

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

**[✓] Re-Certification**

Name of Management Organisation : Brahma Binabakti Palm Oil Mill – PT Brahma Binabakti, subsidiary of Triputra Agro Persada

Plantation Name : PT Brahma Binabakti; Brahma Binabakti Estate

Location : Suko Awinjaya Village, Sekernan Sub District, Muaro Jambi District, Jambi Province, Indonesia

Certificate Code : MUTU-RSPO/114

Date Initial Registration : 26 May 2015

Date of Certificate Issue : 24 September 2021      Date of License Issue : 26 November 2021

Date of Certificate Expiry : 23 September 2026      Date of License Expiry : 23 September 2022

\*License expired in 25 May 2020, however due to pandemic Covid-19 situation the license extended until 25 November 2021

Assessment	Assessment Date	PT Mutuagung Lestari Auditor	Reviewed by	Approved by
Recertification Remote Audit	25 to 26 June 2020	Moh Arif Yusni (Lead Auditor), Hasiholan Sihombing, Haikal Ramadhan Kharismansyah and Radityo Puspanjana	Harso Yuli Antena	Octo H.P.N. Nainggolan
Recertification Onsite Audit	02 to 06 August 2021	Moh Arif Yusni (Lead Auditor), M. Amarullah, Radityo Puspanjana and Afiffuddin		

Assessment	Approved by MUTUAGUNG LESTARI on:
Recertification	24 September 2021

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on March 12<sup>th</sup>, 2014 with registration number **ASI-ACC-055**

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Figure 1. Location Map of PT Brahma Binabakti, Jambi Province

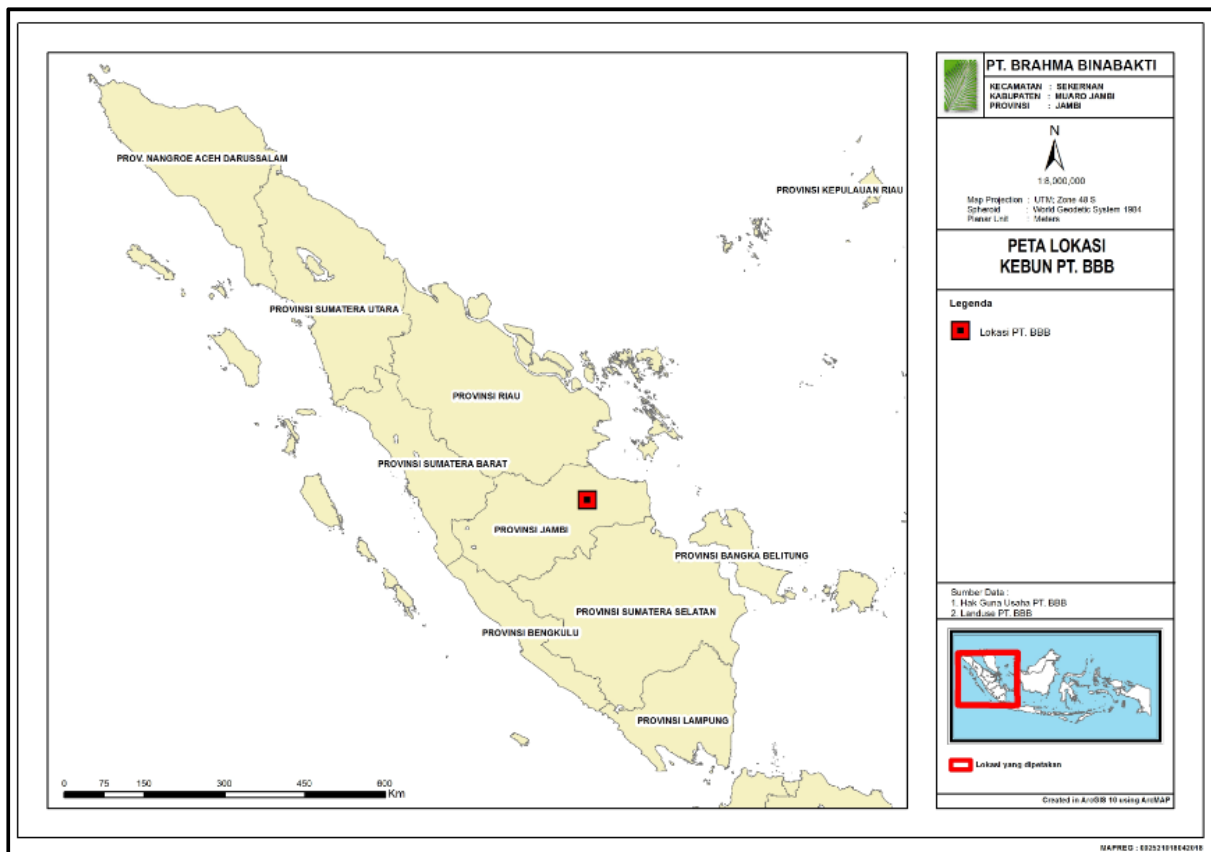
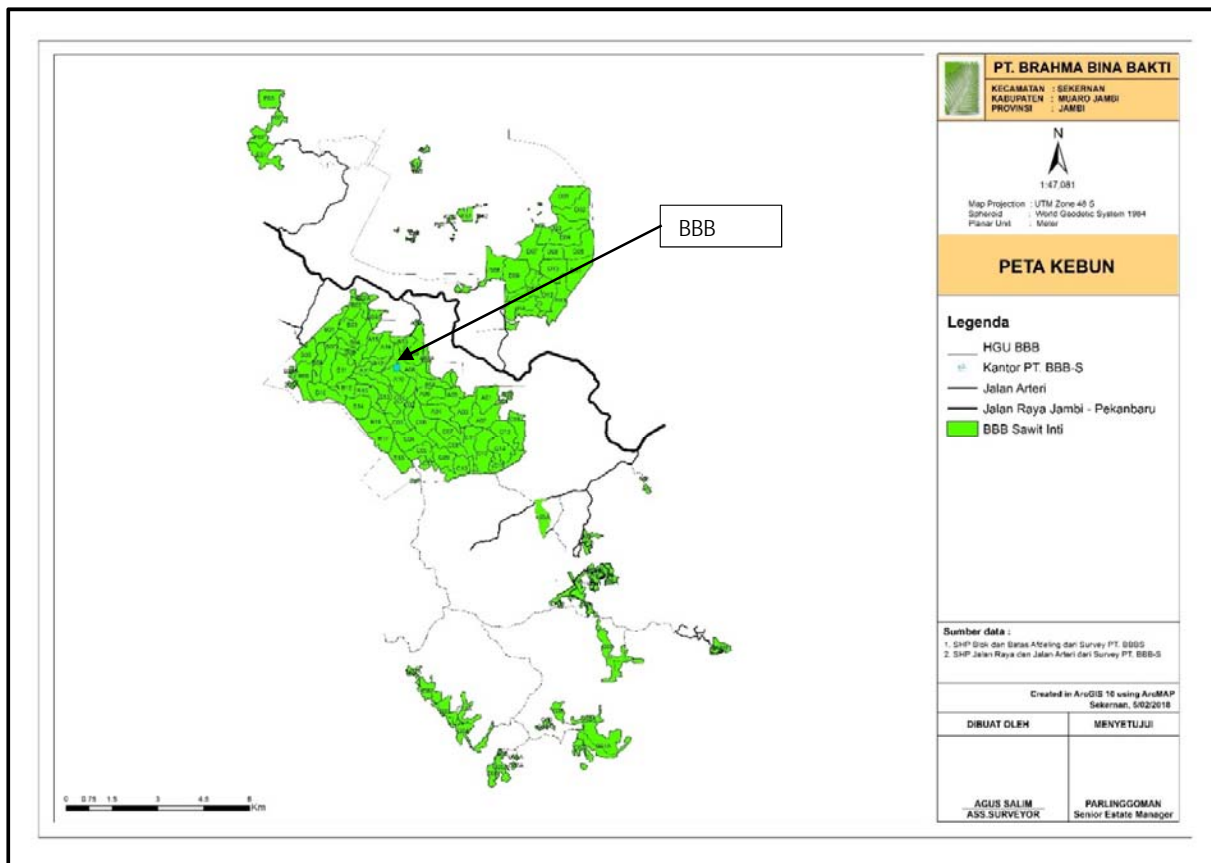


Figure 2. Operational Map of PT Brahma Binabakti.



**Abbreviations Used**

ALS	:	Assessor Licensing Scheme
APAR	:	<i>Alat pemadam api ringan</i> (Fire Distinguisher)
ASA	:	Annual Surveillance Assessment
BBB	:	Brahma Binabakti
BPJS	:	<i>Badan Penyelenggara Jaminan Sosial</i> (Worker and Health Insurance)
CB	:	Certification Body
CEO	:	Chief Executive Officer
CH	:	Certificate holder
CITES	:	Convention on International Trade in Endangered Species of Wild Fauna and Flora
CPO	:	Crude Palm Oil
CSPK	:	Certified Sustainable Palm Kernel
CSPPO	:	Certified Sustainable Palm Oil
CSR	:	Corporate Social Responsibility
CV	:	Curriculum Vitae
DELH	:	<i>Dokumen Evaluasi Lingkungan Hidup</i>
EFB	:	Empty Fruit Bunch
EIA	:	Environmental Impact Assessment
EM	:	Estate Manager
FFB	:	Fresh Fruit Bunch
FPIC	:	Free, Prior, Informed, Consent
FR	:	Frequency Rate
GHG	:	Greenhouse Gases
GM	:	General Manager
HCV	:	High Conservation Value
HCVRN	:	High Conservation Value Resource Network
HGB	:	Building Use Title
HGU	:	<i>Hak Guna Usaha</i> (Land use title)
HIRAC	:	Hazard Identification, Risk Assessment, and Control
IPB3	:	<i>Ikatan Pekerja Brahma Binabakti</i>
IPM	:	Integrated Pest Management
KER	:	Kernel Extraction Rate
KUD	:	Smallholders Cooperative
LSU	:	Leaf Sampling Unit
MCU	:	Medical Check Up
MSDS	:	Material Safety Data Sheet
OER	:	Oil Extraction Rate
OFI	:	Opportunity For Improvement
OHS	:	Occupational Health and Safety
OSH	:	Occupational Safety and Health
P2K3	:	<i>Panitia Pembina Keselamatan dan Kesehatan Kerja</i> /OHS Committee
PIC	:	Person In Charge
PK	:	Palm Kernel
PKB	:	<i>Perjanjian Kerja Bersama</i> (Collective Labour Bargaining)
PKWT	:	<i>Perjanjian Kerja Waktu Tertentu</i> or Temporary Work Agreement
PKWTT	:	<i>Perjanjian Kerja Waktu Tidak Tertentu</i> or Permanent Work Agreement
POM	:	Palm Oil Mill
POME	:	Palm Oil Mill Effluent
PPE	:	Personal Protective Equipment
RKL	:	<i>Rencana Kelola Lingkungan</i>

RPL	:	<i>Rencana Pemantauan Lingkungan</i>
RSPO	:	Roundtable on Sustainable Palm Oil
RTE	:	Rare, Threatened, and Endangered
SCCS	:	Supply Chain Certification Standard
SEM	:	Senior Estate Manager
SHE	:	Safety Health and Environment
SMK3	:	<i>Sistem manajemen keselamatan dan kesehatan kerja</i> (Occupational Safety and health system management)
SOP	:	Standard Operating Procedure
SPSI	:	<i>Serikat Pekerja Seluruh Indonesia</i> (Worker Union)
SR	:	Severity Rate
SSU	:	Soil Sampling Unit
VP	:	Vice President
WLTK	:	<i>Wajib Lapo Tenaga Kerja</i> or (Annual Compulsory Manpower Report)
WTP	:	Water Treatment Plant
WWTP	:	Wastewater Treatment Plant

1.0	SCOPE of the CERTIFICATION ASSESSMENT		
1.1	Assessment Standard Used	<ul style="list-style-type: none"><li>RSPO Principles and Criteria for Sustainable Palm Oil Production 2018, The Indonesian National Interpretation, Endorsed by the RSPO Board of Governors on 20<sup>th</sup> April 2020</li><li>RSPO Certification Systems for Principles &amp; Criteria and RSPO Independent Smallholder Standard, Endorsed by the RSPO Board of Governors on 12 November 2020</li></ul> <p>Additional Documents:</p> <ul style="list-style-type: none"><li>Contingency RSPO Audit Procedure (This procedure is applicable when force majeure (such as pandemics, natural disasters, civil unrest, etc.) preventing the audit team from conducting field verifications) 25 August 2020</li></ul>	
1.2	Organisation Information		
1.2.1	Organization name listed in the Certificate	PT Brahma Binabakti	
1.2.2	Contact person	Dian Novita Putri	
1.2.3	Organisation address and site address	<p><b>Head Office:</b> The East Building, 23<sup>rd</sup> floor, Dr. Ide Anak Agung Gede Agung Street, Kav E.3.2 No. 1, Jakarta Selatan, Indonesia</p> <p><b>Liaison Office:</b> Jalan Sultan Thaha No.4 Pasar Jambi – Pasar Jambi Kota Jambi – 36113, Indonesia.</p>	
1.2.4	Telephone	021 – 5794 4737	
1.2.5	Fax	021 – 5794 4745	
1.2.6	E-mail	<a href="mailto:George.oetomo@tap-agri.com">George.oetomo@tap-agri.com</a>	
1.2.7	Web page address	<a href="http://www.tap-agri.com">http://www.tap-agri.com</a>	
1.2.8	Management Representative who completed the application for certification	George Oetomo	
1.2.9	Registered as RSPO member	1-0038-07-000-00 since 27 June 2007	
1.3	Type of Assessment		
1.3.1	Scope of Assessment and Number of Management Unit	Brahma Binabakti Palm Oil Mill and its one supply base, namely Brahma Binabakti 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
	Brahma Binabakti	Suko Awinjaya Village, Sekernan Sub District, Muaro Jambi District, Jambi Province, Indonesia.	S 01° 20' 50"
			E 103°19'34"

1.4.2	Location of Certification Scope of Supply Base			
	<b>Name of Supply Base</b>	<b>Location</b>	<b>Coordinate</b>	
			<b>Latitude</b>	<b>Longitude</b>
	Brahma Binabakti Estate	Suko Awinjaya Village, Sekernan Sub District, Muaro Jambi District, Jambi Province, Indonesia.	S 01° 21' 38"	E 103° 21' 38"
<b>1.5</b>	<b>Description of Area Statement</b>			
1.5.1	Tenure			
	• State		Land Rights Title (HGU) =	6,892.44 ha
			Building Rights Title (HGB) =	49.22 ha
			<b>Total =</b>	<b>6,941.66 ha</b>
	• Community		-	ha
	<i>*There is adjustment total area of certifications since previous certification cycles/period due to base on the extension of land right title in December 2020 there is changed from 7,227.31 Ha became 6,892.44 Ha</i>			
1.5.2	<b>Area Statement</b>			
	• <b>Total area</b>		<b>6,752.66</b>	ha
	• Mature area		3,346.36	ha
	• Immature area		1,723.20	ha
	• Mill		49.22	ha
	• Emplacements		18.67	ha
	• Infrastructure (road and drainage)		224.96	ha
	• Nursery		17.06	ha
	• Occupation		25	ha
	• Chipping area		315.5	ha
	• Rubber Plantation		1,032.69	ha
	• HCV (including planted area)		70.05	ha
	<ul style="list-style-type: none"> <li>- HCV covering an area of 70.05 ha is included in the planted area (located in the rubber plantation and palm oil plantation)</li> <li>- Certified area in ASA 4 is added 49.22 Ha (HGB) which has include as scope certification since 2015.</li> <li>- 189 Ha is excluded from previous scope certification (smallholder area of Akso Dano Cooperative)</li> <li>- <b>Scope certification area is 6,752.66 Ha</b></li> </ul>			
<b>1.6</b>	<b>Planting Year and Cycles</b>			
1.6.1	Age profile of planting year			
	<b>Planting Year</b>	<b>Hectarage (ha)</b>		
		<b>Brahma Bina Bakti Estate</b>	<b>Total</b>	
	1995	1,161.10	1161.10	
	1996	848.07	848.07	
	1997	185.11	185.11	
	1998	397.14	397.14	
	2005	28.8	28.80	
	2006	279.21	279.21	
	2007	446.93	446.93	
	<b>Sub Total Mature</b>	<b>3,346.36</b>	<b>3,346.36</b>	
	2019	1,013.43	1,013.43	

	2020	574.04	574.04
	2021	135.73	135.73
	Sub Total Immature	1,723.20	1,723.20
	TOTAL	5,069.56	5,069.56
1.6.2	New Planting area after January 2010	1,013.43	Ha
1.6.3	Planting Cycle	2 <sup>st</sup> Cycle	
1.7	Description of Mill and Supply Base		
1.7.1	Description of Mill		
	Name of Mill	Capacity (tonnes/hour)	FFB Processed (tonnes/year)
			CPO
			Out put (tonnes)
			Extraction (%)
			Palm Kernel
			Out put (tonnes)
			Extraction (%)
	Brahma Binabakti	60	642,885.60
			131,075.06
			20,39
			33,916.95
			5.28
	*Production data source from August 2019 – July 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)
			%
	Brahma Bina Bakti	6,752.66	3,346.36
			146,947.92
			21.96
			146,947.92
			100
	TOTAL	6,752.66	3,346.36
			146,947.92
			21.96
			146,947.92
			100
	*Production data source from August 2019 – July 2021		
	*FFB production represent data for two years audit so the yield calculations is based on formula= FFB Production/ Production Area/ 2.		
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)
	Smallholders and outgrowers (uncertified)	-	-
			495,937.68
	TOTAL		495,937.68
	*Production data source from August 2019 – July 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 Production (MT)
	FFB Processed	180,956	146,947.92
	CPO Production	35,798	30,332.53
	Palm Kernel (PK) Production	9,309	7,659.64
1.8.2	Product selling	Actual selling product for last year (MT)	
	Type of selling product		
	CSPO sold as RSPO certified product	1,000.00	
	CSPK sold as RSPO certified product	476.58	
	CSPO sold under other scheme	0	

	CSPK sold under other scheme				0			
	CSPO sold as conventional				28,809.09			
	CSPK sold as conventional				7,083.07			
1.8.3	Estimate of Certified FFB Claim							
	Name of Estate		Total Area (Ha)	Production Area (Ha)		FFB (tonnes/year)		Yield (tonnes/ha/year)
	Brahma Bina Bakti		6,752.66	3,346.36		75,000		22.41
	TOTAL		6,752.66	3,346.36		75,000		22.41
	*Projected FFB production for 12 months of Certificate							
1.8.4	Estimate of Certified Palm Product Claim							
	Name of Mill	Capacity (tonnes/ hour)	FFB Processed (tonnes/year)	CPO		Palm Kernel		Supply Chain Module
				Out put (tonnes)	Extraction (%)	Out put (tonnes)	Extraction (%)	
	Brahma Binabakti	60	75,000	15,750	21.00	4,125	5.5	MB
	*Projected CSPO and CSPK production for 12 months of Certificate							
1.9	Other Certifications							
	ISPO				MUTU-ISPO/241 valid until 25 May 2025			
1.10	Time Bound Plan							
1.10.1	Time Bound Plan for Other Management Units							
	Management Unit		Estate (Supply Base)	Time Bound Plan	Location	Status		
	Mill	Time Bound Plan						
	Brahma Biina Bakti	2014	PT Brahma Binabakti	2014	Jambi	Certified		
			KUD Dano Bangko	2022		-		
			KUD Akso Dano	2022		-		
			Braham Bina Bakti – non certified	2024				
			Braham Bina Bakti Pelayung	2023				
	Gawi Bahandep Sawit Mekar	2015	PT Gawi Bahandep Sawit Mekar	2015	Central Kalimantan	Certified		
			PT Mega Ika Khansa	-		Legal status still location permit		
			Usaha Mandiri Cooperative	-		-		
	First Lamandau Timber International	2020	PT First Lamandau Timber International	2020	Central Kalimantan	Stage 2		
			Cooperative of Natai Pelingkau	-		-		
			Cooperative of Guna Wahana Sejahtera	-		-		
			Cooperative of Karya Sehati	-		-		

		Cooperative of Kepakat Di'i	-		-
		PT Hanamas Jaya Abadi	-		Legal status still location permit
Sukses Karya Mandiri	2025	PT Sukses Karya Mandiri	2025	East Kalimantan	-
		Cooperative of Jati Sejahtera	2028		-
		PT Trieka Agro Nusantara	-		-
PT Muaratoyu Subur Lestari	2022	PT Muaratoyu Subur Lestari	2022	East Kalimantan	-
		Cooperative of Samakeo Lestari – Munggu	2025		-
		Cooperative of Swadaya Toyu-Toyu	2025		-
		Cooperative of Mupakat Taka & Mantorani Mandiri Taka - Tualan	2025		-
PT Etam Bersama Lestari	2023	PT Etam Bersama Lestari	2023	East Kalimantan	-
		Cooperative of Tunas Harapan Jaya – Pelelawan	2026		-
		Cooperative of Titian Terap Lestari _ Tepian Terap	2026		-
PT Dwiwira Lestari Jaya	2024	PT Dwiwira Lestari Jaya	2024	East Kalimantan	-
		Cooperative of Sawit Sejahtera	2027		-
		Cooperative of Biatan Sejahtera	2027		-
PT Hamparan Perkasa Mandiri	2021	PT Hamparan Perkasa Mandiri	2021	East Kalimantan	-
		KUD Nengayetna	2024		-
		PT Subur Abadi Wana Agung	-		-
		KUD Mandiri Sawa	-		-
		KUD Maju Bebaya	-		-
		PT Kutim Agro Mandiri	-		Legal status still location permit
		Cooperative of Mitra Sawit Mandiri Sukses	-		-
		PT Pradana Telen Agromas	-		Legal status still location permit
		Koprasi Kimet Maring Telen Agromas	-		-
PT Natura Pasific Nusantara	2026	PT Natura Pasific Nusantara	2026	East Kalimantan	-
		Cooperative of Akung Di Uhay	2029		-
		Cooperative of Ora Et Labora	2029		-
		Cooperative of Bukit Karya	2029		-

PT Yudha Wahana Abadi	2027	PT Yudha Wahana Abadi	2027	East Kalimantan	-
		Cooperative of Harapan Baru	2030		-
		PT Genera Aura Semari	-		Legal status still location permit
PT Anugerah Agung Prima Abadi	2027	PT Anugerah Agung Prima Abadi	2027	East Kalimantan	-
		Cooperative of Belum Lukut	2030		-
		Cooperative of Tumbu Bebaya	2030		-
PT Kedap Sayaag Dua*	-	PT Kedap Sayaag Dua	-	East Kalimantan	-
		Cooperative of Bina Mitra Sawit Sejahtera & Sempakat Sawit Mandiri	-		-
		Cooperative of Damai Sejahtera mandiri – Muara Jawaag	-		
		Cooperative of Karya Mandiri-Abit	-		
*Mill will be commisioning in 2022					
The Company has presented Time Bound Plans for 19 Management Units and this has been submitted to the RSPO. However:					
<ul style="list-style-type: none"><li>There are units that do not have a timetable for certification such as PT MIK, PT TAN, PT HJA, PT SAWA, PT KAM, PT PTA, PT KSD, PT GAS.</li><li>There has been no revision for TBP PT FLTI, where the audit has been carried out in October 2019, however the process postponed due to RACP Process</li><li>There are units that are planned to be certified above 2023, namely PT SKM (2025), PT DLJ (2024), PT NPN (2026), PT YWA (2027) and PT AAPA (2027)</li></ul>					
Based on document verifications and interview with managements it was known if that situation has been reported to RSPO on 10 October 2020 and the latest respond from RSPO in 10 July 2021, However, there is information regarding status about any irregularities in the TBP timeline. (OFI 03)					
1.10.2	Progress of Associated Smallholders and Outgrowers for Certifiable Standard				
	There are two smallholders that supply FFB to Brahma Bina Binabakti Mill, namely KUD Akso Dano and Pemayung Scheme Smallholders. The agreement KUD Akso Dano currently about FFB Trading and no longer managed by PT BBB. Furthermore for Plasma Pemayung, formerly planned during certification process in 2020, however its postponed due to Covid-19.				

<b>2.0</b>	<b>ASSESSMENT PROCESS</b>
<b>2.1</b>	<b>Assessment Team</b>
<b>RC Remote Audit</b>	<p><b>1. Moh Arif Yusni (Lead Auditor).</b> Indonesian citizen. Bachelor of Agriculture, majoring in Plant Protection. Has experience as an operational staff at a private oil palm plantation company in Indonesia on 2010 to 2012. Has attended several trainings, i.e.: ISO 19011, ISO 9001; ISO 14001, SA 8000, RSPO lead auditor, ISPO lead auditor, OHS expert, OHS auditor based on National Government No. 50/2012, SCCS, etc. Has conducting ISPO, RSPO and MSPO audit as an auditor and lead auditor with expertise on best management practices for estate and mill, legality, worker welfare, safety, social, environment, conservation, transparency, long term economic management plan and supply chain for palm oil mill aspects. During the audit, he verified Legality, Social and SCCS</p> <p><b>2. Hasiholan Sihombing (Auditor).</b> Indonesian citizen. Bachelor of Agriculture Majoring in Agronomy, Agriculture Faculty. He has working experienced for 7 (seven) years since 2009 as an Operational Staff in an Oil Palm Plantation Company in Indonesia. The training he has followed namely: Lead Auditor ISPO, RSPO P&amp;C Lead Auditor Course by Checkmark, SA 8000 Awareness, Quality Management Systems (ISO 9001:2015), Environmental Management Systems (ISO 14001:2015), OHS General Expert, OHSAS 18001:2007, ISO 19011:2018, ISO 17021:2011 and ISO 17065:2012. He has experienced in various audit activities related to the certification system of sustainable palm oil plantation since 2016. During this audit, he assigned to verify best management practices, long term management plan, transparency and OHS aspects.</p> <p><b>3. Haikal Ramadhan Kharismansyah (Auditor)</b> Indonesian citizen, Bachelor of Agriculture department of plant and pest disease (Agrotechnology). He has 3 years 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, Lead Auditor ISPO, Lead Auditor RSPO, ISO 22000, SA 8000, ISO 14000 and SCCS. Has conducting ISPO and RSPO audit with expertise on best management practices, OHS, Worker Welfare, and SCCS. During this audit verified transparency s, SCCS and Worker Welfare</p> <p><b>4. Radytio Puspanjana (Auditor).</b> Indonesian Citizen. Bachelor of agriculture, majoring in Soil Science. Agriculture Faculty. He was working as honorarium Officer at the Riau Province Plantation Agency in the division of huge estate for 1 year. The participated trainings are Survey and Mapping (GIS) Training which was held by National GMT, ISPO auditor training, ISO 9001/2008 auditor training, ISO 14001/2004 auditor training, IHT Geospatial Information System, IHT High Conservation Value, IHT Environmental Impact Assessment, IHT Green House Gas and RSPO Lead Auditor Course by Checkmark Training. Since 2015 has been following many audits as auditor base on Best Management Practice and Environment. Aspect audit: Environment, HCV, GHG.</p>
<b>RC Onsite Audit</b>	<p><b>1. Moh Arif Yusni (Lead Auditor).</b> Indonesian citizen. Bachelor of Agriculture, majoring in Plant Protection. Has experience as an operational staff at a private oil palm plantation company in Indonesia on 2010 to 2012. Has attended several trainings, i.e.: ISO 19011, ISO 9001; ISO 14001, SA 8000, RSPO lead auditor course in 204, ISPO lead auditor, OHS expert, OHS auditor based on National Government No. 50/2012, SCCS, RSPO and ISPO Lead auditor refresher course in 2021 etc. Has conducting ISPO, RSPO and MSPO audit as an auditor and lead auditor with expertise on best management practices for estate and mill, legality, worker welfare, safety, social, environment, conservation, transparency, long term economic management plan and supply chain for palm oil mill aspects. During the audit, he verifies TBP, Partial certifications, Legality, Social and transparency.</p> <p><b>2. Radytio Puspanjana (Auditor).</b> Indonesian Citizen. Bachelor of agriculture, majoring in Soil Science. Agriculture Faculty. He was working as honorarium Officer at the Riau Province Plantation Agency in the division of huge estate for 1 year. The participated trainings are Survey and Mapping (GIS) Training which was held by National GMT, ISPO auditor training, ISO 9001/2008 auditor training, ISO 14001/2004 auditor training, IHT Geospatial Information System, IHT High Conservation Value, IHT Environmental Impact Assessment, IHT Green House Gas and RSPO Lead Auditor Course by Checkmark Training in 2018. Since 2015 has been following many audits as auditor base on Best Management Practice and Environment. Aspect audit:, Environment, HCV, GHG.</p> <p><b>3. Afiffuddin (Auditor).</b> Indonesian citizen, Diploma III majoring Palm Oil Plantation, Bogor Agricultural University. Five years working experience since 2010 at Oil Palm Plantation Company in Indonesia as agronomy operational staff and followed several trainings namely: Basic Plantation Management Program, Auditor Training Indonesian Sustainable Palm Oil (ISPO), Training of RSPO lead auditor in 2018, RSPO SCCS in 2021, OHS General Expert, OHS System Management based on PP 50 2012 and Management System Certification (ISO 9001-2015/SNI</p>

	<p>19011-9001:2015) ISO 17021, ISO 17065, SA 8000 training. He has been involved in several audit activities related to sustainable palm oil certification since 2016 covering Best Management Practices aspect, health and safety aspect and worker welfare aspect. During this audit, He conducted an assessment on SCCS, BMP Agronomy and long-term management plan.</p> <p><b>4. Mohamad Amarullah (Auditor).</b> Indonesian Citizen. Master of Wood Science and Technology from UPM Malaysia and Bachelor of Forestry, majoring in Forest Product Technology from IPB University. Has experiences as an Agronomist and Research Assistant in Indonesia and Malaysia from 2008 to 2014. Has been attended several trainings such as Lead Auditor of ISPO, RSPO in 2017, ISO 17021, ISO 17065, ISO 9001, ISO 19011, ISO 14001, ISO 45001, HCV, SCCS, SA 8000, Life Cycle Analysis, etc. Has been conducted several ISPO, RSPO and MSPO audit scheme as an Auditor and Lead Auditor since 2014 in all aspects. Fluent in Malay and English. During this assessment has verified occupational health and safety, as worker welfare aspect.</p> <p>Curriculum vitae (CV) of the members and the assessment team is available at the PT Mutuagung Lestari office.</p>
<b>2.2</b>	<b>Assessment Methodology, Assessment Process and Locations of Assessment</b>
<b>2.2.1</b>	<b>Figure of person days to implement assessment</b>
<b>RC Remote Audit</b>	<p>Number of auditors: 4 auditors</p> <p>Number of days for RC remote: 2 days</p> <p>Number of working days for remote audit: 8 Working days</p>
<b>RC Onsite Audit</b>	<p>Number of auditors: 4 auditors</p> <p>Number of days for Onsite audit RC: 4 days</p> <p>Number of working days for onsite audit: 16 Working days</p>
<b>2.2.2</b>	<b>Assessment Process</b>
<b>RC Remote Audit</b>	<p>The assessment was conducted by measuring the sufficiency of implementation with the consistency done by the PT Brahma Binabakti to the requirements of <b>Principles and Criteria for the Production of Sustainable Palm Oil 2018, endorsed by the RSPO Board of Governors and adopted at the 15<sup>th</sup> Annual General Assembly by RSPO Member on 15 November 2018 and RSPO Certification System for Principles and Criteria, 14 June 2017.</b></p> <p>For this section (Remote Audit Recertification) The assessment was conducted in One method are document review, aiming to observe the sufficiency of types or substances from required documents including interview with key personnel's. Improvement of findings from resertification findings were observed by auditors at this assessment. All information obtained was recorded in Check List of PT Mutuagung Lestari (MUTU) and part of Remote Audit report.</p> <p>The opening meeting was held on Thursday 25 June 2020 at 08.30 am through a teleconference (Zoom). As for the participants who attended the opening meeting included the Estate Manager, Mill Manager, Support Team from sustainability department and other relevant staff. while the closing meeting will take place on 26 June 2020 at 15 pm. attended by the same participants as the opening meeting. Remote audit activities are accompanied by the Accreditation Body, as a part of the accreditation (ASI) process for CB (PT MAL). during the audit process, ASI virtually monitors audit activities using the Zoom application. Commonly, the audit activities went smoothly with good support from the unit management. The presentation of documents is presented quite well using email or drobox.</p> <p>The assessment program please find Appendix 2</p>
<b>RC Onsite Audit</b>	<p>The assessment was conducted by measuring the sufficiency of implementation with the consistency done by the PT Brahma Binabakti to the requirements of:</p> <ul style="list-style-type: none"> <li>• RSPO Principles and Criteria for Sustainable Palm Oil Production 2018, The Indonesian National Interpretation, Endorsed by the RSPO Board of Governors on 20<sup>th</sup> April 2020</li> <li>• RSPO Certification Systems for Principles &amp; Criteria and RSPO Independent Smallholder Standard, Endorsed by the RSPO Board of Governors on 12 November 2020</li> </ul> <p>Additional Documents:</p>

- Contingency RSPO Audit Procedure (This procedure is applicable when force majeure (such as pandemics, natural disasters, civil unrest, etc) preventing the audit team from conducting field verifications) 25 August 2020

The scope of certification of PT Brahma Binabakti consist of one mill (Brahma Binabakti Mil) and one (1) estate (Brahma Binabakti Estate). Currently the process of certification in PT BBB already in 2<sup>nd</sup> cycles, with the first license of certificate starting in 26 May 2015 and valid until 25 May 2020

During pandemic covid -19 situation PT Brahma Binabakti applying Scenario 4 in accordance with Contingency RSPO Audit Procedure 25 August 2020. Remote audit Recertification has been carried out on 25 – 26 June 2020 and until next following year (12 Months since remote audit), there is no field visit due to group safety policy, travel restriction, extended lockdown, restrictive quarantine procedures. Since palm trace license expired on 25 May 2020 there is no new license for Brahma Binabakti Mill and the license extended every three months. Because PT BBB implemented scenario 4, the process of certification on this audit held in accordance with Contingency RSPO Audit Procedure 25 August 2020) with a sample audit increase of 100% due to the audit is conducted excess the maximum time (4 ext. time/ 12 months) and documents cover two periods of audit.

The audit program is included as Appendix II. The approach to the audit was to treat the mill and its supply base as an RSPO Certification Unit. Mill was audited together with the sample estates. A range of environmental and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HCVs, declared conservation areas and local communities.

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.

During the COVID-19 pandemic, there were several modifications to the audit activity due to health protocols. Audit process carried out with high safety protocol procedure that developed by Certification Body and the unit of certification. before an onsite audit carried out, there are several meetings to discuss health protocol procedures. There are several activities that are not possible to do face to face, such as public consultations with government agencies, communities, or previous landowners so that these activities are carried out by telephone. Furthermore, during field observation auditor only verification the activity and interview process carried separately by telephone. Document verification conducted separately through the electronic files.

Public Stakeholder Notification was made on MUTU Website and RSPO Website. There is no written negative feedback receive. Stakeholder consultation involved internal and external stakeholders. discussion was held with stakeholders to seek their views on the performance of the company with respect to the RSPO requirements and aspects where they considered that improvements could be made. At the start of each discussion, the interviewer explained the purpose of the audit followed by an evaluation of the relationship between the stakeholder and the company before discussions proceeded. The interviewer recorded comments made by stakeholders and these have been incorporated into the assessment findings. The comments made by external stakeholders were also taken into account in the assessment

Structured worker interviews with male and female workers and staff were held in private at the workplace in the mill and the estates through teleconference. Fieldworkers were interviewed informally in small groups in the field. Company officials were not present at any of the internal or external stakeholder interviews. A list of Stakeholders contacted is included as Appendix III.

Audit activities are accompanied by the Accreditation Body, as a part of the accreditation (ASI) process for CB (PT MAL). during the audit process, ASI Assessors virtually monitors audit activities through ASI facilitator. Information that gathered during onsite audit informed by facilitator to ASI lead Assessor through virtually (phone, WhatsApp call, zoom meting and etc.). Commonly, the audit activities went smoothly with good support from the unit management. The presentation of documents is presented quite well by involving related personnel.

	<p>Some opportunities for improvement of the results Recertification delivered by the MUTU auditor to the management unit and the results are the subject will be verified at the next assessment phase ASA 1.1. All information obtained was recorded in Check List of PT Mutuagung Lestari (MUTU) and part of Recertification reports</p> <p>The assessment program please find Appendix 2</p>
<b>2.2.3</b>	<b>Locations of Assessment</b>
<b>RC Remote Audit</b>	No field visits.
<b>RC Onsite Audit</b>	<p>The sampling location consider the issue arose from the review documents and stakeholder's consultation that are fundamental and crucial. On this assessment sample locations that visited and respondent that interviewed by team auditor are:</p> <p><b>Brahma Binabakti Mill</b></p> <ul style="list-style-type: none"> <li>• <b>Chemical warehouse.</b> Field observations and interview related chemical management, OHS, and environmental aspect.</li> <li>• <b>Spare part Warehouse.</b> Field observations and interview related spare part management, OHS, and environmental aspect.</li> <li>• <b>Hazardous Waste Temporary Warehouse.</b> Field observations and interview related hazardous waste management, OHS and environmental aspect.</li> <li>• <b>Workshop.</b> Field observations and interview related workshop activity, OHS, environmental and worker welfare aspect.</li> <li>• <b>Hydrant simulation.</b> Observation related emergency preparedness</li> <li>• <b>FFB weighing.</b> Observation of FFB reception and weighbridge administration.</li> <li>• <b>Unloading Ramp Station.</b> Observations related to occupational safety and health as well as established work procedures.</li> <li>• <b>Loading Ramp Station.</b> Observations related to occupational safety and health as well as established work procedures</li> <li>• <b>Sterilizer Station.</b> Observations related to occupational safety and health as well as established work procedures</li> <li>• <b>Capstans Station.</b> Observations related to occupational safety and health as well as established work procedures</li> <li>• <b>Office Production.</b> Observations related to occupational safety and health as well as established work procedures.</li> <li>• <b>Thresher &amp; Press Station.</b> Observations related to occupational safety and health as well as established work procedures</li> <li>• <b>Kernel Recovery Station.</b> Observations related to occupational safety and health as well as established work procedures</li> <li>• <b>Empty Bunch Bin System Station.</b> Observations related to occupational safety and health as well as established work procedures</li> <li>• <b>Boiler Station.</b> Observations related to occupational safety and health as well as established work procedures</li> <li>• <b>Power Plant Station.</b> Observations related to occupational safety and health as well as established work procedures</li> <li>• <b>WTP.</b> Observations related to water management, recording of water used, OHS, and waste management.</li> <li>• <b>Mill Drainage.</b> Observations mill effluent drainage, sanitation mill and flow of leaching mill.</li> <li>• <b>WWTP.</b> Observation on WWTP, indication of waste overflow, OHS implementation, and interview with worker about worker welfare, OHS, and company's policies.</li> <li>• <b>Solid Waste.</b> Observation of the management of Solid waste consist of EFB, fiber and shell from the production process of mill.</li> </ul> <p><b>Brahma Binabakti Estate</b></p> <ul style="list-style-type: none"> <li>• <b>FFB Harvesting,</b> Block C051 Division Charly. Observation and interviews with foreman and harvester related FFB</li> </ul>

	<p>quality, harvesting round, OHS, and employment.</p> <ul style="list-style-type: none"> <li>• <b>Legume Crop cover maintenance Block B17</b>, Observation related work procedures, health and safety as well as worker welfare</li> <li>• <b>Spraying Circle &amp; Path, Block A04</b>. Interviews of spraying mechanism, work tools, chemicals used, doses used, medical examinations, extra fooding, PPE, labor aspect and environment.</li> <li>• <b>HCV Putak River Buffer zone Block C10 (Planting years 1995)</b>, Observation for HCV management</li> <li>• <b>Housing Division Delta</b>. Observation for domestic waste management, OHS, worker facilities</li> <li>• <b>Fire tower monitoring</b> Observation and interview related to emergency response mechanism</li> <li>• <b>Replanting Area Block C3</b>, observation related replanting activity, soil managements and work procedure</li> <li>• <b>Daycare Division Echo</b>. Observation for OHS, daycare / childcare and worker facilities</li> <li>• <b>Boundary Poles (BPN Poles) No 59,61,65,89 and 90</b> . Observation for Boundary Markers management.</li> <li>• <b>Circle racking, block D07 Division E Planting Year 1996</b>. Observation related work procedures, health and safety as well as worker welfare</li> <li>• <b>Barn Owl Box, block D07 Division E Planting Year 1996</b>. Observation related the implementations of IPM</li> <li>• <b>Spraying with Controlled Dropped Application, Block D04 Division E Planting year 1996</b>. Observation of activities related to technical aspects of spraying, OHS aspects, waste management and employment.</li> <li>• <b>Harvest and FFB Transport, Block D14 Division E Planting Year 1996</b>. Observation of activities related to technical aspects of harvesting, fruit quality, OHS aspects and employment (child labor).</li> <li>• <b>Nursery and Immature Area, Block H19 Planting year 2019</b>. Observation of activities related to technical aspects of spraying, OHS aspects, waste management and employment.</li> <li>• <b>POME Land Application, Block B02</b>. Observation of POME management as nutrient cycle strategy.</li> <li>• <b>EFB Application Block B02</b>. Observation of EFB management and biomass utility for fertilizer.</li> <li>• <b>Monitoring well Block B02</b>. Observation of water source management and ground water quality.</li> <li>• <b>Fire tower monitoring Block B04</b>. Observation of fire extinguishers and management fire monitoring.</li> <li>• <b>Fertilizer &amp; pesticide warehouse, fuel tank, civil storage block A10</b>. Observations relating to the implementation of storage hazardous material, Health safety and labor management.</li> <li>• <b>Hazardous waste temporary warehouse</b>. Field observations related to the fulfillment of the attributes health and safety, recording, and the implementation of compliance requirements hazardous waste temporary warehouse.</li> <li>• <b>Housing complex block 07</b>. Observation related facilities for workers, sanitation, water, electricity, and domestic waste management.</li> <li>• <b>Clinic, block A10. Observation</b> related to medical facility.</li> <li>• <b>Workshop, block A10</b>. Observations related to the management and implementation of health safety, and social worker.</li> <li>• <b>Fire Fighting Equipment Storage block A10</b>. Observations the function of fire extinguishers and team readiness.</li> <li>• <b>Used sack shower facility block A10</b>. Observation about management Used sack storage.</li> <li>• <b>Pesticide applicator PPE rinse room, mixing pesticide area &amp; Pesticide applicator PPE storage block A10</b>. Observation related to management of agrochemical material and waste, MSDS, emergency response facilities and the types of fertilizer used.</li> <li>• <b>Housing complex block G07</b>. Observation related facilities for workers, sanitation, water, electricity, and domestic waste management.</li> <li>• <b>Daycare block G01</b>. Observations related to facilities provided and the feasibility of existing facilities.</li> <li>• <b>Domestic effluent drainage Block G01</b>. Observation of management domestic effluent.</li> <li>• <b>Landfill block G54</b>. Observation related to waste management.</li> <li>• <b>Water source block G01</b>. Observation related water source for worker compsumtion</li> <li>• <b>Sports facilities block G01</b>. Observation related badminton court, volley court and football court</li> <li>• <b>Worship facilities block G01</b>. Observation related a place of worship in the form of a prayer room.</li> <li>• <b>Pesticide applicator PPE rinse room, mixing pesticide area &amp; Pesticide applicator PPE storage block G01</b>. Observation related to management of agrochemical material and waste, MSDS, emergency response facilities and the types of fertilizer used.</li> </ul>
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<b>2.3</b>	<b>Stakeholder Consultation and Stakeholders Contacted</b>
<b>2.3.1</b>	<b>Summary of stakeholder consultation process.</b>
<b>RC Remote Audit</b>	will be completed during the onsite audit
<b>RC Onsite Audit</b>	<p>Summary of stakeholder consultation process</p> <p>Consultation of stakeholders for Brahma Binabakti Mill - PT Brahma Binabakti was held by:</p> <ul style="list-style-type: none"> <li>• Public Notification on website on RSPO website with notification date 30 June – 30 July 2021</li> <li>• Public Notification on website on MUTU website with notification date 30 June 2021</li> <li>• Public consultation with NGOs (by email) such as WALHI, WWF, AMAN and Sawit Watch 30 July 2021</li> <li>• Public consultation meeting with government institution 03 August 2021</li> <li>• Public consultation meeting with communities as well as previous land owner on 03 August 2021</li> <li>• Public consultation meeting with internal stakeholders and contractor 03 August 2021</li> </ul> <p>Numbers of input from stakeholders were clarified by PT Brahma Binabakti</p>
<b>2.3.2</b>	<b>Stakeholder contacted</b>
	<b>Appendix 1</b>
<b>2.4</b>	<b>Determining Next Assessment</b>
	The next visit (ASA 1.1) will be determined eight (8) months to twelve (12) months after certificate issued

### 3.0 ASSESSMENT FINDINGS

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

MUTUAGUNG LESTARI has conducted an assessment of Brahma Binabakti POM – PT Brahma Binabakti, subsidiary of Triputra Agro Persada operation consisting of one (1) mill and one (1) oil palm estates.

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

MUTUAGUNG LESTARI found that Brahma Binabakti POM – PT Brahma Binabakti, subsidiary of Triputra Agro Persada complied with the requirements of **Principles and Criteria for Sustainable Palm Oil Production 2018, The Indonesia National Interpretation, endorsed by the RSPO Board of Governors on 20 April 2020 and RSPO Certification Systems for Principles & Criteria and RSPO Independent Smallholder Standard, Endorsed by the RSPO Board of Governors on 12 November 2020**

Therefore, MUTUAGUNG LESTARI Recommends RSPO Certification of compliance is issued

Ref Std.	VERIFICATION RESULT of MUTU-Certification	
<b>PRINCIPLE #1 BEHAVE ETHICALLY AND TRANSPARENTLY</b>		
<b>1.1</b> <b>The unit of Certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participations in decision making.</b>		
<b>1.1.1</b> The company has list of documents that can be accessed Publicly, such as: <ul style="list-style-type: none"> <li>• Land use rights document</li> <li>• OSH committee implementation report</li> <li>• Environment document (HCV and management and monitoring environment report)</li> <li>• Report of SIA and its management report</li> <li>• Complaint and grievance document</li> <li>• Continual improvement document</li> <li>• RSPO Audit Report</li> <li>• Human right</li> <li>• Etc.</li> </ul> <p>The document also set stakeholder who can access the document. These documents are available in estate and mill Office. The company also has monitoring and management report, such as OHS implementation report, report of environmental management and monitoring plan, land use report, and plantation activities report. These documents also can be accessed by Public through the mechanism which has determined by the company.</p>		
<b>1.1.2</b> Based on the results of document review and interviews with agencies, such as the Muaro Jambi Regency Plantation Service, the Environment Service, Land Office and Manpower Office, it is known that the information presented by the certification unit has been presented in an appropriate language and can be accessed by the agency. <p>The unit of certification has provided evidence that the information has been received in an appropriate form and language for the relevant stakeholders, such as reports on Proof of handover of Mandatory Labor Report, No. Reporting: 36381.202010160001, reporting date 16 October 2020, reporting obligation 16 October 2021.</p>		

**1.1.3**

The company shows other requests for information, including based on the log book of incoming and outgoing letters, it is known that there are several requests for information and evidence of responses, for example shown by the following documentation:

- Letter Number B/1050/UN21.6/PK.06/2019 dated July 25, 2019 from Jambi University regarding Application for Field Work for 6 students majoring in Agribusiness for the period 20 August to 20 October 2020. The letter has been responded to on 05 August 2019 by the Senior Estate Manager in accordance with the reply letter No.114/BBB/SPM-CLE-SK/IX/19 with the decision to be invited to carry out these activities.
- Letter Number 343/UBR-05/G/IV/2019 dated April 09, 2019 regarding Data requests for completion of student thesis. The letter was received by the company on April 22, 2019 and has been responded to in accordance with Letter No: B.093/BBBS /PGA/IV/2019 April 22, 2019 with the answer in the form of the requested data.

**1.1.4**

The company has a consultation and communication procedure in the External Relations implementation guidance document, document number 002 / TAP / PRO-CSP-HO / XII / 10. In addition, the company also has an SOP for Receiving and Handling Information Requests, document number SOP/SUPPN/2017/004, dated 28 October 2019, revision 05, which has been approved by the Group CEO. The procedures include explaining the process flow for receiving and handling requests for information as follows:

- Types of Information that can be accessed
- A list of stakeholders is created and updated by the CSR assistant every 6 months
- Receipt of requests for information can be through the guest book or telephone
- Especially for requests for information that are not approved, the maximum response period is 5 days.

The company has shown documents related to communication and consultation socialization, which were shown by the company, the minutes of socialization of the submission of complaints by stakeholders on 16 May 2019 to 11 participants from the community and plasma administrators.

The person responsible for communication and consultation with stakeholders is the CSR and Plasma Area. Job descriptions are available for the CSR and Plasma Area sections, including building relationships with local leaders and communities.

**1.1.5**

The company shows PT BBB's Stakeholder List document for 2021, which explains the names of stakeholders by type, namely the community, government, trade unions, hospitals, NGOs, insurance, suppliers and others. In addition, there is also contact information for the person, address, contact number and others.

Based on this document, it is known that the stakeholders who have been collected data are as follows:

1. Community (participants of smallholders as well as previous land owner, village community and district community): 54 stakeholders
2. Government and agencies: 34 stakeholders
3. Trade unions: 6 stakeholders
4. Hospitals: 7 stakeholders
5. NGOs: 1 stakeholder
6. Insurance: 1 stakeholder
7. Suppliers: 41 stakeholders

<b>Status: Comply</b>
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**1.2**

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

**1.2.1**

There is a policy for acting ethically as stated in Standing Instruction No. 004/SI-DIR/II/2013 dated February 22, 2013 from the Managing Director of PT Triputra Agro Persada regarding the Integrity Pact. The policy explains that the integrity pact is a form of commitment in implementing Good Corporate Governance. In addition, there is also a 2006 Code of Conduct for Ethics, in which it has discussed reasonable business practices, prohibition of corruption, bribery, fraud in the use of funds and resources, etc.

The company showed the PT BBB Code of Conduct Socialization Activity Report and Statement of Integrity, dated June 7, 2021, to all employees and staff of PT BBB – Mill. Furthermore, based on interview with several contractors, it was known that company policy, included regulations has been officially delivered before signing the contract agreement.

### 1.2.2

There is a system in place to monitor compliance and the implementation of policies and ethical business practices as a whole, which is stated in the Integrity Pact Standing Instruction, which was stipulated on February 22, 2013. The systems established in the implementation of this policy include the following:

- Every form of Cooperation between the Company and business partners must be accompanied by the signing of an Integrity Pact.
- Corporate secretary is the party designated as the company's representative who is the party receiving reports on the actions of company employees who request/require compensation or gifts in any form as stated in the Integrity Pact.
- Control of the implementation of the signing of the Integrity Pact with business partners at the head office level is the responsibility of the Procurement Division
- Control of the implementation of the signing of the Integrity Pact with business partners in the palm oil mill is the responsibility of the Mill Controller
- Control of the implementation of the signing of the Integrity Pact with business partners in local plantations is the responsibility of the VP Finance of each site.

The company showed several examples of the implementation of this system, including the submission and signing of an integrity pact to CV Artha Mandiri on July 1, 2021.

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

Based on document verifications the unit of certification can present compliance with applicable local, national, and ratified international laws and regulations, for example:

##### Land Legality

The certification scope area has had HGU and IUP. Related the compliance regarding forest status for the estate based on land title extension in December 2020 their area covering 112.52 ha was excluded from the current land title due to the are was determined is forest production area, furthermore for Brahma Bina Bakti mill although has been obtained land title document in 2000 based Decree from Ministry of Forestry No 727/Menhut-II/2012 about the changed of forest area in Province of Jambi the Mill Area (HGB) covering 49.22 Ha included in the production Forest Area. Company managements described if the release of forest area not yet finished. PT BBB has been sent letter No 124011/BBB/SKR-R01-HO/IV/17 regarding request of respond about forest status release area in accordance with PP No 104 Year of 2015 o behalf of PT BBB to *Direktur Pengukuhan dan Penatagunaan Kawasan Hutan*

##### **Safety aspect**

- Occupational Safety and Health Committee (P2K3) has approved through Decree of *UPTD Balai Pengawasan Ketenagakerjaan Wilayah* /No. 151 Tahun 2021 dated 28 July 2021. The decree valid for three years. Secretary of committee was an OSH Expert with License No. 5/6585/AS.02.04/X/2020 dated 21 October 2020 and Appointment from Minister of Manpower No. 5/9711/AS.02.04/X/2020 dated 21 October 2020. This letter valid for 3 years.
- Unit of certification has provide proper PPE, ant it could be replaced when broken or unproper to be used.
- Unit of certification has provide first aid kit with licensed first aider.
- Monitoring of operator license, as well as machinary permit has properly carried out by the unit of certification.
- Reporting of quarter P2K3 report has consistantly delivered to the Manpower Agency.

##### **Manpower Aspect**

- Annual WLTk report and PKWT report has consistently conducted by the unit of certification.
- The salary, as well as overtime and premium calculation has in accordance with applicable regulation.
- All workers had covered with *BPJS Ketenagakerjaan* and BPJS Health.

**Environment**

- The company has an environmental document in the form of an Environmental Impact Analysis *Dokumen Evaluasi Lingkungan Hidup* (DELH) for PT. Brahma Binabakti compiled in 2010 which was approved by the Regent Muaro Jambi.
- The company shows the Recommendation Letter for Revision of the DELH RPL Matrix for Oil Palm Plantation and Palm Oil Mill Activities. 660.4/095/BLH.3/II/2016 dated 23 February 2016 from environmental agency Muaro Jambi Regency to increase the scope of environmental monitoring of land application activities and environmental hygiene sanitation.
- The company has an extension area permit to utilize POME from the palm oil industry to PT Brahma Binabakti on the ground in accordance with the Decree of *Badan Satu Pintu terpadu* (Investment Board of Jambi Province) No. 503/249/II/DPMPSTP/2019-year 2019 valid 5 years.
- The company already has a temporary storage area for hazardous and toxic waste in oil palm plantations and mills, according to the Decree of the Head of the One Stop Investment Service, Muaro Jambi Regency No. 800/362/II/DPMPSTP/2020 dated 31 March 2020, valid for 5 year, as for the licensed temporary storage of waste hazardous and toxic materials is located at Mill and Estate.
- The company has a surface water extraction permit based on of the Minister of Public Works and Housing Number 238 / KPTS/M/2016 valid until 6 Mei 2021. The company shows the permit extension process document in the form of a request for technical considerations on the use of surface water from the Sumatra VI River Region Hall on 27 July 2020.

**BMP**

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

**2.1.2**

Procedure of legal requirement which presented in internal memo document No. MI-005/MD/SUST/XII/2012, dated 11 December 2014 mentioned that sustainability division has responsibility to arranged and monitored legal related laws and/or regulation. The procedure mentioned that in order to monitor and update of laws and/or regulations, the sustainability and legal division required to actively check and make coordination with Government Agencies or Institutions

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

To ensure compliance with the certification unit and third-party laws in the certification unit, routine monitoring is carried out once a year by means of compliance audit / internal audit. The last internal audit for RSPO and SCCS was conducted on 24 – 26 February 2021. In addition to going through a compliance audit / internal audit, the company conducts monitoring and evaluation of third parties (contractors) through contractor evaluation activities which are conducted at least once a year. The types of evaluations carried out include contract compliance, contractor quality and performance, accuracy of work completion, compliance with labor regulations, OHS, housekeeping and the environment.

In addition, the certification unit has carried out an evaluation of each contractor after the completion of the agreement period (5 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. Meanwhile, for annual inspections, there are seven main criteria, namely work environment, PPE, emergency response, work equipment, safety signs, contractor competence, and work in hazardous areas.

### 2.1.3

Procedure of legal boundary poles monitoring and maintenance is presented in document of Standing Instruction Managing Director No. 027/MI-DIR/XII/2012 dated 13 December 2012. Estate management were able to shows location of boundary poles map as well as its coordinate points. Monitoring of legal boundary poles is shows through document of Boundaries Monitoring that carried out 3 times a year where the last monitoring performed in June 2021. Based on observation to in poles sample (Poles No 59, 61, 65, 89 and 90), it was known that BPN poles were satisfactory maintained and easy to identified. Furthermore, coordinate marked by Auditor through application GPS-Map were match with coordinate settled by BPN

Status: Comply

## 2.2

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

### 2.2.1

Unit of certification shows list of contractors for period 2020/2021, which inform number of agreement (SPK), name of contractor, contact person, address, type of works and location of works. The list informed that there are 24 contractors with various of works, such as heavy machineries rent, installation of fire monitoring tower, FFB transportation from external sources, planting, transplanting, infrastructure development, etc. According to the list, sighted several contracts, for example as follows:

- Contract No. 010/BBB/P-PRO-HO/XI/20 with CV Tamaro Rezeki for permanent house building in G6 Divisions E and A.
- Contract No. 012/BBB/P-PRO-HO/XI/20 with PT Sakha Pratama Jaya for installation of fire monitoring tower in Afdeling B.
- Contract No. 005/BBB/P-PRO-HO/III/21 with PT Tiga Mustika Agung for installation of harvesting bridge in Afdeling D, G and H.

### 2.2.2

According to work agreement review for works in 2020, such as:

- Contract No. 001/SPK/BBB-S/III/2020 with personal contractor ISM for planting poles placement.
- Contract No. 019/BBB/P-TRA-HO/II/20 with CV Subagio for CPO transportation.
- Contract No. 010/BBB/P-PRO-HO/XI/2020 dated 19 November 2020 with CV Tamaro Rezeki for house G6 building.

It was known that salary payment has comply with minimum wage of Jambi Province regulation in 2020, as verified through internal audit dated 07 April 2020.

Furthermore for 2021, contract agreement review has conducted to contract No. 001/SPK/BBB-S/III/2020 with FFB suppliers initial ISM, contract No. 011/BBB/P-PRO-HO/II/21 dated 17 February 2021 with PT Putra Mas Agro Sejahtera (PT PMAS) for Structure Thermal Deaerator Installation works, contract No. 012/BBB/P-PRO-HO/III/21 dated 19 March 2021 with CV Angkiet for replanting works, it was known that Article 2 Point 2i, Article 10 and Article 16 in contract has mentioned that the contract is required to comply with applicable Indonesian manpower laws and regulations, included safety and worker welfare aspect.

For implementation of regulation compliance, unit of certification has collecting contractors' data, such as company profile of contractors which inform legality and business permit, list of employees, BPJS payment evidence, BPJS card of contractor workers and salary payment slip. According to the review, it was known that manpower and safety regulation compliance has satisfactory carried out by contractors, such as salary has paid more than minimum wage in 2021, and the workers had registered in BPJS-*Ketenagakerjaan*.

### 2.2.3

According to review on work agreement with contractors for example No. 001/SPK/BBB-S/III/2020 with FFB suppliers initial ISM and No. 011/BBB/P-PRO-HO/II/21 dated 17 February 2021 with PT Putra Mas Agro Sejahtera (PT PMAS) for

Structure Thermal Deaerator Installation works, it was known that there are no specific clauses mentioning disallowing child, forced and trafficked labor. However, Article 2 Point 2i, Article 10 and Article 16 in contract has mentioned that the contract is required to comply with applicable Indonesian manpower laws and regulations.

Socialization on human trafficking as refers to Law (UU) No. 13 in 2003, UU No. 21 in 2007 and UU No. 19 in 1999 about ILO convention has conducted on 05 February 2020, attended by 105 participants. Furthermore, verification on the OFI from previous remote assessment has conducted through interview with two contractors (local contractor with initial ARD and representative of PT PMAS), which both has mentioned that company policy on prohibition towards child labour (minimum aged), forced labour and human trafficked labor, had socialized and delivered by the company representatives before signing work contract agreement. Furthermore, data of contractors' employees also available and indicated that there is no non-conformity towards manpower company policy and regulations. Both contractors also understood that minimum age of workers is 18 years old.

**Status: Comply**

### 2.3

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

#### 2.3.1

The unit of certification can present list of FFB supplier that accepted by mill, namely

- Abiiyu- Jainuri
- Surjana
- Basiran / Yayasan (Kongregasi Imam)
- PT Bina Usaha Sawit

Brahma Bina Bakti Mill can presented the data pertaining name of suppliers, address of supplier estate, and coordinates along with a map of the location of the plantation. For example for suppliers on behalf of PT Bina Usaha Sawit with Location of Plantation in Village of Bukit Baling, District of Sekernan, Muaro Jambi Regency including coordinates point. Furthermore, can present the land title documents for PT Bina Usaha Sawit including deed of incorporation of a PT Bina Usaha Sawit

#### 2.3.2

Not Applicable on this assessment. As mentioned in Annex 4: Implementation Procedure for Indicator 2.3.2 for existing RSPO certified mills, the time requirement to fulfil this Criterion for all their smallholder suppliers is three years from 15 November 2018 or will be applicable on 15 November 2021.

**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 shows the Projection document of PT Brahma Bina Bhakti, signed by VP Finance, which explains the work plan for 2019 – 2030. These documents include explaining Total Immature, Total Mature, Total Planted, Total FFB Produced, Total FFB Processed, Mill Capacity, Mill Production, Total CPO Production, OER, KER, Mill Cost per FFB Processed, FFB Purchase Metrics, CPO Price, Operational Metrics, Upkeep Cost, Fertilizer Cost, Harvesting Cost, Transportation Cost, Selling Price and others. For 2022, the targets for achieving OER and KER percentages are 19.8% and 5.4%, respectively.

The company has PT BBB's Replanting Plan document for the next 6 years (2020-2025 period), which among other things explains the annual plan that is described per each block. For example, the plan for replanting in 2022 is 516.96 ha in blocks A01, A02, A03, A04, A05, A06, B05, B05A, B06, B09, B10 and B12 which are plants with a planting year of 1995. Evaluation of the replanting plan is carried out at the end of the year. The company also shows documentation of the progress of the implementation of replanting activities for each month such as chipping and planting oil palm activities.

**3.1.2**

The company has PT BBB's Replanting Plan document for the next 6 years (2020-2025 period), which among other things explains the annual plan that is described per each block. For example, the plan for replanting in 2022 is 516.96 ha in blocks A01, A02, A03, A04, A05, A06, B05, B05A, B06, B09, B10 and B12 which are plants with a planting year of 1995. Evaluation of the replanting plan is carried out at the end of the year. The company also shows documentation of the progress of the implementation of replanting activities for each month such as chipping and planting oil palm activities.

**3.1.3**

The unit of certification conducts a management review in a planned time according to the scale and nature of the activities carried out, which are routinely carried out quarterly. For example, for Q1 2021, it is known that a management review was carried out in April 2021, which among others discussed the condition of the factory and the condition of the seedlings in the nursery.

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

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

**3.2.1**

Evidence of continuous improvement implementation is presented as follows:

- Internal audit which conducted on 18-23 February 2020 has identified 8 (eight) non-conformity notes that all has fully comply.
- Internal audit which conducted in 24 to 26 February 2021 has identified 5 (five) non-conformity notes that all has fully comply on 28 May 2021. The report signed by Auditor, Mill Manager and Estate Manager.
- Management review for quarter 4 2020 which conducted on 18 to 20 January 2021. There are 23 general notes and 7 notes for PT BBB. Among action that need to be carried out according to review are castration shall be conducted on-time, replanting in 2021 should be completed on October 2021, fertilizer for LCC and road compaction.
- Management review for quarter I 2021 which conducted on 20 to 23 April 2021 which consist of 36 topics of discussion. Among notes discussed are:
  - Palms ready for replanting in the nursery (>12 months) to immediately planted and mulched with EFB.
  - For slipped Dump Truck relocation on the field, avoid to use premium payment, but pay directly through 1 man-day payment.
  - To repaint the dull surface on the mill buildings.
- In term of BMP aspect, unit of certification has no more to use Paraquat, implementing biological method for pest population control, and to adopt the Electronic Bunch Count Chit (EBCC) application in android which aims to collect daily FFB data and Mobile Estate applications to conduct field checks and to ease daily FFB data verification.

**3.2.2**

Unit of certification shows RSPO metric template during the time of audit. As checked properly, it was known that all data provided were match with actual situation.

Base on document verification, for The RSPO metric template known annual data 12 month periode use (January to December 2020) for schedule reporting annual data social and environmental, included monitoring data of water consumption, management dan monitoring HCV.

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

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

**3.3.1**

PT Brahma Binabakti has documents of SOP Agronomic Technical Guidelines starting from land clearing up to harvesting, approved by Director on 2014. The SOP documents among others about planning of new area planting, replanting plans, nurseries, land clearing, planting, replanting, pest and disease control, weed control, fertilization, maintenance of immature plant, preparation ahead of harvest, harvesting, loading and transportation of FFB. The Oil Mill has SOP Factory Technical Guidelines covering all mill operations such as FFB Grading, Sterilization Station, Press Station, Threshing Station, Oil Room, Kernel Plant, Laboratory, CPO & PK Despatch, Engine Room, Boiler Room, Electrical, Workshop as well as Raw and Boiler Water Treatment Plant. The entire procedure both of plantation and mill has been included of safe working

instruction, other than those described in the HIRAC document. Based on the results of document review and interviews with management regarding the SOP, it is known that there are no changes/revisions from the previous assessment.

Based on the results of field observations and interviews with workers in Afdeling E, it is known that these SOPs have been implemented and understood by workers. For example, related to spraying work, employees can show how to work according to existing procedures. Based on the results of field observations at the factory, it is known that at each station there are SOPs that are installed and are easy to read.

### 3.3.2

The company has a mechanism to check the consistency of the implementation of procedures by conducting internal audits both operational and sustainability internal audits. Based on the results of interviews with management, it is known that operational internal audits are carried out once a year both estates and mills and are commonly called the Problem Identification Corrective Action (PICA). The company conducts regular internal audits in the application of SOPs for estates and mills and also checks harvests, pest detection, rat censuses, etc.

RSPO internal audit activities are carried out once a year, including the performance of the contractor. Mechanisms to ensure compliance with RSPO standards for contractor workers are overseen by operational sections such as the foreman, foreman I, assistants, security personnel, managers and so on. Then, the safety officer also oversees the implementation of OHS contractors such as the use of PPE and ownership of heavy equipment and other licenses by the contractor. Then the sustainability team also oversees the ongoing work agreement. For example, the addition of insurance provisions and OHS aspects. Procedures that apply to any discrepancies that arise, are required to take action on improving the action plan and act on prevention and send it to the internal audit department.

### 3.3.3

The company shows records of monitoring results carried out internally as well as records of corrective actions taken, for example the PICA Genba Inspection Report on 18 May 2020 which explains the findings from the results of the estate manager's visit and the PICA Genba Inspection Report on 5 February 2020 which explains the findings from the results of the mill manager's visit. It was also shown a record of the improvement in the form of action plan findings, responses and follow-up from the audited management unit along with the time and personal targets responsible for these findings. The findings have been responded and have been corrected.

Based on the results of interviews with management, field observations and interviews with contractors, it is known that the internal control carried out by the company on the contractor's performance on the implementation of SOPs is carried out by conducting field inspections directly. For example, for manual upkeep contractors, housing complexes and mill gardens, field inspections are carried out regarding the completeness of PPE, administrative completeness and so on. The same thing happened to specialist contractors of civil, structure and mechanical works.

Status: Comply

## 3.4

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

### 3.4.1

#### Environmental document.

The company has a EIA in accordance with the decree of Environmental Agency Regency of Muaro Jambi number 11 year 2010 for activities of palm oil plantation (Own Estate & Plasma) and mill covers ± 10,500 ha located in Sekernan District, Regency of Muaro Jambi and endorsement by Head of office Environmental Agency dated on December 27, 2010. Processing Capacity is 60 tonnes FFB/hour. There is a matrix revision recommendation of Environment Monitoring Plan (RKL) EIA for plantation and processing Mill of Palm oil with number decree 660.4/095/BLH.3/II/2016 dated February 23, 2016, by Environmental Agency. The evidence was consisting of the Attendant List of village members on public consultation as a phase of data gathering for the Environmental Impact Assessment document.

The company has a comprehensive Social and Environmental Impact Assessment (SEIA) covered HCV, HCS, and GHG aspects. The company Conducted management and monitoring of environmental impact every semester and review every semester in accordance with government regulation requirements.

Based on the results of the public consultation, there are several issues related to SIA for example, indirect impacts, dynamics of plasma area that have an impact on operational activities and corporate image.

Public consultation with Environmental agency of Muaro Jambi indicate that the company has made environmental management and there is no issue of pollution caused by the company's operational activities. The company are consistently done the environmental management and monitoring as outlined in the Report of the Environmental Management and Monitoring per sixth month regularly. These report described realization of monitoring and management of the environment in accordance with environmental parameters in the RKL/RPL.

**Social Impact Assessment document.**

Social impact assessment was conducted on 22<sup>nd</sup> February – 11<sup>th</sup> March 2013 by Lingkar Komunitas Sawit (LINKS) involving local communities. Social assessment has covered some aspects, such as village demographics, ethnics, religion, beliefs, economics, health services, education facilities, transportation and accessibility.

The assessment is conducted by direct interview with stakeholder, namely worker union, estate and mill worker, representative of Suko Awini Jaya, Bukit Baling, Suak Putat, and Tanjung Lanjut Village, and Akso Dano Cooperative and its member. Attached list of attendees of interview participants and minutes of meeting.

However Based on documents verifications, field observation and interview with management it was known there are new planting after 1 January 2010 covering 1,013.43 Ha with planting year 2019 where the area is conversion from rubber Plantation to palm oil Plantation and the area located in the scope of certifications. Those area has been included in the SIA, EIA and HCV assessment that has been carried by the company.

**3.4.2**

The Implementation of environmental monitoring and management plan are documented on periodical report of environmental monitoring and management implementation report (RKL-RPL) report for certification unit. The company are consistently done the environmental management and monitoring as outlined in the Report of the Environmental Management and Monitoring per semester regularly. The significant impacts that are managed and monitored based on AMDAL Documents.

Meanwhile, the plan of social monitoring and management included The Social impact assessment conducted in 2020. The results of these studies have included all the potential impact factors such as

The management and monitoring plan identified among other:

- Increasing community economy
- Improvement of transportation / communication facilities and social facilities of village communities
- Electricity token fee subsidy
- Production service.
- Realization of the CSR 2020.
- Public Healthy monitoring 2020.
- Independence Day commemoration, religious ceremony.
- Nearest community income assessment.

As a form of social management, the company has developed/compiled by involving independent parties in conducting social impact assessments related to the company's operational activities. The first social impact assessment was carried out in 2013 by *Lingkar Komunitas Sawit* (LINKS) as a follow-up to the results of the assessment, there are several recommendations for the company, including:

- Create a Social Management Strategic Plan.
- The Social Management Activity Plan as an elaboration of the RENSTRA document consists of: Social impacts and priority issues, management activity plans, timelines, and resource allocation (human, time and budget).
- Dynamic social change, so it is necessary to strengthen the social documentation system.

As one of the efforts to improve and focus attention to the latest situation in 2019, the company collaborated with Aksenta to carry out the Social Impact Review and Update which was carried out in 2013 where this was due to the dynamic social situation and the seriousness of the company to build and maintain the company's sustainability, especially in social aspects, then this study was carried out again. In the recommendation section, it is explained that a social impact study is carried out so that the management of social impacts can mitigate, minimize or eliminate negative impacts (mitigating adverse effects) and increase positive impacts (advancing benefits) in order to achieve the company's social goals. The proposed recommendations refer to the principle of balance between the management of the social, environmental and economic aspects of the company.

In a follow-up effort to the 2019 SIA recommendation, the company has developed a social management and monitoring plan that is set out in the Action Plan document on the findings of PT Brahma Binabakti's social impact assessment, however, in the process of compiling the document, it was discovered that:

- External stakeholders involved in the preparation of the management plan and social monitoring are still limited to the *Village Heads around the company Awin Jaya Village, Bukit Beling Village Head, Tanjung Lanjut Village Head, Suak Putat Village Head*) and *KUD Akso Dano*, not representative attention to the parties involved broadly affected, for example, women, migrants, local residents, youth leaders, contractors, and other affected parties
- Internal stakeholders have not been directly involved in the management plan and social monitoring.

So that with the limited number of parties involved in the preparation of the management plan and social monitoring, there are several issues that have not been identified that have been monitored and managed in a comprehensive and integrated manner, for example:

- Particular attention is paid to the indirect impacts caused by the company, for example, the dynamics of plasma areas that have an impact on operational activities and company image
- Decreased income of plasma farmers when replanting.
- Attention related to employment issues, for example with the potential loss of income for harvest employees when replanting and Pandemic of the Covid-19
- Potential social issues caused by disturbance of animal livestock in the company's operational area.

a social impact management and monitoring plan has been developed with the participation of widely affected stakeholders so that there are several unidentified issues that have been monitored and managed in a comprehensive and integrated manner. **Based on that's explanation raised Non Conformity No 2021.01 With Minor Category**

### 3.4.3

Based on verification, RKL-RPL report semester 2 year 2019 dan semester 1 year 2021 has already contained adequate environmental management and monitoring component such as: ambient air quality, water quality, aquatic biota, employment opportunities. The last evaluation for environmental monitoring/management plans have been developed on January 2021 and as the feedback of review, the company has included land fire monitoring, land applications, and replanting impact on semester 1 the year 2021 monitoring report. The important impacts that are managed and monitored are for example:

- IPM
- Soil and water conservation.
- Zero burning
- Soil suitable assessment

The company is consistently done the environmental management and monitoring as outlined in the Report of the Environmental Management and Monitoring per the sixth month regularly. This report described the realization of monitoring and management of the environment in accordance with environmental parameters in the RKL/RPL base on document verification semester 2 year 2019 dan semester 1 year 2021 no negative effect arising from the monitoring result. Public consultation with the Environmental agency of Muaro Jambi indicates that the company has made environmental management and there is no issue of pollution caused by the company's operational activities.

The impact identified in SIA has been managed and monitored through SIA Management and Monitoring Plan. The plan describes monitoring indicator, monitoring method, PIC and frequency. Compiled based on the results of reviews of

management plan on January 2020, which conducted in a participatory manner. The SIA Management and Monitoring implementation on 2020 has been evaluated and updated, document namely "*Problem Identification corrective action*" on 26 to 27 April 2020, involved nearest community included the Village Heads around the company (Awin Jaya Village, Bukit Beling Village Head, Tanjung Lanjut Village Head, Suak Putat Village Head) and KUD Akso Dano.

Based on an interview via telephone with the Village Head of the village Tanjung Lanjut, Bukit Baling Village, Suak Putat Village known that SIA, management and monitoring plan has been conducted in an involved manner with affected Village with a Forum Group Discussion (FGD).

<b>3.4.2</b>	<b>Status: Non Conformity No 2021.01 with minor category</b>	<b>Open</b>
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### 3.5

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

##### 3.5.1

Mechanism of recruitment, selection, hiring promotion, retirement and termination are presented in several documents, as follows:

- Standard Operational Procedure for Human Resources Triputra Agro Persada Group, which covers recruitment, facility and benefit, status of employee, requirement of recruitment, selection, employees request, work performance assessment and career path.
- Internal Memorandum No. MI/HC/VII/2019/071 dated 31 July 2019 about Employee's Performance Assessment, for every semester evaluation that used as consideration in giving bonus or reward.
- Collective work agreement (PKB) period 2021 to 2023 as registered through Decree of Manpower Agency Head of Muaro Jambi Regency No. 560.6/.../II/2/Nakertrans dated 25 January 2021 about registration of collective work agreement or "*Perjanjian Kerja Bersama* (PKB)" of PT Brahma Binabakti, for estate and mill. The PKB has registration No. 06/PKB/1/02/2021. The PKB is valid up to 13 January 2023. This document is the most comprehensive and detail in technical matters. Based on interview with Labor union representative from estate and mill, it was known that the PKB was agreed by employer and employee, and had registered to Manpower Agency of Muaro Jambi Regency. All manpower matters on the PKB has follows applicable regulation in Indonesia. For example, The CH has system for retirement and termination, which both has presented in the PKB (collective work agreement Period 2021-2023, in Article 23 about retirement and Article 41 to 43 about termination. Implementation of those system were available and in accordance with applicable regulation in Indonesia.

Worker status in the unit of certification are permanent workers (PKWTT) and temporary workers (PKWT)

##### 3.5.2

Records on manpower procedure has satisfactory documented, as verified randomly to several documents, as follows:

- Form of Job Applicant for security dated 20 January 2021 from applicant with initial AAP. Attached Potential test (passed); Work Agreement for 3 months' probation (17 February 2021 to 16 May 2021) No. 04/BBB-Mill/PGA/PKKP/II/2021 dated 17 February 2021; Evaluation Form with score 75 (passed); Letter of Mill Manager No. 01/BBB-MILL/PGA/PHEMPI/IV/2020 dated 15 May 2021 about Evaluation Result of AAP which stated passed as employee of PT BBB; Personnel Change Notice dated 15 May 2021; and Decree of Assistant Mill Manager No. 04/SK/TAP Group/HRD/V/2021 dated 15 May 2021 about recruitment as permanent worker in PT BBB – Mill.
- Form of Job Applicant for clerk position dated 22 July 2021 from high school fresh graduate. The applicant born in 18 February 2003. Together with the form, attached application letter, ID card, Covid vaccine card, family card, certificates of competency, police record and self-picture.
- Form of Promotion Non-Staff dated 16 June 2021 for worker with NIK. 21/2141/1299/33 from Foreman of Process to be promoted as Shift Engineer. The form signed by Mill Assistant, Mill Production Controller and Deputy Director of Mill.
- Personnel Change Notice dated 30 July 2019 for employee named ASL from Harvester in Afdeling E to become FFB Clerk in Afdeling F. together with the document, attached "*Formulir Evaluasi Kinerja Karyawan*" or Employee Evaluation Form of the respective worker, signed by Assistant Afdeling, Senior Estate Manager and Regional HR; and Decree of Senior Estate Manager No. A.0644/BBB-S/PGA/SK/VII/2019 dated 30 July 2019 about promotion.
- Warning Letter Level 1 (SP1) for Harvesting Foreman with initial BFG dated 17 January 2020, signed by the respective employee, Assistant Afdeling and Estate Manager. Monitoring of behavior and improvement is conducted up to 16 July 2020.

	<b>Status: Comply</b>	
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**3.6**
**An Occupational Health and Safety (H&S) plan is documented, effectively communicated and implemented.**
**3.6.1**

Hazard Identification Risk Assessment and Control (or HIRAC) is presented in document Form No. TAP/FO/120-SHE/0001-12 dated 12 June 2021 about "*Form Identifikasi Bahaya, Analisa Dampak Lingkungan dan Penilaian Resiko K3L*", signed by PIC SHE, Assistant and Manager. The document has covers, type of activity/product/services, hazard or environmental aspect, potential incident or environmental impact, normal operation, existing controls, current risk (consequence, probability, risk), acceptance analysis, additional controls, residual risk and remarks. Unit management mentioned that the HIRAC has evaluate annually or immediately when there is accident happened.

Based on interview with labour committee representative, Manpower Agency of Muaro Jambi and OSH Committee of PT BBB, it was known that in general unit of certification has consistent in implementing safe working practices, such as providing a proper PPE, PPE replacement, to conduct periodic medical check up and special check up, covers by Insurance BPJS, placement of OSH symbol or signboard on the field, license monitoring and socialization.

Unit of certification has identified sources of hazard and its potential risk for operational activities on the estate and mill. In general, each activities has been identified, analyzed and assessed for preventive action need to be taken. However, based on field observation, identified some isolated cases which have potential on OSH risk, for example:

- Mechanism of potential risk on dehydration and heat stroke is not available on nursery, replanting and immature plant areas.
- Potential of exposure to Covid-19 on the several activities such as muster morning, attendance, FFB truck queues, etc.
- First aid kit in Hazardous Waste Store, Agrochemicals Store, and any room which potentially contaminate the kit.

Thus, it is an opportunity for the unit of certification for making further risk analysis evaluation and its implementation on the unit works. **OFI**

**3.6.2**

Effectivity of OSH plan has shown through several documents, for example as follows:

- OSH program 2021 is presented in document No. TAP/FO/120-SHE/0001-18, issued by PIC of SHE and Estate/Mill Manager. The program consists of regulation compliance, monitoring of device and operator license, monitoring of program implementation and reporting, training and socialization and internal audit. Detail of program is presented in document of One Year Policy period 2021 which presented in document No. TAP/FO/120-SHE/0001-17, issued by PIC of SHE and Estate/Mill Manager.
- Unit of certification shows Form of PPE Delivery for Mill in July 2021. Based on interview with Labour Union representatives from estate and mill, OSH Committee, as well as some estate workers and mill operators, it could be concluded that the unit of certification has provide proper PPE, in accordance with its risk analysis. All broken and/or improper PPE could be replaced immediately. Satisfactory PPE usage also verified and sighted during field observation on 03 to 04 August 2021.
- Meeting of P2K3 or OSH Committee has conducted every month, for example as shows through minutes of meeting dated 17 June 2021 which attended by 10 participants. Among the subject are socialization of safety in muster morning, socialization on safety working hours.
- Report P2K3 No. 127225/BBB/SKR-Mill/SM/VII/2021 dated 27 July 2021 for period quarter II 2021 (or April to June 2021).
- Socialization of OSH to contractors dated 21 January 2021 and 06 March 2021. Subject of socialization included to be aware on potential risk, usage of proper PPE, sharing of experience and BPJS Ketenagakerjaan. Furthermore, there are safety inspection to contractors that carried out in 31 March 2021 and 12 April 2021.

<b>Status: Comply</b>
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**3.7**
**All staff, workers, Scheme Smallholders, outgrowers, and contract workers are appropriately trained.**
**3.7.1**

Unit of certification shows training program for period 2020/2021, which issued by Sustainability, Admin (KTU) and Regional Mill Controller. Program of training consist of training on technical matters (replanting, manuring, pest

management, pesticide application, supply chain, FFB grading, land application, etc.); safety matters (OSH socialization, first aid, emergency situation, accident reporting); general (administration, finance reporting, etc)

There were 18 training programs in 2021, with realization has shown on training of safety record in FFB grading on 03 June 2021, on loading ramp area on 13 March 2021, in sterilizer station on 12 April 2021, in capstan and hoisting crane area on 21 May 2021, in press station on 14 July 2021, etc. Furthermore, training for contractor workers were usually related to safe working practices in the work place, instead of technical matters. Implementation on these training had verified through verification on training record to the contractors which has carried out in 01 April 2021. Furthermore, based on interview with two contractors, it was known that subject of training for contractors consists of usage of PPE, monitoring of PPE, first aid, etc.

Based on observation to the estate and mill, it was known that technical matters were in accordance with procedures. This is indicate training has conducted properly.

### 3.7.2

Unit of certification has identified the needs of training for each position and/or individual, for example as follows:

- Independent smallholder: making Delivery Order, FFB quality, and other technical matter such as upkeep on mature area and pruning.
- Clerk: procedure of recruitment, mutation, promotion and demotion, tap motion checking, production report for FFB from smallholders, line of internet, census report, verification and upload LHM, sharing data, process of FFB smallholders' payment, field inspection report, closing payroll, safety device and smallholders monthly report.
- Field Assistant: class block, budgeting, first aid, OSH basic, mechanical manuring, cost monitoring, partnership, land compensation, effect of herbicides, work disease, 5K, manual manuring, estate cost, law and regulation, infectious disease, poisoning, etc.

Unit of certification is able to shows report of training realization, as well as kept training record for each worker. Training realization is presented as follows:

- Socialization of work safety in spraying activities had conducted on 05 February 2020 and 09 April 2020, attended by 5 workers in Afdeling E.
- Introduction on dangerous weeds and its management had conducted on 08 April 2020, attended by 6 workers.
- Training to smallholder plasma oil palm plantations had conducted on 06 April 2020.
- On the mill, training of FFB grading had conducted on 03 June 2021, in loading ramp area on 13 March 2021, in sterilizer station on 12 April 2021, in capstan and hoisting crane area on 21 May 2021 and in press station on 14 July 2021, e
- The safe working practices training also delivered to contractor workers on 01 April 2021.
- Record training worker with initial THA informed that since 2015, ha has attend 32 trainings provided by the unit of certification. Last training attended was first aid training which conducted on 26 May 2021.

### 3.7.3

Company provided an understanding of SCCS to weighbridge operators, sorting, sustainability, security, and logistics on 31 May 2021. The materials discussed included the definition of RSPO SCCS, new standards for RSPO SCCS, principles for compliance with RSPO SCCS.

Based on interviews with weighbridge operators and security, it is known that they understand the supply chain process starting the acceptance of FFB, separation between certified and non-certified FFB and the procedure relating SCCS. Furthermore based on interviewed with administrative staff, the personnel's can described regarding separation between certified and non-certified CPO and PK; mass balance records as well as the procedure relating SCCS

<b>Status: Comply</b>
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## 3.8

### Supply Chain Requirements for Mills

#### 3.8.1; 3.8.2

SCSS module used in Brahma Binabakti Mill is Mass Balance (MB), because the mill receives FFB certified by RSPO and non-certified RSPO. Source or supplier of FFB received by the mill can be classified into three categories: own

estates, smallholder and independent suppliers / third parties. The Mill has been recorded well the separation of FFB and products (CPO and PK) from certified and uncertified sources. The Mill only claims certified products from certified sources.

### 3.8.3

Estimated certified product recorded in the last Assessment Report and Certificate, and updated in the RSPO Palm Trace. Actual certified produced has been verified during this assessment, and not exceed the estimate. The estimates of certified production for the next license period also have been set, in reasonable amount 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 Production (MT)	Estimate Production next 12 months (MT)
FFB	180,956	146,947.92	75,000
CSPO	35,798	30,332.53	15,750
CSPK	9,309	7,659.64	4,125

Since the last period of assessment, BBB Mill applied scenario 4 in accordance with RSPO Contingency Audit Procedures and there is no new license, since issued after ASA 4 assessment. Normally recertification of this audit shall be conducted in early in 2020 however due to Covid 19 pandemic the recertification assessment postponed and conducted in 2021. with there is no new license since the expired period, palm trace id of BBB extended every three months since the license expired (25 2020) and the volume of certified products will be added according to the request of the certification unit. throughout 2020 and 2021 there are several additional RSPO Product as follows:

Dated	Additional Volume (MT)			
	FFB Estate	FFB scheme or associated	CSPO	CSPK
30 March 2021	7,980		1,270	375
13 August 2021	82,976		15,828	4,134

### 3.8.4

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

Member Information	
Member Name	PT Brahma Binabakti
Member ID	RSPO_PO1000001619
Member Country	INDONESIA
Member Category	Oil Mill
Core Product	Palm Oil

License Information	
License ID	CB87747
Issued By	PT Mutuagung Lestari
Issued On	07/10/19
Start Date	07/10/19
End Date	08/25/2021
License Status	Active

All transaction has been announced to RSPO IT Platform and confirmed shipped. The Mill has conducted SCCS mechanism such as announcement in Palm Trace of RSPO CSPO and CSPK sold as certified and confirming the shipping announcement, as well as remove of certified stock for products sold as other scheme or as non-certified/conventional as described in indicator 3.8.8 and 3.8.16

### 3.8.5

Brahma Binabakti Mill has the documents of supply chain procedures for Mass Balance models (TAP/SOP/120-DCC/002 dated 27 May 2020). The procedures established and covering all elements of the supply chain model requirements, records and reports of compliance with supply chain requirements including responsibilities of each key personnel

involved, definition, the FFB reception process, weighing, checking quality, processing, monitoring refined products, mass balance calculations, delivery of the product. The procedure is according to RSPO SCCS 21 February 2020, Indonesia National Interpretation Principle and criteria 2020

### 3.8.6

The Procedure to conduct annual internal audit are describe in of supply chain procedures for Mass Balance models (TAP/SOP/120-DCC/002 dated 27 May 2020) in clausal VI.21, that mentioned that internal audit is done annually.

The last internal audit is done in 24 – 26 February 2021 that carried out by sustainability team. Based on result of internal audit there are two non-conformity regarding SCCS about training documents and selling documents not available in site/ This finding has been followed up and corrected by mill.

### 3.8.7

- i. **The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.**

The mill has a record amount of FFB tonnage as follows:

#### Period August 2019 – July 2020

Month	FFB (MT)		
	RSPO Certified	Non-Certified	Total
Aug-19	6,784.37	23,809.21	30,593.58
Sep-19	7,216.93	25,675.17	32,892.10
Oct-19	7,395.23	24,390.01	31,785.24
Nov-19	6,747.34	22,070.49	28,817.83
Dec-19	6,460.19	20,018.77	26,478.96
Jan-20	5,782.68	21,884.24	27,666.92
Feb-20	4,954.79	17,559.17	22,513.96
Mar-20	4,262.86	15,511.28	19,774.14
Apr-20	5,027.28	18,373.83	23,401.11
May-20	5,031.16	15,843.93	20,875.09
Jun-20	5,335.93	15,231.62	20,567.55
Jul-20	4,685.63	13,511.46	18,197.10
<b>Total</b>	<b>69,684.39</b>	<b>233,879.18</b>	<b>303,563.58</b>

#### Period August 2020 – July 2021

Month	FFB (MT)		
	RSPO Certified	Non-Certified	Total
Aug-20	6,179.21	19,870.42	26,049.63
Sep-20	7,407.29	25,285.15	32,692.45
Oct-20	7,164.25	25,340.46	32,504.70
Nov-20	6,884.38	26,065.47	32,949.86
Dec-20	6,088.54	24,587.60	30,676.15
Jan-21	5,659.16	22,244.22	27,903.38
Feb-21	5,541.68	15,980.36	21,522.04
Mar-21	6,464.23	18,922.56	25,386.79
Apr-21	6,517.21	19,459.84	25,977.05
May-21	6,104.65	22,015.99	28,120.65
Jun-21	6,431.52	22,817.74	29,249.26
Jul-21	6,821.41	19,468.69	26,290.10
<b>Total</b>	<b>77,263.53</b>	<b>262,058.50</b>	<b>339,322.06</b>

- ii. **The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage.**

Since the last period of assessment, BBB Mill applied scenario 4 in accordance with RSPO Contingency Audit Procedures and there is no new license, since issued after ASA 4 assessment. Normally recertification of this audit shall be conducted in early in 2020 however due to Covid 19 pandemic the recertification assessment postponed and conducted in 2021.

with there is no new license since the expired period, palm trace id of BBB extended every three months since the license expired (25 August 2020) and the volume of certified products will be added according to the request of the certification unit. throughout 2020 and 2021 there are several additional RSPO Product as follows:

Dated	Additional Volume (MT)			
	FFB Estate	FFB scheme or associated	CSPO	CSPK
30 March 2021	7,980	-	1,270	375
13 August 2021	82,976	-	15,828	4134

**iii. The mill shall have a mechanism in place for handling non-conforming oil palm products and/or documents**

In the RSPO SCCS SOP Clausal VI.17 mentioned Buyers can make a claim, if the quality & quantity of the products shipped is not appropriate. in accordance with the applicable procedures in the company.

**3.8.8**

Documentation for the Sustainable Crude Palm Oil (Sustainable CPO), consist of: daily record of the FFB acceptance, daily record of CPO production, which classified as the CSPO, CPO (RSPO) sale record, stock record that has been reconciled with the FFB acceptance, monthly production and sale and annual recapitulation.

Documentation for the Sustainable Palm Kernel (Sustainable PK), consist of: FFB dispatch record, which further will be counted the daily production of the Sustainable PK, daily production record of the PK, which classified as the Sustainable PK, monthly recapitulation of the Sustainable PK's sale, stock record, which has been reconciliation with the FFB acceptance record, monthly sale production and annual recapitulation.

Documents verifications and interview with management units obtained information if in last 24 months before audit (August 2019 – July 2021) the CSPO and CSPK product that sold as follows:

**CSPO**

Transaction ID	Date	Buyer Reference	Product	Volume (MT)	License ID
TR-bfc65736-c754	26/03/20	8101132288	CSPO	1,000	CB87747 (Active)

**CSPK**

Transaction ID	Date	Buyer Reference	Product	Volume (MT)	License ID
TR-71ab3cfa-9080	26/03/20	7781014795	CSPK	476.58	CB87747 (Active)

Documents verification and interview during remote audit it was known if claim related CSPK products is no longer than 3 months since the product delivered. The unit of certification can present the supporting documents were contract agreement, delivery order, delivery ticket, report of loading, weighing minutes, weighing card, and delivery note. Those documents cover information's of delivery date, description of product and supply chain model, product quantity, identification number, certificate number, sender's name and address of the seller. 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 No R-bfc65736-c754 with volume of CSPO 1000 MT, module of SCCS MB, buyer reference number 8101132288 dated 27 March 2020, the mill can present Delivery Order No 201101530, with shipping period 16 - 23 January 2021 to PT. Wilmar Nabati Indonesia and with RSPO certificate number is MUTU-RSPO/114

**3.8.9**

The company has legal ownership of CPO and PK products which in the transport of CPO and PK are given to third parties. The certification bodies have access to the outsourcing contractor stated in notifications letter by the company that have been agreed by the contractors for example notification letter dated 20 March 2020 with CV Mitra Insan Persada regarding to compliance of RSPO SCCS and that certification bodies have access to the outsourcing contractor or operation if an audit is deemed necessary.

**3.8.10**

Transportation of CPO and PK has been carried out by third parties and the company has detailed records of the contractors used, as follows:

- CPO Transportation agreement with PT. Mitra Insan Persada, address Banyuasin
- CPO Transportation agreement with PT. Putra Hang Tuah, address Jambi
- CPO Transportation agreement with CV. Perintis Lintas Talang Duku, address Jambi
- CPO Transportation agreement with PT. Mentari Laju Jaya Usaha, address Jakarta
- PK Transportation agreement with PT. Farhan Adjie Pratama, address Padang

**3.8.11**

Based on review list of transporters verified on ASA 4 with this recertification, there is no new contractor added. There are 5 outsourcers which physical handling of RSPO certified oil palm products. It will be verified on next surveillance, if any new contractor

**3.8.12**

Brahma Binabakti Mill has been maintaining accurate, complete and up-to-date for the FFB receives, process and CPO & PK production from its supply bases.

The record keeping saves in "Mass Balance Report". Within this record, the certificate holders maintain the FFB's sources based on monthly bases, as Follows:

**1. FFB Acceptance**
**Period August 2019 – July 2020**

Month	FFB (MT)		
	RSPO Certified	Non-Certified	Total
Aug-19	6,784.37	23,809.21	30,593.58
Sep-19	7,216.93	25,675.17	32,892.10
Oct-19	7,395.23	24,390.01	31,785.24
Nov-19	6,747.34	22,070.49	28,817.83
Dec-19	6,460.19	20,018.77	26,478.96
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Jun-20	5,335.93	15,231.62	20,567.55
Jul-20	4,685.63	13,511.46	18,197.10
<b>Total</b>	<b>69,684.39</b>	<b>233,879.18</b>	<b>303,563.58</b>

**Period August 2020 – July 2021**

Month	FFB (MT)		
	RSPO Certified	Non-Certified	Total
Aug-20	6,179.21	19,870.42	26,049.63
Sep-20	7,407.29	25,285.15	32,692.45
Oct-20	7,164.25	25,340.46	32,504.70
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Dec-20	6,088.54	24,587.60	30,676.15
Jan-21	5,659.16	22,244.22	27,903.38
Feb-21	5,541.68	15,980.36	21,522.04
Mar-21	6,464.23	18,922.56	25,386.79
Apr-21	6,517.21	19,459.84	25,977.05
May-21	6,104.65	22,015.99	28,120.65
Jun-21	6,431.52	22,817.74	29,249.26
Jul-21	6,821.41	19,468.69	26,290.10
<b>Total</b>	<b>77,263.53</b>	<b>262,058.50</b>	<b>339,322.06</b>

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

**CPO production and Dispatch for POM**
**Period August 2019 – July 2020**

Period	CPO production (MT)		Total	Cert CPO Dispatch (MT)		
	Cert	Non-Cert		RSPO	Other scheme	Non Cert
<b>Opening Stock</b>	<b>1310.57</b>		<b>1310.57</b>			
Aug-19	1,456.40	5,111.13	6,567.53			1,181.13
<b>Sub Total</b>	<b>2,766.97</b>		<b>7,878.10</b>			
<b>Stock</b>	<b>1,585.84</b>		<b>1,585.84</b>			
Sep-19	1,466.37	5,216.81	6,683.18			1,302.46
Oct-19	1,527.76	5,038.66	6,566.42			1,130.77
Nov-19	1,403.38	4,590.46	5,993.84			1,566.48
<b>Sub Total</b>	<b>5,983.35</b>	<b>14,845.93</b>	<b>20,829.28</b>			<b>3,999.72</b>
<b>Stock</b>	<b>1,983.63</b>		<b>1,983.63</b>			
Dec-19	1,362.18	4,221.10	5,583.28			2,244.32
Jan-20	1,200.94	4,544.90	5,745.85	1,000.00		285.14
Feb-20	1,040.87	3,688.74	4,729.61			1,009.15
<b>Sub Total</b>	<b>5,587.62</b>		<b>18,042.37</b>	<b>1,000.00</b>		<b>3,538.61</b>
<b>Stock</b>	<b>1,049.01</b>		<b>1,049.01</b>			
Mar-20	838.28	3,307.17	4,145.45			1,203.74
Apr-20	986.35	3,796.54	4,782.89			850.8
May-20	1,019.81	3,237.63	4,257.45			1,155.05
<b>Sub Total</b>	<b>3,893.45</b>	<b>10,341.34</b>	<b>14,234.80</b>			<b>3,209.59</b>
<b>Stock</b>	<b>683.86</b>		<b>683.86</b>			
Jun-20	1,099.29	3,140.59	4,239.87			1,323.20
Jul-20	908.2	2,607.67	3,515.86			533.96
<b>Sub Total</b>	<b>2,691.35</b>	<b>5,748.26</b>	<b>8,439.59</b>			<b>1857.17</b>
<b>Stock</b>	<b>834.18</b>		<b>834.18</b>			
<b>Total</b>	<b>14,309.83</b>	<b>48,501.40</b>	<b>62,811.23</b>	<b>1,000.00</b>		<b>13,786.20</b>

**Period August 2020 – July 2021**

Period	CPO production (MT)		Total	Cert CPO Dispatch (MT)		
	Cert	Non Cert		RSPO	Other scheme	Non Cert
<b>Opening Stock</b>	<b>834.18</b>		<b>834.18</b>			
Aug-20	1,164.78	4,019.61	5,184.39			553.3
<b>Sub Total</b>	<b>1,998.96</b>		<b>6,018.57</b>			<b>553.3</b>
<b>Stock</b>	<b>1,445.66</b>		<b>6,018.57</b>			
Sep-20	1,453.90	4,961.37	6,415.27			2,087.34
Oct-20	1,399.50	5,221.26	6,620.76			1,304.59
Nov-20	1,370.35	5,138.80	6,509.15			1,687.71
<b>Sub Total</b>	<b>5,669.41</b>	<b>15,321.43</b>	<b>25,563.75</b>			<b>5,079.64</b>
<b>Stock</b>	<b>589.77</b>		<b>589.77</b>			
Dec-20	1,307.12	5,223.44	6,530.56			1,307.80
Jan-21	1,124.72	4,349.96	5,474.67			1,213.94
Feb-21	1,130.03	3,265.59	4,395.63			910.68
<b>Sub Total</b>	<b>4,151.64</b>	<b>12,838.99</b>	<b>16,990.63</b>			<b>3,432.42</b>
<b>Stock</b>	<b>719.22</b>		<b>719.22</b>			
Mar-21	1,143.45	4,032.53	5,175.98			1,069.92
Apr-21	1,180.10	3,999.43	5,179.52			1,495.20
May-21	1,070.11	4,302.68	5,372.79			267.87

<b>Sub Total</b>	4,112.88	12,334.64	16,447.51			2,833.00
<b>Stock</b>	<b>1,279.88</b>		<b>1,279.88</b>			
Jun-21	1,201.34	4,944.46	6,145.80			1,798.21
Jul-21	1,166.73	4,092.57	5,259.30			1,326.33
<b>Sub Total</b>	<b>3,647.95</b>	<b>9,037.03</b>	<b>12,684.98</b>			<b>3,124.54</b>
<b>Stock</b>	523.41		523.41			
<b>Total</b>	<b>14,712.13</b>	<b>53,551.70</b>	<b>68,263.82</b>			<b>15,022.89</b>

**PK production and Dispatch for POM**
**Period August 2019 – July 2020**

Period	PK production (MT)		Total (MT)	Cert PK Dispatch (MT)		
	Cert	Non-Cert		RSPO	Other scheme	Non-Cert
Opening Stock	96.54		96.54			
Aug-19	361.85	1,269.89	1,631.75			260.08
<b>Sub Total</b>	<b>458.39</b>	<b>1269.89</b>	<b>1728.29</b>			<b>260.08</b>
<b>Stock</b>	<b>198.31</b>		<b>198.31</b>			
Sep-19	380.35	1,353.13	1,733.48			230.43
Oct-19	415.29	1,369.66	1,784.95			644.78
Nov-19	362.62	1,186.13	1,548.75			145.48
<b>Sub Total</b>	<b>1356.57</b>	<b>3908.92</b>	<b>5265.49</b>			<b>1020.69</b>
<b>Stock</b>	<b>335.88</b>		<b>335.88</b>			
Dec-19	355.84	1,102.66	1,458.50	378.1		113.26
Jan-20	310.48	1,175.01	1,485.50	98.48		28.86
Feb-20	303.56	1,075.78	1,379.33			508.26
<b>Sub Total</b>	<b>1,305.76</b>	<b>3,353.45</b>	<b>4,659.21</b>	<b>476.58</b>		<b>650.38</b>
<b>Stock</b>	<b>178.80</b>		<b>178.80</b>			
Mar-20	222.27	873.22	1,095.49			327.75
Apr-20	249.72	943.87	1,193.60			215.28
May-20	256.10	799.5	1,055.60			234.87
<b>Sub Total</b>	<b>906.89</b>	<b>2,616.59</b>	<b>3,523.49</b>			<b>777.89</b>
<b>Stock</b>	<b>129.00</b>		<b>129.00</b>			
Jun-20	272.18	768.31	1,040.50			318.42
Jul-20	240.49	679.13	919.62			184.94
<b>Sub Total</b>	<b>641.67</b>	<b>1,447.44</b>	<b>1,960.12</b>			<b>503.36</b>
<b>Stock</b>	<b>138.31</b>		<b>138.31</b>			
<b>Total</b>	<b>3,730.75</b>	<b>12,596.29</b>	<b>16,327.07</b>	<b>476.58</b>		<b>3,212.41</b>

**Period August 2020 – July 2021**

Period	CPO production (MT)		Total	Cert CPO Dispatch (MT)		
	Cert	Non Cert		RSPO	Other scheme	Non Cert
<b>Opening Stock</b>	<b>138.31</b>		<b>138.31</b>			
Aug-20	288.95	973.14	1262.09			220.20
<b>Sub Total</b>	<b>427.26</b>	<b>973.14</b>	<b>1400.4</b>			<b>220.20</b>
<b>Stock</b>	<b>207.06</b>		<b>207.06</b>			
Sep-20	391.19	1349.81	1741			482.60
Oct-20	366.89	1366.59	1733.48			245.41
Nov-20	358.33	1338.89	1697.22			550.48
<b>Sub Total</b>	<b>1323.47</b>	<b>4055.29</b>	<b>5378.76</b>			<b>1278.49</b>
<b>Stock</b>	<b>44.98</b>		<b>44.98</b>			
Dec-20	340.38	1334.48	1674.86			71.49
Jan-21	310.38	1169.27	1479.65			389.28
Feb-21	289.43	823.59	1113.02			418.60
<b>Sub Total</b>	<b>985.17</b>	<b>3,327.34</b>	<b>4,312.51</b>			<b>879.37</b>

<b>Stock</b>	<b>105.80</b>		<b>105.80</b>			
Mar-21	272.95	953.89	1226.84			303.61
Apr-21	309.89	1068.03	1377.92			248.56
May-21	285.36	1068.38	1353.75			189.99
<b>Sub Total</b>	<b>974.00</b>	<b>3,090.30</b>	<b>4,064.31</b>			<b>742.16</b>
<b>Stock</b>	<b>231.84</b>		<b>231.84</b>			
Jun-21	313.28	1257.02	1570.31			374.57
Jul-21	305.29	1,054.50	1,359.79			375.87
<b>Sub Total</b>	<b>850.41</b>	<b>2,311.52</b>	<b>2,930.10</b>			<b>750.44</b>
<b>Stock</b>	<b>99.97</b>		<b>99.97</b>			
<b>Total</b>	<b>3,832.32</b>	<b>13,757.59</b>	<b>17,589.93</b>			<b>3,870.66</b>

**3.8.13; 3.8.14**

The rate of production of CPO (OER) and PK (KER) were based on actual daily, monthly, and yearly production.

**3.8.15**

The Mill only applying RSPO SCC Module of Mass Balance.

**3.8.16**

Documentation for the Sustainable Crude Palm Oil (Sustainable CPO), consist of: daily record of the FFB acceptance, daily record of CPO production, which classified as the CSPO, CPO (RSPO) sale record, stock record that has been reconciled with the FFB acceptance, monthly production and sale and annual recapitulation.

Documentation for the Sustainable Palm Kernel (Sustainable PK), consist of: FFB dispatch record, which further will be counted the daily production of the Sustainable PK, daily production record of the PK, which classified as the Sustainable PK, monthly recapitulation of the Sustainable PK's sale, stock record, which has been reconciliation with the FFB acceptance record, monthly sale production and annual recapitulation.

Documents verifications and interview with management units obtained information if in last 24 months before audit (August 2019 – July 2021) the CSPO and CSPK product that sold as follows:

**CSPO**

Transaction ID	Date	Buyer Reference	Product	Volume (MT)	License ID
TR-bfc65736-c754	26/03/20	8101132288	CSPO	1,000	CB87747 (Active)

**CSPK**

Transaction ID	Date	Buyer Reference	Product	Volume (MT)	License ID
TR-71ab3cfa-9080	26/03/20	7781014795	CSPK	476.58	CB87747 (Active)

Documents verification and interview during remote audit it was known if claim related CSPK products is no longer than 3 months since the product delivered. The unit of certification can present the supporting documents for example shipping announcement, delivery orders, sales contract and etc. For f CSPO and CSPK sold as conventional or other scheme during this period has been removed from certified stock. The unit of certification can present removing allocated product or credit allocation from palm trace, as follows

Stock Transaction ID	Date	Product	Model	Transaction Type	Volume (MT)
T-TR-1e654c03-f92d	07/11/19	CSPO	Mass Balance	Credit Allocation	700.00
ST-TR-1e654c03-f92d	26/03/20	CSPO	Mass Balance	Credit Allocation	5,000.00
ST-TR-87b5f3aa-bf72	07/04/20	CSPO	Mass Balance	Credit Allocation	5,000.00
ST-TR-bdd3763e-a74d	26/06/20	CSPK	Mass Balance	Remove From Certified Stock	4,323.42
ST-TR-eb56e37b-e6ae	06/09/20	CSPO	Mass Balance	Credit Allocation	1,300.00

ST-TR-daa734eb-5cab	30/06/21	CSPO	Mass Balance	Credit Allocation	3,000.00
<b>3.8.17</b> The products are claims as mass balance. The Mill does not use RSPO trademark on product or off product and its has been verified during onsite assessment					
<b>Status: Comply</b>					
<b>PRINCIPLE #4 RESPECT COMMUNITY AND HUMAN RIGHTS AND DELIVER BENEFITS</b>					
<b>4.1</b> <b>The unit of certification respects human rights, which includes respecting the rights of Human Rights Defenders.</b>					
<b>4.1.1</b> Policy of human rights is presented in Sustainable Palm Oil Policy Point 6 dated 27 July 2020 and in collective work agreement Period 2021-2023 Part Introduction which stated that the company give a respect to human rights and gave same opportunities to all workers, without considering race, religion, ethnic and group/class. All policy provided in Bahasa. Socialization on human right policy had conducted on 11 January 2020, attended by 41 employees.  Based on interview with surrounding communities' representatives, Manpower Agency of Muaro Jambi Regency, Gender Committee and Labor Union representatives from estate and mill, it was known that there is no discrimination case in PT BBB operational areas. All performance has fairly accessed by upper ordinate and documented satisfactory.					
<b>4.1.2</b> Based on interview with surrounding communities' representatives, Manpower Agency and Plantation Agency of Muaro Jambi Regency, Gender Committee and Labor Union representatives from estate and mill, as well as field observation and internet browser, it was known that there is no intimidation conducted by the unit of certification.					
<b>Status: Comply</b>					
<b>4.2</b> <b>There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties.</b>					
<b>4.2.1</b> Based on the interviews with representatives of worker unions, gender committees, and representatives of surrounding village communities such as Tanjung Lanjut Village, Suak Putat Village and Bukit Baling Village, it was discovered that up to the time of the recertification period 2020 - 2021 there were no complaints or disputes issuance. As stated by company representatives, specific mechanisms agreed by the parties will be developed if there are significant disputes or complaints resolved with mediatory.					
<b>4.2.2</b> As explained by the management representative, a mutually agreed system for handling complaints will be established when complaints are found. System making reference is a procedure for receiving and resolving complaints from stakeholders (Procedure No: 106899 / TAP / PRO-CSR-HO / VI / 13) where in point 4.3.3 it is stated that problem solving with stakeholders must prioritize a fair process and avoid all forms intimidation both directly and indirectly.  Based on interviews with internal and external stakeholders on recertification activities, they are understood both internal and external regarding the complaints and complaints system. The complaints mechanism available on estate office and Mill office. The complaint mechanism is also submitted directly to internal and external stakeholders every any socialization activities and forum group discussion.					
<b>4.2.3</b> Furthermore, in the work instructions of the Stakeholder Complaints Handling Mechanism (External and Internal No. 124267 / TAP / IKE-HRD / HO / V / 17 dated May 5, 2017, it is also regulated if internal and external complaints are not agreed upon by the parties, then complaints can be brought to the complaint panel RSPO (complaints@rspo.org)  Based on interviews with internal and external stakeholders on recertification activities, progress of the handling of complaints to the parties, including the agreed time frame, and the results are available and communicated to complainant.					

#### 4.2.4

The auditors have captured this issue via the internet related to land disputes between the company and plasma and have verified this, for land disputes issues are handled by the legal team and public relations. The PIC is responsible to receive complaints and grievances handling by the public relations department.

Based on interviews with internal and external stakeholders on recertification activities, is known the progress complaints submitted to the complainant, if it is not resolved, it can involve the government, mediator, or other independent legal institutions.

Status: Comply

#### 4.3

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

The results of interviews with management, conveyed that the CSR program was prepared based on the participation of the surrounding community. The company shows examples of forum group discussion on 26 to 27 April 2020, involved nearest community included the Village Heads around the company (Awin Jaya Village, Bukit Beling Village Head, Tanjung Lanjut Village Head, Suak Putat Village Head) and KUD Akso Dano.

From the results of meetings with the community, a CSR program was prepared in 2020. For the CSR program in 2021, the company arranged a CSR program in the fields of Economy, Environment, Education, and social culture. The company has also shown the CSR realization record to the communities. For example:

- Foundation of the *Ketapang* seed for Muaro Jambi Police agency.
- Honorary teacher assistance Bukit Baling village is realized on 30 January 2020
- Assistance with Islamic activities on 10 February 2020.
- Heavy equipment assistance for Suko Awin Jaya village on 29 February 2020.
- Etc.

The results of interviews with representative of village Tanjung Lanjut, Bukit Baling Village and Suak Putat Village revealed that the company regularly visits the surrounding community. From the interview results, it was conveyed that the company had provided CSR assistance to the surrounding community in accordance with the identification needs.

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

PT Brahma Binabakti has right to cultivate for about 6,941.66 ha, which consist of 6,892.66 ha under HGU and 49.22 ha under HGB. From the cultivated permit there are covering 189 Ha is exclude from the scope certification (smallholder area of Akso Dano Cooperative). The company area originates from forest area that has been release by forestry ministry decree No. 125/Kpts-II/1993 dated 27 February 1993. In that area there are several community's land, which the land acquisition from community's area by providing compensation on 1995 - 2000. The right to cultivate that owned by the company as following:

- HGU Certificate No. 77 – 93, dated 25 April 2014, valid until 27 January 2049, covering area 563.783 ha.
- HGU Certificate No. 94 – 108, dated 25 April 2014, valid until 27 January 2049, covering area 453.3 ha.
- HGU Certificate No. 00167 - 00172, dated 23 July 2020, valid until 31 December 2045, covering area 5,875.3571 ha
- HGB Certificate No 02 dated 09 October 2000, valid until 09 October 2030, covering area 49.22 ha.

There are adjustment total area of certifications since previous certification cycles/period due to base on the extension of land right title in December 2020 there is changed of from 7,227.31 Ha became 6,892.44 Ha

##### 4.4.2

PT Brahma Binabakti is a national company under the subsidiary of TAP Agri. Formerly there were two entities in this certification area, namely PT Brahma Binabakti and PT Kirana Sekernan, which then in 2009 both companies merged

became PT Brahma Binabakti as mentioned in the deed of amendment No. 67 dated 17 December 2009 who explained merged PT Brahma Binabakti and PT Kirana Sekernan which became PT Brahma Binabakti.

The certification area is originated from the forest area that has been released by forestry ministry decree No: 125/Kpts-II/1993 dated 27 February 1993 covering 6220 Ha. although the company has been obtained forest release from the government, there were local rights/ traditional rights in those areas in the form of community cultivation areas. about those areas, the company can present the land acquisitions with accepted both parties.

Based on an interview with the previous landowner, the community handover / give area to the company for developed plantation with comparison 70% for the community (scheme Smallholders) and 30 % for company area. Furthermore, based on interviews with community leaders, smallholders and previous landowners obtained information if the compensation process has been approved by both parties, involved community leaders, and government agencies. Currently, there is no land compensation on the process, the whole previous land compensation was completed before the year 2000. Land compensations are documented and maintained in the Legal Department (site office and in Jakarta Head Office).

Based on field observation, interviews with management and community leaders (village head/smallholders) it was known the compensation process for the community cultivated area was completed company in 2000, all records of land compensation evidence were verified by the auditor. The unit of certification can present the recapitulation of the results of the inventory of community arable land, a statement of ownership, a statement of the release of land rights, and a receipt for compensation. Based on interviews with the previous landowners when the public consultation stated that the company had negotiated and paid for land compensation in accordance with the agreement, there was no coercion and witnessed by government representatives.

#### **4.4.3**

Although there was no land compensation in PT BBB, the company has been developed an FPIC process that explained the procedure of land acquisition (No: 002/TAP/PRO-CSP-HO/IV/10 dated 11 February 2013). The procedures started with planning and socialization that involving estate staff and villager representatives. Land survey and measurement of land should be involving the land users in order to verify land ownership, handover estimation cost, and land compensation process.

Based on field observation, interviews with management and community leaders (village head/smallholders) it was known the compensation process for the community cultivated area was completed company in 2000, all records of land compensation evidence were verified by the auditor. The unit of certification can present the recapitulation of the results of the inventory of community arable land, a statement of ownership, a statement of the release of land rights, and a receipt for compensation. Based on interviews with the previous landowners when the public consultation stated that the company had negotiated and paid for land compensation in accordance with the agreement, there was no coercion and witnessed by government representatives.

#### **4.4.4**

As mentioned in indicator 4.4.2 Currently there is no land compensation on the process, the whole previous land compensation was completed before the year 2000. Since the company obtained forest release from the government, there was local right/ traditional right in those areas and the company can present the land acquisitions with accepted both parties. Based on an interview with the previous landowner the community handover / give area to the company for developed plantation with comparison 70% for the community (scheme Smallholders) and 30 % for company area. Furthermore, based on interviews with community leaders, smallholders and previous landowners obtained information if the compensation process has been approved by both parties in appropriate forms and languages, involved community leaders, and government agencies.

#### **4.4.5**

As mentioned in indicator 4.4.4 Based on field observation, interview with managements and community leaders (village head / smallholders) it was known the compensation process for the community cultivated area was completed company in 2000, all records of land compensation evidence were verified by the auditor. The unit of certification can present the recapitulation of the results of the inventory of community arable land, a statement of ownership, a statement of release

of land rights, and a receipt for compensation. Based on interviews with previous land owner when the public consultation stated that the company had negotiated and paid for land compensation in accordance with the agreement, there was no coercion and witnessed by government representatives.

#### 4.4.6

As mentioned in indicator 4.4.3 Based on field observation, interview with managements and community leaders (village head / smallholders) it was known the compensation process for the community cultivated area was completed company in 2000, all records of land compensation evidence were verified by the auditor. The unit of certification can present the recapitulation of the results of the inventory of community arable land, a statement of ownership, a statement of release of land rights, and a receipt for compensation. Based on interviews with previous land owner when the public consultation stated that the company had negotiated and paid for land compensation in accordance with the agreement, there was no coercion and witnessed by government representatives.

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

Based on documents verifications, field observation and interview with management it was known there are new planting after 1 January 2010 covering 1,013.43 Ha with planting year 2019 where the area is conversion from rubber Plantation to palm oil Plantation and the area located in the scope of certifications. As mentioned in indicator 4.4.1 the certification area is originated from the forest area that has been released by forestry ministry decree No: 125/Kpts-II/1993 dated 27 February 1993 covering 6220 Ha. although the company has been obtained forest release from the government, there were local rights/ traditional rights in those areas in the form of community cultivation areas. about those areas, the company can present the land acquisitions with accepted both parties.

Based on an interview with the previous landowner the community handover / give area to the company for developed plantation with comparison 70% for the community (scheme Smallholders) and 30 % for company area. Furthermore, based on interviews with community leaders, smallholders and previous landowners obtained information if the compensation process has been approved by both parties, involved community leaders, and government agencies. Currently, there is no land compensation on the process, the whole previous land compensation was completed before the year 2000. Land compensations are documented and maintained in the Legal Department (site office and in Jakarta Head Office).

##### 4.5.2

As mentioned in indicator 4.4.2 Based on field observation, interview with managements and community leaders (village head / smallholders) it was known the compensation process for the community cultivated area was completed company in 2000, all records of land compensation evidence were verified by the auditor. The unit of certification can present the recapitulation of the results of the inventory of community arable land, a statement of ownership, a statement of release of land rights, and a receipt for compensation. Based on interviews with previous land owner when the public consultation stated that the company had negotiated and paid for land compensation in accordance with the agreement, there was no coercion and witnessed by government representatives.

##### 4.5.3

As mentioned in indicator 4.4.2 Based on interviews with previous land owner when the public consultation stated that the company had negotiated and paid for land compensation in accordance with the agreement, there was no coercion and witnessed by government representatives.

##### 4.5.4

As mentioned in indicator 4.4.2 The certification area is originated from the forest area that has been released by forestry ministry decree No: 125/Kpts-II/1993 dated 27 February 1993 covering 6220 Ha. although the company has been obtained forest release from the government, there were local rights/ traditional rights in those areas in the form of community cultivation areas. about those areas, the company can present the land acquisitions with accepted both parties.

Based on an interview with the previous landowner the community handover / give area to the company for developed plantation with comparison 70% for the community (scheme Smallholders) and 30 % for company area. Furthermore, based on interviews with community leaders, smallholders and previous landowners obtained information if the compensation process has been approved by both parties, involved community leaders, and government agencies. Currently, there is no land compensation on the process, the whole previous land compensation was completed before the year 2000. Land compensations are documented and maintained in the Legal Department (site office and in Jakarta Head Office).

#### 4.5.5

As mentioned in indicator 4.5.1 Based on documents verifications, field observation and interview with management it was known there are new planting in 2019 covering 1013.43 Ha where the area are conversion from rubber Plantation to palm oil Plantation and the area located in the scope of certifications. Currently, there is no land compensation on the process, the whole previous land compensation was completed before the year 2000. Land compensations are documented and maintained in the Legal Department (site office and in Jakarta Head Office).

#### 4.5.6

As mentioned in indicator 4.5.1 Based on documents verifications, field observation and interview with management it was known there are new planting in 2019 covering 1013.43 Ha where the area are conversion from rubber Plantation to palm oil Plantation and the area located in the scope of certifications. Currently, there is no land compensation on the process, the whole previous land compensation was completed before the year 2000. Land compensations are documented and maintained in the Legal Department (site office and in Jakarta Head Office).

#### 4.5.7

As mentioned in indicator 4.5.1 Based on documents verifications, field observation and interview with management it was known there are new planting in 2019 covering 1013.43 Ha where the area are conversion from rubber Plantation to palm oil Plantation and the area located in the scope of certifications. Currently, there is no land compensation on the process, the whole previous land compensation was completed before the year 2000. Land compensations are documented and maintained in the Legal Department (site office and in Jakarta Head Office).

#### 4.5.8

As mentioned in indicator 4.5.1 Based on documents verifications, field observation and interview with management it was known there are new planting in 2019 covering 1013.43 Ha where the area are conversion from rubber Plantation to palm oil Plantation and the area located in the scope of certifications. Currently, there is no land compensation on the process, the whole previous land compensation was completed before the year 2000. Land compensations are documented and maintained in the Legal Department (site office and in Jakarta Head Office).

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

Procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, available in the procedure of land acquisition (No: 002/TAP/PRO-CSP-HO/IV/10 dated 11 February 2013). The procedure is covered the process of identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation. The procedure started with planning and socialization that involving estate staff and villager representatives. Land survey and measurement of land should be involving land user in order to verify land ownership, handover estimation cost and land compensation process.

##### 4.6.2

The Company has no new land acquisition and the entire compensation process was completed before 2000. The results of compensation documents verification and interview with communities and previous land owners is known that

compensation process is done directed to the land owner and landowners are given the freedom to release their land without coercion.

#### 4.6.3

As mentioned in indicator 4.4.2 The certification area is originated from the forest area that has been released by forestry ministry decree No: 125/Kpts-II/1993 dated 27 February 1993 covering 6220 Ha. although the company has been obtained forest release from the government, there were local rights/ traditional rights in those areas in the form of community cultivation areas. about those areas, the company can present the land acquisitions with accepted both parties.

Based on an interview with the previous landowner the community handover / give area to the company for developed plantation with comparison 70% for the community (scheme Smallholders) and 30 % for company area. Furthermore, based on interviews with community leaders, smallholders and previous landowners obtained information if the compensation process has been approved by both parties, involved community leaders, and government agencies. Currently, there is no land compensation on the process, the whole previous land compensation was completed before the year 2000. Land compensations are documented and maintained in the Legal Department (site office and in Jakarta Head Office).

#### 4.6.4

As mentioned in indicator 4.4.3 Based on field observation, interview with managements and community leaders (village head / smallholders) it was known the compensation process for the community cultivated area was completed company in 2000, all records of land compensation evidence were verified by the auditor. The unit of certification can present the recapitulation of the results of the inventory of community arable land, a statement of ownership, a statement of release of land rights, and a receipt for compensation. Based on interviews with previous land owner when the public consultation stated that the company had negotiated and paid for land compensation in accordance with the agreement, there was no coercion and witnessed by government representatives.

Status: Comply

#### 4.7

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

##### 4.7.1

Procedure for identifying people entitled to compensation available in the procedure of land acquisition (No: 002/TAP/PRO-CSP-HO/IV/10 dated 11 February 2013). The procedure is covered the process of identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation. The procedure started with planning and socialization that involving estate staff and villager representatives. Land survey and measurement of land should

##### 4.7.2

As mentioned in indicator 4.4.2 The certification area is originated from the forest area that has been released by forestry ministry decree No: 125/Kpts-II/1993 dated 27 February 1993 covering 6220 Ha. although the company has been obtained forest release from the government, there were local rights/ traditional rights in those areas in the form of community cultivation areas. about those areas, the company can present the land acquisitions with accepted both parties. Currently, there is no land compensation on the process, the whole previous land compensation was completed before the year 2000. Land compensations are documented and maintained in the Legal Department (site office and in Jakarta Head Office). The results of compensation documents verification and interview with communities and previous land owners is known that compensation process is done directed to the land owner and landowners are given the freedom to release their land without coercion.

##### 4.7.3

Based on an interview with the previous landowner the community handover / give area to the company for developed plantation with comparison 70% for the community (scheme Smallholders) and 30 % for company area. Furthermore, based on interviews with community leaders, smallholders and previous landowners obtained information if the compensation process has been approved by both parties, involved community leaders, and government agencies.

Currently, there is no land compensation on the process, the whole previous land compensation was completed before the year 2000. Land compensations are documented and maintained in the Legal Department (site office and in Jakarta Head Office).

**Status: Comply**

#### 4.8

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

##### 4.8.1

As a guidance to resolved land dispute ruled in the Procedure acceptance and grievance resolution form stakeholders (No. 106899/TAP/PRO-CSR-HO/XI/16 dated 16 November 2016). The procedure described the resolution process if any land conflict.

##### 4.8.2; 4.8.3; 4.8.4

Until recertification, there were no conflicts and land disputes within the PT BBB Certification area. This is also in line with the results of interviews with surrounding communities and related agencies during a public consultation, which stating that there were no land conflicts in the company's operational area. However based verification through internet there several issue land dispute that involved PT Brahma Bina Bakti, based on auditor verification and interview with stakeholder it was known those issued happened in smallholders area and its became NC in indicator 3.4.3

**Status: Comply**

### PRINCIPLE #5 SUPPORT SMALLHOLDER INCLUSION

#### 5.1

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

##### 5.1.1

Based on the Akso Dano cooperation agreement for the development of scheme smallholders that made between PT. BBB with cooperative, the determination of the purchase price of FFB from the scheme smallholders follows the determination of the price of FFB by the Provincial Government of Jambi. The determination is carried out every week by the Palm Oil FFB Purchase Determination Team in Jambi Province. For independent smallholder and third-party supplier following the company's internal pricing mechanism.

Base on interviews with Scheme smallholders and FFB suppliers the FFB prices every 2 times a month. The price information is available for them to inform What up group media and FFB prices signboard on Mill.

##### 5.1.2

Based on an interview with Akso Dano cooperation is known by the that the price of FFB from kemitraan was in accordance with prices set by the Plantation Agency and in accordance with the agreement of both parties and there are no complaints regarding the payment of FFB. The Regular updating of FFB prices to cooperation via WhatsApp group and directly short message send to member. The CH explains the FFB Pricing to smallholders, such as regular minutes of meeting with smallholders on 1 July 2021.

##### 5.1.3

Base on document verification on the agreement letter between the company and Akso Dano cooperation has been known and signed by representatives of both parties and is known by the Regional Government. The results of interviews with cooperation members revealed that the price of FFB from kemitraan was in accordance with prices set by the Plantation Agency and in accordance with the agreement of both parties and there are no complaints regarding the payment of FFB. From the results of the interview, it was also conveyed that every payment as well as in the activity / meeting for revenue sharing was always attached with a price list that issued by Plantation Agency.

##### 5.1.4

The company has an agreement contract with cooperative and FFB Supplier Each contract document, signed by both parties as evidence that a work agreement has been agreed. Contract agreement documents are kept by both parties, which will be used as legal references. Base on document verification on the agreement letter between the company and Akso Dano cooperation has been known and signed by representatives of both parties and one is a woman who is a member.

**5.1.5**

The company has an agreement contract with cooperative and FFB Supplier Each contract document, signed by both parties as evidence that a work agreement has been agreed. The contract agreement documents are kept by both parties, which will be used as legal references, fair, legal, and transparent, and have an agreed time frame. Part 3.4 on the agreement, the information regarding the contract clauses indicates that it is fair and has a timeframe. The agreements explain the criteria for FFB grading, payment, validity period, plasma construction provisions, terms of cooperation, financing, pricing, rights & obligations, sanctions to settle disputes and signed by both parties.

**5.1.6**

Has been verification the FFB Payment and Financial Report of 1-10 July 2021, for the FFB production and pricing of July 2021. The report describes pricing and pricing periods, FFB amount, reduction/cost, and total paid. The payment was conducted within a month. For example, the payment for period 31 July 2021 a cooperative Akso Dano Account member 110-00-04572-XXX for 1.569.535 kg period 1 July 2021.

**5.1.7**

The results of document verifications it was known that the certification unit has routinely calibrated the weighing equipment carried out by a third party. The certification unit has also shown documents on the weighbridge calibration carried out in April 2021. The company shows proof of email for recalibration requests to independent parties on 27 July 2021, based on the email recalibration has not been able to be carried out due to activity restrictions due to Covid 19.

**5.1.8**

The company has carried out socialization related to RSPO certification to cooperatives / plasma farmers through annual meetings between the company and the community. The company shows the Minutes of the annual meeting on 30 December, 2020 in Suko Awini Jaya Village and Tanjung Lanjut village which was attended by the company, village government, community representatives and plasma farmers.

**5.1.9**

The company has a mechanism of complaint and grievance handling in *SOP Penyelesaian Keluhan Karyawan di Site* No SOP/SUPP/XI/2016/009 dated November 25<sup>th</sup> 2016 and *SOP Penerimaan dan Penyelesaian Keluhan dari Pemangku Kepentingan* (SOP/SUPP/III/2018/001) dated March 19<sup>th</sup> 2018 which explain handling of complaint and grievance from internal and external stakeholder. The procedure is made involve the consideration from various parties. Company must maintain the confidentiality of employees who submit complaints and ensure their safety to avoid inappropriate treatment with these employees.

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

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

**5.2.1**

The company has carried out socialization related to RSPO certification to cooperatives/plasma farmers through annual meetings between the company and the community the conclusion from the annual meeting such as the socialization & training Good Agricultural Practices, pesticide handling, organizational system and fire land. The company shows the Minutes of the annual meeting on 30 December, 2020 in Suko Awini Jaya Village and Tanjung Lanjut village was attended by the company, village government, community representatives and plasma farmers.

**5.2.2**

The program development and implement livelihood improvement programs, including at least capacity building to increase productivity in describing on the work program cooperative Akso Dano for the period 2020 until 2021. The program included, OHS, IPM, Best Management Practice and RSPO requirement. The last evaluated program on 30 December 2020.

### 5.2.3

The company shows the Minutes of the annual meeting on 30 December, 2020 in Suko Awini Jaya Village and Tanjung Lanjut village which was attended by the company, village government, community representatives and plasma farmers. The meeting of minutes describes process legality of the land.

### 5.2.4

The company has provided pesticide handling training to smallholders. This is indicated by the Minutes of the socialization of Best Practices, Spraying and P&C RSPO 2018 on 30 December, 2020 and Minutes of review of law registers. The socialization of policies to contractors, plasma and core on 9 October 2020 related to Occupational Safety and Health, Environment and Employment regulations.

### 5.2.5

The work program cooperative Akso Dano for the period 2020 until 2021. The program included, OHS, IPM, Best Management Practice and RSPO requirements. The last evaluated program was on 30 December 2020.

**Status: Comply**

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

### 6.1

**Any form of discrimination is prohibited.**

#### 6.1.1

Policy of human rights is presented in Sustainable Palm Oil Policy Point 6 dated 27 July 2020 and in collective work agreement Period 2021-2023 Part Introduction which stated that the company give a respect to human rights and gave same opportunities to all workers, without considering race, religion, ethnic and group/class. All policy provided in Bahasa. Socialization on human right policy had conducted on 11 January 2020, attended by 41 employees.

Based on interview with surrounding communities' representatives, Manpower Agency of Muaro Jambi Regency, Gender Committee and Labor Union representatives from estate and mill, it was known that there is no discrimination case in PT BBB operational areas. All performance has fairly accessed by upper ordinate and documented satisfactory.

#### 6.1.2

There is no migrant workers in PT BBB. All employees were Indonesian. According to the list of workers in June 2021, it was known that tribes (*suku*) in PT BBB has dominated by Batak and Jawa (both occupy around 26 %), followed by Jambi (19 %), Melayu Deli and Palembang (both occupy around 7 %).

Based on interview with several workers from the estate and mill, as well as with labor union, gender committee manpower agency of Muaro Jambi Regency and surrounding communities, it was known that there is never happen an issue related to racial/tribes and "*pribumi* (local) vs *pendatang* (non-local)". All workers have same career opportunity, which could be verified through work performance appraisal.

#### 6.1.3

Unit of certification shows selection and recruitment process, for example as follows:

- Form of Job Applicant for security dated 20 January 2021 from applicant with initial AAP. Attached Potential test (passed); Work Agreement for 3 months' probation (17 February 2021 to 16 May 2021) No. 04/BBB-Mill/PGA/PKKP/II/2021 dated 17 February 2021; Evaluation Form with score 75 (passed); Letter of Mill Manager No. 01/BBB-MILL/PGA/PHEMPI/IV/2020 dated 15 May 2021 about Evaluation Result of AAP which stated passed as employee of PT BBB; Personnel Change Notice dated 15 May 2021; and Decree of Assistant Mill Manager No. 04/SK/TAP Group/HRD/VI/2021 dated 15 May 2021 about recruitment as permanent worker in PT BBB – Mill.

- Form of Job Applicant for clerk position dated 22 July 2021 from high school fresh graduate. The applicant born in 18 February 2003. Together with the form, attached application letter, ID card, Covid vaccine card, family card, certificates of competency, police record and self-picture.
- Form of Promotion Non-Staff dated 16 June 2021 for worker with NIK. 21/2141/1299/33 from Foreman of Process to be promoted as Shift Engineer. The form signed by Mill Assistant, Mill Production Controller and Deputy Director of Mill.
- Personnel Change Notice dated 30 July 2019 for employee named ASL from Harvester in Afdeling E to become FFB Clerk in Afdeling F. together with the document, attached "*Formulir Evaluasi Kinerja Karyawan*" or Employee Evaluation Form of the respective worker, signed by Assistant Afdeling, Senior Estate Manager and Regional HR; and Decree of Senior Estate Manager No. A.0644/BBB-S/PGA/SK/VII/2019 dated 30 July 2019 about promotion.

Based on document review as provided by human resources department, it could be concluded that the CH is able to demonstrate stages of employees' recruitment which properly implemented, in accordance with company regulation, as shown through job application, potential test, probation work agreement, worker evaluation, personnel change notice, recruitment letter, promotion letter and work agreement for permanent worker.

#### 6.1.4

Based on interview with gender committee, it was known that there is no discrimination due to gender matters. Pregnancy test has conducted every month. Those who detected pregnant will be transferred to non-chemicals works. Furthermore, based on interview with female workers such as from nursery, chemist upkeep, manual upkeep and weighbridge operator, it could be concluded that there were never been discrimination issues due to gender matters, for example as related to work opportunity, career path and salary.

#### 6.1.5

Based on interview with gender committee representatives, it was known that the committee has established since 2014. The latest committee has approved by Estate Manager on 26 January 2021. The committee consist of Resources; Service; Research and Development; and Administrative and Finance. Gender committee organization has consisted of 52 members with 7 of the members were male. The committee members have covered all operation areas on the estate and mill. Annual program arranged by the committee consist of religion matters, bazaar, talent improvement, social gathering, socialization, etc.

#### 6.1.6

Structure and scale of salary/wage of PT BBB for period 2021 is presented in document of Internal Memo of Human Capital Directorate No. MI/HC/XII/2020/025 dated 30 December 2020 as respond to the Decree of Governor of Jambi No. 932/KEP.GUB/DISNAKERTRANS-3.3/2020 dated 08 December 2020 about minimum wages of Muaro Jambi Regency. Company policy on salary matter which in accordance with regulation has reported to the manpower Agency of Muaro Jambi. There is no discrimination in salary payment, as shows through slip payment period June 2021 review, for example as follows:

- Weighbridge operator with initial ARG (male) and TIS (female) has same 1A level. Both has salary above IDR 2,777,500.-.
- Upkeep worker with initial SKT (female) and STM (male) has non-level grade. Both has salary above IDR 2,737,500.-
- Admin worker with initial SMR (female) and PRA (male) has same 2A level. Both has salary above IDR 2,765,000.

In general, basic salary was in accordance with applicable regulation in 2021. Based on payment slip review, as well as interview with the respective workers (weighbridge operator, upkeep workers and admin) and labour union committee, it was known that there is no discrimination of salary payment due to gender background. Difference ammount of salary obtained is only affected by number of attendance, year of service in company, work performance and debt, without taking gender into account.

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

Minimum wage in PT BBB has refers to several documents, as follows:

- Decree of Governor of Jambi No. 932/KEP.GUB/DISNAKERTRANS-3.3/2020 dated 08 December 2020 about minimum wages of Muaro Jambi Regency for period 2021, which was about IDR 2,732,475.44 per month.
- Internal Memo of Human Capital Directorate No. MI/HC/XII/2020/025 dated 30 December 2020 which mentioned several salaries, as follows:
  - Daily workers will be paid IDR 109,300 per day.
  - Probation, contract and permanent workers will be paid IDR 2,732,500, - per month.
- Collective work agreement (PKB 2021-2023) Article 18.

Based on payment slip review, it was known that salary payment has in accordance with Indonesian applicable regulation. Furthermore, based on interview with several workers from the estate and mill, as well as with labour union representatives, it was known that information towards minimum wages had been socialized annually on the beginning of the coming year and there never been an issue on these matters. Moreover, additional of rice in money cash form also been given by the company, apart from minimum wages.

**6.2.2**

Unit of certification shows several work agreements, for example as follows:

- Temporary Work Agreement (PKWT) No. 00381/HC/SPK/2121/01/2021 dated 21 January 2021 with worker initial RAP for nursery works, that will be end in 21 January 2023. Article 3 mentioning salary and facilities that refers to company policy (PKB).
- Permanent Work Agreement (PKWTT) No. 0001/BBBS/SPK-WTT/II/2021 dated 14 January 2021 with worker initial FNP for Harvesting Foreman works. Article 2 mention about salary and other facility rights for workers.
- All type of work agreement has referred to the Collective Work Agreement (PKB), as issued through Decree of Manpower Agency Head of Muaro Jambi Regency No. 560.6/.../II/2/Nakertrans dated 25 January 2021 about registration of collective work agreement or "*Perjanjian Kerja Bersama* (PKB)" of PT Brahma Binabakti, for estate and mill. The PKB has registration No. 06/PKB/1/02/2021. The PKB is valid up to 13 January 2023. The PKB has consist of salary, deduction, overtime, leave, paid leave, work termination, etc.
- For harvesting premium, there is Decree of Director No. SKD/DOE/II/2020/002 dated 24 January 2020. According to simulation of calculation, the premium is complied with Indonesian regulation.
- As compare workers with same level (1A) that works bellow 1 year and more than 5 years, the salary difference about IDR 198,250.-. Thus, structure and scale of salary is properly implemented.

According to document verification, it was known that there are two types of workers in PT BBB i.e., permanent employees and contract employees. Relationship between employer and employee is presented in the work agreement that signed by both parties and make it into two copies.

In general, there is no change of workers policy. Socialization has conducted for the new PKB, even though there is no change in regulation. Deduction or penalty has only implemented for absence. Sanction to workers is explained in Article 38 and 39 of PKB. However, every sanction has been started with warning letter before execution. Furthermore, payroll document has informed accurate information, such as basic salary, number of working days, number of overtime or premium, premium of absence, BPJS covers payment, natura premium, bonus, incentive and some deductions (BPJS, labour union contribution, cooperative contribution, debt, etc.).

Based on interview with contract employees, it was known that before signing the agreement, the employer will explain the content of work agreement. The employee is able to explain information given by the employer. Evidence of this activities shows through official letter dated 28 and 29 May 2021. However, the employee mentioned that currently they have no received a copy of contract work agreement. Regarding this matter, unit of certification explain that the contracts were still under reporting process to the Manpower Agency, where for period 2021, the report had delivered on 28 July 2021. Moreover, unit of certification is able to shows that contract agreement in 2020 had distributed to the respective employees. Thus, unit of certification is encouraged to make sure that all employees have received their work contract agreement (copy). **OFI.**

**6.2.3**

Legal compliance towards salary payment shows through review on payment slip and absence data, for example as follows:

- Harvester ID No. 21/2121/0111/314 has basic salary IDR 2,752,500; fix premium IDR 286,500; harvesting premium IDR 867,596; Loose-fruits picking premium IDR 251,125; Natura (rice in money) IDR 370,500; and others. After deduction, take home pay in June 2021 with 23 man-days was IDR 4,219,200.-.
- Weighbridge Operator ID No. 21/2141/0918/235 has basic salary IDR 2,787,500; overtime 102.50 hours) IDR 1,651,558; Natura IDR 142,500; another income IDR 273,912; and others. After deduction, take home pay in June 2021 with 21 man-days was IDR 4,734,000.-.

Based on review, it was known that overtime and/or premium calculation are complied with applicable Indonesian Regulation. Furthermore, legal compliance towards working hours, working days, leaves, has shown and verified through daily absence. Additional supported documents such as medical letter for menstruation and maternity leave were available and in accordance with applicable regulation. This matter also confirmed by gender committee which also works as paramedics, through direct interview. In short, there is no issue on this matter.

**6.2.4**

According to list of PT BBB social and general facilities 2021, comprises of:

- Vehicles: 1 unit ambulance, 2 units school bus, 1 unit transportation vehicle, 1 unit fire truck and 3 units school trucks.
- 1 Licensed Clinic.
- 1 permanent school building.
- House: 1 unit Type G1 permanent house, 1 unit Type G10 non-permanent house, 75 units Type G2 non-permanent house, 21 units Type G2 permanent house, 7 units Type G3 non-permanent house, 2 units Type G4 non-permanent house, 3 units Type G4 permanent house, 1 unit Type G5 non-permanent house, 44 units Type G6 non-permanent house and 3 units Type G6 permanent house.
- Prayer building: 2 units mosque, 6 units musholla, 1 unit church.
- 3 units Hall.
- 1 unit ATM house and security post.
- Gazebo: 2 units non-permanent gazebo and 1 unit permanent gazebo.
- 15 units generator set.
- Sport facilities: 2 units permanent badminton field, 3 units non-permanent volleyball field, 7 units non-permanent futsal field.
- 20 units of non-permanent toilet (MCK).
- Water tower 7 units permanent water tower and 4 units non-permanent water tower.
- 2 units fire monitoring tower.
- 1 unit signboard.
- 1 unit internet tower.
- 8 units daycare.

Based on observation to housing areas, it was known that the facilities were properly maintained. Reparation is immediately conducted by the unit of certification. Electricity and clean water are free.

**6.2.5**

Estate location to Jambi is only take 2 hours by car. Accessibility and road condition is considered satisfactory. Furthermore, for household availability, there is employees cooperative namely "*Koperasi Karyawan Brahma Bina Bakti Sawit*" or Cooperative of Employee of Brahma Binabakti Sawit. According to review with committee member of cooperative, it was known that monthly transaction could reach IDR 500 million.

**6.2.6**

Prevailing wage in PT BBB is presented in the following Table:

Parameter	Value (IDR)
Non-cash benefit	1,874,387

Housing	376,875
Free electric and water	251,104
Education cost	235,658
Daycare cost	341,301
Health facility	28,147
Transportation	99,469
Food	418,500
Sport facilities	123,333
<b>Cash benefit</b>	<b>3,248,214</b>
Basic salary (min UMK)	2,732,500
BPJS	288,006
<b>Total</b>	<b>5,122,601</b>

Based on the table above, it could be concluded that total prevailing wages in PT BBB was IDR 5,122,601. - which is 87.47 % higher compare to the basic salary as required by Decree of Governor of Jambi No. 932/KEP.GUB/DISNAKERTRANS-3.3/2020 dated 08 December 2020. Furthermore, compare to the previous year, the current DLW is bigger about 1.47 %.

**6.2.7**

According to the list of employees in June 2021, contract worker is only carried out for nursery works, which will be finalized the whole activities in 2 years. This matter has observed to contract agreement No. 00872/HC/SPK/2121/06/2021 dated 19 June 2021 and contract No. 00381/HC/SPK/2121/01/2021 dated 21 January 2021. Those contracts valid for two years.

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

Palm Oil Sustainability Policy dated 27 July 2020 at Point 6 mentioned that the company has respect the rights of its employee to become a member of labor union. Furthermore, in the collective work agreement (PKB), it was mentioned that there are two labor union recognized by the company, i.e.:

- *Ikatan Pekerja Brahma Bina Bakti* (IPB3), with registration No. 560.6/09/SP-SB/III/Sosnakertrans dated 03 March 2011.
- *Pengurus Unit Kerja Federasi Serikat Pekerja Pertanian dan Perkebunan Serikat Pekerja Seluruh Indonesia* (PUK-F.SPSP-SPSI) PT BBB, with registration No. 560.6/02/SP-SB/III/Sosnakertrans dated 23 February 2009.

Moreover, Article 6 of collective work agreement also mentioned that the company (employer) had acknowledge the existence of both labor union, as representative of employee. The company will not hinder any activities carried out by both unions, as long as it was in accordance with applicable manpower regulation in Indonesia.

Based in interview with representatives from both labor union, it could be concluded that the company has support the existence of labor union, and considered cooperative in the relationship. Furthermore, there is no intervention from the CH structural management on the workers representatives on Bipartite. Most of labour union committee members were from Foreman level and bellows.

**6.3.2**

Internal meeting of union is conducted every month, for example as shows through minutes of meeting dated 15 June 2021 and 04 July 2021. Furthermore, meeting with employer has also conducted every month, for example as shows through minutes of LKS Bipartite Meeting dated 19 June 2021 and 15 July 2021. The latest meeting has subject agenda on proposal of 24 units houses in G6, continuation of vaccine program and blood donation in August 2021. Based on information from union committee, it was known that the company is considered cooperative in fulfilling employee's aspiration.

**6.3.3**

Every labor union has mechanism of internal management system (AD/ART) which also reported during registration to the Manpower Agency. According to the list of union members, it could be concluded that all of the member committee were not from PT BBB structural organization, but from Foreman level and below. Furthermore, based on interview with representatives of both labor union, it was known that the union committee members were not came from structural of company organization, but from Foreman level to below, and there is no intervention of any union activities.

<b>Status: Comply</b>
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**6.4**

**Children are not employed or exploited.**

**6.4.1**

Operational guideline of Human Resources Department mentioned that minimum age for worker is 18 years old. Meanwhile for child protection, this matter has mentioned in Article 36 PKB. During recruitment, the applicant needs to provide a copy of ID card, to identify age of applicant. For child protection, unit of certification has provided daycare on housing complex.

Based on interview with gender committee, it was known that there is no case related to child abuse nor child labor. Based on list of employee period June 2021 review, it was known that there is no worker under 18 years old. Furthermore, for contractors, clauses of child labor prohibition are presented in work agreement.

**6.4.2**

During recruitment process, the applicant is required to provide a copy of ID card and Family Card for age identification. Only those with age more than 18 years old will be processed into the next step. Moreover, based on list of employee period June 2021, it was known that the youngest employee was born in 19 April 2003 and start join with PT BBB was on 07 June 2021 (>18 years old).

**6.4.3**

As verified through list of employees (for example in June 2021), as well as field observation to the estate and mill, it was known that there is no internship student on the unit of certification operational areas. Hence, it could be concluded that PT BBB is not employing young worker (or internship student in Indonesian context) on its operational areas.

**6.4.4**

Socialization on prohibition of child labor to smallholder, contractor and surrounding communities has conducted on 21 January 2021, 27 February 2021, 06 March 2021 and 12 April 2021. Based on field observation and interview with labor union representatives, gender committee, as well as with Manpower Agency of Muaro Jambi Regency, it was known that there is no indication of child labor within PT BBB operational areas.

<b>Status: Comply</b>
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**6.5**

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

**6.5.1**

Policy on sexual harassment prevention is presented in palm oil sustainability Policy on July 2020 and PKB Part VII Article 38. Communication on this matter has conducted by gender committee. Based on interview with labor union representative and gender committee, it was known that there is no sexual harassment in 2019 to the time of audit (August 2021).

**6.5.2**

Reproductive right policy is preseted in PKB Article 16 which mentioned several paid leave, as follows:

- For givingbirth women, paid leave given was for 3 months.
- For aborted birth, paid leave given was 1.5 months
- For menstuation, paid leave given was 2 days.

The above has satisfactory implemented by the unit of certification, as informed by the gender committee. Furthermore, unit of certification also allow breastfeeding worker to carried out breastfeeds to the baby on the daycare in housing areas.

**6.5.3**

Based on information from the Chief of gender Committee which also a midwife for PT BBB, it was known that the method on new mother identification has conducted through direct conversation with the new mother, as refers to practical guidance on gender inclusion and compliance to the 2018 P&C and 2019 ISH standard, as well as refers to Act. No 36 of 2009 concerning health and obligation to provide exclusive breastfeeding for 6 month or longer period of time based on the child's needs.

In actual implementation on the field as result of new mother identification, unit of certification has provided daycare in employees' housing complex, lactation room on the office, monthly mother and baby check-up included giving immunization. Moreover, during working hours, breastfeeding workers is allowed to breastfeed her baby on the daycare room.

**6.5.4**

Mechanism of complain and grievance is presented in document No. 106899/TAP/PRO-CSR-HO/XI/16 dated 16 November 2016 if related with land compensation and No. SOP/SIPP/XI/2016/009 dated 23 May 2019 for general grievance/complaint. There are three methods on grievance/complaint delivery, i.e.: directly to upper-ordinate, through suggestion box and/or via labor union. Anonymity of whistle blower is protected. Any complaint will immediately be responded by the PIC on the same date, for example as follows:

- From Foreman dated 28 June 2021 about extra fooding request for FFB Loaders, has responded on the same date, and approved by management.
- From Foreman in Afdeling C dated 10 April 2021 about water depo installation, has responded on the same date, with information that the device is currently under request. In 28 June 2021, the installation works is completed and ready to use.

<b>Status: Comply</b>
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**6.6**

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

**6.6.1**

According to employee's data as per June 2021, it was known that there were no migrant workers on the estate and mill. Based on interview with Labor Union representative and Manpower Agency of Muaro Jambi Regency, it was known that most of employees of PT BBB were locals. The procedures related to human resources management shows that every worker has a work agreement that describe specific job description and there is no substitution of contract without prior consultation and agreement from the worker.

Registration of contract workers shows through several documents, for example as follows:

- Decree of Manpower Agency Head of Muaro Jambi Regency No. 560.6/07/Nakertrans dated 25 January 2021, for 10 contract workers, with registration No. 07/PKWT/II/02/2021.
- Decree of Manpower Agency Head No. 560.6/36/VII/02/Disnakertrans/2021 dated 28 July 2021, for 61 contract workers, with registration No. 36/PKWT/VII/02/2021.

**6.6.2**

Based on information from labor union representative, as well as interview with some workers from the estate and mill, it was known that there are no forced labor and divergence in manpower regulation compliance. Mechanism of manpower to contract worker has refores towork agreement and PKB of PT BBB Period 2021-2023.

<b>Status: Comply</b>
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**6.7**

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

**6.7.1**
**OSH Committee (P2K3)**

Organization of OSH committee of PT BBB had approved through Decree of *UPTD Balai Pengawasan Ketenagakerjaan Wilayah* /No. 151 Tahun 2021 dated 28 July 2021. The decree valid for three years. Secretary of committee was an OSH

Expert with License No. 5/6585/AS.02.04/X/2020 dated 21 October 2020 and Appointment from Minister of Manpower No. 5/9711/AS.02.04/X/2020 dated 21 October 2020. This letter valid for three years.

Meeting of P2K3 or OSH Committee has conducted every month, for example as shows through several minutes of meeting, for example as follows:

- Minutes dated 28 April 2021 which attended by 16 participants. Among the subject are maintenance of some property in housing complex, assembly point information needs to be installed, to complete PPE in Afdeling A and C.
- Minutes dated 31 May 2021 which attended by 14 participants. Among the subject are to complete first aid kit for new Foreman, to deliver MSDS to new Foreman, maintenance of safety tank and desilting drainage on housing areas.
- Minutes dated 17 June 2021 which attended by 10 participants. Among the subject are socialization of safety in muster morning, socialization on safety working hours.

Report of P2K3 delivery to Manpower Agency shows through document No. 127225/BBB/SKR-Mill/SM/VII/2021 dated 27 July 2021 for period April to June 2021 of second quarter 2021.

#### **6.7.2**

Procedure of emergency situation is presented in several documents, as follows:

- Document No. PT/SUPP/XI/2017/023 dated 31 October 2017 about emergency situation.
- Document No. PT/SUPP/III/2016/002 about work accident.
- Document work instruction No. IK/001-PT/SUPP/XI/2017/023 dated 19 March 2020 about covid-19 protocol

#### **Clinic and Paramedic**

The unit of certification has a clinic with license Clinic Pratama of PT Brahma Binabakti Sawit, as shows through Decree of "*Dinas Penanaman Modal Pelayanan Terpadu Satu Pintu*" or One Door Integrated Investment Board Agency No. 503/14/06/II/DPMPSTP dated 01 July 2020. The license valid up to 18 February 2023. There are three paramedics with "*Hiperkes*" Licensed, as shows through document of Certificate No. 14.006/PM-I/12 dated August 2012, No. 24.549/DBK3-PM/05/II/2018 dated May 2018, and Certificate dated 18 July 2020, for Midwife, Nurse and doctor, respectively.

#### **First Aid**

Total number of first aid kit set in the estate and mill were 16 set and 9 set, respectively. Furthermore, there are 53 portable first aid kit that bring by the Foreman to the field. Currently there are 10 First Aider on the Estate and 4 First Aider on the Mill, for example as shows through Certificate of License No. 014/P3K/Disnakertrans.3.1/VIII/2019 and No. 013/P3K/Disnakertrnas.3.1/VIII/2019. All licenses were valid until 2022.

Based on field observation to nursery area in Afdeling E Block H19, it was identified several situations, noted as follows:

- There was a semi-permanent building that used for fertilizer store. However, information on potential emergency and hazard are not available. MSDS of fertilizer stored were also not available.
- First aid kit item for nursery area is less than 21 items, as required by the company.

Furthermore, based on observation to the estate and mill, it was known that evacuation route was available. This matter also mentioned during safety induction before conducting field observation.

During time of audit, unit certification shows several correction evidence such as official letter of pallet installation, hazardous symbols and other OSH symbols on the Store, completeness on first aid kit, etc. However, the auditor team considers that the clarification evidence has not shown effective and comprehensive actions related to efforts to prevent emergencies including work accidents in the company's operational areas as part of efforts to OSH implementation. Thus, the company is not be able to shows that emergency procedure and work accident, included first aid in working areas has properly available and periodically monitored. **Based on that's explanation raised non conformity No. 2021.02 with minor category.**

#### **6.7.3**

Unit of certification shows Form of PPE Delivery for Mill and Estate in July 2021. Based on interview with Labour Union representatives from estate and mill, OSH Committee, as well as some estate workers and mill operators, it could be

concluded that the unit of certification has provide proper PPE, in accordance with its risk analysis. All broken and/or improper PPE could be replaced immediately. Satisfactory PPE usage also verified and sighted during field observation on 03 to 04 August 2021.

Furthermore, based on observation to PPE Store and Pesticide Mixing Room in Block A10 and Block G01, it was known that estate management has provide special place for mixing activities, applicators devices (included PPE) washing areas and PPE storage room. Personal clothing was stored on the personal locker and the pesticide applicators used different work clothing and PPE during application on the field.

#### **6.7.4**

Unit of certification shows evidence of BPJS-Ketenagakerjaan (Manpower) and BPJS-Health payment for all of employee, for example payment in June for BPJS-Ketenagakerjaan has carried out in 02 June 2021 and for BPJS Health in 07 June 2021. Based on interview with labor union and Manpower Agency of Muaro Jambi Regency, it was known that the company has comply in providing both BPJS Ketenagakerjaan and BPJS Health to its workers.

There is work accident claimed to BPJS, for example as verified on accident happens in 02 February 2021 for harvester, on 26 April 2021 for upkeep worker and on 18 June 2021 in Loading Ramp Station. Supported documents such as investigation report, socialization on HIRAC to the respective workers, medical letter, report, claim to BPJS, receipt assurance from BPJS and Report to Manpower Agency of Muaro Jambi were available and verified onsite. All cost of accident were covered by the company and BPJS-Ketenagakerjaan. During leave time, the respective workers were still paid. This matter also verified to the labour union committee, which mentioned that the company has comply with applicable regulation.

#### **6.7.5**

Unit of certification shows latest record on LTA, for example during 2020 as follows:

- Estate: Total number of working hours was 1,958,981 hours; number of work accident with lost day was 1 with 10 man-days lost; FR was 0.51 and SR was 5.10.
- Mill: Total number of working hours was 593,462 hours; number of work accident with list day was 3 with 28 man-days lost; FR was 5.06 and SR was 47.18.

Based on lost time accident data review from 2019 to July 2021, it could be concluded that unit of certification has consistently record and calculate the man-day lost, severity rate and frequency rates.

<b>6.7.2</b>	<b>Status: Non Conformity No. 2021.02 with minor category</b>
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### **PRINCIPLE #7 PROTECT, CONSERVE AND ENHANCE ECOSYSTEMS AND THE ENVIRONMENT**

#### **7.1**

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

##### **7.1.1**

The activity budgeted on the program were consist of detection, census and monitoring of pests and diseases attack, biological control such as barn owl nest installation and planting of beneficial plants. According to IPM activity records for January to June 2020 such as program and realization of rat census, leaf eating caterpillar census and termite census, it could be concluded that all the census results were still under its economic threshold. There is no invasive species attack. This may lead to zero use of pesticides for pests and diseases control. It could be concluded that IPM techniques implemented by biological methods is effective to control pests and diseases and also to minimize the use of chemicals. Furthermore, according to pesticides used record in 2020 and 2021, agrochemical uses was only implemented for weeds control purposes.

The company has a good commitment to improve the use of pest natural predator as part of integrated pest control. One of natural predator development is the reproduction and the construction of barn owl box as a mechanism to control rat. Currently, there are total 75 barn owl boxes in PT BBB.

Based on the results of field observations in Block D07 Afdeling E Planting Year 1996, it was known that there was an owl cage in an active condition, as seen in the presence of rat droppings, feathers and bones. In addition, during the visit to Afdeling E, the beneficial plants *Turnera subulatan* and *Antigonon leptopus* were found which were well developed and well maintained as biological methods for controlling caterpillars and bagworms.

### 7.1.2

The company has implemented IPM integrated pest control, including biological pest control. Based on the results of document review and field observations, it is known that the species used in biological control include *Turnera subulata*, *Antigonon leptopus* and *Tyto alba*, which species are not included in the invasive species according to P.94/MENLHK/SEKJEN/KUM.1/ 12/2016 concerning Invasive Types. Based on the description, it is concluded that the company does not use invasive species in pest control.

### 7.1.3

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

<b>Status: Comply</b>
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## 7.2

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

### 7.2.1

The company shows Internal Memo No. 001/TAP/MIN-EST-HO/II/13 regarding Termination of Ordering Paraquat Herbicide dated February 22, 2013. Based on the results of interviews with management and field observations at the chemical warehouse, it is known that there is no stock of paraquat in the warehouse chemical material. The company has a Technical Weed Supply SOP which is regulated in the SOP, including:

- Spot Spraying technical guidelines,
- Weed Spray Technical Guidelines,
- Circle Path and TPH Spray Technical Guidelines,
- Weed Control Technical Guidelines

For example, in the Circle Path and TPH Spray Technical Guidelines, it is explained the solution used for the herbicide glyphosate + Methyl metsulfuron. The SOP and work instructions on weeds management, the guidance covering about chosen, storage, application, contaminated handling, known about signs and symptoms of pesticides poisoning and first aid for poison case.

Based on the results of interviews with foreman of herbicide application in the circle and path spraying activity block D04 Planting Year 1996, it is known that the pesticide foreman knew the types of weeds that were targeted and the trademarks used and the dosages used.

### 7.2.2

The company records every pesticide use that explains the Active Ingredients, Amount of pesticides used, content of active ingredients, LD50, area of pesticide application (Ha). For example, the use of the Metaprima pesticide for the period January – July 2021, the active ingredient of methyl metsulfuron, which explains the total area, FFB production, use of materials and toxicity of pesticides.

The certificate holder shows information regarding the recapitulation of the use of all types of pesticides which are listed in the Chemical Use Report document, updated June 30, 2021. The document describes the use of 12 chemicals according to the active ingredients, trademarks and monthly usage, for example:

- Methyl metsulfuron, total use 176.9 kg.
- Triclopyr butoxy ethyl ester, total use 382.80 liters
- Ammonium glufosinate, total use 74 liters.

### 7.2.3

As part of reducing the use of pesticides, the company has integrated biological control in pest control, for example by using beneficial plants aimed at controlling oil palm leaf eating caterpillar pests and owl for controlling rats. Based on the

review of the oil palm leaf eating caterpillar pest census document and rat pests, it was found that there were no pest attacks that exceeded the threshold, this is in line with the results of the review of pesticide use documents and visits to the pesticide warehouse where no use of pesticides was found for controlling animal pests.

The certificate holder shows information on types of biological control, such as the use of owls to control rat pests, which are listed in PT BBB's Tyto Alba Owl Gupon Monitoring document for the first monitoring period in July 2021 and the second monitoring period in July 2021. The document explains the number of owl cages installed in the area. each block per Division along with conditions and signs of Tyto Alba's activity. For example, in the second monitoring in Afdeling E, it was found that during the monitoring on July 31, 2021, there were 31 owl cages installed according to the plan, but in its implementation, there was 1 unit in a collapsed condition. In addition, the condition of the owl's cage was seen in an active condition, characterized by droppings, feathers, rat bones, eggs, chicks and adult birds.

#### 7.2.4

There is no preventive use of pesticides for the prevention of pests and diseases (prophylactic use). This is evidenced by, among other things, the selection of special materials used or not by the company, which are listed in the list of pesticides used. For example, the pesticide Ammonium glufosinate targets broad-leaved weeds (*Borreria alata*) and narrow-leaved weeds (*Ottochloa nodosa*, *Imperata cylindrica*, *Scleria sumatensis*).

The company continues to minimize the use of pesticides as part of the plan according to the IPM plan. The use of pesticides is not preventive for disease prevention (prophylactic use), but based on census results that exceed the specified threshold value. As an example of the company's efforts, the company is trying to develop owls (*Tyto alba*) as natural enemies of rat pests. Based on the results of field observations, it was found that the activity of owls as control of rat pests was marked by the presence of dirt, feathers and rat bones around the owl's cage. In addition, in an effort to reduce the use of pesticides to control caterpillar pests by developing useful plants such as *Turnera subulata* and *Antigonon leptopus*. Based on the results of field observations in Afdeling C, D, E, G and H, it was found that *Turnera subulata* and *Antigonon leptopus* plantings were growing very well and well maintained as a form of controlling nettle caterpillars and bagworms.

#### 7.2.5

The company presented Internal Memo with the number 001/TAP/MIN-EST-HO/II/13 dated 22 February 2013 on the termination of paraquat herbicide reservation. The memo was issued by Estate Division Head. The memo is valid from 22 February 2013. Based on document verification, there is no application of paraquat and WHO Class 1A or 1B or that are listed by the Stockholm or Rotterdam Conventions from July 2019 until June 2020.

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

#### 7.2.6

The company showed that pesticides are only handled, used or applied by persons who have completed the necessary training, for example:

- Socialization related to work safety in spraying activities on 5 February 2020, attended by 5 workers in Afdeling E.
- Training related to spraying activities on 9 April 2020, attended by 5 workers.
- Training related to the introduction of dangerous weeds and spraying of these weeds on 8 April 2020, attended by 6 workers.

Based on field observations at block A04 dan D04, it is known that pesticides are applied according to product labels, such as the use of complete PPE in the form of face shields, respirators, gloves, masks, spray clothes and boots. All warning information affixed to the product is properly observed, applied and understood by workers. Sprayers and packaging for transporting materials and vehicles for transporting materials are equipped with the appropriate hazard symbols and an MSDS is available.

#### 7.2.7

Based on the results of field observations at the agrochemical warehouses block A10, it is known that the storage of all pesticides is in accordance with recognized best practices, which refers to PP. 74 of 2001 concerning Management of Hazardous and Toxic Materials. Based on the results of these field observations, it can be explained that the storage area has been equipped with B3 symbols, MSDS, ventilation, pesticide spills, eyewash and showers, fire extinguishers, first aid kits, emergency handling flows, racks according to packaging and others.

#### 7.2.8

The company already has SOP for storing pesticides number SOP PT/SUPP/2018/028. The SOP describes the mechanism for storing pesticides in a special warehouse, including a place for mixing pesticides to be used in the field in a special isolated place so there is no potential for chemical exposure to outside the warehouse. Storage of used pesticide packaging is stored in a temporary storage area for hazardous and toxic waste materials and then sent to a licensed collector.

Based on field visits in the pesticide warehouse and the temporary storage area for hazardous and toxic waste in the estate, it was found that the pesticide storage area was well managed, oil traps were available, adequate and isolated airways so there was no potential for pesticide exposure to leave the warehouse. Pesticide waste, such as used pesticide packaging which is classified as hazardous and toxic waste, was also found to be stored in a temporary storage warehouse for hazardous and toxic materials which were properly monitored and then collected to licensed collectors. Before being stored in a temporary storage place for hazardous and toxic waste, the used pesticide packaging in the form of jerry cans is shredded first, this is done by management to avoid reuse of pesticide packaging and make storage efficient.

Based on interviews via telephone with employees and foremen of pesticide application in estate, it was found that all containers used for pesticide packaging were returned and sent to temporary storage places for hazardous and toxic waste materials that were not used for purposes other than pesticide application activities. All used containers, work tools and work clothes are stored in a special storage area. Thus, there are no contaminated items to be taken home. The results of the employee's home observations show that it is not found that the used pesticide packaging is disposed of at the disposal site and is not used for other purposes such as trash cans, flower pots and so on.

#### 7.2.9

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

#### 7.2.10

Unit of certification has agreement with Daya Medika Clinic dr. Sander B to conduct medical checkup including special medical checkup every semester. However, during pandemic situation, those activities has postponed, as justify through Circular Letter from Minister of Manpower to all Governor NO. M/7/AS.02.02/V/2020 dated 20 May 2020 about covid protocol in the company. One of the messages is to avoid crowd and health facilities, if not urgently necessary. Furthermore, it also stated that any medical checkup shall be postponed, after all OSH aspect has fully covered or no more covid-19 pandemic. As response of this Letter Sustainability Division Head of PT Triputra Agro Persada issued Letter No. 007/TAP/SUS-HO/XII/2020 dated 02 December 2020 about medical check-up postponed.

#### 7.2.11

Based on interview with Gender Committee representative which also a midwife, it was known that pregnant and breastfeeding women are prohibited to works with agrochemicals. Pregnancy detection test is conducted every month. currently there are no pregnant and breastfeeding women.

Status: Comply
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### 7.3

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

#### 7.3.1

All waste products and sources of pollution have been identified and documented in the waste management and identification document period of 2020. Based on document verification shown company has implemented waste management accordance with waste identification source and management plan for examples are :

- Estates, waste source: chemist activities, waste type: ex pesticides containers (toxic and hazardous waste), clinic waste, managed by stored in optimalization store and sent to related transporters
- Mill, waste source: FFB process, waste type: shell and fiber (non-toxic/hazardous waste), managed by renewable energy usage for boiler
- Mill, waste source : FFB process, waste type : palm oil mill effluent, managed by the effluent pond and land applications as nutrient cycle.
- Estates, waste source: pruning activities, waste type: oil palm frond (organic waste), managed by frond stacking.

Based on field visits at residential locations, warehouse for Hazardous and Toxic Waste and warehouse for fertilizers and chemicals in PT Brahma Binabakti POM and Estate, it was found that the company had carried out management related to Hazardous and Toxic Waste and non-Hazardous and Toxic Waste in accordance with established procedures.

### 7.3.2

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

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

Based on a field visit at the Temporary Storage for Hazardous and Toxic Waste, it was found that the Brahma Binabakti POM and Estate Temporary Storage for Hazardous and Toxic Waste had a permanent design with adequate ventilation and a roof that would not be exposed to rainwater and had a watertight floor. The temporary storage place for hazardous and toxic waste is equipped with SOP for storage of hazardous and toxic waste, SOP for emergency response procedures, logbooks, symbols on buildings, safety signs, fire extinguishers, first aid facilities, emergency alarms/bells, lighting lamps and facilities. emergency response tool (spill kit) for spills in the form of sawdust/fiber.

Base on-field visit explains results of field visit related to waste type are properly disposed of based on toxicity and hazardous characteristics. Base on an interview with the manager related to the disposal of domestic waste, by separating organic and inorganic waste. Afterward, fiber and shell are managed by renewable energy usage for boiler and palm oil mill effluent (POME), managed by the effluent pond and land applications as a nutrient cycle.

### 7.3.3

The company does not carry out open burning for waste disposal. Base on field observation known waste separation is separated based on the type of wet and dry waste, garbage transportation is carried out routinely, waste separation organic and inorganic are adjusted to the appropriate tub then put into the final waste disposal and closed periodically. Based on the results of field visits, both on land and in housing, there was no indication of open burning of hazardous and toxic waste or domestic waste.

<b>Status: Comply</b>
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## 7.4

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

### 7.4.1

The company has SOPs for soil fertility management in the Fertilization Chapter:

- Manual Fertilization Technical Guidelines, (PT/EST/IX/2017/024)
- Technical Guidelines for Mechanical Fertilization, (025/PT/II/2014)
- Technical Guidelines for Organic Fertilization with Liquid Waste Application (POME LAND), (026/PT/VII/2014)
- Technical Guidelines for fertilizer sampling test, (PT/EST/X/2017/031)
- Technical Guidelines for Fertilization in seedling and fertilizing legumes, (039/PT/XI/2014)
- Technical Guideline for Leaf Sampling Unit, (050/PT/VIII/2014)
- Nutrients and deficiency symptoms in Plants.(052/PT/IX/2014)
- Soil Sampling Unit. (069/PT/VIII/2014)

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

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

Based on the results of field observations, in Afdeling G, H and D, it is known that there are fertilization applications using organic fertilizers in the form of empty leaves and land applications.

#### 7.4.2

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

- Results of Analysis of LSU Leaf Samples from the Testing Laboratory (LP-1124-IDN), Date of Receipt 06 October 2020, Start of Analysis 13 – 31 October 2020, Number of Samples 14 Samples, Request for Analysis of N, P, K, Mg and B. For example, Sample Code BBB-55 N is 2.32 %, P 0.18 %, K 0.97 %, Mg 0.24 % and B 18 ppm.
- Soil Sample Analysis Results, from the Testing Laboratory (LP-1124-IDN), Date of Acceptance 08 June 2020, Start of Analysis 29 June – 24 July 2020, Number of Samples 16, Request for Analysis of pH, Total N, C-Organic, Total P and others.

#### 7.4.3

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

- Recap of PT BBB's 2021 EFB Application, which explains the application of plan/actual/block vacancies and the application area (ha) plan/actual/block per month until July 2021. For example, for the period of July 2021, it is known that it is planned the application area is 114 ha and is applied to 113.9 ha in blocks C12 and B12.
- POME from BBB POM is used by the company to be applied to land in Afdeling H. The use of POME is documented every month and also reported to the relevant agencies through the *Laporan Pemanfaatan Limbah Cair* Report every 3 months. Based on this document, it is known that in July 17,921 m3 of block E05/B03 had been applied.

#### 7.4.4

Records of fertilizer use are maintained and can be shown during audit activities, which are listed in the Full Year Vs Act Recap Fertilizer Recap document until July 2021, which explains the recommendations and actualization of fertilizers in detail per type, starting from information on division, block, area, tree amount, dose per type of fertilizer, total tonnage and others. Based on the document, it can be briefly explained the achievement of realization in 2021 per type of fertilizer as follows:

- Urea: recommended 85,735 kg and has been completed 85,735 kg (100%)
- MOP: recommended 42,948 kg and has been completed 41,400 kg (96%)
- Kieserite: recommended 5,750 kg and has been completed 5,750 kg (100%)
- Borate: recommended 6,376 kg and has been completed 3,188 kg (50%)

<b>Status: Comply</b>
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**7.5**
**Practices minimize and control erosion and degradation of soils.**
**7.5.1**

There are maps that identify marginal and fragile soils, including land with steep slopes, which are as follows:

- Soil Type Map with scale 1:140,000 with map projection geographic (Lat/Lon), Spheroid: World Geodetic System 1984, planar unit: ARC Degrees, source SRTM 90m DEM 2010. Created on 5 September 2014.
- Slope Map with scale 1:140,000 with map projection geographic (Lat/Lon), Spheroid: World Geodetic System 1984, planar unit: ARC Degrees, source SRTM 90m DEM 2010. Created on 5 September 2014. Information available on map This includes the level of slope of the area, for example 0 – 8% = flat, 8 – 15% = gentle, and 15 – 25% = slightly steep.
- The results of the identification of high conservation values (HCV) in the PT BBB area issued by Aksenta in June 2019, it is explained that the type of soil in the company's HGU is dominated by Typic Dystrudepts, Typic Hapludults, Typic Haploortox, Typic Paleudults, and Typic Eutrodepts. Based on this, it is concluded that there is no soil with the category of peat in the company's HGU area.

Based on the results of field observations in the new planting area for the 2019 planting year, for example in block H19 Afdeling E, it is known that the land is not marginal land and fragile soil. This is in accordance with the land suitability assessment that has been carried out and the map of soil types and slopes shown.

**7.5.2**

Oil palm replanting is carried out in areas that have been planned according to plant conditions such as unproductive age. In areas with slopes, replanting activities are carried out by making contour terraces. Based on the results of field observations in Afdeling D Block C3 in the replanting area, it is known that there is a treatment for making contour terraces on sloping - wavy land.

**7.5.3**

Based on the results of field observations in block H19 Afdeling E, it is known that new oil palm plantings (planting year 2019) were not carried out on land with steep terrain.

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

Based on the results of field observations in Afdeling E block H-19 which is a new crop (new planting) conversion from rubber plants to oil palm plants in the 2019 planting year, it is known that the land planted is suitable for oil palm cultivation, namely with sloping topography and mineral soil types (not peat). This is in line with:

- Soil Type Map with scale 1:140,000 with map projection geographic (Lat/Lon), Spheroid: World Geodetic System 1984, planar unit: ARC Degrees, source SRTM 90m DEM 2010. Created on 5 September 2014.
- Slope Map with scale 1:140,000 with map projection geographic (Lat/Lon), Spheroid: World Geodetic System 1984, planar unit: ARC Degrees, source SRTM 90m DEM 2010. Created on 5 September 2014. Information available on map includes the level of slope of the area, for example 0 – 8% = flat, 8 – 15% = gentle, and 15 – 25% = slightly steep.
- The results of the identification of high conservation values (HCV) in the PT BBB area issued by Aksenta in June 2019, it is explained that the type of soil in the company's HGU is dominated by Typic Dystrudepts, Typic Hapludults, Typic Haploortox, Typic Paleudults, and Typic Eutrodepts. Based on this, it is concluded that there is no soil with the category of peat in the company's HGU area.

**7.6.2 & 7.6.3**

Based on the results of field observations in the new planting area for the 2019 planting year block H19 Afdeling E, it is known that the land is not marginal land and fragile soil. This is in accordance with the land suitability assessment that has been carried out and the soil type and slope map shown.

	<b>Status: Comply</b>	
<b>7.7</b> <b>No new planting on peat, regardless of depth after November 15<sup>th</sup>, 2018 and all peatlands are managed responsibly.</b>		
<b>7.7.1, 7.7.2, 7.7.3, 7.7.4, 7.7.5, 7.7.6 &amp; 7.7.7</b> <p>Based on the results of field observations in the Afdeling C, E, G and H areas, no peatlands were found. This is in line with the results of the verification of the soil type map document with a scale of 1:140,000 with map projection geographic (Lat/Lon), Spheroid: World Geodetic System 1984, planar unit: ARC Degrees, source SRTM 90m DEM 2010. Created on September 5, 2014 it is known that there is no soil classified as peat in the company's operational area.</p> <p>From the results of the identification of high conservation values (HCV) in the PT BBB area issued by Aksenta in June 2019, it is explained that the type of soil in the company's HGU is dominated by Typic Dystrudepts, Typic Hapludults, Typic Haplorox, Typic Paleudults, and Typic Eutrodepts. Based on this, it is concluded that there is no soil with the category of peat in the company's HGU area.</p>		
	<b>Status: Comply</b>	
<b>7.8</b> <b>Practices maintain the quality and availability of surface and ground water</b>		
<b>7.8.1</b> <p>The company has identification on water course within its operational area in HCV document and there is also water management plan covered in HCV management plan, environmental management plan document (RKL/RPL document) and Interna Memo number. MI/SUST/1/2019/003 dated 01 January 2019. Among other the plan covers determination of riparian area border, protection of riparian area by not conducting chemical spraying and tree enrichment. The action taken among other by testing periodically river water quality, monitoring volume of water use, applying treated mill effluent to permitted land application.</p> <p>Company also conducted regularly water quality testing every semester for Sekawan river (upstream &amp; downstream) based on RKL/RPL matrix. Document review showed that semester 1 2021 testing results for Sekawan river quality (upstream and downstream) dated 2 March 2021 are still compliant with standard quality (government regulations Number 82-year 2001).</p> <p>The company also conducts groundwater quality testing. Results of groundwater quality analysis of PT. Brahma Binabakti on March 2, 2021. Based on the results of the test, no parameter exceeds the threshold value determined in accordance with the Minister of Health Regulation No. 492 of 2010.</p> <p>Based on workers interviews on estate housing shown that drinking water for them originated from refill water / reverse osmosis water station and Mill also provides clean water access for all workers.</p>		
<b>7.8.2</b> <p>The unit certification conducted practices maintain the quality and availability of surface and groundwater, explained on HCV management plan to maintain the HCV areas in the operation area of PT BBB, listed on Management plan HCV 2020 and 2021 documents. HCV management activities that are taken by the management unit are maintained HCV attributes (HCV boundary, signboard), HCV socialization (community and worker), maintain HCV area, regular patrols for maintaining HCV security, water source, enrichment in riparian.</p> <p>Base on field visit during audit, for examples on Suak Putat river block C10, acquired information that company shown proper ways for maintain and protect the catchment area for example manual weeding and marking the chemical boundary border.</p>		
<b>7.8.3</b>		

POME quality testing document review shown for August 2019 to April 2020 all of POME testing parameters are compliant to the standards quality (for examples BOD on April 2020 are 4,867 mg/l with threshold 5000 mg/l and pH 7,86), and all of POME management and monitoring has been reported to related institutions for regular basis per 3 months. On the onsite audit the company also conducted POME quality testing, based on document verification POME testing report on January – June 2021 still accordance minister environmental number 28-year 2003.

The company has an extension area permit to utilize POME from the palm oil industry to PT Brahma Binabakti on the ground in accordance with the Decree of Badan Satu Pintu terpadu (Investment Board of Jambi Province) No. 503/249//DPMPTSP/2019 year 2019 valid 5 years.

#### 7.8.4

The procedure of water use monitoring in mill available under document Procedure of Water Treatment Plant. Water consumption monitored by using flowmeters installed in the piping system of WTP. Base document verification metric template RSPO is known recording water consumption record for period January until December 2020 fresh water usage 235.275 m<sup>3</sup> and mill fresh water per produced tonnes 3,75 (M<sup>3</sup> / MT).

**Status: Comply**

#### 7.9

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

##### 7.9.1

The unit certification already maximizing the use of renewable energy (fiber & shell) as boiler fuel. For example, use of shells and fiber period January to December 2020 POM has produces 1,145,277 kWh of electricity from turbine. Renewable energy use per ton of palm product in the mill is 14.11 kwh / ton CPO. Result Direct fossil fuel used is 0.13 kWh/ ton CPO. Based on the verification results of the document on the efficiency of the use of fossil fuels from January to December 2020, it is concluded that the plan to reduce the use of fossil fuels has been achieved by utilizing shells and fiber.

**Status: Comply**

#### 7.10

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

##### 7.10.1

The company has identified source of pollution and air emission sources, including gaseous, particles and shoot emissions and effluent covering emissions and pollution sources from estate and mill operations. The emission source identified from estate and mill operation among others are land use change, vehicle operation, machine operation, fertilizer and pesticide application, use of AC/refrigerator, waste piling and electricity consumption.

Identification of significant GHG gas emission source is identified and the mitigation plan has been developed by the company covering mill and estate. The significant GHG emission among others are land use change, POME, use of fertilizer and pesticide, use of fossil fuel for operation and transport. The mitigation plan among others is correct dosage use for fertilizer and application as recommended, reduce reuse and recycle action, electric use limitation, transport and engine maintenance, periodic air quality test.

Fossil fuel reducing on Brahma Binabakti POM have been implemented by fiber/shell usage for boiler. POME has been monitored every month and monitoring periods January to June 2021 shown that all of POME testing parameters is compliant to the standards quality.

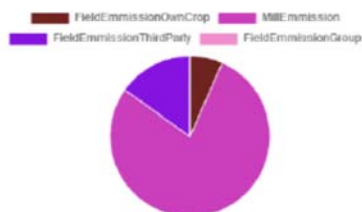
Based on document review for examples: pesticides usages monitoring, diesel fuel monitoring, HCV identification and etc. found that accurate data has been put into the RSPO palm GHG Calculator.

The calculation of GHG and its monitoring has conducted by EHS department. GHG emission for 2019 calculated using RSPO palm GHG calculator 4.0 Summary of GHG emission for Brahma Binabakti POM and its supply base are listed as follows:

#### Summary Emission

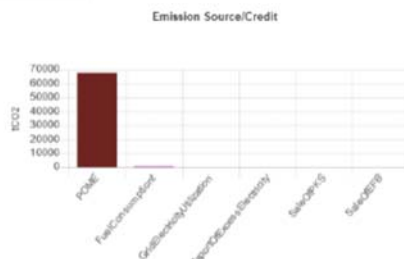
Product	tCO <sub>2</sub> e / tProduct	Action
CPO	0.98	
PK	0.98	
PKO	0.00	
PKE	0.00	

Description	Unit	Value	Action
Oil palm planted on mineral soil	Ha	5365.52	✓
Oil palm planted area on peat	Ha	0.00	✓
Total oil palm planted area	Ha	5365.52	✓
Conservation area (Forested)	Ha	0.00	✓
Conservation area (Non-Forested)	Ha	70.09	✓
FFB Production per hectare	t/ha	64.68	✓
OER	%	20.73	✓
KER	%	5.30	✓



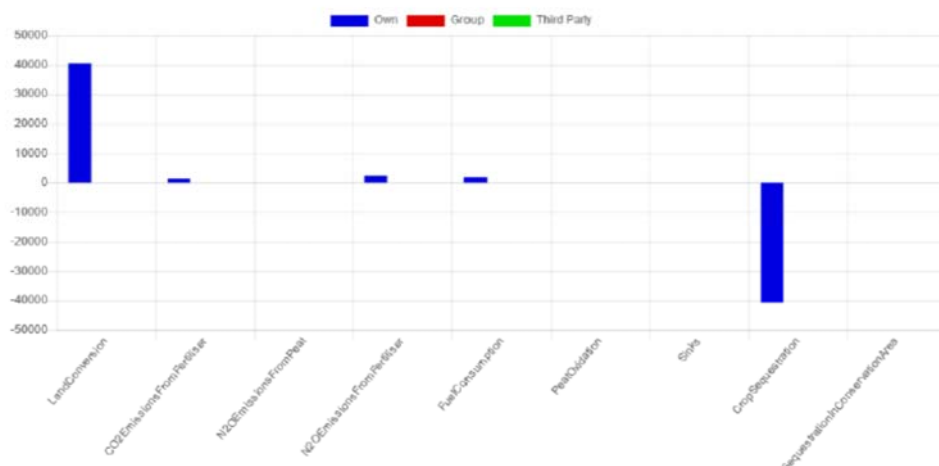
#### Mill Emissions and Credits

Description	tCO <sub>2</sub>	tCO <sub>2</sub> e/t FFB	Action
<b>Emission Sources</b>			
POME	68029.13	0.20	
Fuel Consumption	830.59	0.00	
Grid Electricity Utilisation	0.00	0.00	
<b>Credits</b>			
Export of Excess Electricity to Housing & Grid	0.00	0.00	
Sale of PKS	0.00	0.00	
Sale of EFB	0.00	0.00	
<b>Total</b>	<b>68860.12</b>	<b>0.20</b>	



#### Estate/Plantation field emissions and sinks

	Own			Group			3rd Party			
Description	tCO2e	tCO2e/ha	tCO2e/t FFB	tCO2e	tCO2e/ha	tCO2e/t FFB	tCO2e	tCO2e/ha	tCO2e/t FFB	Total
Emission Source										
Land Conversion	40734.39	7.59	0.52	0.00	0.00	0.00	0.00	0.00	0.00	40734.39
CO2 Emissions from Fertiliser	1561.65	0.29	0.02	0.00	0.00	0.00	0.00	0.00	0.00	1561.65
N2O Emissions from Peat	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
N2O Emissions from Fertiliser	2417.84	0.45	0.03	0.00	0.00	0.00	0.00	0.00	0.00	2417.84
Fuel Consumption	1955.00	0.36	0.02	0.00	0.00	0.00	0.00	0.00	0.00	1955.00
Peat Oxidation	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Sinks										
Crop Sequestration	-40808.44	-7.61	-0.52	0.00	0.00	0.00	0.00	0.00	0.00	-40808.44
Sequestration in Conservation Area	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	5881.44	1.10	0.07	0.00	0.00	0.00	13436.49	0.00	0.00	19311.93

**Field Emission and Sinks**


The GHG emission calculated using RSPO palm GHG calculator 4.0 Summary of GHG emission for Brahma Binabakti POM and its supply base for period 2020 are listed as follows:

**Summary Emission**

Emission per product	tCO2e/tProduct
CPO	1.41
PK	1.41

Production	t/yr
FFB processed	307,868.80
CPO produced	62677
PK produced	16278

Extraction	%
OER	20.36
KER	5.29

Land use	Ha
Planted area	5385.06
Planted on peat	0
Conservation Area Forested	70.09
Conservation Area Non Forested	0

**Summary of field emission and Sinks**

Description	Own crop			Group			Total
	tCO2e	tCO2e/ha	tCO2e/tFFB	tCO2e	tCO2e/ha	tCO2e/tFFB	
Emissions Sources							
Land conversion	41298.69	7.67	0.58	0	0	0	41298.69
CO2 emissions from fertilizer	2699.52	0.50	0.04	0	0	0	2699.52
N2O emissions from Peat	0	0	0	0	0	0	0
N2O emissions from Fertilizer	3348.35	0.62	0.05	0	0	0	3348.35
Fuel consumption	1848.08	0.34	0.03	0	0	0	1848.08
Peat oxidation	0	0	0	0	0	0	0
Sinks							
Crop sequestration	-35524.12	-6.60	-0.50	0	0	0	-35524.12
Sequestration in Conservation area	-642.73	-0.12	-0.01	0	0	0	-642.73
Total	13027.80	2.42	0.18	0	0	0	55661.28

**Summary Oil Mill Emissions and Credits**

Remarks	tCO <sub>2</sub> e	tCO <sub>2</sub> e/t FFB
Emissions sources		
POME	60347.50	0.20
Fuel consumption	760.47	0.00
Grid electricity	0	0
Credits		
Export of grid electricity	-5488.18	-0.02
Sales of PKS	0	0
Sales of EFB	0	0
Total	55619.79	0.18

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

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

**POME Divert to Anaerobic Digestion**

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

The company giving justification the GHG value per ton product is increased because decrease CPO production and increase used fertilizer on estate.

**7.10.2**

Based on documents verifications, field observation and interview with management it was known there are new planting after 1 January 2010 covering 1,013.43 Ha with planting year 2019 where the area is conversion from rubber Plantation to palm oil Plantation and the area located in the scope of certifications. Based on documents verification (LURI Reports) those area categorized low risk area

Based on interview with Management representative, planted on 2006 & 2007 are Plasma and own estate PT BBB. Distribution of land is 30% for Own estate and 70% for smallholders. The last year land clearing for area planted on 2006 & 2007 was conducted in September 2004. There is cooperation agreement for land clearing on September 3rd, 2004 between PT Kirana Sekernan with Cooperative unit of Akso Dano Village.

**7.10.3**

The company has identified pollutions and emissions sources of Brahma Binabakti POM for the period 2020, such as CO<sub>2</sub> (boiler, generator, transportation), CH<sub>4</sub> (POME), hazardous waste (WTP, chemical storage), noise (machinery). The sources of pollution and emissions for the estate are listed on the identification documents and management plans for pollution sources for the period 2020, such as emissions (CO<sub>2</sub>, CO), noise, chemical waste, organic and inorganic waste, and infectious waste. The emission testing on meet with regulation i.e generator emission accordance with environment minister's decision number 13 year 2009 appendix 1, boiler emission accordance with environment minister's decision number 07 year 2007.

Plans to reduce or minimize have been implemented and monitored as explained in RKL-RPL semester II the year 2019 and semester 1 year 2021. Fossil fuel reduction on Brahma Binabakti POM have been implemented by fiber/shell usage for the boiler.

**Status: Comply**
**7.11**
**Fire is not used for preparing land and is prevented in the managed area.**
**7.11.1**

Zero burning policy has been developed and listed on *Prosedur Pedoman Teknis Imas* (No: 008/PT/II/2014). The company does not new planting, the company only carries out replanting and conversion from rubber plantations to oil palm. Based on field visit is known their activities conducted by mechanic

#### 7.11.2

The company has demonstrated the plan and realization of the program for preventing land and forest fires in 2020 and 2021, for example:

- Creation of a fire hazard map available in February 2020.
- Dissemination of prevention and control of forest and land fires by disseminating information from the Fire Fighter Province dan Police regarding law enforcement in the prevention and control of forest and land fires date 3 August 2021.
- Fire management training and simulations were held every month.

The company has shown a list of facilities and infrastructure owned by referring to equipment standardization in the Minister of Agriculture Regulation number 5 of 2018 and the equipment monitoring every month.

Management and monitoring actions related to the prevention of forest and land fires, the company carries out according to what is stated in the management and monitoring plan for semester 1 of 2021, which are described as follows, for example:

- Implementing a zero-burning system by clearing land using heavy equipment.
- Maintaining the river riparian area by carrying out an enrichment program for woody plant species in the riverbank area
- Formation of firefighting teams in each estate and at the factory.
- Hold firefighting training in each for employees
- Carry out routine patrols
- Utilizing water reservoirs or reservoirs in plantation areas and around employee housing estates as natural water sources in the context of forest and land fire prevention
- Installation of signboards prohibiting forest burning in plantation areas

Based on field visits and interviews by phone with several employees, that the company has made fire prevention and control efforts through the installation of signboards related to forest and land fires, socialization to employees and during fire simulations by the estate firefighting teams, it can be concluded that the team has been trained in the use of firefighting equipment.

#### 7.11.3

The company regarding the formation of a fire-care community group (*Kelompok Masyarakat Peduli Api*) in Village Head of the village Tanjung Lanjut, Bukit Baling Village, Suak Putat Village in 2021. Base on interview via telephone with the Village Head of the village Tanjung Lanjut, Bukit Baling Village, Suak Putat Village. The company gives a reward for each village that can keep the land fires every year.

**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

Until recertification remote and onsite audit conducted, no new planting activities above 15 November 2018, the company did not conduct new land clearing activities or development of operational areas. Land clearing was conducted in 1995. This is in accordance with email from RSPO dated March 16<sup>th</sup>, 2018 PT Brahma Binabakti Estate has disclosed with *zero non-compliant land clearance*.

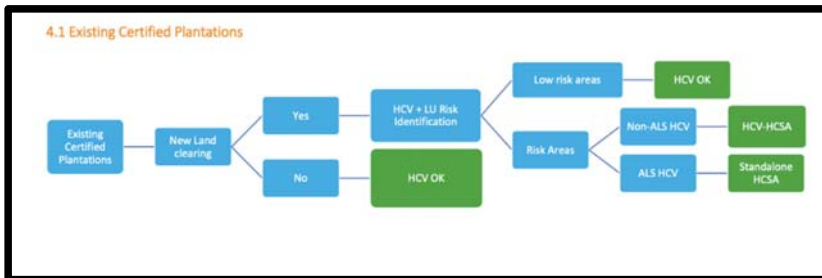
##### 7.12.2

The company has a report identification HCV PT BBB was conducted on 7-12 May 2013 by Ahmad Faisal Siregar S.Hut. MSI (HCV Consultant). Based on identification area HCV is 30.66 Ha such as Anak Mendahara River (16.77 Ha) and Suak Putat River (13.89 Ha). The methodology based on guidance identification HCV Indonesia Version II June 2008. Consultation process was involved local communities (Suko Awin Jaya Villages, Bukit Baling Villages, Suak Putat Villages and Tanjung Lanjut Villages. Peer review by Dr. Ir. Nyoto Santoso on May 2013. Based on ASA-2 audit findings regarding

to riparian area, the company has re-measurement of their riparian area which is concluded that the company added perimeter of HCV in riparian area. It increasing HCV area in riparian area amount 2.12 Ha, so that the total area of HCV managed by the company is 32.78 ha.

The company conducted an HCV document review on 7 January 2019 (Aksenta). A review of HCV documents was carried out for the study area of 7,227.31 Ha. Based on the results of the review, it is known that the area of HCV PT BBB is 70.09 Ha which is spread in planted areas, rivers and rubber plantation areas. The results of the review of HCV document found 9 species of mammals, 64 species of aves, 12 types of herpetofauna and 132 species of plants. As for the types of RTE found 3 types of mammals, 11 types of Aves, and 1 type of Herpetofauna. an example of an animal RTE is turtle (*amboinensis*).

During remote audit in June 2020 there non conformity regarding where in 2020 based on document verification of document statement obtained it was known in the certification area there is a conversion from rubber plantation to palm oli plantation covering an area of 1013.43 Ha. in accordance with NPP Procedure 2015 and 2021 it's due to the new planting area located in the scope of certification, the obligation to carried out NPP verifications it's not applicable. However, the unit certification has not been able to show that the new land clearing has been carried out identification of land use risk (LURI) and the stages as set out in the RSPO document Interpretation indicator 7.12.2 and Annex 5 for the RSPO P&C 2018.



Regarding those non conformity the unit of certification can presented corrective evidence in the form of :

- Email to RSPO related to LURI planting area in 2019 originating from Conversion of rubber plantations to Oil Palm on 27 July 2020.
- Email response from RSPO on 28 July 2020 related to the situation encountered at PT Brahma Binabakti, which explained based on the situation and scenario it was explained that LURI does not need to be sent to the RSPO Secretariat for review 28 July 2020 and do not need to carried HCS Assessment.

### 7.12.3

Base on document submitted by Proforest namely RSPO No deforestation consultancy: high forest cover countries, Consultancy report on definitions and recommendations to the RSPO June 2018 as known not set HFCL for Indonesia.

### 7.12.4

The unit certification established HCV management plan to maintain the HCV areas in operation area of PT BBB, listed on Management plan HCV 2020 and 2021 documents. HCV management activities that taken by the management unit are maintain HCV attributes (HCV boundary, sign board), HCV socialization (community and worker), maintain HCV area, regular patrols for maintain HCV security, species monitoring, enrichment in riparian. The management plan has contained type of activities, timeline, PIC and location.

The HCV management plan to maintain the HCV areas in operation area of PT BBB, listed on Management plan HCV 2020 and 2021 documents. The management and monitoring plan has been referring to the latest HCV document review that is document review 7 January 2019 by Aksenta and the last review on 12 January 2021.

The HCV management and monitoring implemented that taken by the management unit such as maintain HCV attributes (HCV boundary, sign board), HCV socialization (community and worker), maintain HCV area, regular patrols for maintain HCV security, species monitoring, enrichment in riparian. Management plan HCV 2020 and 2021 has developed in

consultation with relevant stakeholders and covers areas affected such as Suko Awin Jaya Villages, Tanjung Lanjut Villages and Bukit Baling Villages. The last forum group discussion on 30 December 2020.

The company has implemented the HCV management in accordance with the management plan/ procedure for the period 2020 and 2021. The management plan is reviewed every year, for example, the review on period 2020 involved government, village heads, community leaders, traditional leaders, local communities around the operational area.

Base on field visit during audit, for examples on Suak Putat river block C10, acquired information that company shown proper ways for maintain and protect the catchment area for example manual weeding and marking the chemical boundary border. The auditor found that companies have marked perform revegetation with *ketapang*, and HCV signboard placement. During field visit also found riparian condition were managed well and there is no chemical activity indications on those riparian that become sampling audit.

#### **7.12.5**

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

#### **7.12.6**

The identification of rare, threatened or endangered / RTE species included HCV document review that is document review 7 January 2019 by Aksenta. The results of the review of HCV document found 9 species of mammals, 64 species of aves, 12 types of herpetofauna and 132 species of plants. As for the types of RTE found 3 types of mammals, 11 types of Aves, and 1 type of Herpetofauna. an example of an animal RTE is turtle (*amboinensis*).

The Company has showed the guidance handling technique *Orang utan* and protected wildlife with number of document 001/PT-HCV/III/2015 approved by CEO Group. Based on HCV management implementation report, known the unit certification installed information signboard on estate office and housing complex related the type of wildlife, sanction if the workers hunting and killing the wildlife amounted to IDR 100.000.000 and prison for 5 years lin accordance with regulation number 5-year 1990. The company also installed sign board that informs of hunting wildlife prohibiting, conservation responsibility and fire awareness that located in Suko Awin Jaya Villages, Tanjung Lanjut Villages and Bukit Baling Villages.

The company have established HCV management plan, and implemented it well. Regularly patrols record shown company has been monitored illegal hunting, and other illegal activities. All of records for daily patrols on each estate are available and verified by auditors.

For example RTE patrols summary results on 2020 for conservation area on Kaos riparian such as *Simpai* (*Presbytis melalophos*), *Kucing Hutan* (*Prionailurus Bengalensi*), *Tiong Emas* (*Gracula religiosa*), and *Elang Tikus* (*Elanus caeruleus*). Meanwhile flora species trap is Mahang (*Macaranga triloba*). The patrols summary results RTE species on 2021 such as *pekakak emas* (*palargopsis capinensis*) and *Kipasan belang* (*rhpidura javanica*).

The program to regularly educate the workforce about the status of RTE species explained on management and monitoring implementation report HCV semester 2 year 2021, such as education to workforce for RTE species date 17 February 2021 BBB estate. Afterward, the installation of signboards containing RTE species information appeals and prohibitions in accordance with Indonesia regulation.

Based on the results of field visits and interviews via telephone with employees, it is known that they have understood the protection of flora and fauna which is socialized by the company.

#### **7.12.7**

The HCV management activities that taken by the management unit for period 2021 are maintain HCV attributes (HCV boundary, sign board), HCV socialization (community and worker), maintain HCV area, regular patrols for maintain HCV security, species monitoring, enrichment in riparian. The company has also submitted a report related to the biodiversity database and monitoring & management HCV of PT BBB to the Natural Resources Conservation Center of Jambi Province.

The management plan period 2020 is effectively and implemented based on the monitoring result implementation period 2019. The enhancement and result of the HCV / RTE monitoring review for the next HCV program. The review of the 2020 program, will become an HCV program in 2021, for example, the Repairing HCV signboard in December 2020 has not been fully completed and has been realization on February 2021.

**7.12.8**

Based on areal statement, Brahma Binabakti Estate not clearing land above November 2005. The land clearing was conducted on 1995 -1998. This is accordance with email from RSPO dated on March 16, 2018 (PT Brahma Binabakti with own estate) has disclosed with zero non-compliant land clearance.

Based on interview with Management representative, planted on 2006 & 2007 are Plasma and own estate PT BBB. Distribution of land is 30% for Own estate and 70% for smallholders. The last year land clearing for area planted on 2006 & 2007 was conducted in September 2004. There is cooperation agreement for land clearing on September 3<sup>rd</sup>, 2004 between PT Kirana Sekernan with Cooperative unit of Aksadano Village.

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

<b>1.</b>	<b>Evidence of permission or approval certificate and logo from Certification Body which submitted by Client</b>	<b>X or√</b>
<b>RC</b>	The company doesn't use RSPO logo or trademark	
	<b>Status: Comply</b>	
<b>2.</b>	<b>Implementation of certificate and logo used by Client comply with size and type (shape) against Guideline of Logo Use</b>	<b>X or√</b>
<b>RC</b>	The company doesn't use RSPO logo or trademark	
	<b>Status: Comply</b>	
<b>3.</b>	<b>Implementation of Certificate and Logo is not used on product</b>	<b>X or√</b>
<b>RC</b>	The company doesn't use RSPO logo or trademark	
	<b>Status: Comply</b>	
<b>4.</b>	<b>Controlling of Certificate and Logo, including withdrawing inappropriate logo.</b>	<b>X or√</b>
<b>RC</b>	The company doesn't use RSPO logo or trademark	
	<b>Status: Comply</b>	

### 3.3 Summary of RSPO Partial Certification.

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

PT Triputra Agro Persada Time Bound Plan (TBP) is explained in table 1.5. PT Triputra Agro Persada run nineteen (19) units in Indonesia. PT Triputra Agro Persada has informed the TBP, MUTU has considered that PT Triputra Agro Persada is comply with the RSPO requirement for TBP. The Time Bound Plan was declared by PT Triputra Agro Persada and has been reported to RSPO on 8 December 2020.

MUTU has verified partial certification for un-certified unit's subsidiary of PT Triputra Agro Persada based on their Time Bound Plan. MUTU Auditor verified positive assurance against the company internal audit and supporting evidence as well as any information from others sources.

MUTU Auditor has verified company partial certification and concludes that:

- There is no significant land conflicts which have not been declared below
- The company has follow RSPO requirement related to Remediation and Compensation Procedure, but not for New Planting Procedure. The company will follow the sanction from RSPO for area that has open after 1 January 2010 without NPP.
- There is no labour disputes that are not being resolved through an agreed process
- All plantations established since 2005 have been done so in accordance with the applicable laws of the country and that there is no evidence of non-compliance with law in any of the non-certified holdings which has not been declared above

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
2.2.1	Did the company conduct an internal audit? If so, has a positive assurance statement been produced?	<p><b>Company Group/Holding Statement:</b> PT TAP has conducted an internal audit for all uncertified unit.</p> <p><b>Auditor Verification:</b></p> <ol style="list-style-type: none"> <li>1. PT. Anugerah Agung Prima Abadi</li> <li>2. PT. Hanamas Jaya Abadi.</li> <li>3. PT. Etam Bersama Lestari.</li> <li>4. PT. Dwiwira Lestari Jaya</li> <li>5. PT. Hamparan Perkasa Mandiri.</li> <li>6. PT Kutim Agro Mandiri</li> <li>7. PT Kedap Sayaq Dua</li> <li>8. PT Genera Aura Semari</li> <li>9. PT Mega Ika Khansa</li> <li>10. PT Sukses Karya Mandiri</li> <li>11. PT Trieke Agro Nusantara</li> <li>12. PT Muaratoyu Subur Lestari</li> <li>13. PT Subur Abadi Wana Agung</li> <li>14. PT Pradana Telen Agromas</li> <li>15. PT Natura Pasific Nusantara</li> <li>16. PT Yudha Wahana Abadi</li> </ol> <p>Triputra Agro Persada has conducted Internal Audit for units that are not yet certified. However, there is no information on the date of the audit activity and evidence that the Internal Audit document was signed by management.</p>

2.2.2	<p>No replacement after dates defined in NIs Criterion 7.3 of:</p> <ul style="list-style-type: none"> <li>• Primary forest.</li> <li>• Any area identified as containing High Conservation Values (HCVs).</li> <li>• Any area required to maintain or enhance HCVs in accordance with RSPO criterion 7.3.</li> </ul>	<p><b>Company Group/Holding Statement:</b> PT TAP has reported the disclosure of non-compliance land clearing to the RSPO through email on December 8, 2020.</p> <p><b>Auditor Verification:</b></p> <ol style="list-style-type: none"> <li>1. PT MIK <ul style="list-style-type: none"> <li>• HCV assessment conducted by Bioref Centre on October 2014.</li> <li>• LUCA conducted by Fakultas Kehutanan IPB on June 2015.</li> </ul> </li> <li>2. PT MSL <ul style="list-style-type: none"> <li>• HCV assessment conducted by Tim HCV Fakultas Kehutanan - IPB on February 2014</li> <li>• LUCA conducted by Fakultas Kehutanan IPB on March 2015.</li> </ul> </li> <li>3. PT NPN <ul style="list-style-type: none"> <li>• HCV assessment conducted by Tim HCV Fakultas Kehutanan - IPB on February 2014.</li> <li>• LUCA still on progress</li> </ul> </li> <li>4. PT PTA <ul style="list-style-type: none"> <li>• HCV assessment conducted by Bioref Centre on October 2014</li> <li>• LUCA conducted by Fakultas Kehutanan IPB on June 2015.</li> </ul> </li> <li>5. PT SAWA <ul style="list-style-type: none"> <li>• HCV assessment conducted by Bioref Centre on October 2014</li> <li>• LUCA conducted by Fakultas Kehutanan IPB on June 2015.</li> </ul> </li> <li>6. PT SKM <ul style="list-style-type: none"> <li>• HCV assessment conducted by Bioref Centre on October 2014</li> <li>• LUCA conducted Fakultas Kehutanan IPB on June 2015.</li> </ul> </li> <li>7. PT TAN <ul style="list-style-type: none"> <li>• HCV assessment conducted by Tim Fakultas Kehutanan IPB on March 2012</li> <li>• LUCA conducted by Tim Fakultas Kehutanan IPB on June 2015.</li> </ul> </li> <li>8. PT YWA <ul style="list-style-type: none"> <li>• HCV assessment conducted by Tim Fakultas Kehutanan IPB on March 2012</li> <li>• LUCA conducted Tim Fakultas Kehutanan IPB on June 2015.</li> </ul> </li> <li>9. AAPA <ul style="list-style-type: none"> <li>• HCV Assessment conducted by Bioref Center – Forestry Faculty of IPB on August 2014.</li> <li>• LUCA conducted by Tim Fakultas Kehutanan IPB on 2016.</li> </ul> </li> <li>10. PT DLJ <ul style="list-style-type: none"> <li>• HCV Assessment conducted by Tim Fakultas Kehutanan IPB on February 2014</li> <li>• LUCA conducted by Tim Fakultas Kehutanan IPB on May 2016</li> </ul> </li> <li>11. PT EBL <ul style="list-style-type: none"> <li>• HCV Assessment conducted by Tim Fakultas Kehutanan IPB on February 2014</li> <li>• LUCA conducted by Tim Fakultas Kehutanan IPB on September 2016</li> </ul> </li> <li>12. PT GAS <ul style="list-style-type: none"> <li>• HCV Assessment conducted by Tim Fakultas Kehutanan IPB on August 2016</li> <li>• LUCA conducted by Tim Fakultas Kehutanan IPB on 2016</li> </ul> </li> </ol>
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		<p>13. PT HJA</p> <ul style="list-style-type: none"> <li>• HCV yet to be done</li> <li>• LUCA still on progress</li> </ul> <p>14. PT HPM</p> <ul style="list-style-type: none"> <li>• HCV Assessment conducted by Tim Fakultas Kehutanan IPB on June 2014</li> <li>• LUCA conducted by Tim Fakultas Kehutanan IPB on September 2016</li> </ul> <p>15. PT KAM</p> <ul style="list-style-type: none"> <li>• HCV Assessment conducted by Bioref Center – Forestry Faculty of IPB on December 2014</li> <li>• LUCA conducted by Fakultas Kehutanan IPB on December 2016</li> </ul> <p>16. PT KSD</p> <ul style="list-style-type: none"> <li>• HCV Assessment then conducted by Tim Fakultas Kehutanan IPB on June 2014</li> <li>• LUCA still on progress</li> </ul>
2.2.3	Any new plantings since January 1 <sup>st</sup> 2010 must comply with the RSPO New Plantings Procedure.	<p><b>Company Group/Holding Statement:</b> All subsidiaries of TAP not conduct NPP for new planting since 1 January 2010.</p> <p><b>Auditor Verification:</b> Based on auditor verification 16 subsidiaries of TAP not conduct NPP and will be object as sanction, those unit consist of:</p> <ol style="list-style-type: none"> <li>1. PT MIK were planted in 2007 – 2015</li> <li>2. PT MSL were planted in 2007 – 2019</li> <li>3. PT NPN were planted in 2009 – 2016</li> <li>4. PT PTA were planted in 2012 – 2019</li> <li>5. PT SAWA were planted in 2011 – 2016</li> <li>6. PT SKM were planted in 2006 – 2019</li> <li>7. PT TAN were planted in 2012 – 2020</li> <li>8. PT YWA were planted in 2006 – 2012</li> <li>9. PT AAPA were planted in 2010 - 2019</li> <li>10. PT DLJ were planted in 2001 – 2010</li> <li>11. PT EBL were planted in 2000 – 2019</li> <li>12. PT GAS were planted in 2015 – 2016</li> <li>13. PT HJA were planted in 2005 – 2018</li> <li>14. PT KAM were planted in 2012 – 2013</li> <li>15. PT HPM were planted in 2008 – 2019</li> <li>16. PT KSD were planted in 2008 - 2012</li> </ol>
2.2.4	Any Land conflicts are being resolved through a mutually agreed process, e.g. RSPO Grievance procedure or Dispute Settlement Facility, in accordance with RSPO criteria 6.4, 7.5 and 7.6.	<p><b>Company Group/Holding Statement:</b> There are several land conflict in some of subsidiary companies of PT TAP and the progress of conflict resolution has been documented. List of land conflict as follows.</p> <ul style="list-style-type: none"> <li>- 18 July 2019: Land conflict between Tanjung Jaya Abadi and PT Brahma Bina Bakti/PT Kirana Sekernan (conflict closed)</li> <li>- 27 April 2020: PT BBB was reported to the environment ministry for alleged encroachment of production forest (conflict closed).</li> <li>- 26 January 2018: Five oil palm companies, including PT BBB, are suspected of encroaching into forest areas in Batanghari (conflict closed).</li> <li>- November 2016: Six oil palm companies in Lamandau (including PT FLTI) are suspected of violating land cultivation permits (conflict closed).</li> </ul>

	<ul style="list-style-type: none"> <li>- 26 May 2015: Oil palm companies occupy the Customary Land of Dayak Modang. Company (including PT HPM) accused of confiscating customary land of Dayak Modang (Long Bentuq Village) (conflict closed).</li> <li>- 19 April 2013: Company (including PT SAWA) accused of confiscating customary land of Dayak Modang (Long Bentuq Village) (conflict closed).</li> </ul> <p>PT MIK: There are no land conflicts  PT NPN: There are no land conflicts  PT PTA: There are no land conflicts  PT TAN: There are no land conflicts</p> <p><b>Auditor Verification:</b></p> <ol style="list-style-type: none"> <li><b>1. PT Mega Ika Khansa</b>  SIA has conducted by Linkar Komunitas Sawit on 2014. SIA document informed that there is an issue related land claims as a negative impact of PT MIK's operations. → No information related land conflict on internet.</li> <li><b>2. PT Muaratoyu Subur Lestari</b>  SIA has conducted by Linkar Komunitas Sawit on 2014. SIA document informed that there is an issue related land claims as a negative impact of PT MSL's operations → No information related land conflict on internet.</li> <li><b>3. PT Natura Pasific Nusantara</b>  SIA has conducted by Linkar Komunitas Sawit on 2016. SIA document informed that there is an issue related land claims as a negative impact of PT NPN's operations. → No information related land conflict on internet.</li> <li><b>4. PT Pradana Telen Agromas</b>  The company has UKL-UPL documents that discuss the positive and negative impacts that may arise due to the company's operations, one of which is land conflicts → No information related land conflict on internet.</li> <li><b>5. PT Subur Abadi Wana Agung</b>  SIA has conducted by Linkar Komunitas Sawit on 2015. SIA document informed that there is an issue related land claims as a negative impact of PT SAWA's operations. → there is issue on website <a href="https://nasional.tempo.co/read/669597/perusahaan-sawit-duduki-tanah-adat-dayak-modang/full&amp;view=ok..">https://nasional.tempo.co/read/669597/perusahaan-sawit-duduki-tanah-adat-dayak-modang/full&amp;view=ok..</a> However, based on the website informed that there are customary land claims submitted from Long Bentuq village that think the company has evicted their customary land. The company has clarified through village forest verification. After verification of the village forest referred to by the community as customary forest which was determined based on the Decree of the Minister of Forestry number SK.184 / Menhut-II / 2012 dated April 18, 2012 with an area of 880 hectares, the area in question is outside the company's concession.</li> <li><b>6. PT Sukses Karya Mandiri</b>  SIA has conducted by Linkar Komunitas Sawit on 2015. SIA document informed that there is an issue related land claims as a negative impact of PT SAWA's operations. → there is issue on website <a href="https://saveourborneo.org/konflik-agraria-di-kalimantan-tengah/">https://saveourborneo.org/konflik-agraria-di-kalimantan-tengah/</a>. However, based on the website informed that The location within the company's permit turned out to be a transmigration area for Palih Baru village and there was a problem with the boundaries between</li> </ol>
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		<p>Sukamara and Kutai Waringin Barat districts. The company has made settlement efforts until 2017, where the company has been mediated by the government and has offered various settlement solutions. However, the village did not want to accept it. Current land conditions, 50 percent are managed by the community and 50% are managed by companies.</p> <p><b>7. PT Trieke Agro Nusantara</b> SIA has conducted by Linkar Komunitas Sawit on 2013. SIA document informed that there is an issue related land claims as a negative impact of PT TAN's operations → No information related land conflict on internet.</p> <p><b>8. PT Yudha Wahana Abadi</b> SIA has conducted by TIM HCV – SIA Fakultas Kehutanan IPB on 2014. SIA document informed that there is an issue related land conflict as a negative impact of PT YWA's operations. → No information related land conflict on internet.</p> <p><b>9. PT Anugrah Agung Prima Abadi</b> SIA has conducted by TIM SIA Fakultas Kehutanan IPB on August 2014. Based on document SIA, there is no negative issue related to PT AAPA operational activities.</p> <p><b>10. PT Dwiwira Lestari Jaya</b> SIA has conducted by Social Impact Department of Head Office Team of Triputra Agro Persada on August 2014. Based on document SIA, there is no negative issue related to land conflict in PT Dwiwira Lestari Jaya. There is an issue on website, summary as follows. <a href="https://berau.prokal.co/read/news/52377-geram-dengan-harapan-palsu.html">https://berau.prokal.co/read/news/52377-geram-dengan-harapan-palsu.html</a> informed that there was a community perception that the company planted outside its license and asked that the land be returned to Biatan Ilir Village. Company has informed the Biatan Ilir Village that the area is within the business plantation permit area.</p> <p><b>11. PT Etam Bersama Lestari</b> SIA has conducted by Linkar Komunitas Sawit on March 2014. Based on document SIA, there are several social issues, such as decreasing of community land, complicated process of compensation payment → No information related land conflict on internet..</p> <p><b>12. PT General Aura Semari</b> The company has UKL-UPL documents that discuss the positive and negative impacts that may arise due to the company's operations, one of which is land conflicts → No information related land conflict on internet..</p> <p><b>13. PT Hanamas Jaya Abadi</b> The company has UKL-UPL documents that discuss the positive and negative impacts that may arise due to the company's operations, one of which is land conflicts → No information related land conflict on internet..</p> <p><b>14. PT Hamparan Perkasa Mandiri</b> SIA has conducted by Linkar Komunitas Sawit on July 2015. Based on document SIA, informed that there is an issue related land conflict as a negative impact of PT YWA's operations.  There is an issue on website, summary as follows.</p>
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2.2.5	Any Labour disputes are being resolved through a mutually agreed process, in accordance with RSPO criterion 6.3.	<p><b>Company Group/Holding Statement:</b> Related complaint mechanism of workers, the company already has SOP <i>Penyelesaian Keluhan Karyawan di Site</i> No. SOP/SUPP/XI/2016/009 dated May 27, 2019.</p> <p><b>Auditor Verification:</b> Based in information from public source and RSPO website informed:</p> <ol style="list-style-type: none"> <li>1. PT MIK → there is no labor dispute</li> <li>2. PT MSL → there is issue on website <a href="https://spn.or.id/sudah-2-tahun-gugatan-80-pekerja-pt-muaratoyu-subur-lestari-ditandatangani/">https://spn.or.id/sudah-2-tahun-gugatan-80-pekerja-pt-muaratoyu-subur-lestari-ditandatangani/</a>. However, based on the website informed that there are labor issues related work termination at PT MSL. The company has clarified through the decision of the Samarinda Industrial Relations Court which states that the work termination between the Plaintiffs and the Defendants are legal.</li> <li>3. PT NPN → there is no labor dispute</li> <li>4. PT PTA → there is no labor dispute</li> <li>5. PT SAWA → there is no labor dispute</li> <li>6. PT SKM → there is no labor dispute</li> <li>7. PT TAN → there is no labor dispute</li> <li>8. PT YWA → there is issue on website <a href="https://sbsinews.com/hampir-tiga-bulan-kesepakatan-antara-buruh-dengan-managemen-pt-yudha-wahana-abadi-belum-teralisasi/">https://sbsinews.com/hampir-tiga-bulan-kesepakatan-antara-buruh-dengan-managemen-pt-yudha-wahana-abadi-belum-teralisasi/</a>. and <a href="https://www.beritamometer.com/polri-harus-beri-perlindungan-hukum-kepada-buruh-ntt-di-kaltim/">https://www.beritamometer.com/polri-harus-beri-perlindungan-hukum-kepada-buruh-ntt-di-kaltim/</a>. Several meetings / negotiations have been held to discuss and explain the status of the company which is facilitated by the supervision department of the Manpower Agency and the Manpower Agency after monitoring and assessing this case they convey that the Company's actions have complied with the applicable laws. It was explained by the Manpower Agency that in case the labor union requires a permanent and binding decision, the labor union must register the case with Industrial Relations Court. However, until now, labor union has not entered into the realm of law,</li> </ol>

		<p>meaning that it has not been registered as a labor legal process or registered with Industrial Relations Court.</p> <p>9. PT AAPA → there is no labor dispute</p> <p>10. PT DLJ → there is no labor dispute</p> <p>11. PT EBL → there is no labor dispute</p> <p>12. PT GAS → there is no labor dispute</p> <p>13. PT HJA → there is no labor dispute</p> <p>14. PT HPM → there is no labor dispute</p> <p>15. PT KAM → there is no labor dispute</p> <p>16. PT KSD → there is no labor dispute</p>
2.2.6	Any Legal non-compliance is being resolved in accordance with the legal requirements, with reference to RSPO criteria 2.1 and 2.2.	<p><b>Company Group/Holding Statement:</b> The company has a mechanism to evaluate compliance with regulations.</p> <p><b>Auditor Verification:</b></p> <ol style="list-style-type: none"> <li>PT Mega Ika Khansa (MIK) <ul style="list-style-type: none"> <li>Location permit based on Decree of Seruyan Regent No. 50 year 2007 on March 28 2007 for an area of ± 6.000 Ha.</li> <li>Extension of the Location Permit based on the Seruyan Regent Decree No. 188.45 / 388/2014 dated 1 December 2014 covering an area of ± 4,843.2 Ha.</li> <li>Area Release Permit based on the Decree of the Minister of Forestry of the Republic of Indonesia No. SK.815 / menhut-II / 2014 dated 25 September 2014 covering an area of 1,799.66 hectares.</li> <li>Plantation Business Permit for Cultivation (IUP-B) based on the Seruyan Regent Decree No. 188.45 / 297/2020 dated 8 July 2020 for an area of ± 2,617.08 Ha.HGU → on process.</li> </ul> </li> <li>PT Muaratoyu Subur Lestari <ul style="list-style-type: none"> <li>Location Permit based on document No. 460.I / 153 / BPN-44.4 dated 15 August 2005 for an area of ± 12,000 Ha.</li> <li>IUP based on the Decree of the Regent of Paser No. 525/0 / Ek.Adm.SDA / IX / 2013 dated 24 September 2013 for an area of ± 12,000 Ha and a processing capacity of 60 tons of FFB / hour.</li> <li>HGU Certificate No. 32 dated 10 December 2009 covering an area of 11,254.9 hectares and valid until 8 September 2044.</li> </ul> </li> <li>PT Natura Pasific Nusantara <ul style="list-style-type: none"> <li>Location Permit based on the Decree of the Regent of Berau No. 161 of 2007 dated 1 May 2007 for an area of ± 5,090 Ha.</li> <li>IUP based on the Decree of the Regent of Berau No. 713 of 2015 dated 11 September 2015 for an area of ± 4,221 hectares and a processing capacity of 30 tons of FFB / hour.</li> <li>HGU Certificate No. 26 dated 1 September 2008 covering an area of 1,640.27 hectares and valid until 27 July 2043.</li> </ul> </li> <li>PT Pradana Telen Agromas <ul style="list-style-type: none"> <li>Location Permit based on Kutai Timur Regent Decree No. 525.26 / K.771 / HK / XII / 2011 dated 27 September 2011 for an area of ± 2.685 Ha.</li> <li>IUP based on Kutai Timur Regent Decree No. 188.4.45 / 069 / Eko.1-VIII / 2011 dated 18 August 2011 for an area of ± 2.685 Ha.</li> </ul> </li> <li>PT Subur Abadi Wana Agung <ul style="list-style-type: none"> <li>Location Permit based on Kutai Timur Regent Decree No. 22 / 02.188.45 / HK / I / 2006 dated 18 January 2006 for an area of ± 14,350 Ha.</li> <li>IUP based on Kutai Timur Regent Decree No. 500/054 / EK-II / 2006 dated 7 February 2006 for an area of ± 14,350 Ha</li> <li>8. BPN Decree No. 12 / HGU / BPN RI / 2011 dated 7 March 2011 for a land area of 7,343.43 hectares.</li> </ul> </li> </ol>

		<p>6. PT Sukses Karya Mandiri</p> <ul style="list-style-type: none"> <li>- Location Permit was issued by the OSS system on 4 September 2018 for an area of 14,580 Ha.</li> <li>- IUP based on the Decree of the Regent of Sukamara No. 99 of 2005 dated 9 August 2005 for an area of <math>\pm</math> 14,600 Ha and a capacity of 30 tons of FFB / hour.</li> <li>- BPN Decree No. 113 / HGU / KEM-ATR / BPN / 2017 dated 3 November 2017 for a land area of 6,666,8652 Ha.</li> </ul> <p>7. PT Trieka Agro Nusantara</p> <ul style="list-style-type: none"> <li>- Location Permit in accordance with the Decree of the Regent of Lamandau No. Ek.525.26 / 03 / SK-IL / VI / 2014 dated 30 June 2014 for an area of 4,765.65 Ha.</li> <li>- IUP No. 503.6 / 27 / X / DPMPTSP-2020 dated 19 October 2020 for an area of <math>\pm</math> 3,614 Ha.</li> <li>- BPN Decree No. 65 / HGU / KEM-ATR / BPN / 2016 dated 7 October 2016 for a land area of 3,640.47 Ha.</li> </ul> <p>8. PT Yudha Wahana Abadi</p> <ul style="list-style-type: none"> <li>- Location Permit in accordance with the Decree of the Regent of Berau No. 305 of 2004 dated 13 December 2004 for an area of 10,000 Ha.</li> <li>- IUP-B No. 295 of 2005 dated 4 October 2005 for an area of <math>\pm</math> 9,120 Ha and IUP-P No. 278 of 2012 dated 22 May 2012 for a capacity of 60 tons of FFB / hour covering an area of 30 ha.</li> <li>- BPN Decree No. 65-HGU-BPN RI-2007 dated 14 December 2007 for a land area of 8,782.940 hectares.</li> </ul> <p>9. PT Anugrah Agung Prima Abadi.</p> <ul style="list-style-type: none"> <li>- Location permit in accordance with Decree of Berau Regent No. 124/2008 issued on 25 March 2008 for area of <math>\pm</math> 10,000 Ha.</li> <li>- Plantation business permit from Regent Of Berau based on Decree No. 158/2007 issued on 24 April 2007. The areal coverage for Business Plantation Permit is <math>\pm</math>8.410 Ha. Company showed the Recommendation Letter from One Stop Services and Investment Service Kalimantan Timur Province issued on 25 January 2019 about Recommendations on conformity with plantation development planning for Plantation Business Permit- Processing of PT AAPA. It stated that in principle, provides recommendations for Plantation Business Permits for processing palm oil products with a capacity of 60 tons of FFB / hour</li> <li>- Land use rights (HGU) decree No. 27/HGU/BPN RI/2010 issued on 11 May 2020 covering 7,064.16 Ha</li> </ul> <p>10. PT Dwiwira Lestari Jaya</p> <ul style="list-style-type: none"> <li>- Location permit in accordance with Decree of Berau Regent No. 570/05/T.PEM.A/1999 issued on 11 August 1999 for area of <math>\pm</math> 20,000 Ha</li> <li>- Plantation business permit No. 777/Menhutbun-II/2000 issued on 29 June 2000 with coverage area 12,000 Ha with 1 unit palm oil mill with processing capacity 60 ton FFB/hour from Ministry of Forestry and Plantation of Republic of Indonesia.</li> <li>- Land use rights (HGU) decree No. 149/HGU/BPN RI/2009 issued on 27 October 2009 with coverage area 11,983 Ha, described in 6 plot maps. The land use rights is valid for 35 years.</li> </ul> <p>11. PT Etam Bersama Lestari</p> <ul style="list-style-type: none"> <li>- Location permit in accordance with Decree of Kutai Timur Regent No. 114/02.188.45/HK/IV/2004 issued on 7 April 2004 for area of <math>\pm</math> 15,000 Ha</li> <li>- Plantation business permit in accordance with letter No. 775/Menhutbun-II/2000 issued on 29 June 2000 with coverage area 10,000 Ha and 1 unit</li> </ul>
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		<p>palm oil mill with processing capacity 45 ton FFB/hour from Ministry of Forestry and Plantation of Republic of Indonesia.</p> <ul style="list-style-type: none"> <li>- Land use rights (HGU) decree No. 151/HGU/BPN RI/2009 issued on 12 November 2009 with coverage area 9,977.70 Ha. The certificate of this HGU is No. 89 for area of 9,977.70 Ha and valid until 11 November 2044.</li> </ul> <p>12. PT Genera Aura Semari</p> <ul style="list-style-type: none"> <li>- Location permit in accordance with Decree of Berau Regent No. 742/2014 about extension of Location Permit issued on 31 October 2014 for area of <math>\pm</math> 2,990 Ha.</li> <li>- Plantation business permit in accordance with Decree Letter of Berau Regent No. 489/2016 issued on 30 June 2016 with coverage area <math>\pm</math> 2,990 Ha.</li> <li>- Land Use Rights for PT GAS is not issued yet and still in progress of issuance. Company showed documentation of Resume of Committee B Hearing for area of 2,251.57 Ha of PT General Aura Semari on 8 June 2016.</li> </ul> <p>13. PT Hanamas Jaya Abadi</p> <ul style="list-style-type: none"> <li>- Company has two location permits, as follows: According to Decree of Lamandau Regent No. EK.525.26/02/II/2007 about Location Permit for PT First Lamandau Timber International issued on 27 January 2007. This decree explain that PT First Lamandau Timber International which already has location permit according to Decree of Lamandau Regent No. EK.525.26/01/VI/2006 has changed name into PT Hanamas Jaya Abadi with coverage area <math>\pm</math> 3,000 Ha. According to Decree of Lamandau Regent No. 503.5/05/IL/IX/BPPTPM-2015 about Location Permit for PT Hanamas Jaya Abadi with coverage area <math>\pm</math> 1,480.10 Ha issued on 7 September 2015.</li> <li>- Plantation business permit according to Decree of Lamandau Regent No. EK.525.26/07/SK.IUP/IX/2007 about plantation business permit for PT Hanamas Jaya Abadi issued on 25 September 2007 for coverage area 3,000 Ha and processing capacity 30 tonnes/hour.</li> <li>- PT HJA does not have land use rights yet.</li> </ul> <p>14. PT Kutim Agro Mandiri</p> <ul style="list-style-type: none"> <li>- Location permit in accordance with Decree Letter of Kutai Timur Regent No. 525.26/K.145/HK/111/2011 about Location Permit for PT Kutim Agro Mandiri for coverage area <math>\pm</math> 7,515 Ha issued on 15 March 2011. This permit has 3 times extended. The latest extension of Location permit is in accordance with Decree of Kutai Timur Regent No. 535.26/K.377/HK/VI/2015 about Extension of Location Permit of PT Kutim Agro Mandiri for about <math>\pm</math> 7,192 Ha issued on 10 June 2015.</li> <li>- Plantation business permit according to Decree of Kutai Timur Regent No. 188.4.45/070/Eko.1-VIII/2011 about plantation business permit for PT Kutim Agro Mandiri issued on 18 August 2011 for coverage area <math>\pm</math> 7,515 Ha.</li> <li>- PT KAM does not have land use rights yet.</li> </ul> <p>15. PT Hamparan Perkasa Mandiri</p> <ul style="list-style-type: none"> <li>- Location permit in accordance with Decree Letter of Kutai Timur Regent No. 27/02.188.4.5/HK/II/2006 about Location Permit for PT Hamparan Perkasa Mandiri for coverage area <math>\pm</math> 12,180 Ha issued on 19 January 2006. This permit has been extended and the extension of Location permit is in accordance with Decree of Kutai Timur Regent No. 188.4.45/7/HK/II/2008 about Extension of Location Permit of PT Hamparan Perkasa Mandiri for about <math>\pm</math> 11,880 Ha issued on 9 January 2008.</li> </ul>
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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 4**

NCR No.	: 2019.1	Issued by	: Asystasya Aishah Silalahi
Date Issued	: 21 March 2019	Time Limit	: 20 June 2019
NC Grade	: Major	Date of Closing	: 20 June 2019
Standard Ref. & Requirement	: 6.5.1 Documentation of pay and conditions for employees based on the existing manpower regulation shall be available		
Evidence observed & Non-Conformance Description (filled by auditor): Based on interview with Land Application operator, known that overtime is paid by fixed premium as much as Rp 110,000 according to Director decree No 105703/TAP/SKD-HRD-HO/IV/13 on April 19 <sup>th</sup> , 2013. Company also showed: <div><div>1.</div><div>Example of payslip, attendance, detail of wage payment, work order on Sundays period February 2019 for land application operator. From those documents, known that basic wage for worker is Rp 2,461,500, overtime on Sunday for 3 days and paid as much as Rp 330,000. While overtime payment according to regulation, worker has to be paid as much as Rp 598.588.</div></div> <div><div>2.</div><div>Example of payslip, attendance, detail of wage payment period February 2019 for mill security. Basic wage for worker is IDR 2,509,000 and overtime on holiday is paid as much as IDR 110,000. Meanwhile overtime payment according to regulation, worker has to be paid as much as IDR 203,040.</div></div> Based on explanation above, company do not paid overtime on Sunday and holiday according to regulation yet.			
Root Cause Analysis (filled by organization audited): 13 June 2019 Company did not review yet Director Decree No. 105703/TAP/SKD-HRD-HO/IV/13 on 19 April 2013 about Premium payment in Holiday/Sunday.			
Correction (filled by organization audited): 13 June 2019 Reviewing the Directors Decree No. 105703 / TAP / SKD-HRD-HO / IV / 13 and adjust to the applicable regulations			
Corrective Action (filled by organization audited): 13 June 2019 Review the Director Decree No. 105703/TAP/SKD-HRD-HO/IV/13 and adjust it with appllicable regulation.			
Assessor Evaluation and Conclusion (filled by auditor): Verification on 20 June 2019 Company showed correction evidence, as follows: <div><div>-</div><div>Director decree No. SKD/DOE/VI/2019/033 about premium payment for Security in Sumatera Region issued on 19 June 2019. This decree is applied after 1 July 2019.</div></div> <div><div>-</div><div>Director decree No. SKD/DOE/VI/2019/032 about productivity premium payment for land application worker in holiday in Sumatera Region issued on 19 June 2019. This decree is applied after 1 July 2019. Based on the document, premium payment on holiday is Rp 650/m<sup>3</sup>.</div></div>			

Based on those documents, this nonconformity is **closed** and the implementation of the decree will be verified in next assessment.

**Verified by** : **Asystasya Aishah Silalahi**

NCR No.	: 2019.02	Issued by	: Leonada
Date Issued	: 21 March 2019	Time Limit	: 20 June 2019
NC Grade	: Major	Date of Closing	: 20 June 2019
Standard Ref. & Requirement	<p>General COC 5.7.2</p> <p>The involved supply chain actors mentioned in 5.7.1 shall do the following actions in the RSPO IT Platform:</p> <ul style="list-style-type: none"><li>Shipping Announcement / Announcement: When RSPO certified volume is sold as certified, the volumes of products that are in the yield scheme (Figure 2 and 3, refer Annex 1) shall be registered as a Shipping Announcement / Announcement in the RSPO IT Platform. The declaration time to do Shipping announcement / Announcement is based on members' own standard operating procedures.</li><li>Trace: When RSPO certified volumes are sold as RSPO certified to actors in the supply chain beyond the refinery, the volume shall be traced at least annually. Tracing triggers the generation of a trace document with a unique traceability number. Tracing can be done in a consolidated way at least annually.</li><li>Remove: RSPO certified volumes sold under other scheme or as conventional, or in case of underproduction, loss or damage shall be removed.</li><li>Confirm: Acknowledge the purchase of RSPO certified volume by confirming Shipping Announcements / Announcements.</li></ul>		
<p><b>Evidence observed &amp; Non-Conformance Description (filled by auditor):</b></p> <p>Based on the documents verification of CPO and PK shipments/sales during the period of 26 May 2018 – 16 March 2019, it is known that there are conventional PK sales (not certificate claims) taken from certified PK stock, while companies also do not claim certified PK during that period. Certified PK products sold conventionally until 16 March is: 3,233 ton. In this case, the company has not removed on palm trace for certified PK products sold conventionally.</p>			
<p><b>Root Cause Analysis (filled by organization audited):</b></p> <p><b>23 May 2019</b></p> <p>Lack of understanding PIC for removing stock if there are certified products sold conventionally</p> <p><b>17 June 2019</b></p> <p>There are no procedures related to the regulation of removing stock</p>			
<p><b>Correction (filled by organization audited):</b></p> <p><b>23 May 2019</b></p> <p>Removing certified PK that has been sold conventionally</p>			
<p><b>Corrective Action (filled by organization audited):</b></p>			

**23 May 2019**

Conducted socialization / training to PIC regarding SCCS

**17 June 2019**

Make Work Instructions regarding removing stock at the Palm Trace

**Assessor Evaluation and Conclusion (filled by auditor):**
**Verification 29 May 2019**

The company show evidences, such as:

- Removing stock of CSPK on palm trace 3,535 ton dated 4 April 2019 for conventional sold volume
- Training on 12 April 2019 for PIC SCCS

The Evidence e above is acceptable, but the company needs to complete the root cause analysis and corrective action along with the evidence of the corrective action. Based on this, the non compliance cannot be stated as closed

**Verification 20 June 2019**

The company shows the instructions for removing stock CPO and PK on Palm trace No.124271 / TAP / IK-SUS-HO / VI / 19 dated 17 June 2019. Based on this, these nonconformities can be declared closed

**Verified by** : **Leonada**

NCR No.	: 2019.03	Issued by	: Leonada
Date Issued	: 21 March 2019	Time Limit	: 20 June 2019
NC Grade	: Major	Date of Closing	: 20 June 2019
Standard Ref. & Requirement	Cerification system clausul 4.5.3 Timebound plan		
<b>Evidence observed &amp; Non-Conformance Description</b> (filled by auditor):			
PT. Triputra Agro Persada as the holding company of PT. Brahmana Binabakti has a timebound to certify the management units of PT. Triputra Agro Persada, the following:			
<ul style="list-style-type: none"><li>- PT. Brahma Binabakti</li><li>- PT. Gawi Bahandep Sawit Mekar</li><li>- PT. First Lamandau Timber International</li></ul>			
Meanwhile PT. Triputra Agro Persada is also a holding company and has management control over the following companies:			
<ul style="list-style-type: none"><li>- PT. Muaratoyu Subur Lestari</li><li>- PT. Etam Bersama Lestari</li><li>- PT. Hamparan Perkasa Mandiri</li></ul>			
In this case, the company has not been able to show a timebound plan for all management units of PT. Triputra Agro Persada along with the results of a partial audit for those units.			
<b>Root Cause Analysis</b> (filled by organization audited):			
<b>17 June 2019</b>			
The three companies are not included in the RSPO Certification Time Bound Plan because they are still in the internal process of meeting sustainability (sustainability compliance)			

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

**17 June 2019**

Revise RSPO Certification of the Time Bound Plan for units that have not been included in the TAP management unit

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

**17 June 2019**

Ensure that new TBPs include TAP business units that have not been included in the previous TBP along with a partial certification of these units.

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

**Verification 20 June 2019**

Revised timeboundplan 17 June 2019 by management of PT. Brahma Binabakti with additions:

- PT. Muaratoyu Subur Lestari plan to certify at 2021
- PT. Etam Bersama Lestari plan to certify at 2022
- PT. Hamparan Perkasa Mandiri plan to certify at 2022

Based on evidence above, analysis of the root cause and the corrective action shown, the nonconformity can be stated as closed.

**Verified by** : **Leonada**

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

NCR No.	: 2020.01	Issued by	: Radytio Puspanjana
Date Issued	: 26 June 2020	Time Limit	: 25 August 2020
NC Grade	: Critical / Major	Date of Closing	: 28 July 2020
Standard Ref. & Requirement	7.12.2 HCVs, HCS forests and other conservation areas are identified as follows: a. For existing plantations with an HCV assessment conducted by an RSPO-approved assessor and no new land clearing after 15 November 2018, the current HCV assessment of those plantations remains valid b. Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations.		

Evidence observed (filled by auditor):  
Based on document verification of document statement on 2020 obtained information that in the certification area there is a conversion from rubber plantation to palm oli plantation covering an area of 1013.43 Ha. Regarding this matter, the unit certification has not been able to show that the new land clearing has been carried out identification of land use risk (LURI) and the stages as set out in the RSPO document Interpretation indicator 7.12.2 and Annex 5 for the RSPO P&C 2018.

4.1 Existing Certified Plantations

Existing Certified Plantations

New Land clearing

Yes

No

HCV + LU Risk Identification

HCV OK

Low risk areas

Risk Areas

HCV OK

Non-ALS HCV

ALS HCV

HCV-HCSA

Standalone HCSA

Non-Conformance Description (filled by auditor):  
The company hasn't show evidence that the 2019 land clearing stage (plant conversion) has identified land use risk (LURI) and the stages as set out in the RSPO document Interpretation indicator 7.12.2 and Annex 5 for the RSPO P&C 2018.

Root Cause Analysis (filled by organization audited):  
Has conducted a risk analysis of replanting but has not yet submitted the results of land use risk identification (LURI) and stages as set out on the RSPO document Interpretation indicator 7.12.2 and Annex 5 for the RSPO P&C 2018 to the RSPO secretariat.

Correction (filled by organization audited):  
The conduct a risk analysis of replanting and submit the results of land use risk identification (LURI) and stages as set out in the RSPO document Interpretation indicator 7.12.2 and Annex 5 for the RSPO P&C 2018 to the RSPO secretariat

Corrective Action (filled by organization audited):

Present the results of land use risk identification (LURI) and stages as set out on the RSPO document Interpretation indicator 7.12.2 and Annex 5 for the RSPO P&C 2018 to the RSPO secretariat.

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

**Verification auditor 28 July 2020**

The company shown the evidence consist of:

- The email related to submit the results of land use risk identification (LURI) to RSPO on 27 July 2020.
- Respond email from the RSPO on 28 July 2020 that explaining the company do not need to send LURI to RSPO secretariat for review under this scenario.

Based on the analysis of the root causes presented, evidence of corrections shown and preventive measures delivered, these non conformity is stated to be closed.

**Verified by** : **Radytio Puspanjana**

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

NCR No.	: 2021.01	Issued by	: Radytio Puspanjana
Date Issued	: 8 August 2021	Time Limit	: Next Assessment
NC Grade	: Minor	Date of Closing	:
Standard Ref. & Requirement	3.4.2 For the unit of certification, a SEIA is available and social and environmental management and monitoring plans have been developed with participation of affected stakeholders.		
Evidence observed (filled by auditor): As a form of social management, the company has developed/compiled by involving independent parties in conducting social impact assessments related to the company's operational activities. The first social impact assessment was carried out in 2013 by Lingkar Komunitas Sawit (LINKS) as a follow-up to the results of the assessment, there are several recommendations for the company, including: <ul style="list-style-type: none"><li>- Create a Social Management Strategic Plan.</li><li>- The Social Management Activity Plan as an elaboration of the RENSTRA document consists of: Social impacts and priority issues, management activity plans, timelines, and resource allocation (human, time and budget).</li><li>- Dynamic social change, so it is necessary to strengthen the social documentation system.</li></ul> As one of the efforts to improve and focus attention to the latest situation in 2019, the company collaborated with Aksenta to carry out the Social Impact Review and Update which was carried out in 2013 where this was due to the dynamic social situation and the seriousness of the company to build and maintain the company's sustainability, especially in social aspects, then this study was carried out again. In the recommendation section, it is explained that a social impact study is carried out so that the management of social impacts can mitigate, minimize or eliminate negative impacts (mitigating adverse effects) and increase positive impacts (advancing benefits) in order to achieve the company's social goals. The proposed recommendations refer to the principle of balance between the management of the social, environmental and economic aspects of the company.  In a follow-up effort to the 2019 SIA recommendation, the company has developed a social management and monitoring plan that is set out in the Action Plan document on the findings of PT Brahma Binabakti's social impact assessment, however, in the process of compiling the document, it was discovered that: <ul style="list-style-type: none"><li>- External stakeholders involved in the preparation of the management plan and social monitoring are still limited to the <i>Village Heads around the company Awin Jaya Village, Bukit Beling Village Head, Tanjung Lanjut Village Head, Suak Putat Village Head</i>) and KUD Akso Dano, not representative attention to the parties involved broadly affected, for example, women, migrants, local residents, youth leaders, contractors, and other affected parties</li><li>- Internal stakeholders have not been directly involved in the management plan and social monitoring.</li></ul> So that with the limited number of parties involved in the preparation of the management plan and social monitoring, there are several issues that have not been identified that have been monitored and managed in a comprehensive and integrated manner, for example: <ul style="list-style-type: none"><li>- Particular attention is paid to the indirect impacts caused by the company, for example, the dynamics of plasma areas that have an impact on operational activities and company image</li><li>- Decreased income of plasma farmers when replanting.</li><li>- Attention related to employment issues, for example with the potential loss of income for harvest employees when replanting and Pandemic of the Covid-19</li><li>- Potential social issues caused by disturbance of animal livestock in the company's operational area.</li></ul>			
Non-Conformance Description (filled by auditor):			

a social impact management and monitoring plan hasn't been developed with the participation of widely affected stakeholders so that there are several unidentified issues that have been monitored and managed in a comprehensive and integrated manner.

**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**

:

NCR No.	:	2021.02	Issued by	:	Mohamad Amarullah
Date Issued	:	06 August 2021	Time Limit	:	Next assessment
NC Grade	:	Minor	Date of Closing	:	
Standard Ref. & Requirement	:	6.7.2. 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.			
Evidence observed (filled by auditor): Based on field observation to nursery area in Block H19, it was identified several situations, noted as follows: <ul style="list-style-type: none"><li>There was a semi-permanent building that used for fertilizer store. However, information on potential emergency and hazard are not available. MSDS of fertilizer stored were also not available.</li><li>First aid kit item for nursery area is less than 21 items, as required by the company.</li></ul> During time of audit, unit certification shows several correction evidence such as official letter of pallet installation, hazardous symbols and other OSH symbols on the Store, completeness on first aid kit, etc. However, the auditor team considers that the clarification evidence has not shown effective and comprehensive actions related to efforts to prevent emergencies including work accidents in the company's operational areas as part of efforts to OSH implementation.					
Non-Conformance Description (filled by auditor): The company is not be able to shows that emergency procedure and work accident, included first aid in working areas has properly available and periodically monitored					
Root Cause Analysis (filled by organization audited):					
Correction (filled by organization audited):					

<i>Corrective Action (filled by organization audited):</i>	
<i>Assessor Evaluation and Conclusion (filled by auditor):</i>	
<i>Verified by</i>	:

**3.4.4. Opportunity for Improvement**

No	Ref. Std.	Description
1	<b>3.6.1</b>	<p>Unit of certification has identified sources of hazard and its potential risk for operational activities on the estate and mill. In general, each activities has been identified, analyzed and assessed for preventive action need to be taken. However, based on field observation, identified some isolated cases which have potential on OSH risk, for example:</p> <ul style="list-style-type: none"> <li>• Mechanism of potential risk on dehydration and heat stroke is not available on nursery, replanting and immature plant areas.</li> <li>• Potential of exposure to Covid-19 on the several activities such as muster morning, attendance, FFB truck queues, etc.</li> <li>• First aid kit in Hazardous Waste Store, Agrochemicals Store with located inside the room which potentially contaminate the kit.</li> </ul> <p>Thus, it is an opportunity for the unit of certification for making further risk analysis evaluation and its implementation on the unit works</p>
2	<b>6.2.2</b>	<p>According to document verification, it was known that there are two types of workers in PT BBB i.e., permanent employees and contract employees. Relationship between employer and employee is presented in the work agreement that signed by both parties and make it into two copies.</p> <p>Based on interview with contract employees, it was known that before signing the agreement, the employer will explain the content of work agreement. The employee is able to explain information given by the employer. Evidence of this activities shows through official letter dated 28 and 29 May 2021. However, the employee mentioned that currently they have no received a copy of contract work agreement.</p> <p>Regarding this matter, unit of certification explain that the contracts were still under reporting process to the Manpower Agency, where for period 2021, the report had delivered on 28 July 2021. Moreover, unit of certification is able to shows that contract agreement in 2020 had distributed to the respective employees. Thus, unit of certification is encouraged to make sure that all employees have received their work contract agreement (copy).</p>
3	<b>RSPO Cert-System 2020 5.5.2</b>	<p>Time Bound Plan</p> <p>The company has presented Time Bound Plans for 19 Management Units and this has been submitted to the RSPO. However:</p> <ul style="list-style-type: none"> <li>• There are units that do not have a timetable for certification such as PT MIK, PT TAN, PT HJA, PT SAWA, PT KAM, PT PTA, PT KSD, PT GAS.</li> <li>• There has been no revision for TBP PT FLTI, where the audit has been carried out in October 2019, however the process postponed due to RACP Process</li> <li>• There are units that are planned to be certified above 2023, namely PT SKM (2025), PT DLJ (2024), PT NPN (2026), PT YWA (2027) and PT AAPA (2027)</li> </ul> <p>Based on document verifications and interview with managements it was known if that situation has been reported to RSPO on 10 October 2020 and the latest respond from RSPO in 10 July 2021, However, there is information regarding status about any irregularities in the TBP timeline</p>

**3.4.5. Noteworthy Positive Components**

No	<i>Description</i>
1	The company commitment to implement the principles of sustainable palm oil management.
2	Personal competence in their respective fields.
3	Have cooperation partnership of plasma with surrounding community.

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

Public Issues (Institution/ NGO/Community)	Auditor Verification
<b>National Land Agency of Muaro Jambi Regency</b>  <p>The CH complied with applicable regulations related land legality, among others has had location permit, plantation business permit (IUP), land title (HGU).</p> <p>Due to multiple claims to the plasma area, the mediation process has involved local governments starting with villages, and districts.</p>	<p>Based on document review and field observations, the CH has demonstrated legal compliance related land legality, and no indications of land disputes. Regarding land disputes its became NCR in indicator 3.4.2</p>
<b>Manpower Agency of Muaro Jambi Regency</b> <ul style="list-style-type: none"> <li>• Periodic report such as annual WLTK and quarter report P2K3 had consistently delivered by the company on time. Furthermore, the company also considered cooperative and transparent in providing information requested.</li> <li>• There are still contract worker (PKWT) works, but not for main activities. Those PKWT workers has immediately reported to the Agency.</li> <li>• There is no negative issue related to manpower and safety regulation implementation, included license, permit, child labour, forced labour, etc.</li> <li>• All workers were covered by BPJS Ketenagakerjaan and Health.</li> <li>• There are labour union and OSC committee that had registered to the Manpower Agency.</li> <li>• Covid-19 protocol has satisfactory conducted by the unit of certification.</li> </ul>	<p>In general, it could be concluded that implementation of manpower and safety aspect conducted by the unit of certification is considered satisfactory in the view of Agency.</p>
<b>Environmental Agency of Muaro Jambi Regency.</b> <ul style="list-style-type: none"> <li>- The company has EIA documents and has received environmental feasibility in the year 2010 and revision on 2016.</li> <li>- The company has a Temporary Hazardous Waste Storage (TPS LB3) located on Mill and Estate, approved by Muaro Jambi Regency on 2020</li> <li>- Hazardous Waste management activities carried out by storing hazardous Waste in licensed hazardous waste storage and transported have permission by the Ministry of Environment. Quarterly management reporting to relevant agencies.</li> <li>- The company has land application permit.</li> <li>- The company has tested the quality of factory wastewater per month and reported the results of testing to Enviromental Agency Muaro Jambi Regency per quarter.</li> <li>- The company has conducted POME quality testing per semester and reports the results of testing to Enviromental Agency Muaro Jambi Regency.</li> <li>- The company has conducted noise, vibration and noise testing and reported the results of testing to Enviromental Agency</li> </ul>	<p>According to field observation, there are no environment pollution from estate and mill operational.</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<p>Muaro Jambi Regency per semester.</p> <ul style="list-style-type: none"> <li>- The company has reported Hazardous waste (balance and manifest) management to Enviromental Agency Muaro Jambi Regency per semester per semester, for example hazardous waste management report 1st quarterly 2021.</li> <li>- The company has sent the RKL / RPL implementation report to to Enviromental Agency Muaro Jambi Regency periodically, for example the 1<sup>st</sup> semester of 2021.</li> <li>- The company has managed the conservation area / HCV for example in the form of riparian.</li> <li>- Requests for information responded quickly by the management unit.</li> <li>- There have not been any issues and reports from other parties regarding the negative impacts on the environment due to the management of Estate and POM.</li> </ul>	
<p><b>Department of food crops and horticulture Muaro Jambi Regency</b></p> <ul style="list-style-type: none"> <li>• There is no additional area for new permits</li> <li>• CSR is very well implemented and has become a barometer in Muaro Jambi Regency</li> <li>• There are no complaints or complaints from the public regarding the company's operations</li> <li>• Reporting is orderly, namely LKUP every 3 months and includes CSR reports and reports on land and plantation fires.</li> <li>• Fulfillment of fire fighting infrastructure is sufficient in accordance with regulation</li> <li>• CSR programs already cover productive economic and social efforts for the community</li> <li>• No land dispute issues</li> <li>• There is a <i>Badan Pengelola Dana Perkebunan Kelapa Sawit</i> (BPDPKS)/ Palm Oil Plantation Fund Management Agency from the government to assist the replanting of plasma plantations, but the KUD Akso Dano does not use the funds but uses loan funds from the bank.</li> </ul>	<p>In general, there are no very crucial issues raised by the agency.</p> <p>However, regarding the replanting of plasma plantations, the agency deeply regrets that the funds that have been prepared by the government have not been utilized by the KUD. This has become a non-compliance with indicator 3.4.2.</p>
<p><b>Bukit Baling Village Head</b></p> <ul style="list-style-type: none"> <li>• There are no disputes or land conflicts.</li> <li>• The company has provided assistance to the village, such as assistance in the form of materials for the construction of places of worship and heavy equipment assistance.</li> <li>• There are no issues related to environmental pollution.</li> <li>• There is no complaint from previous land owner related the land compensation or FPIC process.</li> <li>• The plasma plantation cooperation has been running for 25 years</li> <li>• Good relationship between village and company</li> <li>• No complaints</li> </ul>	<p>In general, there are no issues raised by Bukit Baling Village Head.</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<ul style="list-style-type: none"> <li>The absorption of labor is quite large from Bukit Baling Village</li> <li>Land compensation was carried out around 1995 – 1996 and the village head (currently) acts as the party who knows.</li> </ul>	
<p><b>Sekernan Sub District Head</b></p> <p>There is no land disputes in company operational area, the dispute in smallholders / Plasma Area due to multiple claims to the plasma area, the mediation process has involved local governments starting with villages, districts and regency.</p>	<p>The CH has shown land compensation documentary evidence carried out referring to the concept of FPIC. Described in detail in criteria 4.4;4.5;4.7. Regarding land disputes its became NCR in indicator 3.4.2</p>
<p><b>Suko Awin Jaya Village Head</b></p> <p>The communication and relation between villages around with company are well maintained, the company's public relation already known by the communities. The mechanism for complaint and grievance submission has been understood well by the community.</p> <p>There are no indigenous rights or customary rights. It also known that compensation process is done directed to the land owner and landowners are given the freedom to release their land without coercion</p> <p>The company has considered satisfactory cooperative and transparent in providing information, for example towards job vacancies. FFB price, CSR and grants. Village people has recognize company representative (PIC) from Division of Public Relation (PR) which handled this matters.</p> <p>There is no land disputes in company operational area, the dispute in smallholders / Plasma Area due to multiple claims to the plasma area, the mediation process has involved local governments starting with villages, districts and regency</p> <p>The community handover / give area to the company for developed plantation with comparation 70% for the community (scheme Smallholders) and 30 % for company area. Furthermore, the compensation process has been approved by both parties, involved community leaders, and government agencies. Currently, there is no land compensation on the process, the whole previous land compensation was completed before the year 2000.</p>	<p>The CH has shown land compensation documentary evidence carried out referring to the concept of FPIC. Described in detail in criteria 4.4;4.5;4.7. Regarding land disputes its became NCR in indicator 3.4.2</p>
<p><b>Akso Dano Cooperative as well as previous land owner</b></p> <p>The company has considered satisfactory cooperative and transparent in providing information, for example towards job vacancies. FFB price, CSR and grants. Village people has recognized company representative (PIC) from Division of Public Relation (PR) which handled these matters.</p>	<p>The CH has shown land compensation documentary evidence carried out referring to the concept of FPIC. Described in detail in criteria 4.4;4.5;4.7. Regarding land disputes its became NCR in indicator 3.4.2</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<p>There is no land disputes in company operational area, the dispute in smallholders / Plasma Area due to multiple claims to the plasma area, the mediation process has involved local governments starting with villages, districts and districts.</p> <p>The community handover / give area to the company for developed plantation with comparation 70% for the community (scheme Smallholders) and 30 % for company area. Furthermore, the compensation process has been approved by both parties, involved community leaders, and government agencies. Currently, there is no land compensation on the process, the whole previous land compensation was completed before the year 2000.</p>	
<p><b>Akso Dano Cooperative Member as well as Previous Land Owner</b></p> <p>There is no land disputes in company operational area, the dispute in smallholders / Plasma Area due to multiple claims to the plasma area, the mediation process has involved local governments starting with villages, districts and regency</p> <p>The community handover / give area to the company for developed plantation with comparation 70% for the community (scheme Smallholders) and 30 % for company area. Furthermore, the compensation process has been approved by both parties, involved community leaders, and government agencies. Currently, there is no land compensation on the process, the whole previous land compensation was completed before the year 2000.</p>	<p>The CH has shown land compensation documentary evidence carried out referring to the concept of FPIC. Described in detail in criteria 4.4;4.5;4.7. Regarding land disputes its became NCR in indicator 3.4.2</p>
<p><b>NGO Berantas</b></p> <p>There is no land disputes in company operational area, the dispute in smallholders / Plasma Area due to multiple claims to the plasma area, the mediation process has involved local governments starting with villages, districts and regency.</p> <p>There are no environmental issues that occur in the company. The company has made regular reports every quarter and semester in accordance with applicable obligations and is officially recorded at the Agency. During the past year, there were no cases of conflict with animals or environmental issues from the community.</p>	<p>There are no issues that need further clarification.</p>
<p><b>Gender Committee</b></p> <ul style="list-style-type: none"> <li>• The committee has established since 2014, covers for oil palm mill and estate.</li> <li>• Annual program arranged by the committee consist of religion matters, bazaar, talent improvement, social gathering, socialization, etc.</li> <li>• There is no issue related to child worker, abuse, discrimination</li> </ul>	<p>In general, it could be concluded that the committee has very helpful in organizing and monitor women rights implementation on the unit of certification. So far, there is no negative issues related to gender discrimination, sexual harassment, child abuse, etc.</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<p>on gender matters.</p> <ul style="list-style-type: none"> <li>• Women reproductive rights (paid leave for menstruation and giving birth) has been satisfactory implemented by the unit of certification.</li> <li>• Pregnancy test has conducted every month.</li> <li>• The committee has known that pregnant and breastfeeding women are prohibited to works with agrochemicals, and will be transferred to manual upkeep works.</li> </ul>	
<p><b>Cooperative of Employee of Brahma Binabakti Sawit</b></p> <ul style="list-style-type: none"> <li>• The cooperative has established since 2000 with main business on household retail, and registered to the Cooperative Agency.</li> <li>• The cooperative has 334 members, only from estate.</li> <li>• Main contribution was IDR 100,000 while monthly contribution was IDR 50,000.</li> <li>• Members annual meeting has periodically conducted, attended by at least 20 % from total members.</li> <li>• The cooperative has five (5) employees, paid by the cooperative. The interviewee stated that BPJS insurance has been paid by the cooperative.</li> <li>• Company support has shown through providing transportation unit for household purchasing, store and training of cooperative management.</li> </ul>	<p>In general, it could be concluded that existence of employees' cooperative has giving advantages in providing house hold goods and retails, as well as for additional income for its members.</p>
<p><b>Estate Labor Union (<i>Ikatan Pekerja Brahma Binabakti</i>)</b></p> <ul style="list-style-type: none"> <li>• The union has established since 2011 and already registered to the Manpower Agency.</li> <li>• The estate is considered satisfactory accommodate workers aspiration.</li> <li>• There are no structural workers in labour union organization. The interviewee was a First Foreman.</li> <li>• Currently the union has 561 members.</li> <li>• Company compliance towards manpower regulations has implemented through annual minimum wages payment, overtime payment, BPJS-<i>Ketenagakerjaan</i> Insurance payment, PPE, semester general and special medical check-up, etc.</li> <li>• Number of premium payments need to be revised, since it was never changed since 2013. Discussion on this matter is still on going with employer representatives.</li> <li>• Collective Work Agreement (PKB) still available and valid up to October 2022.</li> <li>• Meeting with company has conducted every month.</li> <li>• There are no more contract worker (PKWT), but three months probation.</li> </ul>	<p>In general, it could be concluded that manpower regulation has satisfactory implemented by the unit of certification. Any misunderstanding has easily discussed in monthly meeting to avoid further escalation. Furthermore, there is no negative issue related to safety and manpower aspect implementation.</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<b>Mill Labor Union (SP3- SPSI)</b> <ul style="list-style-type: none"> <li>The union already registered to the Manpower Agency.</li> <li>The estate is considered satisfactory accommodate workers aspiration.</li> <li>There are no structural workers in labour union organization. The interviewee was a Maintenance operator.</li> <li>Currently the union has 99 members.</li> <li>Company compliance towards manpower regulations has implemented through annual minimum wages payment, overtime payment, BPJS-<i>Ketenagakerjaan</i> Insurance payment, PPE, semester general and special medical check-up, etc.</li> <li>Collective Work Agreement (PKB) still available and valid up to October 2022.</li> <li>Meeting with company has conducted every month.</li> <li>There is no more contract worker (PKWT), but three months probation.</li> </ul>	<p>In general, it could be concluded that manpower regulation has satisfactory implemented by the unit of certification. Any misunderstanding has easily discussed in monthly meeting to avoid further escalation. Furthermore, there is no negative issue related to safety and manpower aspect implementation.</p>
<b>Local Contractor</b> <ul style="list-style-type: none"> <li>The contractor had relationship for manual upkeep on the garden, housing complex and mill garden.</li> <li>Contract of work been made for one or two years.</li> <li>Contractor employees covered by BPJS.</li> <li>PPE and salary matters had included in work agreement.</li> <li>Payment of work has conducted on-time.</li> <li>There is no negative issue with the company.</li> <li>About 95 % of locals works with PT BBB.</li> </ul>	<p>In general, relationship between company and local contractor is considered satisfactory.</p>
<b>Contractor PT Putra Mas Agro Sejahtera in Medan</b> <ul style="list-style-type: none"> <li>The contractor has specialist of civil, structure and mechanical works, since 2017.</li> <li>Contract has been made for every project, take time from 4 month to 1 year.</li> <li>Regulation on safety and manpower aspect such as basic salary, overtime, BPJS, no child labour, etc. has covers by PT PMAS.</li> <li>Payment of work has conducted on-time.</li> <li>There is no negative issue with the company.</li> </ul>	<p>In general, relationship between company and contractor is considered satisfactory.</p>
<b>Head of Tanjung Lanjut Village</b> <p>There is no negative issues, land dispute issues or environmental pollution. The company has made efforts to develop the surrounding community through CSR programs, the use of local labor and local contractors.</p>	<p>There are no negative issues that need further verification. The Company has made efforts to develop the surrounding community through CSR programs, the use of local workers and local contractors, which are described in criterion related.</p>

<b>Public Issues (Institution/ NGO/Community)</b>	<b>Auditor Verification</b>
The relationship between the company and the community has run quite well and harmoniously. Communication between the company and the village is quite good.	Head of Tanjung Lanjut Village involved on the SIA & CSR programs develop.

<b>4.0</b>	<b>CERTIFIED ORGANISATION'S ACKNOWLEDGEMENT OF INTERNAL RESPONSIBILITY</b>
<b>4.1</b>	<b>Formal Sign-off of Assessment Findings</b>
	<p>Hereunder sign by management representative from inspected company to acknowledge a field assessment and agree for all content explained in this assessment report, included of non-compliance findings.</p> <p>Signed on behalf of:</p> <div style="display: flex; justify-content: space-around; align-items: flex-end;"> <div style="text-align: center;">  <p>PT Brahma Bina Bakti Direktur Utama</p> <p><b><u>George Oetomo</u></b> Monday, 09 August 2021</p> </div> <div style="text-align: center;">  <p>Mutuagung Lestari Lead Auditor</p> <p><b><u>Moh Arif Yusni</u></b> Monday, 09 August 2021</p> </div> </div>

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

No	Institution/ NGO/ Community	Address	Phone/ Email	Form of Communication	Date of Contact	Response	
						Yes	No
1	National Land Agency of Muaro Jambi Regency	Muaro Jambi Regency		Communication by Phone	03 August 2021	✓	
2	Manpower Regulation of Muaro Jambi Regency	Muaro Jambi Regency		Communication by Phone	03 August 2021	✓	
3	Department of food crops and horticulture Muaro Jambi Regency	Muaro Jambi Regency		Communication by Phone	03 August 2021	✓	
4	Environmental Agency	Muaro Jambi Regency	-	Communication by Phone	03 August 2021	✓	
5	Sekernan Sub District Head	Muaro Jambi Regency		Communication by Phone	03 August 2021	✓	
6	Akso Dano Cooperative Member as well as Previous Land Owner	Muaro Jambi Regency		Communication by Phone	03 August 2021	✓	
7	Suko Awin Jaya Village Head	Muaro Jambi Regency		Communication by Phone	03 August 2021	✓	
8	Akso Dano Cooperative members as well as previous land owner	Muaro Jambi Regency		Communication by Phone	03 August 2021	✓	
9	Akso Dano Cooperative secretary as well as previous land owner	Muaro Jambi Regency		Communication by Phone	03 August 2021	✓	
10	Bukit Baling Village Head	Muaro Jambi Regency		Communication by Phone	03 August 2021	✓	
11	Head of Tanjung Lanjut village	Muaro Jambi Regency	-	Communication by Phone	03 August 2021	✓	
12	NGO Berantas	Muaro Jambi Regency		Communication by Phone	03 August 2021	✓	
13	Estate Labor Union Committee	Muaro Jambi Regency		Communication by Phone	03 August 2021	✓	
14	Mill Labor Union Committee	Muaro Jambi Regency		Communication by Phone	03 August 2021	✓	
15	Gender Committee	Muaro Jambi Regency		Communication by Phone	03 August 2021	✓	
16	Local contractor	Muaro Jambi Regency		Communication by Phone	03 August 2021	✓	
17	Contractor PT PMAS	Muaro Jambi Regency		Communication by Phone	03 August 2021	✓	
18	Mill Workers (18 Workers)	Muaro Jambi Regency		Communication by Phone	04 August 2021	✓	

19	Estate Workers (44 Workers)	Muaro Jambi Regency		Communication by Phone	05 August 2021	✓	
20	WALHI	Indonesia	informasi@wal hi.or.id	Questionnaire	30 July 2021		✓
21	Sawit Watch	Indonesia	info@sawitwatc h.or.id	Questionnaire	30 July 2021		✓
22	AMAN	Indonesia	rumahaman@c bn.net.id	Questionnaire	30 July 2021		✓
23	WWF Indonesia	Indonesia	wwf- indonesia@ww f.or.id	Questionnaire	30 July 2021		✓

**Appendix 2. Assessment Program**
**1. Recertification Remote Audit**

DATE	25 – 26 June 2020	
PROGRAM	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
<b>Thursday, 25 June 2020</b>		
08.00 – 08.30	<b>Opening Meeting Team Auditor With ASI</b>	<b>All Auditor &amp; ASI team</b>
08.30 – 09.00	<b>Opening meeting (recorded video conference)</b> <ul style="list-style-type: none"> <li>Auditee Speech (Introduction of PIC, Profile of Certified Management Unit)</li> <li>Auditor Team Speech (Introduction, Audit Objective, Audit Scope, Audit Plan Discussion, Determine of Audit Sample, Transparency and Confidentiality Clarification)</li> </ul>	<b>All Auditor</b>
09.00 – 12.00	<ul style="list-style-type: none"> <li>Document review and completing audit checklist.</li> <li>Verification of Basic Information Mill and Estate</li> <li>Confirmation of Time Bound Plan</li> <li>// Review of Partial Certification</li> </ul>	<b>All Auditor</b>
12.00 – 14.00	<ul style="list-style-type: none"> <li><b>Break</b></li> </ul>	<b>All Auditor</b>
14.00 – 16.15	<ul style="list-style-type: none"> <li>Document review and completing audit checklist.</li> </ul>	<b>All Auditor</b>
16.15 – 17.00	<ul style="list-style-type: none"> <li>Presentation of Daily Progress.</li> </ul>	<b>All Auditor</b>
<b>Friday, 26 June 2020</b>		
08.00 – 11.30	<ul style="list-style-type: none"> <li>Document review and completing audit checklist.</li> </ul>	<b>All Auditor</b>
12.00 – 15.30	Internal discussion by auditor team preparing for Closing Meeting	<b>All Auditor</b>
15.30 – 16.30	<b>Closing Meeting (recorded video conference)</b> <ul style="list-style-type: none"> <li>Presentation of audit findings (Noteworthy Positive Component, Non Conformities, OFI, Timelie of CAR's, Conclusion)/</li> <li>Comments, Responses and Questions</li> </ul>	<b>All Auditor</b>
16.30 -	<b>Closing Meeting Team Auditor with ASI</b>	<b>All Auditor &amp; ASI team</b>

**2. Recertification Onsite Audit**

DATE	02 – 07 August 2021	
PLANNED TIME	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
Monday, 02 August 2021		
10.50 – 11.00	JAKARTA → Jambi	All Auditor & ASI Facilitator
11.30 – 12.30	Jambi → PT Brahma Binabakti	
12.30 – 13.00	Medical Screening in PT Brahma Binabakti	
14.00 – 15.00	Opening Meeting Auditor with ASI (Teleconference)	All Auditor & ASI Assessors
15.00 – 16.30	Opening meeting <ul style="list-style-type: none"><li>Auditee Speech (Introduction of PIC, Profile of Certified Management Unit)</li><li>Auditor Team Speech (Introduction, Audit Objective, Audit Scope, Audit Plan Discussion, Determine of Audit Sample, Transparency and Confidentiality Clarification)</li></ul>	All Auditor
Tuesday, 03 August 2021		
08.00 – 12.00	<ul style="list-style-type: none"><li>Verification of Basic Information Mill and Estate</li><li>Confirmation of Time Bound Plan</li><li>Review of Partial Certification</li><li>public consultation with stakeholder<ul style="list-style-type: none"><li>public consultation with stakeholder to relevant agency in Muaro Jambi Regency (by Phone)</li><li>Interview with Gender Committee, Worker's Union, Worker's Cooperative (if any), Local Contractor (for Mill and Estate), Third Party Supplier</li><li>Stakeholder consultation to affected communities surrounding the plantations and previous land owner</li></ul></li></ul>	All Auditor
12.00 – 14.00	Break	All Auditor
14.00 – 16.15	Field observation to Brahma Binabakti Mill: <ul style="list-style-type: none"><li>Supply Chain verification (FFB Receiving, Weighbridge, FFB Sorting, Processing Activity, Dispatch CPO)</li><li>Occupational Health &amp; Safety Aspect (Inspection to Chemical Storage, Hazardous Waste Storage, Fire Control Simulation, POME Pond)</li><li>Implementation of Employment Procedure and Mechanism Aspect</li></ul>	All Auditor
16.15 – 17.00	Presentation of Daily Progress.	
Wednesday, 04 August 2021		
08.00 – 12.00	Field Observation to Brahma Binabakti Estate Aspect to be verified: <ul style="list-style-type: none"><li>Implementation of Legal Aspect (Land Ownership, Legal Boundaries);</li><li>Implementation of Agronomy Aspect (Harvesting &amp; Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application)</li></ul>	All Auditor

DATE	02 – 07 August 2021	
PLANNED TIME	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
	<ul style="list-style-type: none"> <li>- Implementation of Environmental, Conservation/HCV and Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management)</li> <li>- Implementation of Occupational Health &amp; Safety Aspect</li> <li>- Implementation of Employment Procedure and Mechanism Aspect</li> <li>- Observation of Workers Facilities (Housing, School, Worship Place).</li> </ul>	
12.00 – 14.00	Break	
14.00 – 15.00 15.00 – 16.15 16.15 – 17.00	<ul style="list-style-type: none"> <li>• Interview with related personnel's during field observation (teleconference) document review and completing audit checklist.</li> <li>• Document review and completing audit checklist.</li> <li>• Presentation of Daily Progress.</li> </ul>	All Auditor
<b>Thursday, 05 August 2021</b>		
08.00 – 12.00	<ul style="list-style-type: none"> <li>• Continued field observation and interview with stakeholders (if needed).</li> <li>• interview with related personnel's during field observation (teleconference) document review and completing audit checklist.</li> </ul>	All Auditor
12.00 – 14.00	Break	
14.00 – 16.15 16.15 – 17.00	<ul style="list-style-type: none"> <li>• Document review and completing audit checklist.</li> <li>• Presentation of Daily Progress.</li> </ul>	All Auditor
<b>Friday, 06 August 2021</b>		
08.00 – 09.30 09.30 – 11.00	Internal discussion by auditor team preparing for Closing Meeting  Closing Meeting: <ul style="list-style-type: none"> <li>• Presentation of audit findings (Noteworthy Positive Component, Non Conformities, OFI, Timeline of CAR's, Conclusion)/</li> <li>• Comments, Responses and Questions</li> </ul>	All Auditor
12.00 – 13.00	<ul style="list-style-type: none"> <li>• PT Brahma Binabakti → Jambi</li> </ul>	All Auditor
13.00 – 15.00	<ul style="list-style-type: none"> <li>• Test in Jambi as flight requirement for Flight to Jakarta.</li> </ul>	All Auditor
16.00 – 17.00	Closing Meeting Auditor & ASI	All Auditor & ASI assessors
<b>Saturday, 07 August 2021</b>		
11.00 – 12.00	JAMBI → JAKARTA	All Auditor