	South Sumatera	-
			KUD Tri Tunggal Karya	2023	South Sumatera	-
	Sinarsiak Dianpermai POM (PT Sinarsiak Dianpermai)	2023	Sinarsiak Dianpermai Estate	2023	Riau	-
	Agro Indah Persada 2 POM (PT. Agroindo Indah Persada)	2023	-	2023	Bangko – Jambi	NPP Audit

Malaysia						
Sapi POM (PPB Oil Palms Berhad)	2008	Sapi 1	2008	Sandakan, Sabah, Malaysia	Certified	
		Sapi 2	2008	Sandakan, Sabah, Malaysia	Certified	
		Kiabau	2008	Sandakan, Sabah, Malaysia	Certified	
Reka Halus POM (PPB Oil Palms Berhad)	2008	Reka Halus	2008	Sandakan, Sabah, Malaysia	Certified	
Sabahmas POM (PPB Oil Palms Berhad)	2008	Sabahmas	2008	Lahad Datu, Sabah, Malaysia	Certified	
Saremas 1 POM (PPB Oil Palms Berhad)	2010	Saremas	2010	Bintulu, Serawak, Malaysia	Certified	
		Saremas 2 (Div D)	2010	Bintulu, Serawak, Malaysia	Certified	
		Suai	2010	Bintulu, Serawak, Malaysia	Certified	
Saremas 2 POM (PPB Oil Palms Berhad)	2010	Saremas 2 (exclude Div D)	2010	Bintulu, Serawak, Malaysia	Certified	
		Kaminsky	2010	Bintulu, Serawak, Malaysia	Certified	
		Segarmas	2010	Bintulu, Serawak, Malaysia	Certified	
Ribubonus (PPB Oil Palms Berhad)	2010	Ribubonus	2010	Sandakan, Sabah, Malaysia	Certified	
Terusan POM (PPB Oil Palms Berhad)	2010	Terusan 1 + 2	2010	Sandakan, Sabah, Malaysia	Certified	
		Rumidi	2010	Sandakan, Sabah, Malaysia	Certified	
Sri Kamusan POM (PPB Oil Palms Berhad)	2011	Sri Kamusan	2011	Sandakan, Sabah, Malaysia	Certified	
		Hibumas 1	2011	Sandakan, Sabah, Malaysia	Certified	
		Hibumas 2	2011	Sandakan, Sabah, Malaysia	Certified	
		Jebawang	2011	Sandakan, Sabah, Malaysia	Certified	
		Sekar Imej	2011	Sandakan, Sabah, Malaysia	Certified	
		Sapi Sugut	2011	Sandakan, Sabah, Malaysia	Certified	
Suburmas POM (PPB Oil Palms Berhad)	2021	Suburmas	2021	Bintulu, Serawak, Malaysia	-	
Africa						
BOPP POM, Biase Plantation Limited	2014	Adum Bansa	2014	Western Region, Ghana	Certified	

			Scheme Smallholder	2014	Western Region, Ghana	Certified
	Biase Plantation Limited	2020	Calaro	2020	Cross River State, Nigeria	Mill under construction
	Biase Plantation Limited	2022	Calaro extension	2022	Cross River State, Nigeria	Mill none planned
	Biase Plantation Limited	2020	Ibiae	2020	Cross River State, Nigeria	Mill construction not started
	Eyop Industries	2021	Ibad	2021	Cross River State, Nigeria	Mill construction not started
	Eyop Industries	2020	Kwa Falls	2020	Cross River State, Nigeria	Mill none planned
	Eyop Industries	2021	Oban	2021	Cross River State, Nigeria	Mill none planned
	<p>Time bound plan on January 2021</p> <p>The revision of time bound plan because there is the change of certification time plan from year 2021 to year 2023 for some uncertified management units with reason is still in process to get land use right (Hak Guna Usaha). Some uncertified management units which changed from year 2020 to year 2023 are PT Agro Nusa Investama (Landak) and its supply based (PT Agronusa Investama 2 and PT Pratama Procentindo), PT Buluh Cawang Plantation in West Kalimantan (one of supply base from PT Bumipratama Khatulistiwa), PT Permata Hijau Pasaman (block 22), PT Agro Palindo Sakti in Sanggau District, West Kalimantan and its supply based (PT Agro Palindo Sakti, PT Putra Indotropical, PT Daya Landak Plantation and PT Indoreshin Putra Mandiri), PT Sinarsiak Dian Permai in Riau and PT Musi Banyuasin Indah in South Sumatera.</p> <p>The revision of time bound plan because some scheme smallholders has paid all costs relate of develop of scheme smallholder areas so that it has excluded from the time bound plan. It are KUD Damai Sejahtera (DASTRA) I &amp; II (scheme smallholder under PT AMP Plantation and PT Primatama Mulia Jaya), KSU Mutiara Bosa Sikilang, KUD Permata Sawit Maligi, KUD Rantau Pasaman – Sasak and KUD Kapar (its supply based from PT Gersindo Minang Plantations POM)</p> <p>The revision of time bound plan because two companies (PT Karya Agung Megah Utama &amp; PT Perkebunan Anak Negeri Pasaman) has terminated the management agreement with PT AMP Plantation as stated in the termination agreement letter on 31 May 2019.</p> <p>The result of internal discussion referring RSPO P&amp;C Certification System, 2017 and communicating with auditee that Auditor has not accepted the revision of time bound plan for some cooperatives (KUD Karya Bersama, KUD Sejahtera Bersama, KUD Tabiku Makmur &amp; KUD Kosudra) as supply base from PT Kerry Sawit Indonesia be year 2023 because it is not compliance with RSPO Certification System clause 4.1.3 so auditor has issued final decision as seen on table 8 above.</p>					
1.10.2	<b>Progress of Associated Smallholders and Outgrowers for Certifiable Standard</b>					
	Until this audit, Daya Labuhan Indah 2 POM has no engagement with associated smallholder and outgrower for certifiable standard.					



2.0	ASSESSMENT PROCESS
2.1	Assessment Team
ASA-1.2	<ol style="list-style-type: none"> <li>1. Trismadi Nurbayuto. Indonesian Citizen. Diploma of Forest Management from Forestry Faculty; Associate Degree of Economic from Economic and Management with Major Agribusiness. He has experienced as field assistant on oil palm plantation year of 2008. Therefore, he has experienced as HCV and SEIA Assessor on 2010-2013. He has been followed HCV identification and management training; ISO training (9001;14001; 22000; 45001); ISPO Lead Auditor's training; Safety Expert; RSPO Lead Auditor's; OHS Auditors by Government Regulation No 50 year of 2012; RSPO Next, and SA 8000. He has been conducted audit on ISPO and RSPO scheme since year of 2013 as an Auditor on several aspect as environment, OHS, Legality, Best Management Practices, Social, Worker Welfare, Conflict Resolutions, Long term Business Plan and Supply Chain on Palm Oil Mill. In this audit activity performs the assessment of Environment, Social &amp; GHG aspect.</li> <li>2. Haikal Ramadhan Kharismansyah. Indonesian citizen, Bachelor of Agriculture department of plant and pest disease (Agrotechnology). He has 3 year's experience as an Agronomy Staff in private oil palm plantation in Indonesia. Training which had attended including Basic Management Development Program Agronomy, Integrated Urban Pest Management, Integrated Pest Management, ISO 9001:2015, Auditor ISPO, RSPO Lead Auditor Training, ISO 22000 awareness, RSPO SCCS. Did some audit ISPO scheme with aspects Best management practices. During this assessment verified Legal, FPIC, SCCS and Contractor.</li> <li>3. Rindu Galih Rezza Rachmansyah (Auditor). Indonesian citizen, Bachelor of Agriculture with major in Plant Pest and Disease. Has one year experience as Field Expert in Pesticide Company and 3 years' experience in Industrial Forest Management, Forest Rehabilitation and Reclamation on Indonesia Stated Owned Company as Assistant. Training which had attended including Lead Auditor ISO 9001, ISO 14001, ISO 17021, ISO 19011, ISO 45001, SA 8000, Lead Auditor ISPO, Lead Auditor RSPO, RaCP and NPP Awareness and OHSAS 18001:2007. Has involved in several audit activities related to sustainable palm oil since 2017 in the aspects of Best Management Practices (BMP), social, worker welfare and OHS. During assessment, he assigned to verification towards Worker Welfare, and High Conservation Value (HCV).</li> <li>4. Septian Maulana (Trainee Auditor). Indonesian Citizen, Bachelor of Economic, Pamulang University. Have experience as sustainability staff on oil palm plantation. Training have been followed including Occupational Health and Safety Expert Candidate certification by Ministry of Manpower and Transmigration of Indonesia; Awareness Integrated Management Systems (ISO 9001:2015, ISO 14001:2015, ISO 45001:2018); Basic Fire Fighting; Basic First Aid; Understanding the regulations and technical aspects of environmental management; Training of Immobilization after a venomous snake bite; Awareness ISO 19011:2011; Awareness ISO 17065:2012; Awareness ISO 17021:2015; ISO 14001:2015; and ISO 45001:2018; ISO 9001:2015 Lead Auditor, ISPO Lead Auditor, and RSPO Lead Auditor. In this audit activity was verified OHS and Best Management Practices Aspect under supervised by Lead Auditor.</li> </ol>
2.2	Assessment Methodology, Assessment Process and Locations of Assessment
2.2.1	Figure of person days to implement assessment
ASA-1.2	<p>Number of auditors : 3 auditor and 1 trainee auditor</p> <p>Number of days for ASA-1.2 at site : 4 days</p> <p>Number of working days for ASA-1.2 at site :12 Working days</p>
2.2.2	Assessment Process
ASA-1.2	The assessment was conducted by measuring the sufficiency of implementation with the consistency done by the PT Daya Labuhan Indah to the requirements of Indonesia National Interpretation RSPO Principles and Criteria for the Production of Sustainable Palm Oil 2018 Endorsed by the RSPO Board of Governors on 20 <sup>th</sup> April 2020 and



RSPO Certifications Systems for Principles & Criteria and RSPO Independent Smallholders Standard (Endorsed by RSPO Board of Governors on 12 November 2020)

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 *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 *Recertification* 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*.

Opening meeting were attended by 4 auditor and 11 auditee, document central on Wonosari Estate Office, all auditor is stay on Wonosari Estate Mess. Therefore closing meeting were attended by 4 auditor and 15 auditee. During closing meeting, they were accepted the auditor conclusion.

The assessment program please find Appendix 2

2.2.3	Locations of Assessment
ASA-1.2	<p>POM 2</p> <ul style="list-style-type: none"> <li>● Security Post. Interviews (by telephone) and observations regarding the flow of FFB receipts, inspection of everyone who will enter the PKS area, including PPE checks.</li> <li>● Weighbridge. Interview (by telephone) and observations regarding the administration of FFB receipts.</li> <li>● Sorting and Grading. Interview (by telephone) and observations regarding quality inspection of FFB, PPE, and employee working hours as well as understanding of emergency response.</li> <li>● Loading Ramp. Interview (by telephone) and observations regarding the quality inspection of FFB, PPE, and working hours of employees as well as understanding of emergency response.</li> <li>● Boiler. Interview (by telephone) and observation of operational activities and working hours of employees as well as understanding of emergency response including operator license and medical check-up.</li> <li>● Engine Room. Interview (by telephone) and observation of operational activities and working hours of employees as well as understanding of emergency response including operator license and medical check-up.</li> <li>● Press. Interview (by telephone) and observation of operational activities and working hours of employees as well as understanding of emergency response including health checks.</li> <li>● CPO Tanks. Observations on CPO storage capacity</li> <li>● Kernel Silos. Observation of Silo Kernel capacity</li> <li>● Chemical warehouse. Observation and interview with 1 Operator related to the fulfillment of the attributes health and safety, recording, and the implementation of compliance requirements hazardous waste temporary storage, wages and complaint mechanism.</li> <li>● Hazardous waste temporary warehouse. Observation and interview with 1 worker on their understanding towards technical, OSH, Labor and environment aspects, as well as facilities provided by the company.</li> <li>● Workshop. Observation and interview with 1 worker on their understanding towards technical, OSH, License, Labor and environment aspects, as well as facilities provided by the company.</li> <li>● Solar Tank. Observations related to environmental management and OHS.</li> <li>● Empty Bunch Press Station dan Empty Bunch Area. Observation and interview with 1 Operator on their understanding towards technical, OSH, Labor and environment aspects, as well as facilities provided by the company.</li> <li>● Water Treatment Plant (WTP). Observation and interview with 1 Operator on their understanding towards technical, OSH, Labor and environment aspects, as well as facilities provided by the company.</li> <li>● Waste Water Treatment Plant (WWTP). Observation and interview with 1 Operator on their understanding towards technical, OSH, Labor and environment aspects, as well as facilities provided by the company.</li> <li>● Water reservoir. Observations related to the use, management and storage of water in the mill.</li> <li>● Water Intake. Observations related to surface water extraction procedures.</li> <li>● Waste Outlet. Observations related to waste disposal points in accordance with applicable permits.</li> </ul>

- Mill cleaning activity. Observations and interviews with one contractor worker related to work procedures, wages, OHS and complaints.
- Hydrant No. 04 simulation. Observations related to emergency response activities and facilities owned.
- Housing Complex. Observations related to the feasibility of welfare facilities provided to workers.

**Wonosari Estate**

- Block 112, Division 1: HGU Pole No. I. Observation the conditions and position of legal boundary.
- Block 112, Division 1: HGU Pole No. XXIV. Observation the conditions and position of legal boundary.
- Block 113, Division 1: HGU Pole No. XXXIX. Observation the conditions and position of legal boundary.
- Block 137, Division 2: Fire Monitoring Tower. Observation the conditions of fire tower and management of fire observation systems conducted by the company.
- Block 124, Division 1. Observation on Herbicide Application (mixed Supremo & Kenly) on the palm circle and harvesting path, and interview with Foreman, 1 Tractor Trailer Spray Driver (direct interview) and Pesticide Applicators (2 females by phone), on their understanding towards technical, OSH, manpower, environment and conservation aspects, as well as facilities provided by the company.
- Block 150, Division 2. Observation on Harvesting activities and interview with Foreman and 2 Harvesters, on their understanding towards technical, premium calculation, daily work base, harvesting rotation, OSH, manpower, environment and conservation aspects, as well as facilities provided by the company.
- Block 141, Division 2. Observation on water gate for water management system.
- Block 141, Division 2. Observation on empty bunch application.
- Chemical warehouse. Observation and Interview with workers related to personnel understanding over the applicable SOP, implementation of OHS and material handling
- Lubricants warehouse. Observation related OHS and material handling
- Potable water depot. Observation for workers facilities
- Clinics. Observation for workers facilities, hazardous waste handling and OHS
- Kindergarden. Observation for workers facilities.
- Housing Complex, Division 1, Block M. Observation for workers facilities, waste management, and OHS.
- Diesel fuel store. Observation related OHS and material handling
- Hazardous waste warehouse. Observation and Interview with workers related to personnel understanding over the applicable SOP, implementation of OHS and material handling
- Workshop. Observation related OHS and waste management
- Fertilizer warehouse. Observation related OHS and material handling
- Fertilizer washing sack area. Observation for OHS and material handling
- PPE store and spraying team rinse store. Observation for OHS and waste management
- Fire fighting simulation. Observation on fire fighting tools and emergency response preparedness.
- Landfill, block 114, Division 1. Observation for domestic waste management.

**Sei Deras Estate**

- Boundary Pole number 09 and VII. Observation the conditions and position of legal boundary.
- Housing Complex Division 1. Observation for workers facilities, waste management, and OHS.
- HCV Blok 62 Division 1. Observation condition of HCV area and signboard.
- Path Spraying Activity Blok 83 Division 1. Interview by phone and observation for OHS, environment and worker welfare
- Harvesting Activity Blok 83 Division 1. Interview by phone and observation for OHS, environment and worker welfare
- Water Level Blok 83 Division 1. Observation for condition water level pole and the actual water level
- Manuring Activity Block 69 Division 1. Interview by phone and observation for OHS, environment and worker welfare
- House Rinse Block 96 Division 2. Observation for OHS and environment.
- Subsidence Pole No. 07 Bock 94 Division II. Observation for the pole condition
- Subsidence Pole No. 06 Bock 97 Division II. Observation for the pole condition

- Garbage Dump Block 76 Division I. Observation for waste management.
- Barn Owl Blok 76 Division I. Observation for the barn condition.
- Chemical Warehouse Division I. Observation related OHS and material handling
- Lubricats Warehouse Division I. Observation related OHS and material handling
- Fertilizer Warehouse Division I. Observation related OHS and material handling
- Spare Part Warehouse Division I. Observation related OHS and material handling
- Workshop Division I. Ovation related OHS and waste management

**Cabang Dua Estate**

- Chemical warehouse. Observation and Interview with workers related to personnel understanding over the applicable SOP, implementation of OHS and material handling
- Lubricants warehouse. Observation related OHS and material handling
- Potable water depot. Observation for workers facilities
- Housing Complex. Observation for workers facilities, waste management, and OHS.
- Diesel fuel store. Observation related OHS and material handling
- Hazardous waste warehouse. Observation and Interview with workers related to personnel understanding over the applicable SOP, implementation of OHS and material handling
- Workshop. Ovation related OHS and waste management
- Fertilizer warehouse. Observation related OHS and material handling
- Fertilizer washing sack area. Observation for OHS and material handling
- PPE store and spraying team rinse store. Observation for OHS and waste management
- Fire fighting simulation. Observation on fire fighting tools and emergency response preparedness.
- Boundary pole number VII block 58 division 1. Observation the conditions and position of legal boundary.
- Boundary pole number II block 46. Observation the conditions and position of legal boundary.
- Boundary pole number VI block 60. Observation the conditions and position of legal boundary.
- Circle Spraying Activity. Interview by phone and observation for OHS, environment and worker welfare.
- Bunch Ash Application Activity Block 47 Division I. Interview by phone and observation for OHS, environment and worker welfare
- HCV at Block 42 and 58. Observation related to HCV management and monitoring plan.
- Landfill, block 044, Division 1. Observation for domestic waste management.

2.3	Stakeholder Consultation and Stakeholders Contacted
2.3.1	Summary of stakeholder consultation process.
ASA-1.2	<p>Summary of stakeholder consultation process</p> <p>Consultation of stakeholders for PT Daya Labuhan Indah was held by:</p> <ul style="list-style-type: none"> <li>• Public consultation with NGO: Sawit Watch, WWF, WALHI, and AMAN (5 June 2021)</li> <li>• Public consultation meeting with government institution (15 June 2021)</li> <li>• Public consultation meeting with communities including previous land owners from Sei Nahodaris, Sei Tampang, and Kampung Bilah Village (15 June 2021)</li> <li>• Public consultation meeting with internal stakeholders &amp; contractor worker (16 June 2021)</li> </ul> <p>Numbers of input from stakeholders were clarified by PT Daya Labuhan Indah</p>
2.3.2	Stakeholder contacted
	<i>Please find appendix 1</i>
2.4	Determining Next Assessment
	The next visit (ASA-1.3) will be conducted eight (8) month to twelve (12) month after (8 October 2021)

**3.0 ASSESSMENT FINDINGS**

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

MUTUAGUNG LESTARI has conducted an assessment of Daya Labuhan Indah 2 Palm Oil Mill – PT Daya Labuhan Indah subsidiary of Wilmar International Limited operation consisting of one (1) mill and three (3) oil palm estates.

During the assessment, there were nine (9) opportunities for improvement were identified.

MUTUAGUNG LESTARI found that Daya Labuhan Indah 2 Palm Oil Mill – PT Daya Labuhan Indah subsidiary of Wilmar International Limited complied with the requirements of Indonesia National Interpretation RSPO Principles and Criteria for the Production of Sustainable Palm Oil 2018 Endorsed by the RSPO Board of Governors on 20<sup>th</sup> April 2020 *and* RSPO Certifications Systems for Principles & Criteria and RSPO Independent Smallholders Standard (Endorsed by RSPO Board of Governors on 12 November 2020)

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

Ref Std.	VERIFICATION RESULT of MUTU-Certification
<b>PRINCIPLE #1 BEHAVE ETHICALLY AND TRANSPARENTLY</b>	
<b>1.1</b> 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><b>1.1.1</b> The unit of certification shows a list of documents that can be accessed by stakeholders, for example indicated by Letter Number 001/DLI-EXT/II/2021 dated 06 February 2021. Based on the circular, it is known that there are 13 types of information that can be accessed by the public, such as environmental documents, company permits, HCV documents, CSR, Community Development, etc. As explained by Bina Mitra representatives, for information that is not listed in the list and wants to be accessed, it must be approved by Top Management. The list of documents that can be accessed by the public has also been socialized to stakeholders such as the Sei Tampang Village Head, Kampung Bilah Village Head, Worker Union, and Bilah Hilir Sub-district Head through letter No 001/DLI/Ext/II/2021 dated 06 February 2021.</p> <p><b>1.1.2.</b> The unit of certification shown several mandatory report, for example: <b>Environment Aspect</b></p> <ul style="list-style-type: none"> <li>- Online reporting to the Environment and Forestry Ministry ID TTE 1612800750-3306 for environment management and monitoring of KWS, KSD, &amp; DLI-2 POM 2<sup>nd</sup> semester dated 8 February 2021.</li> <li>- Hazardous waste management 4<sup>th</sup> quarter of 2020 for DLI-2 POM to the Environment Board of Sumatera Utara Province dated 30 January 2021.</li> <li>- UKL-UPL period of 2<sup>nd</sup> semester of 2020 for KCD to Environment Board of Labuhanbatu District dated 8 March 2021.</li> </ul> <p>Based on document verification it was sighted that the UKL-UPL realization of 2<sup>nd</sup> Semester 2020 on KSD in accordance to document number 660/21/BLH-LB/AM 2014 with area 445.88 Ha and also number 660/134/BLH/2/2014 with area 431.87 Ha were conducted by third party/environment consultant dated 22 March 2021. That report was finished on 15 June 2021, the unit of certification sent it to the Environment Board of Labuhanbatu District and Labuhanbatu Selatan District dated 18 June 2021. However the unit of certification to be consider to evaluate all of mandatory report to the relevant agencies in accordance to national regulation (OFI).</p> <p><b>Legal Aspect</b></p>	

- Report on the Utilization of PT DLI's HGU 2020 to the Head of the Regional Agrarian and Spatial Planning Office of Labuhan Batu Regency and Head of the Land Office of Labuhan Batu Regency on 27 January 2021
- Report on Investment Activities Quarter I 2021 dated April 19, 2021 through online reports Number 946408; 946410 for estate units and Number 94611 for Mill to the Regional Investment Office of Labuhan Batu Regency (regional approved)

Based on the interviews with representatives of Kampung Bilah Village, Sei Tampang Village, Sei Nahodaris Village, the Environment Service, and the National Land Agency of Labuhan Batu Regency, it is known that the type of information as disseminated can be accessed by first making an application.

### 1.1.3

The unit of certification has procedures for Information Services for the Public with No. Document: SOP-BNM-003 Revision 01 Effective date February 1, 2015. The procedures, among others, explain the flow of requests and provide information briefly as follows:

Request for information → PGA → Estate/Mill Manager → Conveyor of Information (assessing requestor of information, appropriateness of information, and possible impact) → Estate Manager → Conveyor of Information → Requester of information.

Based on the timeframe in the process, it is known that the longest period in the application process and providing information is one month. The unit of certification also has a logbook to record every incoming request for information contained in the External Incoming Logbook. The logbook describes the date of the letter, origin, type of input (complaint, request for information, proof of delivery (letter/oral), recommendation, response (realization and response date) and status.

Based on the log book, during the 2020-2021 period, it is known that the dominant request is in terms of requests for financial assistance, for example requests for information on October 6, 2020 from the Labuhan Batu Environment Service (Letter No: 660/476/DLH/TL/2020) regarding CSR data request for 2016 – 2020. The request was answered on October 12, 2020 in accordance with Letter Number 141/DLI/KWS/Ext/X/2020. For CDE, for example, the survey from the Central Bureau of Statistics of the Republic of Indonesia for Palm Oil Plantations in the first quarter and the second quarter of 2020. The questionnaire was re-sent to BPS on 08 August 2020.

Based on interviews with representatives of Kampung Bilah Village revealed that in February 2021 the company had disseminated what types of information were accessible to the public. In accordance with the letter, the Village said that in May 2021 it had submitted a request for access to information to the company related to the company's licensing aspect and until June 16, 2021 had not received a response. Based on the company's investigation and explanations from management representatives, it was found that the Village representative gave the letter to the foreman and the foreman who was entrusted with it had not provided further information to PGA or Bina Mitra as the person in charge of the request for information.

In the socialization that has been distributed to the parties on February 6, 2021 regarding information that can be accessed by the public, it is not clear that the diagram/procedure for the parties to obtain information has not been clearly stated. Thus, the certification unit has the opportunity to evaluate and re-assure the effectiveness of the socialization of the procedures for obtaining information to the parties so that any requests for information from the parties can be conveyed properly.

### 1.1.4

Procedure of public communication, information request and service for PT Daya Labuhan Indah (PT DLI) is presented in document No. SOP-BNM-003 dated 01 February 2015, while for PT Perkebunan Milano (PT Milano) is presented in document No. PRO-BM.GEN-002 and PRO-BM.GEN-005. Those procedure mentioned that all information requested shall be response less than 1 (one) month. Information could be requested through several media, such as Official Letter, Suggestion Box, Email, etc.

The officer appointed as the person in charge to ensure that the procedure runs, including socializing it to the parties, is



the PGA and the Public Speaker. Based on the results of interviews with representatives of Kampung Bilah Village, Sei Tampang Village, Sei Nahodaris Village, it is known that one form of procedural socialization to the parties is to explain through direct visits or by telephone.

**1.1.5**

The unit of certification shows a list of stakeholders as follows:

- KSD and KWS :
  - Government sector (31)
  - District/Village (13)
  - Community Leader (2)
  - Suppliers (23)
  - Press (2)
  - Creditors (1)
  - Competitors (3)
  - Employee organization (3)
  
- CDE
  - Government department (28)
  - District/Village (7)
  - Community Leader (1)
  - Suppliers (23)
  - NGO and youth organizations (1)
  - Press (1)
  - Creditors (1)
  - Competitors (1)
  - Employee organization (1)

1.1.2

Status: OFI

1.1.3

Status : OFI

**1.2**

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

**1.2.1**

Company can show the Company Code of Ethics document (applicable to Plantation & Industry), Approved by Country Head, by Recognized HRGA Corporate Head (Human Resource and General Affair) and Examined by Sustainability Division Head, effective from 15 December 2015, Revision 01 date 28/3/2016 (Document No: 044/DIR-KP/XII/2015).

The Company's Code of Ethics version 5 June 2019. Based on the code of ethics, the company describes the code of ethics into 3 principles, namely:

- Avoid conflicts of interest
- Avoid abuse of authority/position
- Ensure the confidentiality of information and prevent misuse of information obtained through the company's operational activities, either for personal interests or for purposes other than the interests of the company.

Based on the results of interviews with workers, for example spraying workers at CDE and contractor workers, it is known that the workers are aware of the Ethical Policy in the company concerned that there should be no bribery, gratuities, corruption, etc.

**1.2.2**

The company has a system to ensure the implementation of the code of ethics, for example:

- The calculation of the harvest is based on the information system established by the company (EBCC), so there is no fraud in the calculation of the harvest.

- Employee recruitment is based on the mechanism owned by the company and based on the needs of each unit.

Regarding financial supervision, the company has also conducted financial audits by public accounting firms, for example the financial audit report of PT Daya Labuhan Indah from the public accounting firm for the 2020 financial year dated April 9, 2021 No. 00449/2.1032/AU.1/01/0687-6/1/IV/2021. Based on the results of the financial audit, the financial auditors expressed an opinion that the accompanying financial statements are fairly presented, in all material respects, the financial position of PT Daya Labuhan Indah as of December 31, 2020, as well as its financial performance and cash flows for the year then ended, in accordance with financial accounting standards in Indonesia.

Status: Comply

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

**2.1**

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

**2.1.1**

The unit of certification has list of regulations of 2021 that includes local regulations and national regulation updated annually. List of laws/regulations listed has covers several aspects such as land permit and legality, manpower, occupational health and safety, best management practices and environment. Some examples of regulations compliance that have been done such as:

Environment:

- AMDAL of PT DLI in accordance to Agriculture Minister number 054/ANDAL/RKL-RPL/BA/IV/95 dated 6 April 1995 with scope of assessment PT DLI Mill & Estate with area 5,000 Ha.
- RKL-RPL of PT DLI revision in accordance to Environment Bord District of Labuhan Batu Decree Letter with number 660/46/SET-KOMISI/VIII/2009 dated 31 August 2009 with scope plantation 4,694.5 Ha and DLI-2 POM with capacity 30 Ton FFB/hours.
- UKL-UPL of PT Perkebunan Milano Cabang Dua Revision in accordance to Environment Board Decree Letter with number 660/42/BLH-LB/AM/2012 dated 01 February 2012, scope area 654.33 Ha of Oil Palm Plantation.
- RKL-RPL of KSD PT DLI in accordance to number 660/21/BLH-LB/AM 2014 dated 12 February 2014 with area scope 445.88 Ha and also number 660/134/BLH/2/2014 dated 5 May 2014 with area scope 431.87 Ha

The other compliances of regulations regarding to environment aspects are EIA management and monitoring in routinely, hazardous waste storage license approved by local government. Compliances of workers and OHS regulations are provided the minimum wage, company safety & occupational health, transporting and forklift operator, etc. Based on interview with stakeholders such as government agencies it is known that the company has comply the related regulations for example: has plantation business permit, land use right, no workers under age of 18, hazardous waste storage permit, etc.

**Legal Aspect**

- Has HGU area of 4,694.50 ha (PT DLI) and 654.33 ha for Cabang Dua Estate as described in more detail in 4.4.1. In addition, there is also an area of 877.75 ha in KSD (PT DLI) which is still under management
- Plantation Business Permit for an area of 4,694.50 and processing capacity of 30 tons of FFB/hour (PT DLI) and IUP for 654.33 ha for PT Perkebunan Milano Cabang Dua Estate (described in more detail in 4.4.1)
- Already have a Plantation Business Assessment Certificate based on the Decree of the Regional Secretary of the Labuhan Batu Regency Number: 520/4676/DIPERTA-BUN/2020 dated December 23, 2020 with a plantation grade II (good) valid for 3 years from the date of stipulation.

**OHS Aspects:**

- The company has carried out routine health checks and special health checks for workers dealing with chemicals.
- The company has equipped workers with licenses/certificates for lifting equipment operators, welders, boilers,

electrical OHS technicians, production power aircraft, paramedic hiperkes etc.

**Best Management Practice:**

- The chemical storage area has been equipped with ventilation, lighting, emergency handling equipment, MSDS, etc. in accordance with PP No. 75 year 2001
- The company does not use invasive species in biological pest control.
- Carry out water management on peatlands in the company's area.
- Do not burn in the company's operational activities.

**Compliance with Manpower Regulation**

Certification unit in general has complied with manpower regulation, including:

- Reporting of Employment Report for PT Daya Labuhan Indah (Estate) in 2021 via online on 17 June 2021 and must be reporting back on 17 June 2022.
- Reporting of Employment Report for PT Daya Labuhan Indah (Mill) in 2021 via online on 17 June 2021 and must be reporting back on 17 June 2022.
- Reporting of Employment Report for PT Perkebunan Milano (Cabang Dua Estate) in 2020 via manual report on 29 September 2020 and must be reporting back on 29 September 2021.
- The implementation of the minimum wage in 2021 is in accordance with the Minimum Wage Decree of the Sumatera Utara Province established by the Governor of Sumatera Utara in November 2020.
- 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.

**2.1.2**

The unit of certification already has a law register document which contains relevant regulations related to operational activities. The law register is divided into four parts, namely the K3 sector, the Plantation Sector including business permits, the Manpower Sector, and the Environment Sector. In SOP-GEN-017 at point 6.4 it is stated that the EHS Officer/Regional Human Resources/Bina Mitra Unit makes a list of regulations, updates accuracy and compliance

The last update of the law register was carried out in January 2020 in conjunction with the RSPO internal audit, while for the period of 2021 the law register has not been reviewed and updated because it is planned to be carried out in the second semester of 2021 so that a review of the latest regulations issued in the first semester of 2021 can be included in the review law register 2021. Based on this, the certification unit has the opportunity to ensure that the planned review of the law register for the 2021 period is carried out in accordance with the stipulated plan.

For an explanation of the evaluation of compliance with regulations for contractors, it is explained in indicators 2.2.1 – 2.2.3

**2.1.3**

The unit of certification shows a report on the monitoring and maintenance of the boundary marks of the HGU KWS, KSD, and CDE for the 2021 period which was carried out in March and June. Based on the monitoring, it is known that there are a total of 49 HGU boundary pole (KWS and KSD); 9 HGU boundary pole (CDE) equipped with a map of the distribution of boundary pole and the location of the coordinates for the installation its boundary pole.

The monitoring results stated that all boundary pole in good condition. Based on the results of field visits to boundary pole No. I and XIV KWS as well as boundaary pole No. VII and 9 KSD and boundary pole No. VII block 58, No. II block 46, No. VI block 60 CDE, it is known that the condition of the stakes is in good condition and well maintained as written on the results of monitoring and maintenance of HGU boundary pole.

2.1.2	Status: OFI
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**2.2**  
**All contractors providing operational service and supplying labour, and Fresh Fruit Bunch (FFB), comply with relevant legal requirements.**



**2.2.1**

In monitoring the use of contractors for plantation and mill activities, the certification unit has well documented the list of contractors, the number of workers they have, contact persons, work agreements, and ensuring other matters related to compliance with laws and regulations in Indonesia. At present the certification unit has 1 contractors (PT Citra Maju Perkasa) with 4 workers (for cleaning work at mill) and 6 suppliers (sparepart). In managing the contractor, the certification unit has a copy of the cooperation agreement in each unit. For example for agreement between two parties such as: Work Agreement No. 038/PKS/CMP/2021 for supply of mill cleaning manpower in PT Daya Labuhan Indah (DLI-2 POM) dated 02 January 2021 which is valid for one year (until 31 December 2021).

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

**2.2.2**

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

The results interviews with contractor workers (mill cleaning worker) revealed that workers had received wages above the minimum wage, were registered in the BPJS program, has been given PPE 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, fulfilling tax payments, BPJS payments and other requirements. For example, fulfillment includes:

- Proof of payment of wages for four (4) workers for periode April-May 2021 who received wages from above the minimum wage in 2021
- BPJS payments for the April and May 2021 period have been completely fulfilled and the last proof of payment is on 28 May 2021.
- The examples of "BPJS Kesehatan" ID number 0002214957914 and "BPJS Ketenagakerjaan" ID number 1210081510930001.

In addition, the certification unit has carried out an evaluation of each contractor after the completion of the agreement period (one years) 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. The certification unit has a list of suppliers for the supply of goods (vehicle spare parts) as many as 6 stakeholders and the certification unit has evaluated the performance of all these suppliers for 2020 performance on December 28, 2020 with the results of the average supplier performance getting a good performance rating of 87%.

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

**2.2.3**

In each work agreement between the certification unit and the contractor, there are clauses related to fulfilling legal obligations in Indonesia as one of the obligations that must be fulfilled by the contractor/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 certification unit always requests the requirements for the completeness before the contractor does / starts work.

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

from trafficking because all workers have understood the work agreement at the start of work and payment for the work is always equal.

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

Status: Comply

**2.3**

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

**2.3.1 & 2.3.2**

Until ASA-1.2 is implemented the certification unit does not receive FFB from the supplier. All FFB processed are from one group of companies.

Status: Comply

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

**3.1**

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

**3.1.1**

The company can show a long-term plan document for the period 2021 – 2026 which informs, among others: financials; area statement, crop and estate cost; FFB processed and milling costs; plantation development costs; capital expenditure for estate and mill; as well as sustainability implementation costs.

**3.1.2**

Based on a review of the area statement document and interviews with management, it is known that the certification unit has carried out planting for the 2nd cycle with a planting year between 2009 – 2017 so that the company does not have a replanting plan for the next 5 years.

**3.1.3**

Companies can show Records of Management Review Activities of PT DLI, DLI-2 POM and PT Milano (CDE) in 2021. The management review meeting was attended by 15 participants consisting of managers, company doctors, field officers, and other staff. Among the things discussed were:

- Company policy
- Organizational structure
- Operational conditions
- Transparency aspect
- Certification audits
- Previous review management
- Legal requirements
- Best practices
- Use of chemicals
- Energy efficiency
- Waste and pollution management
- HCV Maintenance
- OHS and Environment Aspect
- General Environmental and Social Aspects

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**

**Best Management Practice:**

The company has integrated biological pest control in order to reduce the use of pesticides by utilizing natural enemies of pests such as Tyto alba and beneficial plants, namely Turnera subulata.

**Environmental and Social:**

- The company has implemented the RKL-RPL and RKS-RPS programs which are further explained in indicator 3.4.3
- The certification unit also shows the Social Aspects of Realization Report for 2020, the preparation of this report has been carried out in a participatory manner through a questionnaire
  - Manpower recruitment: recruitment of new employees in each unit
  - Correspondence communication: receipt of letters from stakeholders and their responses
  - Reporting on community activities in the plantation: regular reporting
  - Company transportation: road maintenance
  - CSR: realization of CSR in various fields
  - Occupational Health and Safety (Internal): monitoring the use of PPE
  - Clean Water Sources (Internal): provision of drilled wells for toilets in employee housing, and provision of drinking water depots in each plantation

**3.2.2**

The company already has a metric template that provides information related to area, production realization, number of workers, training realization, work accidents, etc.

	Status: Comply	
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**3.3**

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

**3.3.1**

Based on the results of interviews with company management, it is known that there are no changes to procedures, the company already has procedures for plantation and mill operations that are available in Indonesian, for example:

- Procedure for oil palm processing are presented in document No. SOP-MILL-001 to No. SOP-MILL-044, with the most updated was dated on 05 December 2017. The procedure has covers FFB acceptance, FFB Grading, Weigh Bridge, FFB processing, laboratory works, operational on processing Stations (Loading Ramp, Sterilizer, Thresher, Digester, Screw Press, Vibrating Screen, Crude Oil Tank, Decanter, Oil Tank, Sludge Tank, Depericarcter, Nut Silo, Ripple Mill, LTDS, Claybath and Kernel Silo), dispatch of CPO and kernel, transportation and supply chain management system.
- Procedure for oil palm agronomy are presented in document No. PRO-EST-001 to PRO-EST-018, with the most updated was dated on 01 April 2019. The procedure covers nursery, legume cover crop, replanting, field upkeep, harvesting, as well as integrated pest and disease management.
- Procedure of safety are presented in several documents such as No. PRO-EHS-14 dated 01 March 2012 and No. PRO-GEN-013 dated 01 July 2012 about emergency situations including first aid, No. SOP-GEN-002 dated 01 February 2015 about HIRAC and No. FRM-GEN-068 about fire monitoring. Further detail on safety working procedure is described in Hazard Identification Risk Assessment Control (HIRAC) and Material Safety Data Sheet (MSDS) of agrochemicals.

Based on the results of interviews with workers, for example in the application activity of bunch ash, it is known that workers can explain the procedure for sowing bunch ash and are able to identify potential hazards in their work area and the function of the PPE used.

**3.3.2**

To monitor the implementation of procedures consistently, the company conducts internal audits, such as ISPO/RSPO internal audit activities and Standard Harvesting Audits that inform the maturity standards of FFB harvested at the Site and in the POM.

**3.3.3**

The company can prove that records of monitoring and follow-up are maintained, for example:

- Records of Internal Audit activities of ISPO/RSPO Cabang Dua Estate dated 17 March 2021 found 6 non-conformities and 2 Improvement Opportunities.
- Corrective action form for goals and targets (targets) not being achieved every month to evaluate maintenance and maintenance activities every month in each estate and analyze the causes.

Based on the results of interviews with management, it is known that the work of contractors is checked for suitability every time they submit a payment bill.

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**

The unit of certification has four environment impact assessment document were approved by Head of Labuhanbatu District Environmental Agency, covering different area with the following details :

1. *Analisa Dampak lingkungan (ANDAL)* for estate area of 4,694.5 ha in 2009 and 30 tonne FFB/hour
2. *Upaya pengelolaan dan pemantauan lingkungan (UKL/UPL)* for Sei Deras estate covered 445.88 ha in 2014
3. *Upaya pengelolaan dan pemantauan lingkungan (UKL/UPL)* for Sei Deras estate covered 431.87 ha in 2014
4. *Upaya pengelolaan dan pemantauan lingkungan (UKL/UPL)* for cabang dua estate covered 654.33 ha in 2012

All of the EIA documents explained all activities for pre construction, construction, operation, and post operation for example (road construction, field drain construction, housing and facilities, waste water treatment plant, IPM, replanting, biodiversity, and etc) covered the palm oil mill, sei deras estate, wonosari estate, cabang dua estate.

PT DLI and PT Milano has conduct social impact assessment by independent consultant. The scope of study are impact of plantation and mill operation to workers and community surrounding company areas. These assessments also identified negative and positive impact of plantation and mill operation towards social aspect.

Based on document review shown that current SIA has describing and identified potential social impact related vulnerable groups, community perception, environment and health, local economy, land use changes, livestock intrusion by sheperd, workers facilities and etc.

SIA identifications was also done based on affected parties consultation, this matter are amplified by stakeholders e.g Sei Tampang and Bilah villagers during stakeholder consultation and besides that based on interview with local community shown that major impacts has been identified and managed by company.

**3.4.2.**

The unit of certification have planned and includes monitoring protocol outlined in periodically social environmental monitoring and management plan (RKL/RPL) and implemented this plan to monitor the effectiveness of the management activities to mitigate negative impact and enhance postive impacts, for example regarding water management aspects, company has included the results of water level monitoring on peat areas on Semester 2 2020.

The unit of certification also has established management plan and monitoring plan related for social & environment impact based on the impact identification period of 2019 – 2021. This plan were developed with participation affected stakeholders dated 2 January 2019. This plan has been informed the positive and negative impact including management planning time frame and the person in charge for the activity, such as:

External Issues

- Employee recruitment: the job opportunity for nearby communities.

- Communication with stakeholders: the respond letter from company are need much time.
- Reporting of community activities on the estate: the village board didn't know: if any "kenduri" on emplacement
- Company transport: there is dust in the village through which FFB, CPO, and PK transports
- CSR: CSR on infrastructure and religious aspect needs to be improved.

Internal Issues:

- OHS: there are several worker are not aware about PPE's importance & there are workers who don't workers with pesticide, however still exposed by chemical.
- Clean Water: there are damage and leakage in the water tank.

3.4.3.

The unit of certification was shown documents of RKL-RPL (KSD, KCD, KWS, DLI-2 POM), UKL-UPL (KSD) realization report for 2<sup>nd</sup> Semester of 2020. The report was made in a participatory manner by involving to internal and external stakeholders. There are several parameters which monitored and managed by them. For example:

- Effluent quality and ground water quality test
- Solid waste management
- Hazardous waste management
- Air and ambient quality test
- High noise level monitoring
- Odor quality test
- Flora and fauna
- Potential of fire
- Community perceptions
- Job opportunity
- Community Health
- Change in the nature and function of peat
- Soil quality test

The unit certification also shown social impact monitoring and management activities for last year period, for example:

- New employee recruitment on each unit
- Mailing with stakeholders/communication with stakeholders
- Reporting of employee activities to the local agency
- Road maintenance on surrounding village
- OHS aspect: PPE's usage monitoring
- Clean water: well water and sanitation for all employees and water depot on each emplacement.

Based on environmental monitoring result sighted that all paramater's are comply with the national or local regulations.

Status: Comply
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**3.5**

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

3.5.1

The certification unit has procedures related to recruitment, selection, employment, promotion, retirement and termination of employment which are generally described in the Collective Labor Agreement period 2019-2021 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 Collective Labor Agreement, the certification unit 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 in 03 and 06 Februari 2021 which was attended by all workers on muster morning. For example some procedures that are owned by the company include:

- SOP Recruitment (PRO-HRD-001) concerning Employee Recruitment
- Policy No. 039/DIR-KP/IX/2015 concerning Employee Pension
- SOP Promotion (SOP-PD-01) concerning Employee Promotion
- SOP Worker Assessment (PRO-HRD-003) concerning Worker Assessment

Based on the results of the study of labor documents, it is known that since 2020 until now there have been no migrant workers, no contract workers (PKWT/BHL), all workers working in the certification unit are permanent workers with class 2A-2D, and staff. All the rights for each employment status has been distinguished.

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

### 3.5.2

The certification unit 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 certification unit, including:

- The certification unit has a worker recruitment document from the start until the worker becomes a permanent worker. For example, a worker with an employee number DB/SD/1120/1593 (loader) who has recruitment documents such as a job application letter, identity card, family card, recruitment selection results, decree letter accepted to work and undergo probation for 3 months, medical check-up results and others. The worker started working as a probation worker on 02 November 2020, in January 2021 the worker received a performance appraisal with a "Good" result and was promoted to permanent employment (class 2A) in accordance with Decree No. 006/DLI-HRR/SK/II/2021 on 04 January 2021.
- The certification unit has a worker recruitment document from the start until the worker becomes a permanent worker. For example, a worker with an employee number DB/PDLI2/0320/113 (warehouse officer in mill) who has recruitment documents such as a job application letter, identity card, family card, recruitment selection results, decree letter accepted to work and undergo probation for 3 months, medical check-up results and others. The worker started working as a probation worker on 25 February 2020, in June 2020 the worker received a performance appraisal with a "Good" result and was promoted to permanent employment (class 2A) in accordance with Decree No. 001/DLI-HRR/PKS/SK-VI/2020 on 04 June 2020.
- There is a pension document for workers with employee number MO/CDE/0502/105 retired on November 2020 according to Decree No. 021/HRR-MLN/SK/PHK/XI/XI/2020 dated 14 November 2020. 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 DLI-2 POM, Sei Deras, Wonosari and Cabang Dua Estate note that the certification unit 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 Daya Labuhan Indah, this was strengthened by the results of consultations with the four Labor Union (Serbundo, FSPMI, SPSI and FPBI), the Manpower Agency of Labuhanbatu Regency 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.

Based on the description above, it can be concluded that the certification unit already has labor procedures implemented and records are maintained for each worker.

Status: Comply
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**3.6**

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

**3.6.1**

Companies can show documents HIRAC for Mill and Estate units that are valid in 2021, documents HIRAC explain information related to the type of activity, potential hazards, cause analysis, initial risk analysis, current risk analysis, and risk analysis after control (possibility, severity and level of control) risk), as well as established controls. The company has evaluated the potential hazards and risks related to covid 19 that are included in the HIRAC.

**3.6.2**

**Health:**

Companies can show records of medical check up and special health checks, for example:

- CDE: Cholinesterase health check was carried out on March 10, 2021 by Sri Torgamba Hospital (Sri Pamela Medika Nusantara) to 15 chemical officers with all normal results.
- WSE: Cholinesterase health checks were carried out by Sri Torgamba Hospital (Sri Pamela Medika Nusantara) on March 10, 2021 for a total of 28 people with all normal results.
- SDE: Cholinesterase health checks were carried out by Sri Torgamba Hospital (Sri Pamela Medika Nusantara) on March 10, 2021 for a total of 29 people with all normal results.
- Mill: Audiometry health checks were carried out in 2020 by the Prodia Clinical Laboratory with examining doctors who had attended Hiperkes training on April 16-25, 2015 and already had a Decree on the Appointment of a Manpower Health Examiner No. 5/601/AS.02.02/XI/2019 in November 2019. Health checks were carried out on 101 workers in the PKS and the results obtained that the entire workforce was declared fit for work.

Based on the results of the document review, it is known that the results of the drinking water quality test at several drinking water depots in WSE, CDE and SDE with Total Coliform & E.Coli parameters showed <1.1; while the quality standard according to Permenkes No 492 of 2010 is 0. The company has socialized to all employees related to the test results, besides that it also requires employees to boil water from drinking water depots before consumption on February 6, 2021. In the results of interviews with several employees in each unit, the majority of employees explained that the water consumed daily comes from drinking water depots and is directly consumed, but some employees also explained that sometimes they boil the water before consumption. The results of interviews with company doctors explained that the disease trends in 2020 were flu, ARI and gastroenteritis (diarrhea). Where Total Coliform & E.Coli bacteria under certain conditions can cause Gastroenteritis.

The certification unit considers being able to re-evaluate the effectiveness of the OHS plan for all employees, including the hygiene and sanitation of drinking water depots and periodically socialize it to all employees.

**Minutes of P2K3 Meetings:**

The effectiveness of Occupational Safety and Health is also monitored through monthly P2K3 meeting activities, for example recordings of P2K3 meetings for example for CDE in March 2021 which will be held on March 17, 2021, attended by 15 participants consisting of the Chair and Members of P2K3. The materials discussed include the following:

- OHS performance can still be maintained considering that until March 2021 there are no cases of work accidents.
- The number of patient visits at the clinic was 111 people consisting of 15 children and 96 adults and no Covid-19 was detected.
- Reporting of potential hazards
- The spread of Covid-19
- Health checks (CHE) of chemical officers.

3.6.2	Status: OFI
3.7	
<b>All staff, workers, Scheme Smallholders, outgrowers, and contract workers are appropriately trained.</b>	
<p>3.7.1 &amp; 3.7.2</p> <p>The certification unit has identified the training needs for each employee according to the position and type of work. For example, the identification that has been carried out by the certification unit is the Fire Extinguisher Simulation which is intended for the entire Fire Emergency Response Team and Agronomic Techniques (harvest, fertilizer, spray, maintenance and others) aimed at field workers such as harvesters, sprayers, maintenance workers and others. After identifying, the certification unit prepares a training program for 2020-2021 (years of ratification on January 02, 2020 and January 02, 2021) for the plantation there are 23 types of training activities planned while the mill has 8 training activities, for example including:</p> <ul style="list-style-type: none"> <li>• Lotto Training (Lockout Tagout)</li> <li>• Confined Space Entry Training</li> <li>• Work at Height Training</li> <li>• Spraying Training</li> <li>• Harvesting Training</li> <li>• Fire Emergency Response Training</li> <li>• Pest and Fruit Census Training</li> <li>• ISPO/RSPO socialization</li> </ul> <p>In addition, the certification unit has been giving a training/socialization for relevant stakeholders (contractors, suppliers, local communities and smallholders). These programs include the following:</p> <ul style="list-style-type: none"> <li>• Socialization of PPE and OHS.</li> <li>• Socialization of company policies such as code of conduct, human rights, no child worker and others.</li> </ul> <p>To ensure that all the training programs have been running according to the timeframe, the unit of certification has done documentation for each of the training activities carried out. The following is the realization of the training that has been carried out by the certification unit for the period 2020-2021, namely:</p> <ul style="list-style-type: none"> <li>• Socialization of the CLA (explanation of the rights and obligations of workers/entrepreneurs) to all workers in plantations and mill on 09 and 22 June 2020 which was attended by 344 participants.</li> <li>• Dissemination of the Wilmar Group Policy to all workers in plantations and factories on 03 and 06 February 2021 which was attended by 111 participants.</li> <li>• Confined space and electrical training on 23 and 27 January 2021 attended by 26 workers.</li> <li>• Lotto training on January 14, 2020 which was attended by 14 participants.</li> <li>• Training in working in height on March 6, 2020 by 16 participants.</li> <li>• Hot work permit training on 07 April 2020 by 9 participants.</li> <li>• Job safety analysis training on July 08, 2020 by 17 participants.</li> <li>• Socialization of the use of PPE on December 4, 2020 by 10 participants.</li> <li>• Accident investigation training on November 10, 2020 by 4 participants.</li> <li>• Socialization of RSPO and SCCS on 27 August 2020 attended by 13 participants</li> <li>• Emergency and fire response simulation activities conducted on 27 November 2020 which were attended by 48 participants. This simulation activity is carried out for fire and earthquake events.</li> <li>• Emergency and fire response simulation activities conducted on November 30, 2020 which were attended by 27 participants. This simulation activity is carried out for fire and earthquake events.</li> </ul> <p>Based on the results of field observations of harvesting and spraying activities in the plantation as well as process activities at the factory which showed that workers had carried out spraying and harvesting practices and techniques in accordance with the procedures they had and process workers at the mill had worked according to their respective duties and responsibilities station. This is also reinforced by the results of interviews with plantation and mill workers who stated that the certification unit had routinely provided training to its workers, only that in 2020 and 2021 training activities were</p>	



hampered/delayed due to the COVID-19 pandemic.

The socialization given to stakeholders has been well documented, including the following:

- Socialization and fire simulation inviting the people of Sei Tampang and Kampung Bilah Village on November 21, 2019 which was attended by 47 participants.
- Socialization of wilmar group policies and COVID-19 prevention to the people of Sei Tampang and Kampung Bilah Village on 03 and 04 February 2021 which was attended by 25 participants.
- Socialization of wilmar group policies to the people of Sei Nahodaris Village on February 10, 2021, which was attended by 11 participants.

The results of interviews with contractor workers (cleaning workers) at the mill, it is known that the certification unit has carried out socialization related to existing company policies, OHS, use and compliance of PPE and others on a regular basis every year.

Based on the foregoing, it can be concluded that the certification unit 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.

**3.7.3**

The certification unit shows the SCCS training record which was held on April 09, 2020 and was attended by 11 employees including weighbridge, security, and logistics officers. Based on the interview results, it is known that the security and weighbridge officers have been able to clearly explain their duties and functions, including the source of processed FFB and the administrative checking process of the origin of the processed fruit through SPB. Refreshment training is held every year and for 2021 it is planned to be carried out in August 2021.

Status: Comply

**3.8**

**Supply Chain Requirements for Mills**

**3.8.1 & 3.8.2**

DLI-2 POM are applied supply chain module Identity Preserved and Mass Balance, however the mill only received and processed the FFB from certified sources (its own estate: Cabang Dua Estate, Wonosari Estate and Sei Deras Estate) and from certified associated estates (Marbau Estate, certified under certificate no: 824 502 14010 valid until 23 Aug 2021).

**3.8.3**

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

Product	Last Year Projected Certified Volume (MT)		Last Year Actual Certified Volume (MT)		Projected Production for 12 month (MT)	
	IP	MB	IP	MB	IP	MB
FFB	137,600	6,400	148,280.07	0	148,800	7,800
CSPO	31,060	1,440	30,632.79	0	30,700	1,600
CSPK	6,080	320	5,331.76	0	5,400	280

**3.8.4**

Daya Labuhan Indah POM - PT Daya Labuhan Indah, subsidiary of Wilmar International Ltd has registered in RSPO membership 2-0017-05-000-00 (registered since 29 September 2004). Daya Labuhan Indah POM has been registered in IT platform palm trace RSPO <https://palmtrace.rspo.org/web/rspo/member-directory> which information as follows:

- Member Name: Daya Labuhan Indah POM - PT Daya Labuhan Indah
- Account UID: RSPO\_AC1000002148
- Core Product: Palm Oil

- Member ID: RSPO\_PO1000002132
- Type of Business: Oil Mill

### 3.8.5

Procedures and/or written guidances for implementation of SCCS including description of personal key duty. These document observed, namely:

- SOP of FFB, CPO, PK weighbridge document No. SOP-MIL-002 revision of 8 issued on 1 February 2020, in this document mentioned that the security and weighbridge operator are responsible to ensure the source of FFB, the shipment/delivery document, as well as the seals for CPO/PK truck.
- Traceability procedure No. SOP-MILL-034, Revision 08, dated 1 February 2020 informed, the personal key on this activity is:
  - a) Logistic officer input the data of FFB certified product received and responsible in order to balancing the CPO and PK dispatch
  - b) Mill Head responsibility to ensure the stock balance and shipping of CPO and PK well implemented.In clause of 6.3 describes that in term of RSPO product shipment (CSPO/CSPK), in the weighbridge note will be attached the stamp which informed mill name, RSPO certificate number and supply chain model name. Clause of 6.6 describes that the announce to RSPO IT Platform will be done when by shipment of CSPO and CSPK. The data input conducted in every end of the month when there is no longer changes. The retention time of record keeping of supply chain documents is two (2) years.
- CPO and PK Shipment Procedure No.SOP-MILL-035, Revision 08, dated 1 February 2020 informed: point of F, the CPO and PK tank checking, the security officers checked the vehicle physical condition and to ensure the tank is empty without any other material and informed in the Vehicle Control Form document. Shipment with the RSPO status. The weighbridge officer ensure all the documents and information are complete, including the product identity (stamp) informing the certificate number of DLI.2 and the supply chain model use.

Storage tank planned to be washed minimum twice a year as mentioned in the SOP No. SOP-MILL-038, Revision 07, dated 1 February 2020. Switch over product mechanism from MB to IP model, describes as follow:

- a) Define the cutoff date of the switch over in order to ensure FFB latest day acceptance for MB model
- b) Ensure there is dedicated tank will use in empty condition to keep all the IP model status product
- c) All FFB received and production in the cutoff date will stated as MB supply chain model status
- d) Only acceptance and production at one day after the cutoff date can be stored in the dedicated storage tank

Switch over product from IP to MB model mechanism:

- a) Define the cut off date of FFB latest day acceptance for IP supply chain model
- b) FFB and production after cutoff date stated as MB supply chain model and stored.
- c) If IP supply chain model will be shipped and claimed as IP, so the IP product left cannot be mixed with MB supply chain model product.

During this ASA-1.2 audit found that DLI-2 POM only received FFB from certified sources. So they only implemented Module Identity Preserved. Based on interviews and field observation to DLI-2 POM known the weightbridge operators and security understands the supply chain management system. Weightbridge officer said training and refreshment (awareness) of supply chain management system were carried out annually.

### 3.8.6

The Procedure to conduct annual internal audit are describe in SOP No. SOP-GEN-015 rev 02 dated 1 Aug 2016 covering all audit for sustainable palm oil including SCCS. In the SOP mentioned that internal audit is done annually. Internal audit of SCCS conforms to the requirements in the RSPO SCCS and the RSPO market communications and claims documents and effectively implements and maintains the standard requirements. The last internal audit is conduct at March 16, 2021 with audit result all requirements declared comply.

3.8.7

DLI-2 POM only processed their own FFB (from the certification scope) and certified FFB from other estate under the Wilmar International Ltd (Marbau Estate – PT Perkebunan Milano). Record of FFB received 12 month before audit (June 2020 – May 2021) are :

Month	FFB (MT)		Total
	Certified	Non Certified	
June 20	10,426.99	-	10,426.99
July 20	13,445.46	-	13,445.46
August 20	15,638.09	-	15,638.09
September 20	14,243.52	-	14,243.52
October 20	11,734.39	-	11,734.39
November 20	10,981.11	-	10,981.11
December 20	11,740.58	-	11,740.58
January 21	12,321.43	-	12,321.43
Febryary 21	11,318.26	-	11,318.26
March 21	14,074.96	-	14,074.96
April 21	12,995.32	-	12,995.32
May 21	9,359.96	-	9,359.96
<b>Total</b>	<b>148,280.07</b>	<b>-</b>	<b>148,280.07</b>

Product	Last Year Projected Certified Volume (MT)	Last Year Actual Certified Volume (MT)
FFB	128,000	148,280.07
CSPO	28,800	30,632.84
CSPK	6,400	5,331.76

Based on the data above, there is an over production of CSPO and until ASA-1.2 is completed, there has been no notification to the CB regarding the excess of the certified product. The previous license period was 08 October 2020 – 07 October 2021. While the actual assessment is for the period June 2020 – May 2021. So if we adjust it to the CSPO license period that has been produced, it is as follows:

Period	Production (MT)	Quota 08 Oct 2020 – 07 Oct 2021 (MT)
Oct 20	2,440.86	28,000
Nov 20	2,213.81	
Dec 20	2,430.01	
Jan 21	2,523.64	
Feb 21	2,363.02	
Mar 21	2,851.09	
Apr 21	2,777.71	
May 21	1,951.10	
<b>Total</b>	<b>19,551.26</b>	

The average CSPO production referring to the data above is 2,443.90 MT/Month. So that before October 2021 there is a potential for over-production of CSPO. This is in accordance with the production projection of the Daya Labuhan Indah 2

POM which states that between June 2021 - October 2021 CSPO production is 15,666.22 MT. Based on the description above, the certification unit has the opportunity to evaluate and re-assure the monitoring of the production of all certified products so that if it is estimated that there is an excess of certified volume production, the CB has given notice prior to the assessment

**3.8.8**

Based on the description above, the certification unit has the opportunity to evaluate and re-assure the monitoring of the production of all certified products so that if it is estimated that there is an excess of certified volume production, the CB must first notify the CB before the assessment activity is carried out.

The SOP of handling non-conforming FFB received describe in SOP of *Cara Penerimaan TBS* (No. SOP-MIL-001 dated 1 February 2020) which explains the implementation stages of receiving FFB to ensure that the FFB received at the Mill is in accordance with procedures.

Based on document verification and interview with management representative obtained information in last 12 months before audit (June 2020 – May 2021) it was known the product only sold under certified product as described in table below :

	Dispatch period (MT)	
	June 20 – May 21	Total
CSPO sold under RSPO Scheme	30,672.33	30,672.33
CSPO sold under other scheme	-	
CSPO sold as conventional	-	
CSPK sold under RSPO Scheme	5,313.22	5,313.22
CSPK sold under other scheme	-	
CSPK sold as conventional	-	-

Based on documents verifications the unit of certification can present if the Shipping announcement is announced no longer than three months, for example

- Shipping Announcement Transaction ID TR-127fe6f6-996e

<b>Seller</b> Member Name : PT Daya Labuhan Indah Member ID : RSPO_PO1000002132 Country : Indonesia	<b>Buyer</b> Member Name : PT Multimas Nabati Asahan Member ID : RSPO_PO1000000150 Country : Indonesia
<b>Transaction</b> Seller contract number : DO3062113917 Seller reference number : 3062113917 Buyer reference number : DO3062113917 RSPO-IP PO 1210120211	<b>Confirmation</b> Confirmation date : 02-06-2021
<b>Product Details</b> Product name : CSPO Supply chain model : IP Volume : 341,31 MT	<b>Traceability</b> Transaction ID : TR-127fe6f6-996e Transaction status : confirmed Creation date : 27-05-2021

Furthermore, the unit of certification can present information related minimum requirement or RSPO certified products, for example:

- The name and address of the buyer;
- The name and address of the seller;
- The loading or shipment / delivery date;
- The date on which the documents were issued;
- RSPO certificate number;
- A description of the product, including the applicable supply chain model

**3.8.9; 3.8.10; 3.8.11**

There are no outsourcing activities in DLI-2 POM. Transport of CPO and PK is provided by the buyer in accordance with the cooperation contract. The buyer of the certified product is PT Multimas Nabati Asahan which is an RSPO member with ID RSPO\_PO1000000160

**3.8.12**

The site has maintained accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO Supply Chain Certification Standard requirements. All the record can be accessed by the auditor, such as record of certified product shipping, sales contract, delivery order/invoice, production report and product sales. According to the Traceability Procedure (Document Number: SOP-MILL-034, dated 1 February 2020), all document and record related to supply chain kept for minimum 2 years. Based on documents verification, there is available at mill the record of supply chain for last 2 years.

FFB, CSPO and CSPK produced and/or claimed records are kept in minimum 12 months. Record of all certified palm oil/palm kernel oil volumes purchased (input) and claimed (output) for period of 12 months before audit (June 2020 – May 2021):

Period	All CPO Production (MT)			CSPO Dispatch (MT)			Stock of CSPO
	Certified	Non-Cert CPO	Total	RSPO	Other Scheme (ISCC)	As Non-Cert Total CSPO Dispatch	
Balance from previous period							336.33
Jun 20	2,178.08	-	2,178.08	2,284.17	-	-	2,284.17
Jul 20	2,727.99	-	2,727.99	2,585.65	-	-	2,585.65
Aug 20	3,227.61	-	3,227.61	2,867.34	-	-	2,867.34
Sept 20	2,947.87	-	2,947.87	3,411.39	-	-	3,411.39
Oct 20	2,440.86	-	2,440.86	2,539.32	-	-	2,539.32
Nov 20	2,213.81	-	2,213.81	2,136.02	-	-	2,136.02
Dec 20	2,430.01	-	2,430.01	2,424.58	-	-	2,424.58
Jan 21	2,523.64	-	2,523.64	2,613.99	-	-	2,613.99
Feb 21	2,363.02	-	2,363.02	2,269.49	-	-	2,269.49
Mar 21	2,851.09	-	2,851.09	2,790.13	-	-	2,790.13
Apr 21	2,777.71	-	2,777.71	2,720.06	-	-	2,720.06
May-21	1,951.10	-	1,951.10	2,030.19	-	-	2,030.19
<b>Total</b>	<b>30,632.79</b>	<b>-</b>	<b>30,632.79</b>	<b>30,672.33</b>	<b>-</b>	<b>-</b>	<b>30,672.33</b>
Closing Stock							296.84

May 21

Period	All PK Production (MT)			CSPK Dispatch (MT)				Stock of CSPK
	Certified	Non-Cert	Total	RSPO	Other Scheme (ISCC)	As Non-Cert	Total CSPK Dispatch	
Balance from previous period								64.33
Jun 20	343.79	-	343.79	349.26	-	-	349.26	
Jul 20	436.16	-	436.16	466.05	-	-	466.05	
Aug 20	577.72	-	577.72	467.52	-	-	467.52	
Sept 20	534.29	-	534.29	611.51	-	-	611.51	
Oct 20	426.95	-	426.95	466.59	-	-	466.59	
Nov 20	379.10	-	379.10	327.29	-	-	327.29	
Dec 20	429.41	-	429.41	441.45	-	-	441.45	
Jan 21	456.65	-	456.65	454.29	-	-	454.29	
Feb 21	416.79	-	416.79	400.83	-	-	400.83	
Mar 21	494.99	-	494.99	496.47	-	-	496.47	
Apr 21	498.81	-	498.81	509.99	-	-	509.99	
May-21	337.04	-	337.04	321.97	-	-	321.97	
<b>Total</b>	<b>5,331.70</b>	<b>-</b>	<b>5,331.70</b>	<b>5,313.22</b>	<b>-</b>	<b>-</b>	<b>5,313.22</b>	
Closing Stock May 21								165.72

Based on the IP/MB record, it is known that the number of products produced is bigger than sales (positive stock)

### 3.8.13 & 3.8.14

The conversion rate of production of CPO (OER) and PK (KER) were based on actual production. Then the management will monitor if the rate reasonable. Based on production data 12 months previous audit, the average OER is 20.66 %, while KER is 3.60 %.

### 3.8.15

The mill has set the procedure and implement to verify that the RSPO certified oil palm product is kept separated from non-certified oil palm products, from the receiving verification, processing and transporting. During 12 months previous the audit, the Mill did not process the uncertified FFB.

### 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 as shown in the following example of transaction record for example :

- Transaction ID TR-127fe5f6-996e; Transaction date 27-05-2021; Buyer reference number DO 3052113917 RSPO-IP PO 1210120211; Volume 341.3 MT CSPO;
- Transaction ID TR-29c151a7-5a50; Transaction date 27-05-2021; Buyer reference number DO 3052113918 RSPO-IP PO 1210120215; Volume 59.01 MT CSPK

The dispatch period is in May 2021

3.8.17

Based on announcement and transaction report documents review, it concluded that all RSPO certified products submitted are in compliance with the RSPO Rules on Market Communications and Claims. The mill isn't making claims by using RSPO trademark

3.8.7 Status: OFI

PRINCIPLE #4 RESPECT COMMUNITY AND HUMAN RIGHTS AND DELIVER BENEFITS

4.1

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

4.1.1 & 4.1.2

The certification unit already has a Human Rights Policy signed by (Group Plantation Head) and (Group CSR Head), updated June 2014 and is included in the Wilmar Policy (5 December 2103, updated 16/1/2015) at point 3 that it will not do exploitation of fellow humans and local communities. The commitment of the certification unit in respecting human rights has been quite well implemented in the absence of issues and incidents of human rights violations that occurred in the operational area of plantations and factories. This is evidenced by document study on complaints and grievance document (internal and external) that so far there have been no incidents or issues of human rights violations occurring in the operational area of the certification unit. This policies has been socialized to surrounding community in 2021, for examples:

- Socialization of wilmar group policies and COVID-19 prevention to the people of Sei Tampang and Kampung Bilah Village on 03 and 04 February 2021 which was attended by 25 participants.
- Socialization of wilmar group policies to the people of Sei Nahodaris Village on February 10, 2021, which was attended by 11 participants.

Based on the results of interviews with community representatives from Sei Nahodaris, Sei Tampang and Kampung Bilah Village, it is known that so far from 2020 to 2021 there has never been any intimidation/act of violence committed by the certification unit against workers, communities, contractors, or other parties who cooperate with the company. If there is a problem, usually the unit of certification will negotiate in a good manner and without resorting to violence.

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

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; 4.2.2; 4.2.3; 4.2.4

The unit of certification has a Grievance Receipt and Dispute Resolution Procedure (PRO-BNM-007-Revision 2, effective 09 February 2017). In the procedure it is explained that in point 6.2 that if requested by the company, the company guarantees the confidentiality of the identity of the reporter and the whistleblower by looking at the level of sensitivity of the problem, the scale of the impact if the issue is published or the risk of retaliation. Furthermore, in point 6.11 it is also explained that if a collective settlement cannot be reached, then a complaint can be submitted through the RSPO Complaint System. The company responsible to receive complaints and grievance is *Bina Mitra* staff

For those who cannot read and write, the certification unit has a communicator as a liaison between the company and the community. The results of interviews with representatives of Kampung Bilah Village, Sei Tampang Village and Sei Nahodaris Village, it is known that the officers who have been active so far are part of Bina Mitra.



During the onsite audit, there were several public complaints based on the results of the public consultation, such as:

1. Recruitment of labor that is considered unfair by representatives of Sei Tampang Village
2. The slow response to requests for information as submitted by representatives of Kampung Bilah Village
3. Realization of CSR for the dumping of *Dusun 48* and *Dusun 95* roads which were agreed in December 2020 but so far there has been no further information as conveyed by representatives of Sei Nahodaris Village

The complaints submitted by the verification results are as follows :

1. Issues from Sei Tampang Village: The certification unit can provide evidence that information regarding job vacancies is conveyed to the parties including the Nearby Village through job vacancies. Sei Tampang Village. The explanation from the company's side of the issue arose because of the number of applicants who volunteered not all of them could be accepted because they had to be in accordance with the needs of the company and in accordance with the results of the selection.
2. Issues from Kampung Bilah Village: It has been explained in more detail in 1.1.3 and becomes OFI on the indicator.
3. Issues from Sei Nahodaris Village: the unit has provided an explanation that the realization of the program will only be implemented around July 2021. Based on the CSR realization report, it is known that most of the CSR programs have been running, such as assistance for productive goat farming business of 20 goats to the youth of the village mosque. IV and food aid (rice, sugar, cooking oil, and instant noodles) for residents in the face of the covid-19 pandemic

Based on this explanation, it can be concluded that the certification unit basically has a good relationship with the surrounding community and has a positive impact on community development. In general, there are no complaints that have the potential to cause conflict. Complaints that arise are not directly submitted to the company. So that the flow of communication from both parties has not been as fluently as expected

Status: Comply
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#### 4.3

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

##### 4.3.1.

The unit of certification has identified the needs and whereabouts of the surrounding community together with the socialization of social impacts with the Forum Group Discussion (FGD) method on February 6, 2021, for the village community around the company. The village communities involved include: Sei Tampang Village, Wonosari Village, Siderojo Village, Pekan Bilah Village, Sei Deras Village, Sei Bilah Village, Sei Daun Village, Sei Nahodaris Village, Pinang Damai Village and Panai Tengah Village.

Evidence of participatory action from local communities was also sighted in related SIA documentation including photos.

Some aspects were considered during assessment such as:

- Access and use rights;
- Economic livelihoods and working conditions;
- Subsistence activities;
- Cultural and religious values;
- Health and education facilities;
- Other community values.

By considering the above aspects, the company will implement the following programs:

- Community empowerment strengthening program
- Communication and coordination with external parties
- Health improvement program
- Occupational safety and health improvement program
- Manpower strengthening program
- Strengthening community relations with companies

The programs currently running in 2021 are as follows:

1. Recruitment of workers
2. The company has provided information to the surrounding villages regarding all activities carried out within the company
3. Providing assistance in the form of basic necessities,
4. Sports equipment assistance for schools,



5. Assistance for productive businesses. For example, goat farming
6. Assistance in completing religious equipment and facilities
7. Medical equipment assistance

Status: Comply

#### 4.4

Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their Free, Prior and Informed Consent (FPIC).

##### 4.4.1

The total area of certification is 6,226.58 ha with the following details:

- PT DLI *HGU*: 4,694.5 ha. In accordance with SK No. 29/HGU/BPN/92 dated December 24, 1992 and *HGU* certificate No. 1 of 1992 (Valid for 30 years until December 31, 2022)
- PT DLI process *HGU*: 877.75 ha (Consists of 2 areas of cadastral maps). Map of land parcels No. 18/2016 dated September 19, 2016 with an area of 445.88 ha and Map of Land parcels No. 21 dated September 19, 2016 for an area of 431.87 ha
- PT Perlebunan Milano – CDE *HGU*: 654.33 ha. In accordance with SK No: 19/HGU/BPN/96 dated 31 May 1996 and *HGU* Certificate No 2 of 1996 for a land area of 654.33 ha (*HGU* certificate validity period is until August 2021)

##### 1. Extension of PT DLI *HGU* (4,694.50 ha) and CDE (654.33 ha)

Until ASA-1.2 the progress of extending the *HGU* for both KSD and KSW (expires in December 2022) and CDE (expires in August 2021) has not shown positive progress. The progress shown is still the same, namely the 2019 letter from the certification unit to BPN Labuhan Batu regarding the application for the extension of the CDE and PT DLI *HGU* (KSW and KSD)

##### 2. Application for *HGU* for KSD area of 877.75 ha

Not running since 2016. Legal staff explanation states that this area is planned as plasma for the application for *HGU* extension.

As regulated in ATR Regulation No. 7 of 2017 it is stated that after the *HGU* period expires, the right holder can still apply for a renewal of rights and is given a maximum of 2 years after the rights expire. In addition, in the RSPO Statement on Cultivation Rights dated April 1, 2020 point 3, it states that surveillance audits can be continued as stated in the previous announcement.

##### Plantation Permit (IUP):

- PT. Daya Labuhan Indah has had a plantation permit as follows:
  - Plantation Business Permit for Processing (IUP-P) covers 30 tons of FFB/hour processing capacity, based on Labuhan Batu Regent Decree No. 180/27/Huk/2012, dated 12 October 2012.
  - Plantation Business Permit (IUP) covers 4,694.5 ha area and 30 tons of FFB/hour processing capacity, based on Labuhan Batu Regent Decree No. 180/100/Huk/2013, dated 28 March 2013.
- PT. Perkebunan Milano has had a plantation permit Plantation Business Permit (IUP) covers 654.33 ha area, based on Labuhan Batu Regent Decree No. 180/21/Huk/2013, dated 4 April 2013.

Meanwhile, the non-*HGU* area also had a plantation permit as follows:

1. Plantation Business Permit (IUP) covers 445.88 ha area, based on Labuhan Batu Regent Decree No. 180/102/HUK/2014, dated 8 April 2014.
2. Plantation Business Permit (IUP) covers 431.87 ha area, based on Labuhan Batu Regent Decree No. 503/327/BPPTPM-LS/2014, dated 5 September 2014.

##### 4.4.2

According to land historical record, known that concession area of Wonosari and Sei Deras Estate (PT Daya Labuhan Indah) was owned by Asam Jawa Group and Cabang Dua Estate (owned by PT Perkebunan Milano) before took over by Karya Praja Nelayan Group (KPN Group). During year 2001, PT Perkebunan Milano was took over by Wilmar International Ltd. On 2005, Wilmar also took over PT Daya Labuhan Indah. After this process, there was no record of expansion by Wilmar.

Based on the interviews with representatives of Sei Tampang Village, Kampung Bilah Village. And Sei Nahodaris Village is known that the land acquisition process is always based on the agreement of both parties and there is no intimidation to forcibly relinquish land ownership rights.

4.4.3

In accordance with the information contained in the basic info and operational maps of PT DLI and PT plantation Milano (CDE), it is known that the total area included in the scope of certification is 6,226.58 ha. The area has legal rights in the form of HGU as described in 4.4.1. Details of land use are planting area with an area of 5,667.84 ha and other areas in the form of factories, facilities and infrastructure, HCV, and occupation with an area of 548.74 ha.

There are no customary/indigenous rights in operational areas as stated in the HCV identification document or during the social impact assessment. Similar information was also obtained from the results of public consultations with representatives of the Sei Tampang Village Community, Bilah Village Village, and Sei Nahodaris Village.

4.4.4; 4.4.5; 4.4.6

Until ASA-1.2 was implemented, there was no increase in the company's operational area. Land acquisition process is through acquisition as described in indicator 4.4.2. Based on interviews with previous land owners from Kampung Bilah Village, Sei Tampang Village and Sei Nahodaris Village, it is known that the company had previously negotiated and paid land compensation in accordance with the agreement and there was no coercion or intimidation during the land compensation process.

At the time of land right relinquishment, the land owner generally acts as a representative for himself. Regular reviews of the FPIC process are embodied in the SIA document which functions to screen social issues from affected communities including land issues

Status: Comply

4.5

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

4.5.1; 4.5.2; 4.5.3, 4.5.4; 4.5.5, 4.5.6; 4.5.7; 4.5.8

Until ASA-1.2 was implemented, there was no increase in the company's operational area. Land acquisition process is through acquisition as described in indicator 4.4.2. Based on interviews with previous land owners from Kampung Bilah Village, Sei Tampang Village and Sei Nahodaris Village, it is known that the company had previously negotiated and paid land compensation in accordance with the agreement and there was no coercion or intimidation during the land compensation process.

The existence of these agreements and their compliance is one indicator that the FPIC process has been running well.

Status: Comply

4.6

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

4.6.1 & 4.6.2

The company has procedure of land acquisition or to identify customary right (*SOP Pembebasan Lahan, Doc number: SOP-IJIN LAHAN&OPS-006*). This procedure guiding respective staff of management to ensuring all land acquisition are comply with the national or local requirement and informed to the respective stakeholder especially if any indigenous people or customary right. Based on document verification and interview with related stakeholder (village representatives) known that there was no new expansion after this concession took over by Wilmar International Ltd.

4.6.3

Based on the interviews with representatives from the villages of Kampung Bilah, Sei Tampang and Sei Nahodaris, it was found that land acquisition was never based on gender. Everyone, both men and women, has the same opportunity to

own land right
<p>4.6.4</p> <p>The company has documented all of land compensation process. The documentation comprise of Map, Negotiation result (minutes of meeting), Land Release Letter, Payment Receive was filled in estate office based on land location. Based on Procedure Implementation Mechanism Communication and Consultation With Community (PRO-BM.BEN-001), the documentation of land compensation process are limited access and should approved by Document &amp; Legal Department and Manager of Estate if any related parties will access this document. These documents can access with letter of Information Request from another parties to the company. Based on public consultation with village representatives from Bilah Village, Sei Tampang and Sei Nahodaris known land acquisition has finished by former company owner</p>
Status: Comply
<p>4.7</p> <p><b>Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.</b></p>
<p>4.7.1 &amp; 4.7.2</p> <p>The company has procedure of land acquisition or to identify customary right (<i>SOP Pembebasan Lahan, Doc number: SOP-UJIN LAHAN&amp;OPS-006</i>). This procedure guiding respective staff of management to ensuring all land acquisition are comply with the national or local requirement and informed to the respective stakeholder especially if any indigenous people or customary right. Based on document verification and interview with related stakeholder (village representatives) known that there was no new expansion after this concession took over by Wilmar International Ltd.</p>
<p>4.7.3</p> <p>As the results of public consultations with community representatives from Sei Tampang Village, Sei Nahodaris Village, and Kampung Bilah Village, one of the positive impacts of the opening of the company is the opening of road access. The Village Representative also stated that the existence of the company provides access to employment, including CSR. Village representatives stated that the company's existence had a positive impact on developing the economy and living standards of the surrounding community. Prior to the Covid-19 pandemic, the company was still working with the local community as a local contractor. For the current condition, the type of cooperation is local purchases from suppliers who come from around villages and sub-districts.</p>
Status: Comply
<p>4.8</p> <p><b>The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrate that they have legal, customary, or user rights.</b></p>
<p>4.8.1; 4.8.2; 4.8.3; 4.8.4</p> <p>Until the ASA-1.2 assessment was carried out there were no demands from the community regarding the legal rights owned by the company. According to land historical record, known that concession area of Wonosari and Sei Deras Estate (PT Daya Labuhan Indah) was owned by Asam Jawa Group and Cabang Dua Estate (owned by PT Perkebunan Milano) before took over by Karya Praja Nelayan Group (KPN Group). During year 2001, PT Perkebunan Milano was took over by Wilmar International Ltd. On 2005, Wilmar also took over PT. Daya Labuhan Indah. After this process, there was no record of expansion by Wilmar.</p> <p>Based on the company's operational map and basic info data, it is known that there is an area of 101.04 ha which is declared an occupied area. The occupation has occurred since the beginning of land clearing before the Wilmar Group took over. The actual condition of the land is Palm Oil planted by occupant.</p> <p>The unit of certification has shown evidence of recorded agreements with the community regarding the occupation area. Recorded evidence consists of:</p> <ul style="list-style-type: none"> <li>• Agreement between PT DLI and the community on February 28, 2014 for the completion of an area of 101.04 Ha in Kebun Sei Deras. The essence of the agreement is to maintain conducive conditions in the operations of both parties (attached is the attendance list of meeting participants &amp; photos).</li> <li>• Agreement between PT DLI and the community on March 11, 2014 for the completion of an area of 101.04 Ha in Kebun Sei Deras. The essence of the agreement is that both parties will continue to carry out their activities as before</li> </ul>

<p>(attached is the attendance list of meeting participants &amp; photos). This activity was attended by farmers, village heads, TNI and company representatives.</p>	
<p>Based on the company's operational map and basic info data, it is known that there is an area of 101.04 ha which is declared an occupied area. The occupation has occurred since the beginning of land clearing before the Wilmar Group took over. The actual condition of the land is Oil Palm planted by occupant.</p>	
<p>Status: Comply</p>	
<p><b>PRINCIPLE #5 SUPPORT SMALLHOLDER INCLUSION</b></p>	
<p><b>5.1</b>  <b>The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.</b></p>	
<p>5.1.1 – 5.1.6; 5.1.8; 5.1.9            Based on the results of interviews with company management, it is known that there are no FFB suppliers from Independent Smallholders or Plasma Smallholders, the source of FFB comes from nucleus plantations and other plantations within the Wilmar group.</p>	
<p>5.1.7            The unit of certification shows Certificate of Testing Results Number 510.3/157/Dagind-Met/KHP/10/2020 for electronic bridge scales dated October 28, 2020, valid until October 28, 2021. The inspection is carried out by the <i>UPTD</i> Legal Metrology, Labuhan Batu Regency.</p>	
<p>Status: Comply</p>	
<p><b>5.2</b>  <b>The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.</b></p>	
<p>5.2.1 to 5.2.5.            Based on document verification and interview with villagers from Sei Tampang Village, Kampung Bilah Village and Sei Nahodaris Village it was known that there are no scheme smallholders or independent smallholders which agreement with the unit of certification.</p>	
<p>Status: Comply</p>	
<p><b>PRINCIPLE #6 RESPECT WORKERS' RIGHTS AND CONDITIONS</b></p>	
<p><b>6.1</b>  <b>Any form of discrimination is prohibited.</b></p>	
<p>6.1.1, 6.1.2 &amp; 6.1.3            The certification unit has a commitment to respecting human rights and describe in the Equal Employment Opportunity Policy review on January 2018, explained that Wilmar International is committed to providing equality in employment opportunities to every employee. Our beliefs and labor standards confirm that we will not discriminate when making decision to employees, promotion or retire works/candidates based on race, color, sex, age, social class, religion, sexual orientation, politics, or disability-only subject to the conditions attached to the role to be performed. The fundamental aims is to ensure diverse and representative profiles of workers through the promotion equality of labor.</p> <p>The results of the employment document review prove that certification unit does not discriminate and treat all workers equally, the following is evidence that can be shown by the company:</p> <ul style="list-style-type: none"> <li>• The composition of workers consisting of various ethnic groups (5 ethnic), religions (5 religion), gender (2 gender) and workers' origins. The existing workers do not only come from one area but come from several areas spread throughout Indonesia such as Java, Sumatra, Kalimantan and others. During the audit, there was no information regarding migrant or AKAD workers (Angkatan Kerja Antar Daerah) in certification unit.</li> <li>• Recruitment of workers based on the results of selection, performance appraisal, ability and expertise of workers. For example harvesting worker who have employee number DB/SD/1120/1593 and DB/PDLI2/0320/113 received based on the results of the selection of job application files, results of health checks and results of interviews. The worker</li> </ul>	

- also passed the test and has been accepted as permanent worker.
- Documents for recruiting workers with Employee Number DB/SD/1120/1593 (loader) that have been documented, starting from job application documents to decision letters to appoint workers as permanent workers. The worker has applied for a job at PT Daya Labuhan Indah on September 26, 2020 and the recruitment process has been carried out from the results of interviews, written tests and has carried out a medical checkup. As a result, on November 2, 2020, workers were accepted as workers on a probationary period of 3 months in accordance with Decree No. 014/HRR-DLI/SK/XI/2020 and after passing the probationary period the worker gets an assessment (declared pass) and gets a Decree No. 006/DLI-HRR/SK/II/2021 dated January 04, 2021 to become a permanent worker of class 2A.
  - Document recruitment of workers with Employee Number DB/PDLI2/0320/113 (warehouse officer) which has been documented starting from the job application documents to the decision letter to appoint workers to become permanent workers. The worker has applied for a job at PT Daya Labuhan Indah on January 2, 2020 and the recruitment process has been carried out from the results of interviews, written tests and has carried out a medical checkup. As a result, on February 25, 2020, workers were accepted as workers on a probationary period of 3 months in accordance with Decree No. 001/DLI-HRR/SK/III/2020 and after passing the probationary period the worker gets an assessment (declared pass) and gets a Decree No. 001/DLI-HRR/PKS/SK-VI/2020 dated June 4, 2020 to become a permanent worker for class 2A.
  - 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 DLI-2 POM, Sei Deras, Wonosari and Cabang Dua Estate, it is known that workers have never felt that the company has discriminated against since they first working 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. There is no difference between the communication between superior and workers because of the things mentioned above, so that the workers do not feel isolated or discriminated against by the superiors. This has resulted in the absence of discrimination issues from 2020 to the present.

Based on the results of the study of labor documents, it is known that since 2020 until now there have been no migrant workers, no contract workers (PKWT/BHL), all workers working in the certification unit are permanent workers with class 2A-2D, and staff. All the rights for each employment status has been distinguished.

These explanations can conclude that the certification unit has treated all workers equally (based on skill, quality and eligibility) without discrimination based on gender, ethnicity, religion, health conditions or others.

#### 6.1.4

A pregnancy test for workers is carried out every three 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 Sei Deras, Wonosari and Cabang Dua Estate 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 certification unit.

#### 6.1.5

Certification unit have Women Working Group (WOW) that has been formed from gender committee and are still active until today in the certification unit which is chaired by the chairperson along with coordinators in several sections and there are representatives in each unit. The structure of the gender committee not only consists of female workers but also includes male workers. 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 20 April 2020 which was attended by all workers housing residents. The results of this socialization can be seen with the absence of differences in company operational activities such as promotional activities, the same status of workers without gender bias because overall are given equal opportunities for all genders (male or female) in work.

The results of interviews with maintenance workers (male and female 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), women recitation weekly and others, however, this activity was stopped due to the COVID-19 pandemic. Currently the certification unit is more focused on gender bias and equality for women because the most vulnerable parties in plantation operational activities are women, but this does not mean that the company does not focus on other genders. This is evidenced by the absence of any issues or incidents related to this from 2020 until now.

6.1.6

Equal payment of wages has been made by certification unit 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, harvesting worker with Employee Number DB/WB/0211/1707 (male) and maintenance worker Employee Number DB/ED/1117/1479 (female) who get wages in April and May 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). This is in line with statements from workers who were interviewed with types of work as harvesters and sprayers who have the same type of work but have different wage scales based on their performance, length of work in the company, productivity and other factors.

In addition, based on the results of interviews with labour union representatives, it was found that the certification unit 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 class 2A and the highest wage is permanent workers class 2D.

The results of interviews with workers (harvesting, spraying and mill operators) in DLI-2POM, Sei Deras, Wonosari and Cabang Dua Estate 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	
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**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 certification unit has procedures related to recruitment, selection, employment, promotion, retirement and termination of employment which are generally described in the Collective Labor Agreement period 2019-2021 and others manpower procedures 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 certification unit to all employees, one example of the socialization that was carried out was on 13 June 2020 which was attended by all workers on muster morning.

Based on the results of the study of labor documents, it is known that since 2020 until now there have been no migrant workers, no contract workers (PKWT/BHL), all workers working in the certification unit are permanent workers with class 2A-2D, and staff. All the rights for each employment status has been distinguished.



The results of interviews with workers (harvesters, sprayers, fertilizers 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 certification unit. Workers' wages in 2021 have been above the minimum wage set by the government, wage based on years of service, ability, attendance and job performance (structure and scale wage) and there are no late payments every month.

A review of the April and May 2021 wage document for harvester, office worker, maintenance and mill operators proves that the wages received are above the minimum wage and in accordance with the wage scale structure determined by the certification unit for 2021. For example, workers wages with the employee number DB/WB/0211/1707 and DB/ED/1117/1479 have a different based on wage scale structure 2021.

Based on the above explanation it can be concluded that the workers have understood the work requirements that have been socialized by the certification unit in an understandable language (Bahasa).

#### 6.2.2 & 6.2.3

The certification unit has Collective Labor Agreement period 2019-2021 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. Explanations related to the contents of the Collective Labor Agreement include:

- Article concerning Employee Acceptance (recruitment, selection, transfer, promotion, performance appraisal) which explains that all workers wishing to join the company must follow the specified requirements including: being over 18 years old, having a health certificate, taking a selection exam, and other requirements.
- Article concerning Working Time which explains that there are 2 types of working time in the company, namely by working 8 hours per day or 5 working days in a week and 7 hours per day or 6 working days in a week, in which the total working hours are 40 hours in a week. a week.
- Article concerning Wages which explains the wage that cannot be lower than the minimum wage set by the government every year, granting rice allowance to all workers according to its calculation, and other explanations.

In addition to being generally stated in Collective Labor Agreement, the certification unit also has a decree, policy, memorandum and work contract for workers in orientation period that specifically explain these matters. An example is:

- Regarding the minimum wage, the company refers to the Decree of the Governor of Sumatera Utara No.188.44/17/KPTS/2020 dated January 13, 2020 regarding the Plantation Sectoral Minimum Wage of Labuhanbatu Regency for the 2020 Period. The minimum wage is IDR 3,284,500/month or IDR 131,380/day or IDR 18,986/hour. The unit of certification still uses the determination of the minimum wage because the wage determination for Labuhanbatu Regency in 2021 (UMK) is of a lower value (IDR 2,895,289).
- Internal Memorandum No. 090/HC-PS/IM/II/2021 dated February 26, 2021 regarding the Wage Scale for Class 2A-2D Workers in 2021. The minimum wage has not changed, namely IDR 3,284,500/month or IDR 131,380/day, the lowest wage is class 2A with a working period of less than 1 year which is the same as the minimum wage and the highest wage is in class 2D with a maximum wage of IDR 6,038,200.
- Documents for recruiting workers with Employee Number DB/SD/1120/1593 (loader) that have been documented, starting from job application documents to decision letters to appoint workers as permanent workers. The worker has applied for a job at PT Daya Labuhan Indah on September 26, 2020 and the recruitment process has been carried out from the results of interviews, written tests and has carried out a medical checkup. As a result, on November 2, 2020, workers were accepted as workers on a probationary period of 3 months in accordance with Decree No. 014/HRR-DLI/SK/XI/2020 and after passing the probationary period the worker gets an assessment (declared pass) and gets a Decree No. 006/DLI-HRR/SK/II/2021 dated January 04, 2021 to become a permanent worker of class 2A.
- Document recruitment of workers with Employee Number DB/PDLI2/0320/113 (warehouse officer) which has been documented starting from the job application documents to the decision letter to appoint workers to become permanent workers The worker has applied for a job at PT Daya Labuhan Indah on January 2, 2020 and the recruitment process has been carried out from the results of interviews, written tests and has carried out a medical checkup. As a result, on February 25, 2020, workers were accepted as workers on a probationary period of 3 months

in accordance with Decree No. 001/DLI-HRR/SK/II/2020 and after passing the probationary period the worker gets an assessment (declared pass) and gets a Decree No. 001/DLI-HRR/PKS/SK-VI/2020 dated June 4, 2020 to become a permanent worker for class 2A.

- April and May 2021 salary slips for workers with the Employee Number DB/WB/0211/1707 and DB/ED/1117/1479, who have a breakdown of wages in the form of basic wages, benefits, overtime, incentives, fines, and others.
- Overtime payment in April and May 2021 that has been accordance with applicable laws for workers with Employee Number DB/WB/0113/1448 (security) and Employee Number DB/PDLI2/1108/23 (boiler operator).
- List of women workers that has been given maternity leave and pregnant workers in 2020 and 2021.
- Etc.

Since 2020-2021 there has been no change in policy, but what has changed is the decision related to the minimum wage which has changed every year following the government's decision. Regarding the change in the minimum wage decision, it has been routinely submitted annually to workers at the beginning of the year and this is reinforced by the results of interviews with field workers and trade union representatives who are clear about any changes in the minimum wage every year. Based on the description above, the certification unit has demonstrated legal compliance related to working conditions, such as compliance with minimum wage, working hours, overtime, maternity leave and other compliance.

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 certification unit. Workers' wages in 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 April and May 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 certification unit for 2021. For example, workers' wages with the Employee Number DB/PDLI2/1108/23 (DLI-2 POM), DB/WB/0211/1707 (Wonosari Estate), DB/ED/1117/1479 (Sei Deras Estate) and MO/CDE/0517/540 (Cabang Dua Estate) have a different based on wage scale structure 2021 and all wages above the minimum wage. In addition, in the payroll, it has been explained in detail related to compensation for all work performed such as deduction, overtime, premium and others.

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

#### 6.2.4

The certification unit has provided welfare facilities to occupants in the form of housing, clinics, water supply, electricity, education, transportation and other facilities. The results of the field visit in the housing area revealed that workers were provided with adequate housing facilities with 2 bedrooms, 1 bathroom and there were daycare for children. The house is inhabited by 1 family and specifically for workers who are not married then 1 house will be filled by 2 workers. This is in line with the results of interviews with housing residents stating that the facilities provided by the certification unit are houses, electricity, availability of clean water, transportation of school, elementary (for middle and high schools located in Negeri Lama – 45 minute travel), child daycare, places of worship (mosque & church), sport facilities and others. In general, the facilities provided by the certification unit are good / suitable for use by workers and their families. The certification unit has also conducted monitoring for the condition of the feasibility of the facilities provided every year, such as housing that is repaired if there is damage (usually if there is damage the worker will inform it and it will be handled directly by the repair company), the availability of electricity that has been provided by the company in the form of PLN or a generator, and the availability of clean water which is always monitored for its feasibility every 6 months (the results of monitoring clean water in the residential area do not show any test parameters that exceed the threshold).

#### 6.2.5

Certification unit has made it easier for workers and their families to obtain food sources by providing employee cooperatives that sell the daily needs of workers and provide access to vegetable traders to sell in the workers' housing

area. In addition there are also workers who open small business stalls to sell daily necessities in each housing.

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

6.2.6

In Indonesia no Decent Living Wage (DLW) standard is established, so certification unit still implemented the national minimum wages for all workers. In addition to the payment of minimum wages, certification unit has been conduct an assessment of the prevailing wages and in-kind benefits provided to workers in the certification unit aligned with the RSPO Guidance for Implementing a Decent Living Wage. The certification unit has the determination of assessment prevailing wage and all kind of benefits for DLW (Decent Living Wage) simulaton in 2021 has been included in the calculation of main wage, worker status, housing facility, education, electricity, water sources, healthcare and others. The results of these calculations are known that the standard of DLW (Decent Living Wage) currently given / simulated by the certification unit is above the stipulation of the minimum wage with scale of minimum 26,70% and maximum of 28,14%.

Based on the explanation above, it can be concluded that the unit of certification has a Decent Living Wage calculation based on prevailing wage and in kind benefits provided by the company.

6.2.7

All workers working in the certification unit are permanent workers with class 2A-2D and staff. Since 2020 until now there are no longer contract workers (PKWT/BHL) and migrant workers. For work that is permanent in its entirety by permanent workers. Non-permanent work employed by contractor workers is cleaning work in the mill area. For the work given to the contractor, it has completed the regulated requirements such as a work agreement, wages that match the minimum wage, providing PPE, being registered as a member of BPJS, the contractor has a business license (SIUP), certificate of company registration (TDP) and others.

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 Company Policy that regulates freedom of association which is stated in the HRD Head Internal Memo No. 002/WGP-HRD/I/2007 dated January 2, 2007 concerning Employment Provisions. In addition, this is also contained in the PKB Period 2019-2021 Chapter II Article 7 which states, among other things:

- Labor Unions recognize the rights of Employers to control and manage the company's business, while matters relating to the welfare of Workers are carried out on the basis of consensus in joint deliberation between employers and the Trade Unions.
- Labor Unions will assist Employers in enforcing the work discipline of Workers and participate in maintaining and maintaining order in the Company in the context of efforts to increase productivity.
- Labor Unions will help resolve problems between Workers and Employers through deliberation to reach consensus.

As proof that the policy has been implemented properly, the certification unit has four (4) active trade unions to date, namely Serbundo (Serikat Buruh Perkebunan Indonesia), SPSI (Serikat Pekerja Seluruh Indonesia), FSPMI (Federasi Serikat Pekerja Metal Indonesia) and FPBI (Federasi Perjuangan Buruh Indonesia). Based on the results of interviews with representatives of the four (4) labor unions, it is known that the company has never intervened in any decision-making issued by the labor union, the selection of trade union officials is also carried out independently without any interference from the company and there is no coercion to joining/prohibition to join submitted by the company to workers. This means that in general the company has given full freedom to all workers to associate in the company environment. Every labor union has registered to Manpower Agency of Labuhanbatu Regency, such as:

- Registration of Plantation Labour Union (Serbundo) of KCD of PT Milano presented trough Letter of Manpower

Agency of Sumatera Utara No. 560/2160/DTK-4/2017 dated 05 September 2017, with Registration No. 08/PB-SERBUNDO/PT. MILANO Cabang Dua/IX/2017 dated 05 September 2017.

- Registration of Plantation Labour Union (Serbundo) of PT DLI is presented through Decree of Manpower Agency of Labuhanbatu District No. 118/SK/Int/DPP-SERBUNDO/IX/2018 dated 27 September 2018.
- Registration of Labour Union or *Pimpinan Unit Kerja Serikat Pekerja Seluruh Indonesia* (PUK-SPSI) of PT DLI through Letter of Manpower Agency of Labuhanbatu District No. 560/2335/DTK-4/2012 dated 30 July 2019, with Registration No. 05/ORG/PUK.SP.PP.SP.PP-SPSI.LB/VIII/2019 dated 30 July 2019.
- Registration of Labour Union or *Pimpinan Unit Kerja Federasi Serikat Pekerja Metal Indonesia* (PUK-FSPMI) of PT DLI through Letter of Manpower Agency of Labuhanbatu District No. 560/2707/DTK-4/2019 dated 03 September 2019, with Registration No. 07/PUK-FSPMI/PT.DLI/VIII/2019 dated 03 September 2019.

### 6.3.2

The certification unit has a list of workers who have joined the union and the last update was carried out in May 2021, such as:

- There are 465 employees who are members of Serbundo.
- There are 113 employees who are members of SPSI.
- There are 81 workers who are members of the FSPMI.
- There are 50 workers who are members of the FPBI.

In addition to properly documenting the list of members, the certification unit 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 2021, namely:

- Bipartite meeting between trade union representatives and company representatives held on 28 December 2020 which was attended by as many as 18 participants. During the meeting, they discussed scheduling regular meetings every 4 months in 2021 (3 meetings a year), union membership, standard helmet use, BPJS balance, PPE and other discussions.
- Bipartite meeting between trade union representatives and company representatives held on April 7, 2021, which was attended by as many as 13 participants. During the meeting, they discussed the changing day schedule, the implementation of fasting during COVID-19, working hours during the fasting month, the Eid al-Fitr allowance payment schedule and other discussions.
- Bipartite meeting between trade union representatives and company representatives held on April 17, 2021, which was attended by 15 participants. During the meeting, they discussed leave together with the celebration of Eid al-Fitr, calls for a ban on leave for going home during the COVID-19 pandemic and other discussions.

Based on the results of interviews with labor union representatives and their members who are workers in each unit, it is known that the union holds meetings every month with those accommodated in Bipartite meetings between worker representatives and management representatives and since 2021 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 related to labor issue to labor 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, then there will be no conflict of interest that occurs with the company because there are no workers who have the authority as decision makers (staff class and above). 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 the four 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. Certification unit is giving freedom for worker to express their opinion and also, certification unit 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**

Unit of certification policy towards child labour was issued by Group Plantation Head and Group CSR Head on September 2010. The policy has referred to ILO Convention No. 138. That policy 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. 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 certification unit 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 03 and 06 February 2021 and to the contractor when signing the work agreement.

Based on field visits and interviews with workers in the fields of DLI-2 POM, Sei Deras, Wonosari, and Cabang Dua Estate, 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 worker is a worker with a NIK: DB/SD/0618/1548 at the age of 19 when he entered the certification unit (work start date on June 2018 and birth in June 1999).

Based on work agreement with contractors review (Contract with PT Citra Maju Perkasa No. 038/PKS/CMP/2021 in 02 January 2021), it is known that the work agreement attachment has stated that the contractor must protect and not employ minors (under 18 years of age). In addition, there is a socialization that has been conduct to the contractor and the last socialization in 16 Juni 2020. This is supported by the results of a review of certification unit 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 more than 18 years old when entering work.

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**

Unit of certification policy towards preventing sexual and other form of harassment and violence is presented in Company Policy issued by Group Plantation Head and Group CSR Head September 2010, and Internal Memorandum of HRD Head No. 026/WIP-HRD/Int-VIII/2009 dated 12 August 2009. Both policy mentioned that employees are obliged to support morality and security in the work place, as well as to avoid any form of dissexual harassment and violence objected to all workers. The policies 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 Women Working Group (WOW) & certification unit has socialized to the employees, for example on 20 April 2020 and the representatives of the committee gender are available in each division.

Based on document review about complaints and grievance in the last year period (2020) until now, that hasn't any issue/incident related to sexual harassment, violence at work/reproductive rights. This is in line with 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**

Unit of certification has identify pregnant and breastfeeding worker that caried out by company clinic every three months, recorded in document Form No. FRM-GEN-083 (Rev. 0). During works, those identified were not allowed to works related to agrochemicals. Furthermore, maternity leaves has given to the pregnant and breastfeeding workers for three months.



From the identification results, information was obtained that there were 3 workers who were pregnant and 13 workers who were breastfeeding in 2021 (until May 2021).

Based on the results of interviews with women workers in the field as well as representatives of trade unions, it is known that the unit of certification has identified and provided for the needs of new mothers such as the availability of breastfeeding locations in clinics and childcare, providing special opportunities/time for female workers to breastfeed their children every day and ensuring that there are no female workers who are pregnant/breastfeeding working in jobs related to chemicals.

**6.5.4**

The certification unit has several procedures that regulate the mechanism for submitting complaints and employee complaints, including:

- Document No. SOP-GEN-021 dated February 1, 2015 regarding internal communication and consultation. The procedure explains that employees and other stakeholders can provide information, ask questions, complaints, dissatisfaction related to industrial relations, descriptions of potential problems, suggestions and audit findings. The head of the work unit will coordinate and accommodate meetings to find solutions to problems, and can ask top management for help for these solutions. The communication and consultation flowchart is also presented in document no. SOP-GEN-021 dated February 1, 2015, which explains the sequence of complaints or submissions of complaints or aspirations until they are handled by the company.
- Document No. SOP-GEN-031 dated 01 May 2015 regarding receipt of complaints and dispute resolution. The procedure states that employees submit complaints or complaints, verbally or in writing to their superiors which are then forwarded to the PGA/LKS Bipartite Officer. In the procedure described that if requested, the company guarantees the confidentiality of the reporting identity and the disclosure of disgrace or incident (whistleblower).
- CLA for the period 2019-2021 Articles 73 and 74 which state that if there is a complaint, it will be resolved by deliberation to reach consensus or discuss it with the direct superior. If this cannot be done by deliberation, it will be resolved through the company leadership with the union management. If there is no agreement, then the settlement is carried out through the assistance of the manpower office.

Based on the results of interviews with representatives of labor unions (Serbundo, SPSI, FPBI and FSPMI) it is known that the workers have understood the procedures and mechanisms for submitting complaints/complaints to the company, this is because the company has routinely socialized the procedure by posting warnings/complaints. signposts related to this.

	Status: Comply	
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**6.6**

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

**6.6.1 & 6.6.2**

The certification unit have policies related to human right is presented in Human Right Policy of Wilmar International, Ltd. which issued by Group Plantation Head and Group CSR Head on June 2014. The policy explains that the certification unit will respect workers' rights in accordance with applicable regulations, such as child labor, forced labor, and elimination of discrimination. The procedures related to human resources management shows that every worker has a work agreement that describe specific job description.

Based on employee data review, most of the workers came from local communities, Javanese and Melayu, Batak and other ethnicity. In employee list January 2021, known that there is no migrant workers or 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. Most of the workers came from local communities. They have the recruitment process in the certification unit and is in accordance with applicable employee acceptance procedures. 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, for example:

- There is no retention for identity, because all labor documents for individuals are in the form of photocopies and not original items such as ID cards, diplomas, family cards and others.
- There is no contract substitution, because all existing contract workers currently work in accordance with existing



contracts such as contract workers for maintenance activities only doing maintenance activities and do not employ workers other than those stated in the contract.

- The freedom of workers in resigning, because if the worker wants to resign there is no understanding or prohibition from the company to the worker concerned. This is evidenced by the presence of workers who resigned to move to work and the company gave all their rights as fully resigned workers without any shortcomings.
- There is no coercion in doing overtime work, workers who do overtime at the company can refuse if ordered to do overtime activities because overtime is not the worker's obligation and the company also does not prohibit this.

There is no significant obstacles related to employment or violations of company regulations. For example, for the harvesters works daily based in 7 working hours. Certification unit provides output targets that can be obtained in less than 7 hours of work. If the harvester obtains more output within or more than 7 working hours, then the harvester will get the harvest premium payment. No penalty is given to the harvester if it does not get output due to natural factors such as rain. Based on payment list on April and May 2021, the harvesters have earned above the minimum wage.

Based on the results of interviews with workers in plantation and mill, it is known that currently there are no migrant workers, retention of identity, payment recruitment fees, contract substitution, involuntary overtime, lack of freedom of workers to resign, penalty for termination, debt bondage, and withholding. This is because the certification unit has carried out its operations in accordance with applicable regulations.

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**

**P2K3**

Companies can show P2K3 organizational approval documents for plantation and mill units as follows:

- PT DLI: Decree of the Head of UPT Labor Supervision Region IV Manpower Office of North Sumatra Province No. KEP.217-7/P2K3/WIL-IV/DTK/SU/2021 regarding the Ratification of P2K3 in the Company dated March 18, 2021. SKP AK3 P2K3 secretary Yudo Martita is still in the management stage at the Ministry of Manpower based on Certificate from PT Dhawal Prima Abadi No. 0219/DPA/SK/AK3U/VIII/2020 dated August 7, 2020 AK3.
- KCD: OSH Committee P2K3) approved through Decree of Manpower Monitoring of Manpower Agency of North Sumatra Province No. KEP.353-7/P2K3/WIL-IV/DTK/SU/2018 dated 19 November 2018. P2K3 Secretary with appointment Letter through Decree of Manpower Minister No. KEP.P.1037/NAKER-BINWASK3/VII/2018 dated 23 July 2018, valid for three years.

P2K3 meetings are held once a month, while matters discussed include safety observation, condition of emergency response equipment, work accidents, results of health checks, etc.

**P2K3 Report**

- The company can show proof of sending the first quarter PT Perkebunan Milano (CDE) P2K3 report (January – March) 2021 to the Manpower Office of Labuhanbatu Regency on June 8, 2021.
- The company can show proof of sending the first Quarter 2021 P2K3 report to the Labuhan Batu Regency Manpower Office in accordance with the receipt letter 007/PKS DLI-2/EL/IV/2021 dated 30 April 2021.

**The Paramedics**

Company's can show PT Daya Labuhan Indah's Pratama clinic operating license from the One Stop Integrated Investment Office No. 503.445.1/439/DPMPTSP-BP4/2018 dated December 11, 2018 the validity period is 5 years.

- There is evidence that the company doctor has obtained a Hiperkes training certificate from the Ministry of Manpower and Transmigration of the Republic of Indonesia. This is in accordance with Permen Nakertranskop No. Per 01/MEN/1976 on behalf of Mohamad Andri Hiperkes certificate No. 42.340/DBK3-DH/12/VII/2016.
- There is evidence that the company already has paramedic workers who have received Hiperkes Training on 12-16 November 2009 by the Medan Occupational Safety and Health Center. This is in accordance with the Permen Nakertranskop No. as of 01/MEN/1979. There were 2 paramedics who participated in the training, namely Titik

Ismiarti, AMK (No. Ket. 101/BK3-MDN/X/2009) and Armijah Harahap (No. Ket. 102/BK3-MDN/X/2009).

#### 6.7.2

The company already has emergency response procedures listed in the document, for example:

- Document No. SOP-GEN-002 dated 01 February 2015 about guidance of impact aspect determination.
- Document No. PRO-GEN-013 dated 01 July 2012 about emergency action.
- Document No. SOP-GEN-025 dated 1 February 2015 about personal protective equipment.

Safety induction is given to every person/guest who enters the company area in order to know the danger signs and the actions that must be taken in the event of an emergency which indicates the direction of the evacuation route and the gathering point.

#### First Aid

The company has a First Aid officer who has obtained a First Aid Officer license at the Workplace, for example in the following names:

- Indra Bakti No. License 96-7/P3K/WIL-IV/DTK/SU/2021 dated April 16, 2021
- Didit Supriantono License No. 97-7/P3K/WIL-IV/DTK/SU/2021 dated April 16, 2021
- Hermanto Siregar No. License 98-7/P3K/WIL-IV/DTK/SU/2021 dated April 16, 2021
- Firdaus No. License 92-7/P3K/WIL-IV/DTK/SU/2021 dated April 16, 2021
- Sularto No. License 91-7/P3K/WIL-IV/DTK/SU/2021 dated April 16, 2021
- Miswan No. License 90-7/P3K/WIL-IV/DTK/SU/2021 dated April 16, 2021
- Tumino No. License 560/1095/P3K/DSTKT-4/2016 dated December 21, 2016

Based on the results of field observations, such as spraying activities at Sungai Deras Estate Division I block 83, it is known that the foreman has been equipped with a first aid kit and its contents are complete. Based on field observations at the Sungai Deras Estate Fertilizer Warehouse and Wonosari Estate, it is known that the warehouse has been equipped with a first aid kit.

Companies can show recordings of training related to first aid, for example training activities on August 19, 2020 which were carried out at the KWS office, first aid socialization was carried out by company doctors and attended by 13 people consisting of AFM, maintenance foreman, harvest foreman, etc.

#### Fire Extinguisher

Fire Extinguisher Inspection Report for example March 2021 period:

- KSD: there are 42 powder APARs and 1 CO2 APAR in good condition
- KWS: there are 43 powder APARs and 1 CO2 APAR with 37 filled and 10 empty being refilled.
- PKS: there are 18 Powder APARs and 6 CO2 APARs in good condition

#### Hydrant Simulation

During the Hydrant No. simulation activity. 04 (location close to the boiler station) in the Mill, during the initial use of the simulation (without pressure) there was no leakage/damage that occurred but when using pressure there was a damaged nozzle condition (the connection and nozzle mouth were thirsty/rusted) so that it is not strong enough to withstand water pressure during the simulation. The emergency response team has tried swapping the nozzle for another (from Hydrant No. 1 and 3) and the result is the same. When using the new nozzle stock from the spare parts warehouse, the simulation can run smoothly. Based on the results of interviews with the emergency response team and EHS staff, it is known that the results of the last monitoring in June 2021 were in good condition, but checking was only carried out using plain water without using additional pressure so that no damage to the nozzle was detected. The company has provided evidence that it has replaced all Nozzles (3 pieces) that were damaged in the PKS along with the report (can be done quickly due to the availability of nozzle stock in the warehouse) on June 15, 2021. The company has also provided evidence that currently all the hydrants are in good condition by monitoring and checking conditions using pressurized water and for the following month a pressure check will be carried out to ensure all equipment is in good condition. The company has the opportunity to ensure that the monitoring of emergency response equipment has been carried out thoroughly. (OFI)

**6.7.3****Sanitation Facilities**

The Company has sanitation facilities located in each estate. Sanitation facilities have been equipped with showers for workers to clean themselves, a place to clean PPE and work tools, a place to store clean clothes, PPE and work tools, as well as a waste disposal channel.

**PPE**

During a field visit at Wonosari Estate during the application of empty janjang in Block 141, Div 2, it was found that there were four (4) empty bunch applicators who were not wearing masks and at the sorting station there were contractor workers who wore boots. The HIRAC document explains that for empty bunch applicators, one of the PPEs that must be used when doing work is a mask whose function is to protect workers from harmful gases that exist in empty bunch, while for contractor workers entering the Mill area must use safety shoes while in Mill area.

As a corrective action, PPE has been given to these workers, such as masks for empty bunch applicators and safety shoes for contractor workers. The results of other field visits on harvesting, spraying, processing work in Mill, overall, workers have used PPE in accordance with the procedures they have. The company has the opportunity to monitor compliance with the use of PPE for all workers on a regular basis.

**6.7.4**

Certification unit have Collective Labor Agreement that describe about workers have the right to receive medical care and be protected by the accident insurance company. The management unit show proof of payment of BPJS. Payments are made every month by percentage according to the regulation. The last payment that has been paid by certification unit is on 14 June 2021 for "BPJS Ketenagakerjaan" period of May 2021 and on 09 May 2021 for "BPJS Kesehatan" period of May 2021. All proof of payment shown and payment details for the "BPJS Health and Employment" program are in accordance with the current actual conditions / in accordance with the number of existing workers. There is claim for work accidents in 2020 and 2021 for example:

- Reports of work accidents on July 24, 2020, WHY workers with participant number 1806151, have been reported through KK1-KK3 reporting on July 24 and 25, 2020. The processing of BPJS fee claims is still in the process of waiting for a transfer from the BPJS.
- Reports of work accidents on January 23, 2021 for SRT workers with participant No. 17025659685, have been reported through KK1-KK3 reporting on January 23 and 24, 2021. BPJS fee claims are still in the process of waiting for transfer from the BPJS.

Based on the interview with DLI-2 POM, Sei Deras, Wonosari, and Cabang Dua Estate workers, concluded that all employees were aware of the medical service procedures in the event of an accident or illness. All employees interviewed also claimed to have a health BPJS card, if they went to a company clinic there was no fee at all. Based on interview with contractor representative, it is known that the accident insurance for contractor's workers is covered by the head of contractor itself.

**6.7.5**

Work accident records have been recorded using LTA, for example for Cabang Dua Estate and DLI-2 POM as follows:

Cabang Dua Estate:

January – December 2020 Period:

LTA: 10

FR: 1.3

SR: 6.6

Total Working Hours: 304,281

Period January – May 2021:

LTA: 0

FR: 0

SR: 0  
 Total Working Hours: 125,951

DLI-2 POM:  
 Period January – December 2020  
 LTA: 0  
 FR: 0  
 SR: 0  
 Total Working Hours: 221,883

Period January – March 2021  
 LTA: 0  
 FR: 0  
 SR: 0  
 Total Working Hours: 55,459

The company also carries out investigations into work accidents that occur and are recorded using form FRM-GEN-006-087, for example the Work Accident Investigation Report and Advice on 7 May 2021. Hendri Sihombing who caused 2 working days to be lost, the Investigation Report informs the Accident Chronology, Event Analysis, Findings/Conclusions and suggestions/recommendations for improvement. The investigation was carried out by EHS staff.

6.7.2	Status: OFI	
6.7.3	Status: OFI	

**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 unit of certification has committed to implement integrated pest management (IPM) which is presented in several documents for example. SOP-EST-013 (Rev. 01) dated 01 February 2015 about pest and diseases detection and census and No. SOP-EST-018 (Rev. 03) dated 01 September 2016 about pests and diseases management control. The estate management has a program of integrated pest management and its realization which is presented in the monthly report.

**Early Warning System:**  
 The company conducts pest monitoring and pest control if it exceeds the threshold, for example, based on the results of the caterpillar pest census in January 2021 in Block 092 Division 2 Sei Deras Estate, it was found that 144 trees were attacked from the 1,782 trees censused (8%), so that the company controls chemically using pesticides with the chemical Cypermethrin at a dose of 0.3 Liter/Ha.

**Biological Control:**  
 the company shows evidence of biological pest control by using beneficial plants (*Turnera subulata*) planted on the sides of roads and ditches and using natural enemies (*tyto alba*). The results of field visits for example barn owl in Block 76 Division I Sungai Deras Estate found barn owl in an active condition as evidenced by the presence of traces of dirt and bird feathers.

The Company also monitors and maintains the barn owl and beneficial plants located in each Estate, for example the records of maintenance and monitoring at Cabang Dua Estate as follows:

- The company can show a map of the distribution of barn owl locations on CDE with a total of (8) eight units with, and the results of monitoring the condition of barn owl in 2021 it is known that the barn owl is in good condition but not yet active.
- The company can show a recording of *turnera subulata* care activities, for example on May 31, 2021 in Block 55

Division 1 with a realization of 33.58 Meters.

**7.1.2**

Based on the results of the document review and field observations, it is known that the company uses beneficial plants (Turnera Subulata) and owls (Tyto Alba), both of which are not invasive species based on Permen LHK no. 94 year 2016.

**7.1.3**

There is no use of fire for pest management purposes. Estate management prefers to control pest populations by biological methods instead of chemicals. This matter was verified through field observation which shows that there were no indications of fire activities in estate operational areas.

Status: Comply

**7.2**

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

**7.2.1**

The company has a Letter of Recommendation from the UPT of Labor Supervision Region IV regarding Storage/Use of Pesticides No. 170-7/WIL-IV/DTK/SU/2021 dated March 8, 2021, as for the types of pesticides used, for example as follows:

Merk	Target	Registration Number
Regent 50 SC	The subterranean termite Coptotermes curvignathus	RI0010119951192
Marshal 5G	Bagworm, <i>Metisa plana</i> , the pest Sexava nubila	RI01010119961279
Tiara 20WDG	broadleaf weed	RI.01030120124525
Raban 80 WP	spraying fungus on plants	RI.01020120093481
Glinat 150 SL	broadleaf weed	RI.01301220124226
Basta 150 SL	broadleaf weed	RI.01030119921113
Supremo	broadleaf weed	RI.01030120021712

**7.2.2**

The company has a record of pesticide use for each Estate that informs the active ingredient used and the LD50 of the active ingredient, the treatment area, the amount of use of the active ingredient per Ha and the number of applications, for example the use of the pesticide Glimax 480 SL (isopropylamine glyphosate) in Sungai Deras Estate for May 2021 as follows: LD50 > 5,000 mg/kg, active ingredient 480 g/l, application area 2,676.67 ha, total usage 952.09 Ltr, active ingredient used 170 g/ha.

**7.2.3**

As part of the pesticide reduction plan and the implementation of Integrated Pest Management, the company has used biological pest control with natural enemies of pests (tyto alba) and beneficial plants (turnera subulata).

**7.2.4**

The use of pesticides is based on census results, if the results are below the threshold, chemical pest control is not carried out. for example, based on the results of the caterpillar pest census in January 2021 in Block 092 Division 2 Sei Deras Estate, it was found that 144 trees were attacked from the 1,782 trees censused (8%), so that the company controls chemically using pesticides with the chemical Cypermethrin at a dose of 0.3 Liter/Ha.

**7.2.5**

Based on the results of field visits in the pesticide storage warehouse, there was no pesticide with the active ingredient paraquat pesticides registered by WHO 1a and 1b. Based on interviews with spray workers, it is known that the company

no longer uses pesticides with the active ingredient paraquat.

#### 7.2.6

Companies can show recordings of Weeding and Chemist (spraying) technique training, for example for CDE dated March 15, 2021, presented by Research and Development Staff. The training materials include weed control methods, chemist spraying methods, which include material preparation, spraying activities, post-spraying as well as environmental and OHS regulations.

Based on the results of interviews with spray workers, it is known that workers can explain spraying techniques including the chemicals used, spraying targets to areas that are not allowed to be sprayed.

#### 7.2.7

Based on the results of the field visit, it was found that the storage location was equipped with ventilation, adequate lighting, MSDS, emergency response equipment including APAR, first aid kit, Spill Kit, Eyewash and shower.

#### 7.2.8.

Procedure of used pesticide containers management is presented in document No. SOP-EST-020 (Rev. 02) dated 01 February 2015 while procedure on hazardous materials handling is presented in document No. SOP-GEN-005 (Rev. 3) dated 01 October 2015. Procedure mentioned that used pesticide containers shall be delivered and placed on the permitted Hazardous Waste Store, and prohibit to be use for household purposes, unless reuse for related pesticide application activities. Used containers has been managed as refers to PP No. 101 in 2014. Permit of Hazardous Waste Store for KCD; KWS and DLI-2 POM are shows to the Labuhanbatu District Decree, Sumatera Utara No. 503.660.3/140/DPMPSTP-BP2MNP/2019 dated 26 February 2019 and Decree No. 503.660.3/214/DPMPSTP-BP2MNP/2019 dated 01 April 2019, No 503.660.3/409/DPMPSTP-BP2MNP/2021 dated 31 May 2021 respectively. Third permits were valid for five years.

There unit of certification also shown the latest delivering manifest of used chemical containers, such as:

- KWS & KSD: Manifest KLHK-1616416978 (B104d) with volume: 2.429 MT dated 16 March 2021.
- KCD: Manifest KLHK-161818181732 (B104d) with volume: 0.0575 MT dated 24 March 2021.

Based on field observation to Hazardous Waste Store in KCD, KWS and DLI-2 POM. It was known that used pesticide containers were placed properly and delivered to the permitted collector, namely PT Shali Riau Lestari. Furthermore based on field observation to the housing complex in KSD Division I dated 15 June 2021, it was found that the used chemical container and used paint container utilized by workers for water containers. Based on interview with workers and management sighted that they buying from the market and not from company. Therefore the unit of certification were collected it to the temporary hazardous waste store on 16 June 2021. The unit of certification to be consider to evaluate the effectiveness of hazardous waste management and monitoring and re-socialization the prohibition of used chemical container for water containers.(OFI)

#### 7.2.9

The company does not spray through the air.

#### 7.2.10

Companies can show records of special health checks for workers with pesticides, for example:

- CDE: Cholinesterase health check was carried out on March 10, 2021 by Sri Torgamba Hospital (Sri Pamela Medika Nusantara) to 15 chemical officers with all normal results.
- WSE: Cholinesterase health checks were carried out by Sri Torgamba Hospital (Sri Pamela Medika Nusantara) on March 10, 2021 for a total of 28 people with all normal results.
- SDE: Cholinesterase health checks were carried out by Sri Torgamba Hospital (Sri Pamela Medika Nusantara) on March 10, 2021 for a total of 29 people with all normal results.

#### 7.2.11



Based on the results of interviews with spray workers, it is known that pregnant, breastfeeding women are not allowed to work related to pesticides but are transferred to other jobs such as beneficial plant maintenance, workers who are breastfeeding are also given special time to go home to breastfeed their children.

7.2.8 | Status: OFI

**7.3  
Waste is reduced, recycled, reused and disposed of in ways that are environmentally and socially responsible manner.**

**7.3.1**  
All waste has identified and managed in accordance with management plan. Result of field visit to Mill, it is known that mill effluent were processed on effluent pond until it comply with standard before being discharge to water bodies; empty fruit bunches are collected in the empty bunch area then burned using an EFB environment fireplace, and a small portion is applied back to the land, shell and fiber are utilized as a renewable fuel for boiler, chemical containers including pesticide containers have been stored at licensed scheduled waste storage. Regarding hazardous waste disposal, PT Daya Labuhan Indah and PT Milano has collaborate with PT Shali Riau Lestari (licensed collector by decree of environmental minister SK.879/Menlhk/setjen/PLB.3/11/2016) valid until 23 November 2021. Meanwhile, field visit on workers housing on KCD, KWS, and KSD found that domestic waste (organic / inorganic) are disposed by zero burning method to domestic landfill areas. The auditor team also visited landfill areas in KWS, Block 114, Division 1 and KCD, Block 044, Division1. It was known that domestic waste been separated to the organic waste and non organic waste.

**7.3.2**  
Based on interview with estates manager and mill manager, it was known that they been understood about waste management and disposal. Therefore the unit certification also has socialized about waste management and disposal to the all workers by install signboard on the housing complex. Based on interview are spraying team on Sei Deras Estate, Cabang Dua Estate and Wonosari Estate recognized how to properly disposed waste materials.

**7.3.3**  
The unit of certification does not use incineration to destroy waste. This is evidenced by the existence of separate waste management which is regulated by the certification unit including:

- Hazardous waste is managed by storing it in a special place and then picking it up by a special transporter which will then be managed by the party authorized to manage it.
- Domestic waste is collected in every house by using the trash cans provided in the front yard and will be transported by the company every 2 times a week to be collected and disposed of in a self-managed Final Disposal Site.
- Solid waste from mill such as empty bunch, fiber and shell is managed by using it as boiler fuel.

Based on the results of field observations in the residential area of DLI-2 POM, Sei Deras, Wonosari and Cabang Dua Estate, it is known that the certification unit already has warnings for the prohibition of burning waste and during the visit there were no traces of burning around the housing area. All the existing garbage has been in the trash can in each house. This is reinforced by the results of interviews with workers in plantations and mills who stated that the certification unit has prohibited its work from burning waste and until now workers have not done so because all waste has been routinely managed by the company properly.

Status: Comply

**7.4  
Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.**

**7.4.1**  
Procedure related to soil fertility is presented in several documents, as follows:

- Procedure No. SOP-EST-002 (Rev. 00) dated 01 June 2007 about planting of legume cover crop (LCC). The procedure mentioned that the LCC is conducted for more N-fixation on the soil.
- Procedure No. SOP-EST-004 (Rev. 01) dated 08 February 2012 about manual manuring.the procedure covers type of fertilizer, time of application, fertilizer placement, fertilizer management, frequency of application, etc.

- Procedure No. SOP-EST-004A (Rev. 0) dated 24 August 2016 about leaf sampling unit (LSU). The procedure mentioned that LSU shall be conducted annually for annual manuring program calculation reference.
- Procedure No. SOP-EST-004B (Rev. 00) dated 24 August 2016 about soil sampling unit (SSU). The procedure mentioned that SSU shall be conducted every five years. The data also to be used for the annual fertilizer calculation program.

**7.4.2**

Procedure of leaf and soil sampling is presented in document No. SOP-EST-004A (Rev. 0) dated 24 August 2016 and No. SOP-EST-004B (Rev. 00) dated 24 August 2016, respectively. Results of leaf and soil sampling was used as reference for annual manuring recommendation. Leaf and soil laboratory testing works are conducted by Ecological Management Unit (EMU) R&D Laboratory Wilmar International Plantation in Central Kalimantan Project (CKP). Analysis of leaf and soil sampling results for annual manuring recommendation is conducted by the Agronomist team from the Research and Development Department. Estate management is able to shows soil and leaf sampling analysis documents 2020 sebagai dasar rekomendasi pemupukan tahun 2021, as follows:

- Leaf analysis results are presented in document No. 35/BAHAN TANAMAN/III/2020/DLI dated 16 June 2020.
- Soil analysis is presented in document No. 4/TANAH/II/2020/DLI dated 02 June 2020.

Parameters measured on leaf sampling analysis are dry matter content of macro (N, P, K, Mg, Ca) and micro (B, Cu, Zn) nutrients. Meanwhile parameters measured in soil sampling analysis are texture, density, pH, permeability class, pH, C-Organic, N-Total, C/N Ratio, Total and Available P, Cation Exchange Capacity (CEC) and nutrient content (Ca, Mg, K, Na, P, K, Fe, Cu, Zn and Mn).

**7.4.3**

The company utilizes midrib pruning that is carried out in conjunction with harvesting activities arranged at the stacking area as well as the use of bunch ash and empty bunch as a nutrient recycling strategy, for example the following records of utilization:

- Realization of Bunch Ash at Sei Deras Estate in May 2021 48,500 Tons with an application area of 112.78 Ha.
- Realization of Empty Bunch at Sei Deras Estate in 2021 872 Tons with an application area of 21.80 Ha.

**7.4.4**

The company can show fertilization, for example the realization of fertilization of Cabang Dua Estate in 2020 as follows:

- Total Realization of Fertilization: 634.75 Tons
- Total Production in 2020: 10,318 Tons of
- Fertilizer/Ton of FFB: 61.51 Kg/Ton of FFB

Status: Comply

**7.5**

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

**7.5.1**

Unit of Certification has conducted semi detailed soil survey works conducted by Param Agricultural Soil Survey, Sdn. Bhd. in November 2008. Soil survey for PT DLI and PT Milano, on the area covers about 6,010.00 ha and .670.70 ha, respectively. Soil Map is available in proper scale, i.e. 1:25,000 and 1:50,000. Summary of soil survey results towards soil suitability describes as follows:

**Soil Properties**

- Soils in PT DLI (WSE and SDE) were fully covered by peat soil with several depth, divided into four categories, e.g.: shallow (50-100 m), moderate (100-150 cm), deep (150-300 cm) and very deep (>300 cm). All peat was categorized as marginal with saprist decomposition level. However, there are no sulfidic marine clay deposits. Very deep peat soils which are considered as fragile soil have occupied for about 40 % from PT DLI total area, while the rest were considered as marginal. Main limitations for oil palm cultivation on PT DLI were mainly due to very poorly drained property.
- Soils in PT Milano (CDE) were dominated by peat soils for about 80 % with various depths from shallow to deep.

The rest were mineral soils over recent riverine alluvium. Even though there is no fragile soil in CDE, however, it has the same main limitation with estates of PT DLI, which has a very poorly drained soil property.

**Topography**

Based on semi detailed soil survey analysis, it was known that slope conditions in PT DLI and CDE of PT Milano are dominantly flat to undulating, ranging between 0° to 6°. Thus, there is no soil management limitation due to hilly to steep areas. Limitations were mostly due to very poorly drained soil property and prone flooded area. To overcome this matter estate management has conducted a field drains system. This situation has been observed on the field.

**7.5.2**

Based on the results of interviews with company management and the results of document review, it is known that the company does not have a replanting plan for the next 5 years.

**7.5.3**

Based on the results of interviews with management and the results of the study of area statement documents, it is known that the company did not carry out new plantings.

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**

Unit of Certification has conducted semi detailed soil survey works conducted by Param Agricultural Soil Survey, Sdn. Bhd. in November 2008. Soil survey for PT DLI and PT Milano, on the area covers about 6,010.00 ha and 670.70 ha, respectively. Soil Map is available in proper scale, i.e. 1:25,000 and 1:50,000. Summary of soil survey results towards soil suitability describes as follows:

- Soils in PT DLI (KWS and KSD) were fully covered by peat soil with several depth, divided into four categories, e.g.: shallow (50-100 m), moderate (100-150 cm), deep (150-300 cm) and very deep (>300 cm). All peat was categorized as marginal with saprist decomposition level. However, there are no sulfidic marine clay deposits. Very deep peat soils which are considered as fragile soil have occupied for about 40 % from PT DLI total area, while the rest were considered as marginal. Main limitations for oil palm cultivation on PT DLI were mainly due to very poorly drained property.
- Soils in PT Milano (CDE) were dominated by peat soils for about 80 % with various depths from shallow to deep. The rest were mineral soils over recent riverine alluvium. Even though there is no fragile soil in CDE, however, it has the same main limitation with estates of PT DLI, which has a very poorly drained soil property.

**7.6.2 – 7.6.3**

Based on the results of document review and interviews with management, it was found that the company did not develop new plantings.

Status: Comply

**7.7**

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

**7.7.1**

Based on the results of interviews and a study of the area statement document, it was found that the company did not carry out new plantings after November 15, 2018.

**7.7.2**

Until the ASA-2 activity is implemented, there has been no update from the RSPO regarding the peat inventory that has been submitted by the company.

**Peat Area Distribution**

Unit of Certification has conducted semi detailed soil survey works conducted by Param Agricultural Soil Survey, Sdn.

Bhd. in November 2008. Soil survey for PT DLI and PT Milano, on the area covers about 6,010.00 ha and 670.70 ha, respectively. Soil Map is available in proper scale, i.e. 1:25,000 and 1:50,000. Summary of soil survey results towards soil peat distribution describes as follows:

- Soils in PT DLI (KWS and KSD) were fully covered by peat soil with several depth, divided into four categories, e.g.: shallow (50-100 m), moderate (100-150 cm), deep (150-300 cm) and very deep (>300 cm). All peat was categorized as marginal with saprist decomposition level.
- Soils in PT Milano (CDE) were dominated by peat soils for about 80 % (or 535.20 ha) with various depths from shallow to deep. The rest were mineral soils over recent riverine alluvium.

**Peat Inventory Report**

Process of peat inventory report of Wilmar Group has been submitted by Certification Lead and Supply Chain manager of Wilmar to GHG Unit of RSPO (ghg@rspo.org) as RSPO Secretariat representative on 05 November 2019 as verified through email record. Wilmar Group showed a second submission to RGPS GHG Unit on 23 April 2020 which mentioned that the submission for Indonesia sites, Wilmar International Ltd. refers to the Minister of Forestry and Environment Decree No. SK7099/MENLHKPKTL/IPSDH/PLA.1/8/2019 about Penetapan Peta Indikatif Penghentian Pemberian Izin Baru Hutan Alam Primer dan Lahan Gambut Tahun 2019 (PIPIB) on the defining of peat areas in Indonesia. The total peatland area are 339.59 Ha. Latest response from RSPO GHG Unit was delivered on 19 May 2020 which informed that RSPO acknowledged the receipt of the updated peat inventory and the submission of drainability assessment. RSPO later on will follow up and inform Wilmar Group if any further requirement and clarification is needed.

**7.7.3**

Procedure of peat monitoring and management is presented in document No. SOP-EST-028 (Rev. 00). The procedure mentioned that peat subsidence monitoring should be conducted every semester. Estate management is able to show monitoring record of monthly water level and subsidence rate.

Installation of subsidence stakes has been carried out since 2010 and Records of monitoring of peat soil subsidence are recorded in Form No. document. FRM-EST-022-032 (Rev. 02).

The company can show documentation of maintenance activities which include repairing damaged peat subsidence stakes and cleaning the surrounding area for example for the Cabang Dua Estate which was carried out in February 2021, the measurement results are as follows:

Location	Levels (cm)	
	10/11/2020	08/02/2021
Block 051	9,8	10
Block 059	23,5	25

**Wonosari**

Based on the results of peat subsidence measurements for the January – December 2020 period, for example in division 1, it was found that the highest decrease of 0.1 cm was at stake No. 4 blocks 128.

**SDE**

SDE has 8 subsidence stakes, based on the results of measurements installed since 2010 and last measured in March 2021, the highest decline is in Division II Block 94 stakes totaling 31 cm. Decrease from September 2020 – March 2021, the highest 2 cm in Block 086 Division I

Based on the results of field observations at the location of the Subsidence Peg, for example, Sungai Deras Estate block 94 Division I, stake No. 7 and Block 97 Division 1 stake No. 6, it is known that the subsidence stake is in a well-maintained condition.

**7.7.4**

According to a soil survey report, it was known that peat soils in PT DLI and CDE – PT Perkebunan Milano were covered about 100 % and 80 %, respectively, with various depths from shallow to very deep. Procedure of peat monitoring and management is presented in document No. SOP-EST-028 (Rev. 00). The procedure mentioned that water level and water table on peat areas shall be maintained on 60-80 cm through arrangement of sand weirs and flap gate. Water level monitoring should be conducted every month. Estate management are able to shows monitoring record of monthly water level and water table (piezometer), as follows:

**Cabang Dua Estate**

Based on the Water Management Map of PT Perkebunan Milano – Cabang Dua Estate with a scale of 1: 10,000 dated July 19, 2017, it is known that the company has 6 monitoring points for groundwater level monitoring which is routinely monitored every 7 days. Based on the results of monitoring, for example in May 2021, the following data is known:

No	Results (cm)			
	03/05/2021	10/05/2021	17/05/2021	24/05/2021
1	87	69	108	88
2	87	62	106	107
3	65	50	95	95
4	67	60	104	91
5	67	55	83	59
6	69	68	89	58

The lowest level of TMAT is located at point No. 1 on the monitoring date of 10 May 2021, this is because the company's location is not traversed by rivers so that water availability is obtained through rain-fed, but the company has carried out water management by making sand embankments in each block to maintain the water level.

The company also takes measurements of the water level in the canal every 1 month, based on the results of the study of the Bund Off Height Monitoring (Weirs) document, for example in June 2021 it was found that the company has 21 water level monitoring points and the lowest level is located in Block 49/C4 with a height of 70 cm. .

**Wonosari Estate**

Measurement of water level every 1 month using the form FRM-EST-022-031, in 2021 the water level is between 15 – 60 cm. (division I)

In 2021 January – May 2021 in Division II for example, the water level ranges between the highest 7 cm and the lowest 60 cm

**Sungai Deras Estate**

Measurement of surface water level is carried out once a month for the division period January – May 2021, for example division 2, the highest surface water level is 40 cm and the lowest is 75 cm.

Based on the results of field visits at water level monitoring locations, for example in the Sei Deras Estate Block 83 Division I, it is known that the water level is between 60 - 80 cm. The company uses sandbags to adjust the water level.

**7.7.5**

The company has no replanting plan for the next 5 years

**7.7.6**

As informed on a semi detailed soil survey report that was conducted by Param Agricultural Soil Survey, Sdn. Bhd. in November 2008, it was known that main soil limitations in PT DLI and CDE-PT Perkebunan Milano were due to presence of peat soils which have a very poorly drained soil property. Agronomy strategy to overcome this situation was referred to procedure No. SOP-EST-022 and document No. SOP-EST-028 (Rev. 00) dated 01 February 2015. Based on field

observation and document review, several strategies which already implemented by estate management was adoption a proper peat management as follows:

- Water management through maintaining water level at 60-80 cm and monitoring of peat subsidence rate as indicator of water management quality.
- Installing field drain with pattern 1:4 and flap gate.
- Canal desilting for water discharge and application of kaptan (CaCO<sub>3</sub>) which aims to increase soil pH.
- Peat compaction with "hole in hole" planting method, which starts implemented on palms planted in 2014 forward.
- Maintaining land cover crop which aims to retain soil moisture on the field.
- Fertilizer application as in accordance with Agronomist recommendation, especially additional micronutrient on B, Cu and Zn.
- Carry out mounding palm activities to repair sloping palm trees.

**7.7.7**

Based on hectare statement review, it was known that there is no presence of peatland conservation areas. All areas were used for oil palm plantation activities. Furthermore, there is no land clearance for non-corporate purposes areas in PT DLI and KCD of PT Milano.

**Status: Comply**

**7.8**

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

**7.8.1.**

The unit of certification shown the practices to maintain the quality and availability of surface and ground water. Water management plan for POM and estate are listed on 2021 water management plan document. These document describe the water source identification, POM water usage efficiency, peat soil management, and conservation/catchment area protections.

Water sources management and maintenance efforts include:

- The results of interviews with spray operators show that the operators understand how to work properly and safely as well as areas that should not be applied, such as the 3 meter left and right trench borders in order to preserve water flow
- The company conducts testing of the Barumun River water and the employee housing office well water every 6 months
- Verrtiver grass planting along the canals to prevent landslides and erosion
- Maintenance of canals with a wash / dredge program to protect them from superficiality

Based on field observation and interview with several workers at the housing complex on KCD, KSD and KWS it was known that the clean water for bath and wash are from well then the water was channeled to the profil tank and each worker housing. While the water consumption for workers are from water depot, the management were explained that source water from Barumun River (outside of unit certification) distribute by water tank truck. Therefore based on interview with Head of Village from Sei Nahodaris Village, Sei Tampang Village and Kampung Bilah Village sighted that there are no water pollution issues during last year. The auditor team also visit to the firebreak canal (HCV4.3) Block 58, Division I, KCD it was sighted there are signboard of no spraying activities on the riparian.

The unit of certification also conducted water quality testing every semester by accredited laboratory. For example:

- Upstream of Barumun River: BOD 6.85 mg/l; COD: 16.61 mg/l and NO<sub>3</sub>: 1.46 mg/l
- Downstream of Barumun River: BOD: 6.89 mg/l; COD: 13.39 mg/l and NO<sub>3</sub>: 2.56 mg/l

Based on document verification sighted that All parameters tested do not exceed the quality standards required in the applicable regulations.

**7.8.2.**

The unit of certification has procedure of Conservation area identification and management with number SOP-GEN-010, Rev-01 dated 01 May 2015. This procedure were explained about:

- Conservation area identification



- Feasibility assessment of conservation area management
- Prohibition of spraying and fertilizing activities on riparian zone (3-5 meters from the river).

Based on interview with spraying workers in KCD and KSD sighted that they has known about this procedure, therefore in accordance to field observation result to the Block 58, Division I, KCD sighted that there is no fertilizing and spraying activities.

**7.8.3.**

The unit of certification already has a permit document for disposal of effluent to the water bodies in accordance to the Decree of the Head of “*Dinas Penanaman Modal dan Pelayanan Terpadu Satu Pintu*”, Labuhanbatu District with number: 503.660.31 / 266 / DPMPSTP-BP2MNP / 2018 dated 4 May 2018 concerning the extension of the validity period of the permit for disposal of waste water to water or to water sources at the palm oil mill (POM) of PT. Daya Labuhan Indah - Wonosari in Sei Tampang Village, Bilah Hilir District, District Office Labuhanbatu which is valid until April 25, 2023.

The effluent quality test on effluent pond number nine were conducted by accredited laboratory every month, for example: BOD: 86.12 mg/l; 23.81 mg/l; 24.20 mg/l period of January to March 2021 respectively. All of parameters are comply with the Environment Minister Regulation number 5 year of 2014. Based on interview with Environment Board of Labuhanbatu District and Head of Village Sei Tampang it was known that there no complained about water pollution during last year.

**7.8.4**

The company has a water usage budget of 1.2 m3/Ton FFB, based on the results of recording water consumption, for example for the period January – May 2021, it is known that the highest water use for processing is in May 2021 where usage reaches 0.89 m3/Ton FFB. The details of water use are as follows:

WTP	Boiler	FFB Process	M3/Ton TBS
14.490	9,840	12,133	0.81
13.779	8,138	11,473	0.71
17.172	10,422	13,845	0.75
15.296	9,270	13,201	0.70
11.460	8,298	9,357	0.89

Status: Comply

**7.9**

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

**7.9.1.**

The unit of certification has implemented fiber and shell usage for fossil fuel substitution. Realization of renewable energy have been monitored on monthly report for fiber and shell usage. During Jan-May 2021, they has optimally fiber and shell usage as renewable energy (100% fiber is used as boiler fuel, while shells are only a small part sold) resulting the average energy efficiency as following details:

Month (2021)	CPO Production (Ton)	Shell Use (Ton)	Fiber Use (Ton)	Diesel Use (Ton)	KWH turbine
Jan	12,133.24	1,516.57	630.93	7,560	251,640
Feb	11,472.54	1,606.16	753.75	5,645	246,480
Mar	13,845.32	1,938.35	897.18	6,565	304,800
April	13,200.85	1,848.12	829.01	4,230	284,340
Mei	9,357.49	1,169.69	641.29	8,060	223,260
Average	12,001.98	1,615.78	750.43	6,412	262,104

Based on above data sighted that during period of January to May 2021, shell and fiber usage can produce the energy efficiency 21.84 Kwh/ton CPO.

Status: Comply

7.10

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

7.10.1

All waste including emissions and pollutions sources from Mill and estate are identified and recorded on waste and pollution identification for period of 2020. Potential GHG emission from estate and mill activities that has been identified including for examples transportation activities, manuring activities, peatland emission, and boiler emission.

The unit certification have implemented the use of fiber and shell for fossil fuels substitution. Realization of renewable energy have been monitored on monthly report for fiber and shell usage. Waste water has been monitored every months and monitoring period Jan-Mar 2021 shown that all of waste water testing parameters is compliant to the standards quality. Meanwhile company also conduct regular emission testing for semester basis, 2nd semester 2020 teseting results indicates boiler emission has been met with standard quality.

Daya Labuhan Indah II POM and supply bases has calculated GHG emissions for period 2020 using RSPO Palm GHG calculator version 4.0, the results of this calculation are presented as following details:

Annual FFB processed & CPO Produced

Production	t/yr
FFB processed	140,939.46
CPO Produced	29,730.4

Summary Emission

Product	tCO <sub>2</sub> e/t Product
CPO	1.73
PK	1.73
PKO	0.00
PKE	0.00

Description	Unit	Value
Oil palm planted on mineral soil	Ha	6,241.43
Oil palm planted area on peat	Ha	339.59
Total oil palm planted area	Ha	6,581.02
Conservation area (Forested)	Ha	0.00
Conservation area (Non-Forested)	Ha	29.85
FFB production per hectarage	t/ha	21.42
OER	%	21.09
KER	%	3.63

Based on document verification sighted that the company has conducted soil survey on November 2008. All of PT DLI area amount of 6,010.00 Ha and 80% of PT Milano (CDE): 535.20 Ha are peat soil. However, the unit of certification were input the peat soil area amount of 339.59 Ha on the GHG calculators with refers to the Minister of Forestry and Environment Decree No. SK7099/MENLHKPKTL/IPSDH/PLA.1/8/2019 about *Penetapan Peta Indikatif Penghentian Pemberian Izin Baru Hutan Alam Primer dan Lahan Gambut Tahun 2019* (PIPPIB) on the defining of peat areas in Indonesia.

Mill Emission and credits

Remarks	tCO <sub>2</sub> e	tCO <sub>2</sub> e/t FFB
Emissions sources		
POME	27,626.25	0.20
Fuel consumption	275.16	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	27,901.68	0.20

Estate/Plantation of field emission and Sinks

Description	Own crop			Group		
	tCO <sub>2</sub> e	tCO <sub>2</sub> e/ ha	tCO <sub>2</sub> e/t FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e/ ha	tCO <sub>2</sub> e/t FFB
Land conversion	56,078.02	9.88	0.45	4,206.29	4.66	0.26
CO <sub>2</sub> emissions from fertilizer	7,031.99	1.24	0.06	495.88	0.55	0.33
NO <sub>2</sub> emissions from Peat	2,541.94	0.45	0.02	0.00	0.00	0.00
N <sub>2</sub> O emissions from fertilizer	827.53	0.65	0.03	0.28	0.02	0.00
Fuel consumption	18,540.50	0.15	0.01	0.30	0.02	0.00
Peat oxidation	18,540.50	3.27	0.15	0.00	0.00	0.00
Sinks						
Crop sequestration	-53,154.51	-9.36	-0.43	-8,455.25	-9.36	-0.52
Sequestration in Conservation area	0.00	0.00	0.00	0.00	0.00	0.00
Total	35,556.41	6.26	0.29	-3,229.55	-3.58	-0.20

Based on document review, net GHG emission for year 2020 were decreased compared to year 2019 net GHG emission (1.86 to 1.73) t CO<sub>2</sub>/t product.

7.10.2.

The unit of certification didn't conduct any new development since January 2015. so current company net GHG Emission has been described on indicator 7.10.1

7.10.3.

All waste including emissions and pollutions sources from Mill and estate are identified and recorded on waste and pollution identification 2018. Potential GHG emission from estate and mill activities that has been identified including for examples transportation activities, manuring activities, peatland emission, and boiler emission.

The unit of certification have implemented the use of fiber and shell for fossil fuels substitution. Realization of renewable energy have been monitored on monthly report for fiber and shell usage. Waste water has been monitored every months and monitoring period Jan-Mar 2021 shown that all of waste water testing parameters is compliant to the standards quality (see indicator 7.8.3). meanwhile company also conduct regular emission testing for semester basis, 2nd semester 2020 teseting results indicates boiler emission has been met with standard quality.

	Status: Comply	
7.11 Fire is not used for preparing land and is prevented in the managed area.		
7.11.1 At the time the ASA-2 activity was carried out, the company did not carry out any new planting or replanting activities.		
7.11.2 & 7.11.3 The unit of certification establishes fire prevention and control measures for the lands it manages directly, as evidenced by:		
<u>Firefighting Prevention and Control</u> PT Daya Labuhan Indah in carrying out fire prevention and control activities has identified fire-prone areas in and around the company's operational areas listed in the Fire Prone Land Map with a scale of 1:80,000. The map describes the areas or locations that have been identified by the company as fire prone areas. As an implementation of fire prevention, the company makes the Fire Prone Land Map as a reference for carrying out fire patrols carried out by the company's fire patrol team. Based on the results of the study of reports on fire patrol activity reports from semester 2 of 2020 (July-December) to May 2021, it is known that there has never been a fire incident in the operational area. This is reinforced by the results of an interview with the Labuhanbatu Regency Environmental Agency which stated that during 2020 until now there were no fire incidents or reports of fires occurring in the company's operational areas.		
<u>Monitoring of Firefighting Infrastructure</u> The certification unit has APAR available at various points that have been identified as prone to fires such as office areas, warehousing, fuel areas and others. In addition, the company conducts routine monitoring to ensure that any available APAR is functioning properly and is ready to be used in the event of a fire emergency. Based on the monitoring results in May 2021, it is known that the company has 82 APARs and 9 hydrants with monitoring results stating that all APAR and hydrants are in good condition and can be used at any time if needed.		
<u>Reporting on the Implementation of Firefighting Prevention and Control</u> The certification unit has routinely submitted Fire Prevention and Control Reports for the 2nd semester of 2020, namely:		
<ul style="list-style-type: none"> <li>• Monitoring report on the Fire Prevention and Control Reports that have been reported to the Labuhanbatu Regency Agriculture Agency on March 30, 2021.</li> <li>• Monitoring report on the Fire Prevention and Control Reports that have been reported to the Labuhanbatu Regency Environment Agency on March 30, 2021.</li> </ul>		
<u>Firefighting Emergency Response Simulation</u> In carrying out fire prevention and control activities, the certification unit routinely conducts fire fighting simulations/trainings which are carried out regularly every year. The following is the documentation of the simulations that have been carried out by the company in 2020, including:		
<ul style="list-style-type: none"> <li>• Emergency and fire response simulation activities conducted on 27 November 2020 which were attended by 48 participants. This simulation activity is carried out for fire and earthquake events.</li> <li>• Emergency and fire response simulation activities conducted on November 30, 2020 which were attended by 27 participants. This simulation activity is carried out for fire and earthquake events.</li> </ul>		
In addition to providing simulation training to fire officers, the certification unit has also provided socialization to the surrounding community about fire control on a regular basis. The last socialization related to fire control was held on November 21, 2019 in Sei Tampang and Kampung Bilah Village by giving simulations to residents who were present.		
	Status: Comply	
7.12 Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.		
7.12.1 & 7.12.8		

Based on information on plantation management and a review of the hectare statement from the previous audit, it is known that there was no additional planting or expansion of the plantation operational area after November 15, 2018. Certification unit do not conduct any new development since November 2005. PT Daya Labuhan Indah and PT Perkebunan Milano has conduct disclosure to RSPO on July 2014, and as a result RSPO has confirmed PT Daya Labuhan Indah and PT Perkebunan Milano as zero liability on 2017.

#### 7.12.2

There is no additional planting or expansion of the plantation operational area after November 15, 2018. The certification unit has identified HCVs by RSPO Appraisers who have been approved in 2013 for PT Daya Labuhan Indah and in 2009 for PT Perkebunan Milano (Cabang Dua Estate). The following is a further explanation:

- The unit of certification has identified protected, rare, rare, or endangered species, and habitats with high conservation value in 2013 at PT Daya Labuhan Indah. The HCV identification activity was carried out using the HCV toolkit and involved stakeholder participation through a public consultation conducted on 6 May 2013. The identification was carried out in collaboration with a third party, namely Remark Asia. The identification team consists of 8 people of which 3 have been RSPO Approved. From the identification results, it was found that there were HCV 1.1, HCV 1.3, HCV 1.4, HCV 2.3 and HCV 3 covering an area of 3.42 Ha. In addition, there is also an HCV 4.3 covering an area of 5.7 Ha which functions as a natural barrier to prevent the spread of fires (firebreaks).
- The unit of certification has identified protected, rare, rare, or endangered species, and high conservation value habitats at PT Perkebunan Milano (Cabang Dua Estate). Identification was carried out in collaboration with a third party, namely Aksenta, in July 2009. The identification team consisted of 3 people, 3 of whom were RSPO approved. From the identification results, it was found that there is HCV 4.3 covering an area of 2.36 Ha which functions as a natural barrier to prevent the spread of fires (firebreaks) and HCV 6 covering an area of 0.25 Ha is an area that has an important function for the Cultural identity of the Local Community.

#### 7.12.3

This indicator is not relevant to Indonesia, until further decisions by RSPO.

#### 7.12.4 & 7.12.5

There is no additional planting or expansion of the plantation operational area after November 15, 2018. The certification unit has an HCV Management Plan of PT Daya Labuhan Indah and PT Perkebunan Milano (Kebun Branch Dua) annually from 2018 to 2020. In the 2020 HCV Management Plan, the certification unit has several activities including:

- Maintain the existence of flora and fauna in the Danau Biru
- Keeping HCV areas from burning
- To prevent hunting in the company's HCV areas
- Maintain and increase the quality of peat areas with a depth of more than 3 meters in the Danau Biru area
- Maintain and improve the quality of the Danau Biru area as a water provider and flood control.

Implementation of HCV management and monitoring for 2020 is carried out in accordance with the 2020 HCV management plan, for example:

- Socialization related to the HCV area to the surrounding community on 03-04 February 2020 (available minutes, attendance list and photos of activities).
- Flora and fauna monitoring activities are carried out every month from July to December 2020.
- Inspections to ensure safety and implementation of HCV management mitigation are carried out weekly by the HCV officers of each estate, and are included in the HCV patrol reports.

The certification unit has evaluated the HCV Management Plan of PT Daya Labuhan Indah and PT Perkebunan Milano (Kebun Cabang Dua) annually from 2018 to 2020. The last evaluation was carried out on February 4, 2021 and was carried out by the certification unit. The evaluation explained that the implementation of monitoring and management of the HCV area including the existing flora and fauna has been carried out effectively (achievement of 100%). Since 2020 until now there has never been any destruction or occupation in the HCV area.

Although the evaluation above was carried out without the participation of stakeholders (communities, workers and

others), the certification unit has routinely carried out socialization related to HCV management/monitoring areas and the presence of flora and fauna to the surrounding community and to workers on a regular basis every year. The last socialization carried out was on June 10, 2021 to the people of Sei Nahodaris Village and on February 3 to 4, 2021 to the people of Sei Tampang and Kampung Bilah Village, while the socialization to workers was carried out on February 6, 2021.

Based on the results of interviews with the surrounding community (Sei Tampang, Kampung Bilah and Sei Nahodaris Village) and the workers, it is known that these stakeholders have understood the efforts of the certification unit in managing/monitoring the HCV area in its management area and have also been aware of the areas under its management. the HCV area. The certification unit has the opportunity to evaluate the implementation of the HCV Management Plan for 2021 in a participatory manner together with relevant stakeholders, as the basis for the preparation of the HCV Management Plan for 2022. (OFI)

**7.12.6**

The company has developed an HCV management plan and is implementing it accordingly. Regular patrol records show that the company has been monitored for illegal hunting, and other illegal activity. All records for daily patrols at each plantation are available and reports by auditors. The socialization that has been carried out to the community regarding the existence of endangered plants and animals is carried out simultaneously with the socialization of protected areas, for example the socialization of the existence of protected animals and plants to the Sei Nahodaris Village community on 10 June 2021 and for Sei Tampang & Kampung Bilah Village on 03-04 February 2021. This can be proven by an official report in which there is documentation and a list of attendees.

Based on interviews with employees and public consultations with the surrounding community by telephone, it was found that the company had understood the existence of rare flora and fauna, both employees and the community could mention the types of protected species. is in the plantation area of certification unit. The company has conducted outreach to employees and the public regarding the steps that must be taken if there is a meeting with wild / rare animals. The results of the interviews and the RKL-RPL documents have also never been hunting in the company area.

**7.12.7**

Based on the monitoring result of HCV in previous surveillance until this current audit process, there has been no indication of poaching of protected animals because they are rarely found around HCV areas bordering rivers. The unavailability of animal corridors between designated HCV areas and production forests and / or other protected forests is one of the reasons why wildlife species are rarely seen in HCV areas.

Avoid and prevent illegal hunting and / or encroachment of HCV areas that have been determined by certification unit, several warning boards have been installed regarding the prohibition of poaching and encroachment. Routine monitoring of HCV areas is carried out by several personnel appointed by the company. The results of field observations also indicate that there are signs that prohibit hunting of protected animals, burning, and marking the boundaries of conservation areas.

Monitoring of protected areas is carried out periodically every month to ensure the safety of the area. Examples of monitoring at Sei Deras Estate on 28 May 2021 for monitoring of warning boards, monitoring of stake boundary of HCV areas, and flora fauna monitoring. The results of field visits to several conservation areas show that the certification area has carried out protected area management in the form of not logging and replanting, not using chemicals, and installing Protected Area signage and prohibiting hunting.

The management plan is implemented effectively based on the results of monitoring which is carried out regularly every year, and the management plan is updated every year if needed. updates are determined based on the results of evaluated HCV monitoring. The results of the evaluation and updating of the HCV management plan will then be disseminated to all stakeholders within the scope of certification and will be applied in the next period.

7.12.4	Status: OFI	
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3.2 Conformity Checklist of Certificate and Trademark Use

1.	Evidence of permission or approval certificate and trademark from Certification Body which submitted by Client	X or ✓
ASA-1.2	DLI-2 POM and its supply bases did not use trademark in the product or any of its activity	✓
	Status: Comply	
2.	Implementation of certificate and trademark used by Client comply with size and type (shape) against Guideline of Logo Use	X or ✓
ASA-1.2	DLI-2 POM and its supply bases did not use trademark in the product or any of its activity	✓
	Status: Comply	
3.	Implementation of Certificate and Trademark is not used on product	X or ✓
ASA-1.2	DLI-2 POM and its supply bases did not use trademark in the product or any of its activity	✓
	Status:	
4.	Controlling of Certificate and Trademark, including withdrawing inappropriate logo.	X or ✓
ASA-1.2	DLI-2 POM and its supply bases did not use trademark in the product or any of its activity	✓
	Status: Comply	

**3.3 Summary of RSPO Partial Certification.**

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

Wilmar International Ltd Time Bound Plan (TBP) is explained in point 1.10. Wilmar International Ltd has informed the TBP progress, MUTU has considered that Wilmar International Ltd is complied with the RSPO requirement for TBP. The Time Bound Plan was revised and declared by Wilmar International Ltd on January 2021.

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

MUTU Auditor has verified company partial certification and concludes that:

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

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

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

		<p>Refer to case tracker or status of complaints under Wilmar International Limited period of February 2011 to conducting audit that the object of complaint has dominated by certified management unit and the majority of cases has closed. There are 2 case of complaints still in investigation process (PT Permata Hijau Pasaman and PT AMP Plantation). Further details on this case are available here: <a href="http://www.rspo.org/members/complaints/status-of-complaints/view/26">http://www.rspo.org/members/complaints/status-of-complaints/view/26</a></p> <p>Based on self assessment that no land conflict in the location of uncertified management units</p> <p><b>Auditor verification</b> There is no information from public source and RSPO website on any land conflict for uncertified unit of the group subsidiaries.</p> <p>Based on the company record there is documentation on land compensation recapitulation updated on 1 October 2007, participatory mapping, agreement letter on compensation between company and land owner, land owner identity and procedure on compensation technical guidance SOP 001/WIP-KB/(0)/0610 dated June 2010.</p> <p><b>Auditor verification at ASA-1.1 PT DLI (4 August 2020)</b> There is information from social media regarding the land grabbing case at Biase Plantation Limited (<a href="https://ejatlas.org/conflict/wilmar-and-land-grab-in-cross-river-state">https://ejatlas.org/conflict/wilmar-and-land-grab-in-cross-river-state</a>), but the case has already been submitted to the RSPO complaint on 10 November 2012 and has been declared closed. (<a href="https://askrspo.force.com/Complaint/s/case/5009000028Es0LAAS/">https://askrspo.force.com/Complaint/s/case/5009000028Es0LAAS/</a>)</p>
2.1.5	<p>Labour disputes, if any, are being resolved through a mutually agreed process, in accordance with RSPO criterion 6.3 (it has changed be Criterion 4.2 in P&amp;C 2018).</p>	<p>There is a grievance and compliant form/procedure used by the company to collect and collate all complaints from communities and employee as sample in Indonesian is SOP 004/WIP-KB/(0)/0610, SOP 003/WIP-KB/(1)/0911, PRO-PGA-001 and Whistleblowing Policy (effective date on 5 August 2015). Procedure of grievance &amp; complaint from employee has not been dissemination to employee in PT ANI-Pahaman, Cooperative of Buah Jubata (scheme smallholder), PT Daya Landak Plantation, PT Indoresins Putra Mandiri &amp; PT Putra Indotropical. It will be doing by auditee based on correction action plan.</p> <p>Based on self-assessment that uncertified management units has provided documentation of both the process which a dispute was resolved and the outcome and log book about handling grievance &amp; complaint from internal (employee) &amp; external. Based on log book that there are grievance &amp; complaint from employee but there is no identified labor</p>



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

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

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

NCR No.	: -	Issued by	: -
Date Issued	: -	Time Limit	: -
NC Grade	: -	Date of Closing	: -
Standard Ref. & Requirement	: -		
Evidence observed (filled by auditor):			
<u><i>There is No Non-Conformity at ASA-1.1</i></u>			
Non-Conformance Description (filled by auditor):			
Root Cause Analysis (filled by organization audited):			
Correction (filled by organization audited):			
Corrective Action (filled by organization audited):			
Assessor Evaluation and Conclusion (filled by auditor):			
Verified by	:		

3.4.2. Identification of Findings, Corrective Actions and Observations at ASA-1.2

NCR No.	: -	Issued by	: -
Date Issued	: -	Time Limit	: -
NC Grade	: -	Date of Closing	: -
Standard Ref. & Requirement	: -		
Evidence observed (filled by auditor):			
<u>There is No Non-Conformity at ASA-1.2</u>			
Non-Conformance Description (filled by auditor):			
Root Cause Analysis (filled by organization audited):			
Correction (filled by organization audited):			
Corrective Action (filled by organization audited):			
Assessor Evaluation and Conclusion (filled by auditor):			
Verified by	:		

3.4.3. Opportunity for Improvement

No	Ref. Std.	Description
1	1.1.2	Based on document verification it was sighted that the UKL-UPL realization of 2 <sup>nd</sup> Semester 2020 on KSD in accordance to document number 660/21/BLH-LB/AM 2014 with area 445.88 Ha and also number 660/134/BLH/2/2014 with area 431.87 Ha were conducted by third party/environment consultant dated 22 March 2021. That report was finished on 15 June 2021, the unit of certification sent it to the Environment Board of Labuhanbatu District and Labuhanbatu Selatan District dated 18 June 2021. However the unit of certification to be consider to evaluate all of mandatory report to the relevant agencies in accordance to national regulation.
2	1.1.3	<p>Based on interviews with representatives of Kampung Bilah Village revealed that in February 2021 the company had disseminated what types of information were accessible to the public. In accordance with the letter, the Village said that in May 2021 it had submitted a request for access to information to the company related to the company's licensing aspect and until June 16, 2021 had not received a response. Based on the company's investigation and explanations from management representatives, it was found that the Village representative gave the letter to the foreman and the foreman who was entrusted with it had not provided further information to PGA or Bina Mitra as the person in charge of the request for information.</p> <p>In the socialization that has been distributed to the parties on February 6, 2021 regarding information that can be accessed by the public, it is not clear that the diagram/procedure for the parties to obtain information has not been clearly stated. Thus, the certification unit has the opportunity to evaluate and re-assure the effectiveness of the socialization of the procedures for obtaining information to the parties so that any requests for information from the parties can be conveyed properly.</p>
3	2.1.2	<p>A documented system for ensuring legal compliance is in place. This system has means to track changes to the law and also includes listing and evidence on evaluation of legal compliance of all contracted third parties, such as: recruitment agencies, service provider and labour contractor.</p> <p>The unit of certification already has a law register document which contains relevant regulations related to operational activities. The law register is divided into four parts, namely the OHS sector, the Plantation Sector including business permits, the Manpower Sector, and the Environment Sector. In SOP-GEN-017 at point 6.4 it is stated that the EHS Officer/Regional Human Resources/Bina Mitra Unit makes a list of regulations, updates accuracy and compliance</p> <p>The last update of the law register was carried out in January 2020 in conjunction with the RSPO internal audit, while for the period of 2021 the law register has not been reviewed and updated because it is planned to be carried out in the second semester of 2021 so that a review of the latest regulations issued in the first semester of 2021 can be included in the review law register 2021. Based on this, the certification unit has the opportunity to ensure that the planned review of the law register for the 2021 period is carried out in accordance with the stipulated plan.</p>
4	3.6.2	<p>The effectiveness of the H&amp;S plan to address health and safety risks to people is monitored</p> <p>Based on the results of the document review, it is known that the results of the drinking water quality test at several drinking water depots in KWS, KCD and KSD with Total Coliform &amp; E.Coli parameters showed &lt;1.1; whereas the quality standards appropriate Minister Regulation Number</p>



		<p>492 Year 2010 is 0. The company has socialize to all employees associated with the test results, but it also requires employees to boil water from drinking water before consuming depot on February 6, 2021. In the results of interviews with several employees in each unit, the majority of employees explained that the water consumed daily comes from drinking water depots and is directly consumed, but some employees also explained that sometimes they boil the water before consumption. The results of interviews with company doctors explained that the disease trends in 2020 were flu, ARI and gastroenteritis (diarrhea). Where Total Coliform &amp; E.Coli bacteria under certain conditions can cause Gastroenteritis.</p> <p>The certification unit considers being able to re-evaluate the effectiveness of the OHS plan for all employees, including the hygiene and sanitation of drinking water depots and periodically socialize it to all employees.</p>																																			
5	3.8.7	<p><b>Purchasing and Goods in</b></p> <p>i. The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBS received.</p> <p>ii. The mill shall inform the CB immediately if there is a projected overproduction of certified volume.</p> <p>iii. The mill shall have a mechanism in place for handling of non-conforming FFB and/or documents</p> <p>Based on the document review of projected and certified product licenses, the following information is obtained:</p> <table border="1" data-bbox="440 1037 1382 1325"> <thead> <tr> <th>Product</th> <th>Last Year Projected Certified Volume (MT) 08 October 20 – 07 October 21</th> <th>Last Year Actual Certified Volume (MT) June 20 – May 21</th> </tr> </thead> <tbody> <tr> <td>FFB</td> <td>128,000</td> <td>148,280.07</td> </tr> <tr> <td>CSPO</td> <td>28,800</td> <td>30,632.84</td> </tr> <tr> <td>CSPK</td> <td>6,400</td> <td>5,414.62</td> </tr> </tbody> </table> <p>Based on the data above, there is an over production of CSPO and until ASA-1.2 is completed, there has been no notification to the CB regarding the excess of the certified product. The previous license period was 08 October 2020 – 07 October 2021. While the actual assessment is for the period June 2020 – May 2021. So if we adjust it to the CSPO license period that has been produced, it is as follows:</p> <table border="1" data-bbox="440 1516 1328 1877"> <thead> <tr> <th>Period</th> <th>Production (MT)</th> <th>Quota 08 Oct 2020 – 07 Oct 2021 (MT)</th> </tr> </thead> <tbody> <tr> <td>Oct 20</td> <td>2,440.86</td> <td rowspan="8" style="text-align: center; vertical-align: middle;">28,000</td> </tr> <tr> <td>Nov 20</td> <td>2,213.81</td> </tr> <tr> <td>Dec 20</td> <td>2,430.01</td> </tr> <tr> <td>Jan 21</td> <td>2,523.64</td> </tr> <tr> <td>Feb 21</td> <td>2,363.02</td> </tr> <tr> <td>Mar 21</td> <td>2,851.09</td> </tr> <tr> <td>Apr 21</td> <td>2,777.71</td> </tr> <tr> <td>May 21</td> <td>1,951.10</td> </tr> <tr> <td><b>Total</b></td> <td><b>19,551.26</b></td> <td><b>Remaining quota until May 21 : 8,448.74</b></td> </tr> </tbody> </table>	Product	Last Year Projected Certified Volume (MT) 08 October 20 – 07 October 21	Last Year Actual Certified Volume (MT) June 20 – May 21	FFB	128,000	148,280.07	CSPO	28,800	30,632.84	CSPK	6,400	5,414.62	Period	Production (MT)	Quota 08 Oct 2020 – 07 Oct 2021 (MT)	Oct 20	2,440.86	28,000	Nov 20	2,213.81	Dec 20	2,430.01	Jan 21	2,523.64	Feb 21	2,363.02	Mar 21	2,851.09	Apr 21	2,777.71	May 21	1,951.10	<b>Total</b>	<b>19,551.26</b>	<b>Remaining quota until May 21 : 8,448.74</b>
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		<p>The average CSPO production referring to the data above is 2,443.90 MT/Month. So that before October 2021 there is a potential for over-production of CSPO. This is in accordance with the production projection of the Daya Labuhan Indah 2 POM which states that between June 2021 - October 2021 CSPO production is 15,666.22 MT.</p> <p>Based on the description above, the certification unit has the opportunity to evaluate and re-assure the monitoring of the production of all certified products so that if it is estimated that there is an excess of certified volume production, the CB has given notice prior to the assessment</p>
7	6.7.2	<p>Accident and emergency procedures in Indonesian language are in place and clearly understood by all workers. Assigned operatives trained in first aid are present in both field and other operations. First aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.</p> <p>During the Hydrant No. simulation activity. 04 (location close to the boiler station) in the Mill, during the initial use of the simulation (without pressure) there was no leakage/damage that occurred, but when using pressure there was a damaged nozzle condition (the connection and nozzle mouth were thirsty/rusted ) so that it is not strong enough to withstand water pressure during the simulation. The emergency response team has tried swapping the nozzle for another (from Hydrant No. 1 and 3) and the result is the same. When using the new nozzle stock from the spare parts warehouse, the simulation can run smoothly. Based on the results of interviews with the emergency response team and EHS staff, it is known that the results of the last monitoring in June 2021 were in good condition, but checking was only carried out using plain water without using additional pressure so that no damage to the nozzle was detected. The company has provided evidence that it has replaced all Nozzles (3 pieces) that were damaged in the Mill along with the report (can be done quickly due to the availability of nozzle stock in the warehouse) on June 15, 2021. The company has also provided evidence that currently all the hydrants are in good condition by monitoring and checking conditions using pressurized water and for the following month a pressure check will be carried out to ensure all equipment is in good condition. The company has the opportunity to ensure that the monitoring of emergency response equipment has been carried out thoroughly.</p>
8	6.7.3	<p>Workers use appropriate personal protective equipment (PPE) which is provided free of charge to all workers in the workplace, to cover all potentially hazardous operations, such as pesticides application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.</p> <p>During a field visit at Wonosari Estate during the application of EFB in Block 141, Div 2, it was found that there were four (4) empty bunch operator who were not wearing masks and at the sorting station there were contractor workers who wore boots. The HIRAC document explains that for empty bunch applicators, one of the PPEs that must be used when doing work is a mask whose function is to protect workers from harmful gases that exist in empty bunch, while for contractor workers entering the mill area must use safety shoes while in Mill area.</p> <p>As a corrective action, PPE has been given to these workers, such as masks for EFB applicators and safety shoes for contractor workers. The results of other field visits on harvesting, spraying, processing work in Mill, overall, workers have used PPE in accordance with the procedures they have. The company has the opportunity to monitor compliance with the use of PPE for all workers on a regular basis.</p>
9	7.2.8	<p>Based on field observation to the housing complex in KSD Division I dated 15 June 2021, it was found that the used chemical container and used paint container utilized by workers for water containers. Based on interview with workers and management sighted that they buying from the market and not from company. Therefore the unit of certification were collected it to the temporary</p>

		hazardous waste store on 16 June 2021. The unit of certification to be consider to evaluate the effectiveness of hazardous waste management and monitoring and re-socialization the prohibition of used chemical container for water containers.
10	7.12.4	<p>Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An Integrated management plans to protect and/or enhance HCV and HCS forests, peatland and other conservation areas are developed, implemented and adapted if necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan was developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified).</p> <p>The certification unit has evaluated the HCV Management Plan of PT Daya Labuhan Indah and PT Perkebunan Milano (Kebun Cabang Dua) annually from 2018 to 2020. The last evaluation was carried out on February 4, 2021 and was carried out by the certification unit. The evaluation explained that the implementation of monitoring and management of the HCV area including the existing flora and fauna has been carried out effectively (achievement of 100%). Since 2020 until now there has never been any destruction or occupation in the HCV area.</p> <p>Although the evaluation above was carried out without the participation of stakeholders (communities, workers and others), the certification unit has routinely carried out socialization related to HCV management/monitoring areas and the presence of flora and fauna to the surrounding community and to workers on a regular basis every year. The last socialization carried out was on June 10, 2021 to the people of Sei Nahodaris Village and on February 3 to 4, 2021 to the people of Sei Tampang and Kampung Bilah Village, while the socialization to workers was carried out on February 6, 2021.</p> <p>Based on the results of interviews with the surrounding community (Sei Tampang, Kampung Bilah and Sei Nahodaris Village) and the workers, it is known that these stakeholders have understood the efforts of the certification unit in managing/monitoring the HCV area in its management area and have also been aware of the areas under its management. the HCV area. The certification unit has the opportunity to evaluate the implementation of the HCV Management Plan for 2021 in a participatory manner together with relevant stakeholders, as the basis for the preparation of the HCV Management Plan for 2022.</p>

**3.4.4. Noteworthy Positive Components**

No	Ref. Std.	Description
1		The company's commitment to implementing the principles of sustainable palm oil management
2		Good document presentation
3		Obtain ISPO certificate with number MUTU-ISPO/092 valid till 3 August 2022
4		Human Resources (HR) who are competent in their respective fields
5		The use of barcode technology in recording FFB

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

Public Issues (Institution/ NGO/Community)	Auditor Verification
<p><b>Head of Sei Tampang Village</b> So far, the company's relationship with the community is quite good. The social responsibility program is going well. If the community needs assistance, usually through a proposal submission mechanism, the company will then respond to it.</p> <p>During the past year there have been no issues regarding environmental pollution or land fires. What has the potential to become a conflict because some people are dissatisfied is regarding the absorption of labor which is felt to be lacking. The company also routinely conducts socialization regarding conservation areas and prohibitions against disturbing wild or protected animals</p>	<p>In general, the impact felt by the community regarding the existence of the company is positive. With regard to the submission of the Village party stating that there is a lack of transparency in the recruitment of manpower, the company can provide evidence that information about job vacancies is conveyed to the parties including the Surrounding Villages through job vacancies leaflets.</p> <p>Based on the verification of the employee list and interviews with employee representatives also showed that the composition of employees also consisted of residents of the surrounding villages including Sei Tampang village. The explanation from the company's side of the issue arose because of the number of applicants who volunteered not all of them could be accepted because they had to be in accordance with the needs of the company and in accordance with the results of the selection</p>
<p><b>Head of Kampung Bilah Village</b> So far, the relationship between the company and the community is considered quite good, for example by realizing social responsibility and recruitment of labor. The social responsibility provided is in the form of social assistance, such as groceries for the community when the COVID-19 pandemic starts to prolong and free health checks. For the field of empowerment, for example, goats are provided for youth groups</p> <p>Once submitted a letter of request for information regarding legal land rights in May 2021, but until now there has been no response from the company.</p> <p>There are no issues regarding land conflicts, environmental pollution, or fires</p>	<p>In general, the impact felt by the community regarding the existence of the company is positive. With regard to submissions from the Village party who stated that they had provided a letter of request for information until the assessment was completed, there was not enough evidence regarding the existence of the letter. The village party stated that the letter was entrusted to the foreman while the company felt that it had never received the letter. This has been used as an opportunity for improvement in indicator 1.1.3</p>
<p><b>Head of Sei Nahodaris Village</b> In general, the existence of the company has a positive impact. The social responsibilities provided include productive efforts in the form of assistance in the form of goats for mosque youth. In addition, routinely carry out drainage repairs to prevent flooding.</p> <p>The CSR program that is still being awaited is the hoarding of damaged roads for Dusun 48 and Dusun 95 as agreed at the</p>	<p>In general, the impact felt by the community regarding the existence of the company is positive. Regarding the submission of the Village party stating that the realization of the CSR program has not been implemented, the unit has provided an explanation that the realization of the program will only be implemented around July 2021.</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<p>end of 2020</p> <p>There are no issues regarding land conflicts, environmental pollution, or fires</p>	<p>Based on the CSR realization report, it is known that most of the CSR programs have been running, such as assistance for productive business of 20 goats to the Youth of the Mosque of Dusun IV and food assistance (rice, sugar, cooking oil, and instant noodles) for residents in the face of the covid-19 pandemic.</p>
<p><b>Gender Committee</b> During 2021 the activities of the gender committee could not be carried out due to an appeal to limit gathering activities during the Covid-19 pandemic. The work program of the gender committee is still the same as for the 2020 period.</p> <p>So far, there has been no information or reporting regarding incidents of sexual harassment in the workplace or incidents of domestic violence. In addition to the gender committee, the company also has a women's committee that focuses more on women's empowerment and issues.</p> <p>Maternal and menstrual leave are given according to regulations, provided time for breastfeeding mothers to leave work temporarily when they are going to breastfeed their children with a duration of between 30-60 minutes. The company also provides child care to ensure the children are safe while their parents are working.</p>	<p>In general there are no negative issues that require further verification. A more detailed discussion of the activities, work programs, and realization of the gender committee program is described in indicator 6.1.5 while an explanation of reproductive rights is found in 6.5.2.</p>
<p><b>PTP-FPBI (Pimpinan Tingkat Perusahaan – Federasi Perjuangan Buruh Indonesia).</b> This union has been formed since 2018 and is still actively organizing to this day. Bipartite meetings with companies and internal trade unions are not carried out on a regular basis, but are carried out if there are problems that require further discussion. The last bipartite meeting was held in April 2021, which discussed the plan to make a new CLA for the year 2022-2024. The company has also disseminated the policy on freedom of association to workers in plantations and factories to continue to join the union without any coercion and during the process of selecting/forming union officials, there was no intervention/interference by the company (the workers did this manually). independent). During the past year there were no issues/complaints/problems related to employment.</p>	<p>There were no negative incidents/issues that occurred in the company during the last year related to the employment system. The unit of certification has fully provided workers' rights in accordance with applicable regulations.</p>
<p><b>Serbundo (Serikat Buruh Perkebunan Indonesia).</b> This union has been formed since 2018 and is still actively organizing to this day. Bipartite meetings with companies and internal trade unions are not carried out on a regular basis, but are carried out if there are problems that require further discussion. The last bipartite meeting was held in April 2021, which discussed the plan to make a new CLA for the year 2022-2024. The company has also disseminated the policy on</p>	<p>There were no negative incidents/issues that occurred in the company during the last year related to the employment system. The unit of certification has fully provided workers' rights in accordance with applicable regulations. If there is a problem, it will be resolved in a bipartite manner between the company and the trade union before reporting/recording it to the local</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<p>freedom of association to workers in plantations and factories to continue to join the union without any coercion and during the process of selecting/forming union officials, there was no intervention/interference by the company (the workers did this manually). independent).</p> <p>For issues related to bonus deductions circulating on the internet, the trade union and the company have resolved the matter in a bipartite manner without any tripartite meeting with the Manpower Office. The union and the company only came to discuss it without registering it with the IRC because it was still felt that it could be resolved in a bipartite manner.</p>	<p>Manpower Office.</p> <p>Based on the results of the review of the bipartite meeting document between the trade union and the company, some information was obtained as follows:</p> <ul style="list-style-type: none"> <li>• The first bipartite meeting was held to discuss bonus deductions which was held on 22 May 2020. The purpose of the deducted bonus is “uang daging” which is usually given by the company every year at the time of bonus distribution cannot be given during the 2020 bonus distribution, this is because The company stated that it was unable to provide this. “Uang daging” itself is a policy of the company and is not a component of wages or bonuses (only giving forms from the company to workers), but the workers who usually get it do not approve of it.</li> <li>• The second meeting was held on 11 August 2020 which discussed the same issue regarding bonus cuts and the workers were still trying to get the meat money back. The result is that no decision has been reached between the two parties.</li> </ul> <p>At the last meeting on August 31, 2020, the bipartite meeting finally reached an agreement and made a Collective Agreement signed by the company, trade union and witnesses, where the result was that the company was willing to provide “uang daging” assistance of IDR 75,000 which will be added at the time of payment of wages in August 2020.</p>
<p>SPSI (Serikat Pekerja Seluruh Indonesia). This union has been formed since 2019 and is still actively organizing to this day. Bipartite meetings with companies and internal trade unions are not carried out on a regular basis, but are carried out if there are problems that require further discussion. The last bipartite meeting was held in April 2021, which discussed the plan to make a new CLA for the year 2022-2024. The company has also disseminated the policy on freedom of association to workers in plantations and factories to continue to join the union without any coercion and during the process of selecting/forming union officials, there was no intervention/interference by the company (the workers did this manually). independent). During the past year there were no issues/complaints/problems related to employment.</p>	<p>There were no negative incidents/issues that occurred in the company during the last year related to the employment system. The unit of certification has fully provided workers' rights in accordance with applicable regulations.</p>
<p>FSPMI (Federasi Serikat Pekerja Metal Indonesia). This union has been formed since 2019 and is still actively organizing to this day. Bipartite meetings with companies and internal trade unions are not carried out on a regular basis, but are carried out if there are problems that require further</p>	<p>There were no negative incidents/issues that occurred in the company during the last year related to the employment system. The unit of certification has fully provided workers' rights in accordance with applicable</p>



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<p><b>Agriculture Agency of Labuhanbatu Regency.</b> Auditor team had tried to contact the PIC of the appointed agency but the PIC did not respond until the audit activity ended. This causes the Auditor Team to be unable to conduct public consultations with the Labuhanbatu Regency Agriculture Office.</p>	<p>N/A</p>
<p><b>National Land Agency of Labuhanbatu Regency.</b></p> <p>There are no issues related to land claims/disputes that occurred in the operational area of PT Daya Labuhan Indah from 2020 to 2021. The company also has a request for an extension or application for a new HGU permit to the agency. Compulsory reports have also been sent on a regular basis.</p>	<p>There have been no incidents of land disputes/claims since 2020 until now. The company has also routinely sent HGU land use reports to the agency.</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<p><b>Environment Agency of Labuhanbatu Regency.</b> There are no issues related to environmental pollution, the company already has the required environmental permits such as environmental permits, hazardous waste temporary warehouse, IPLC and others. Compulsory reporting has also been routinely carried out by the company. During the past year there has been no request for information provided to the company from the agency. So far, the communication and relationship between the company and the agency has been going well.</p> <p>There is information from the agency that the company has not carried out an inventory of peatlands in accordance with the provisions in force since 2017.</p>	<p>There were no negative incidents/issues that occurred in the company during the last year related to the environment. The unit of certification has fully provided carrying out environmental management and monitoring activities properly.</p> <p>Regarding the peat area inventory submitted by the Dinas, it is known that PT Daya Labuhan Indah is not a company that is required to carry out an inventory of peat areas. In Letter No. S./84/PDKL/PK5/PKL-0/12/2017 dated December 05, 2017 explains the list of companies that are required to carry out field surveys and peat inventory activities under the supervision of the Director General. In the letter, PT Daya Labuhan Indah was not included in the existing list.</p>
<p><b>Manpower Agency of Labuhanbatu Regency.</b> There are no issues related to employment that occur in the company. The company already has a CLA which is valid until December 2021, and there are four (4) trade unions that have been officially registered at the office. During the last one year since 2020 until now there have been no cases of industrial relations disputes that have occurred.</p> <p>The provision of minimum wages, BPJS registration, wage scale structure, calculations and overtime payments have been carried out by the company. The current wage applied is the Labuhanbatu Regency Minimum Wage in 2021.</p>	<p>There were no negative incidents/issues that occurred in the company during the last year related to the employment system. The unit of certification has fully provided workers' rights in accordance with applicable regulations.</p>
<p><b>Contractor (PT Citra Maju Perkasa).</b> The certification unit continues to improve business and empower with communities by cooperating with contractors. Making a work agreement based on the agreement between the two parties and payment is made on time in accordance with the contents of the agreement. The certification unit always conducts socialization and evaluation related to the fulfillment of labor social assurance and the OHS aspects of contractor workers. The contractor is always evaluated on a document basis at the first time he cooperates and is evaluated for its overall fulfillment every year. This is done to ensure that the contractor has implemented government regulations from the aspect of manpower, OHS and others.</p>	<p>There was no negative issue that need further verification. The certification unit has demonstrated its commitment to develop local communities. In addition documentation has been shown that the payment of the contractor's results has been paid according to the agreement and on time.</p>
<p><b>Employment Issues in Internet</b> There were employment issues that occurred in companies that were on the internet on June 24, 2020 with the link:</p>	<p>Based on the results of interviews with representatives of the labor unions (FSPMI and Serbundo) it is known that the problems/issues related to the bonus deduction have been resolved. For issues related to</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<p><a href="https://www.koranperdjoeangan.com/perundingan-tripartit-pc-fspmi-dengan-pt-dli-wilmar-group-tentang-pemotongan-bonus-pekerja-di-disnaker-labuhanbatu/">https://www.koranperdjoeangan.com/perundingan-tripartit-pc-fspmi-dengan-pt-dli-wilmar-group-tentang-pemotongan-bonus-pekerja-di-disnaker-labuhanbatu/</a></p> <p>The issue is related to the Bonus Deduction given to workers by PT Daya Labuhan Indah.</p>	<p>bonus deductions circulating on the internet, the trade union and the company have resolved the matter in a bipartite manner without any tripartite meeting with the Manpower Office. The union and the company only came to discuss it without registering it with the IRC because it was still felt that it could be resolved in a bipartite manner.</p> <p>Based on the results of the review of the bipartite meeting document between the trade union and the company, some information was obtained as follows:</p> <ul style="list-style-type: none"> <li>• The first bipartite meeting was held to discuss bonus deductions which was held on 22 May 2020. The purpose of the deducted bonus is “uang daging” which is usually given by the company every year at the time of bonus distribution cannot be given during the 2020 bonus distribution, this is because The company stated that it was unable to provide this. “Uang daging” itself is a policy of the company and is not a component of wages or bonuses (only giving forms from the company to workers), but the workers who usually get it do not approve of it.</li> <li>• The second meeting was held on 11 August 2020 which discussed the same issue regarding bonus cuts and the workers were still trying to get the meat money back. The result is that no decision has been reached between the two parties.</li> <li>• At the last meeting on August 31, 2020, the bipartite meeting finally reached an agreement and made a Collective Agreement signed by the company, trade union and witnesses, where the result was that the company was willing to provide “uang daging” assistance of IDR 75,000 which will be added at the time of payment of wages in August 2020.</li> </ul>

4.0	CERTIFIED ORGANISATION'S ACKNOWLEDGEMENT OF INTERNAL RESPONSIBILITY		
4.1	Formal Sign-off of Assessment Findings		
	<p>Hereunder sign by management representative from inspected company to acknowledge a field assessment and agree for all content explained in this assessment report, included of non-compliance findings.</p> <p>Signed on behalf of:</p> <table data-bbox="446 787 1315 1134"><tr><td data-bbox="446 787 860 1134"><p>PT Daya Labuhan Indah Management Representative</p><p><u>Hadia Mufti Lubis</u> Thursday, 24 June 2021</p></td><td data-bbox="860 787 1315 1134"><p>Mutuagung Lestari Lead Auditor</p><p><u>Trismadi Nurbayuto</u> Thursday, 24 June 2021</p></td></tr></table>	<p>PT Daya Labuhan Indah Management Representative</p>  <p><u>Hadia Mufti Lubis</u> Thursday, 24 June 2021</p>	<p>Mutuagung Lestari Lead Auditor</p>  <p><u>Trismadi Nurbayuto</u> Thursday, 24 June 2021</p>
<p>PT Daya Labuhan Indah Management Representative</p>  <p><u>Hadia Mufti Lubis</u> Thursday, 24 June 2021</p>	<p>Mutuagung Lestari Lead Auditor</p>  <p><u>Trismadi Nurbayuto</u> Thursday, 24 June 2021</p>		

**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	Sawit Watch	Bogor	<a href="mailto:info@sawitwatch.or.id">info@sawitwatch.or.id</a>	Questionnaire	5 June 2021		✓
2	WWF (World Wild Fund)	Jakarta	<a href="mailto:wwf-indonesia@wwf.or.id">wwf-indonesia@wwf.or.id</a>	Questionnaire	5 June 2021		✓
3	WALHI (Wahana Lingkungan Hidup)	Jakarta	<a href="mailto:informasi@walhi.or.id">informasi@walhi.or.id</a>	Questionnaire	5 June 2021		✓
4	AMAN (Aliansi Masyarakat Adat)	Jakarta	<a href="mailto:rumahaman@cbn.net.id">rumahaman@cbn.net.id</a>	Questionnaire	5 June 2021		✓
5	Agriculture Agency of Labuhanbatu District	Labuhanbatu District, Sumatera Utara Province		Interview by Phone	15 June 2021		✓
6	National Land Agency of Labuhanbatu District	Labuhanbatu District, Sumatera Utara Province		Interview by Phone	15 June 2021	✓	
7	Manpower Agency of Labuhanbatu District	Labuhanbatu District, Sumatera Utara Province		Interview by Phone	15 June 2021	✓	
8	Environment Agency of Labuhanbatu District	Labuhanbatu District, Sumatera Utara Province		Interview by Phone	15 June 2021	✓	
9	Head of Sei Tampang Village	Labuhanbatu District, Sumatera Utara Province		Interview by Phone	15 June 2021	✓	
10	Head of Sei Nahodaris Village	Labuhanbatu District, Sumatera Utara Province		Interview by Phone	15 June 2021	✓	
11	Head of Kampung Bilah Village	Labuhanbatu District, Sumatera Utara Province		Interview by Phone	15 June 2021	✓	
12	Previous land owners	Labuhanbatu District, Sumatera Utara Province		Interview by Phone	15 June 2021	✓	
13	Women of Wilmar	PT DLI	-	Interview by phone	16 June 2021	✓	
14	Cooperative of Konsumen	PT DLI	-	Interview by phone	16 June 2021	✓	
15	Serbundo (Labour Union)	PT DLI	-	Interview by phone	16 June 2021	✓	
16	Serbundo (Labour Union)	PT Perkebunan Milano	-	Interview by phone	16 June 2021	✓	
17	PTP-FPBI (Labour Union)	PT DLI	-	Interview by phone	16 June 2021	✓	
18	SPSI (Labour Union)	PT DLI	-	Interview by phone	16 June 2021	✓	
19	FSPMI (Labour Union)	PT DLI	-	Interview by phone	16 June 2021	✓	
20	DLI-2 POM: • 2 Security Officers • 1 Operators Weightbridge	PT DLI	-	Interview	17 June 2021	✓	

	<ul style="list-style-type: none"> <li>• 2 FFB Graders</li> <li>• 1 Welder</li> <li>• 6 Processing Operators from six Stations</li> <li>• 1 warehouse worker</li> <li>• 1 worker at WTP</li> <li>• 1 worker at POME</li> <li>• 1 worker at waste hazardous storage</li> </ul>						
21	<p>Cabang Dua Estate:</p> <ul style="list-style-type: none"> <li>• 1 HCV officer</li> <li>• 1 Foremans</li> <li>• 6 Pesticide Applicators</li> <li>• 10 Manuring Personel</li> </ul>	PT DLI	-	Interview by Phone	17 June 2021	✓	
22	<p>Sei Deras Estate:</p> <ul style="list-style-type: none"> <li>• 2 Harvester</li> <li>• 3 Pesticide Applicators</li> <li>• 2 Foremans</li> <li>• 1 Manuring Personel</li> </ul>	PT DLI	-	Interview by Phone	17 June 2021	✓	
23	<p>Wonosari Estate:</p> <ul style="list-style-type: none"> <li>• 1 Harvester</li> <li>• 2 maintenance workers</li> <li>• 3 Foremans</li> <li>• 1 worker at water gate</li> <li>• 1 workers at housing complex</li> <li>• 1 welder</li> <li>• 1 store officer</li> <li>• 2 fire fighting team</li> </ul>	PT DLI	-	Interview by Phone	17 June 2021	✓	
24	Contractor worker	PT DLI	-	Interview by Phone	17 June 2021	✓	



**Appendix 2. Assessment Program**

DATE	14 – 19 June 2021	
PROGRAM	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
<b>Monday, 14 June 2021</b>		
07.50 – 10.20	<ul style="list-style-type: none"> <li>Flight from Jakarta to Medan (GA 182)</li> </ul>	<ul style="list-style-type: none"> <li>ALL</li> </ul>
10.20 – 20.00	<ul style="list-style-type: none"> <li>Medan to PT DLI</li> </ul>	<ul style="list-style-type: none"> <li>ALL</li> </ul>
<b>Tuesday, 15 June 2021</b>		
08.00 – 09.00	<ul style="list-style-type: none"> <li>Opening Meeting</li> </ul>	<ul style="list-style-type: none"> <li>ALL</li> </ul>
09.00 – 12.00	<ul style="list-style-type: none"> <li>Stakeholders Consultation with BPN, DISBUN, DISNAKER, &amp; DLH of Labuhanbatu Regency by phone</li> </ul>	<ul style="list-style-type: none"> <li>HRK</li> </ul>
	<ul style="list-style-type: none"> <li>Stakeholders Consultation with Community Leaders (Sei Tampang, Bilah, Sei Nahodaris Villages), Previous Land Owners, Local Contractor by phone</li> </ul>	<ul style="list-style-type: none"> <li>HRK</li> </ul>
	<ul style="list-style-type: none"> <li>Interview with Internal stakeholders (Gender Committee, Cooperation, Serbundo)</li> </ul>	<ul style="list-style-type: none"> <li>HRK</li> </ul>
	<ul style="list-style-type: none"> <li>Field Observation to Wonosari Estate &amp; Sei Deras Estate</li> <li>Replanting, Nursery, Manuring, Spraying, Harvesting, Integrated Pest Management (IPM), Water Management, EFB Application, OHS aspects</li> </ul>	<ul style="list-style-type: none"> <li>RGR/TNB&amp;SML</li> </ul>
12.00 – 14.00	<ul style="list-style-type: none"> <li>Legal operational &amp; High Conservation Value Area , Domestic Waste Management</li> <li>Worker facilities (housing, health clinic, clean water, etc) and Hazardous Waste Material (B3) management, Fire Fighting facilities, Storage, etc.</li> </ul>	<ul style="list-style-type: none"> <li>RGR/TNB&amp;SML</li> </ul>
	<ul style="list-style-type: none"> <li>Break</li> </ul>	<ul style="list-style-type: none"> <li>ALL</li> </ul>
14.00 – 16.30	<ul style="list-style-type: none"> <li>Legal operational &amp; High Conservation Value Area, Domestic Waste Management</li> <li>Worker facilities (housing, health clinic, clean water, etc) and Hazardous Waste Material (B3) management, Fire Fighting facilities, Storage, etc.</li> </ul>	<ul style="list-style-type: none"> <li>TNB&amp;SML</li> </ul>
14.00 – 16.30	<ul style="list-style-type: none"> <li>Field Observation to DLI-2 POM</li> <li>Workshop, Chemical Storage, WTP, Fire Fighting Simulation, EFB station; Effluent Ponds, Land Application (LA), WTP, Water Inlet, Housing Complex</li> </ul>	<ul style="list-style-type: none"> <li>RGR</li> </ul>
	<ul style="list-style-type: none"> <li>Security, Weighbridge Station, CPO Storage Tank, Palm Kernel Silo/Bulk (Supply Chain), Loading Ramp (Grading), Grading Station, Processing Station</li> </ul>	<ul style="list-style-type: none"> <li>HRK</li> </ul>
16.30 – 17.00	<ul style="list-style-type: none"> <li>Clarification of Field Observation Result &amp; Stakeholders Consultation</li> </ul>	<ul style="list-style-type: none"> <li>ALL</li> </ul>
<b>Wednesday, 16 June 2021</b>		
07.00 – 12.00	<ul style="list-style-type: none"> <li>Field Observation to Cabang Dua Estate</li> <li>Replanting, Nursery, Manuring, Spraying, Harvesting, Integrated Pest Management (IPM), Water Management, EFB Application, OHS aspects</li> </ul>	<ul style="list-style-type: none"> <li>TNB/SML</li> </ul>
	<ul style="list-style-type: none"> <li>Legal operational &amp; High Conservation Value Area , Domestic Waste Management</li> <li>Worker facilities (housing, health clinic, clean water, etc) and Hazardous Waste Material (B3) management, Fire Fighting facilities, Storage, etc.</li> </ul>	<ul style="list-style-type: none"> <li>HRK/RGR</li> </ul>

12.00 – 14.00	• Break	• ALL
14.00 – 16.30	Document Verification & Clarification of Field Observation Result	• ALL
16.30 – 17.00	Clarification of Field Observation Result & Stakeholders Consultation	• ALL
<b>Thursday, 17 June 2021</b>		
08.00 – 12.00	• Interview (by phone) with Harvesters, Spraying Workers, Manuring workers, Security, IPM officer, HCV Officer from Wonosari Estate, Sei Deras Estate, & Cabang Dua Estate	• SML/RGR
	• Interview (by phone) with Security, Weighbridge operator, Grading Officer, SCCS Officer	• HRK
	• Interview (by phone) with WTP officer, ETP officer, Store Keeper, Hazardous waste material store keeper, Boiler operator, Engine Room Operator, Operator	• TNB
12.00 – 14.00	• Break	• ALL
14.00 – 16.30	• Document Verification & Clarification of Field Observation Result	• ALL
16.30 – 17.00	• Clarification of Field Observation Result & Stakeholders Consultation	• ALL
<b>Friday, 18 June 2021</b>		
08.00 – 11.30	• Document Verification & Clarification of Field Observation Result	• ALL
12.00 – 14.00	• Break	• ALL
14.00 – 16.00	• Interim Meeting	• ALL
16.00 – 17.00	• Closing Meeting	• ALL
<b>Saturday, 19 June 2021</b>		
05.00 – 13.00	• Travelling from PT DLI to Medan	• ALL
16.25 – 18.50	• Flight from Medan to Jakarta (GA 182)	• ALL