

Roundtable on Sustainable Palm Oil Certification R S P O

[✓] Surveillance

Name of Management Organization : **Gersindo Minang Plantation POM – PT Gersindo Minang Plantation, Subsidiary of Wilmar International Limited.**
 Plantation Name : Gersindo Minang Plantation Estate (PT Gersindo Minang Plantation), Permata Hijau Pasaman-1 Estate and Permata Hijau Pasaman-2 Estate (PT Permata Hijau Pasaman).
 Location : Jorong Tanjung Pangkal, Nagari Lingkung Aur, Pasaman Sub-District, Pasaman Barat District, Sumatera Barat Province, Indonesia.
 Certificate Code : **MUTU-RSPO/038**
 Date of Initial Registration : 21 April 2014
 Date of Certificate Issue : 13 June 2019 Date of License Issue : 21 May 2022
 Date of Certificate Expiry : 20 April 2024 Date of License Expiry : 20 April 2023

Assessment	Assessment Date	PT. Mutuagung Lestari Auditor	Reviewed by	Approved by
ASA-1.2 (Remote Audit)	25 to 26 March 2021	Satria Adi Putra (Lead Auditor), Haikal Ramadhan Kharismasyah, Sansan Suhendar, Radinal	Ardiansyah	Octo HPN Nainggolan
ASA-1.2 & ASA-1.3 (Onsite Audit)	24 to 29 January 2022	Rizliani Aprianita Hasibuan (Lead Auditor), Yudhi Yuniarto Tallutondok, Arief Tajalli, Mia Rahmah Qadryani		

Assessment	Approved by MUTUAGUNG LESTARI on:
ASA-1.2 & ASA-1.3	25 February 2022

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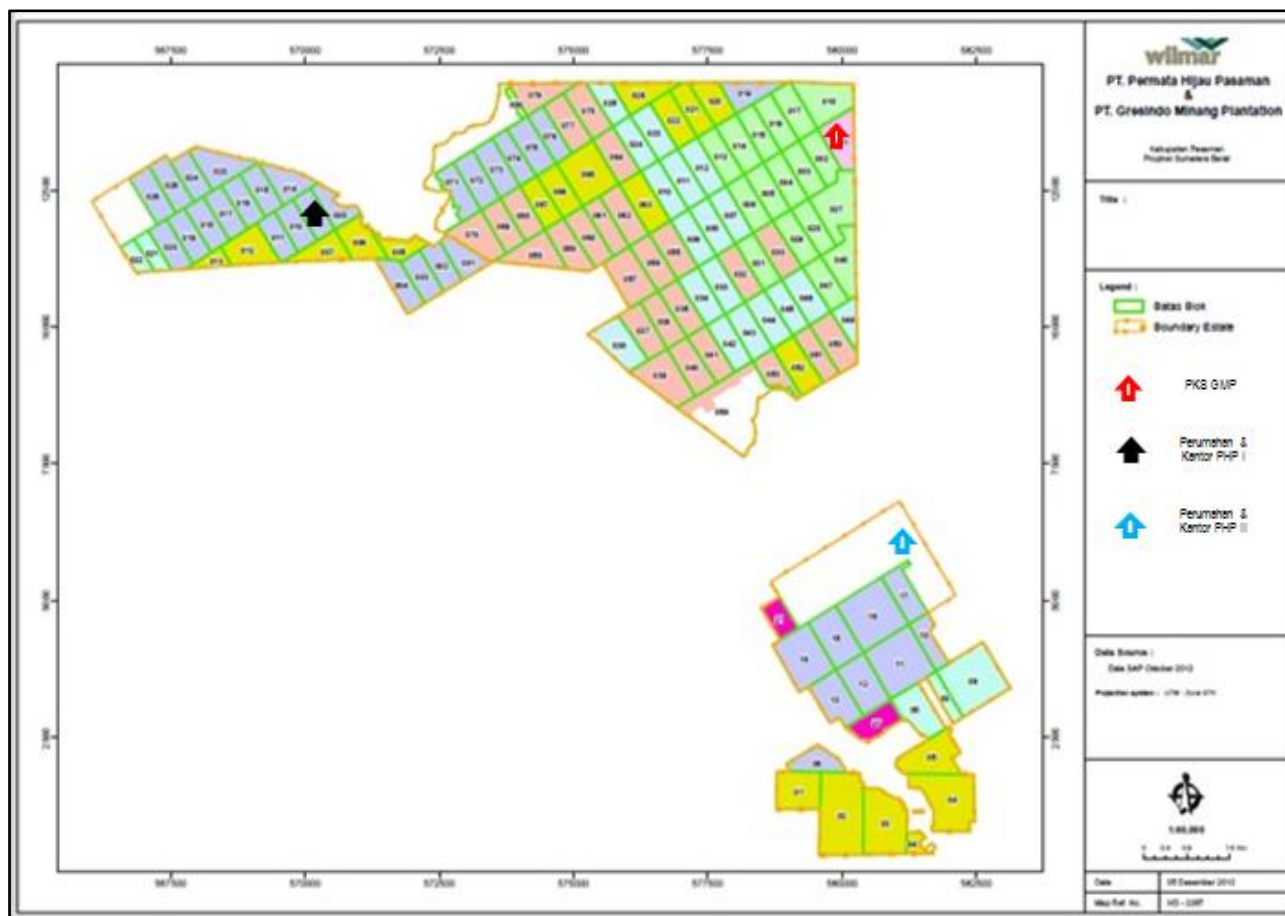
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Figure 1. Location Map of PT Gersindo Minang Plantation and PT Permata Hijau Pasaman



Figure 2. Operational Map of PT Gersindo Minang Plantation and PT Permata Hijau Pasaman



Abbreviations Used

BPBD	:	Badan Penanggulangan Bencana Daerah/ Regional Disaster Management Agency
BPJS	:	Badan Penyelenggara Jaminan Sosial (Social Security Agency)
BPN	:	Badan Pertanahan Nasional/ National Land Agency
BOD	:	Biological Oxygen Demand
B3	:	Bahan Beracun dan Berbahaya (Hazardous Material)
CB	:	Certification Body
CLA	:	Collective Labor Agreement
CPO	:	Crude Palm Oil
CSPK	:	Certified Sustainable Palm Kernel
CSPO	:	Certified Sustainable Palm Oil
CSR	:	Cooperate Social Responsibility
DPMPSTP	:	Dinas Penanaman Modal dan Pelayanan Terpadu Satu Pintu/ Integrated Licensing Service Agency
DPRD	:	Dewan Perwakilan Rakyat Daerah/ Regional People's Representative
EFB	:	Empty Fruit Bunch
EHS	:	Environment health and Safety
EIA	:	Environment Impact Assessment
FFB	:	Fresh Fruit Bunch
FPIC	:	Free, Prior, Informed, Consent
FR	:	Frequency Rate
GAPKI	:	Gabungan Pengusaha Kelapa Sawit Indonesia (Indonesian Palm Oil Association)
GHG	:	Green House Gases
GMP	:	Gersindo Minang Plantation
GPS	:	Global Positioning System
HCV	:	High Conservation Value
HGU	:	Hak Guna Usaha (Land Use Title)
HIRAC	:	Hazard Identification Risk Assessment and Control
HRD	:	Human Resource Department
IPM	:	Integrated Pest Management
ISCC	:	International Sustainability & Carbon Certification
IPAL	:	Instalasi Pengelolaan Air Limbah/ Waste Water Treatment Processes
ISPO	:	Indonesian Sustainable Palm Oil
IUP	:	Izin Usaha Perkebunan (Plantation Business Permit)
IUP-B	:	Izin Usaha Perkebunan Budidaya (Plantation Business Permit for Cultivation)
IUP-P	:	Izin Usaha Perkebunan Pengolahan (Plantation Business Permit for Processing)
KER	:	Kernel Extraction Rate
KSU	:	Koperasi Serba Usaha (Multipurpose Cooperative)
KUD	:	Koperasi Unit Desa (Village Unit Cooperative)
LB3	:	Limbah Berbahaya dan Beracun (Hazardous Waste)
LOTO	:	Lock Out Tag Out
LSU	:	Leaf Sampling Unit
MSDS	:	Material Safety Data Sheet
OER	:	Oil Extraction Rate
OFI	:	Opportunity For Improvement
OHS	:	Occupational Health and Safety
P2K3	:	Panitia Pembina Keselamatan dan Kesehatan Kerja/OHS Committee
P3K	:	Pertolongan Pertama Pada Kecelakaan (First Aid)
PHP	:	Permata Hijau Pasaman
PK	:	Palm Kernel

PKO	:	Palm Kernel Oil
PKWT	:	<i>Perjanjian Kerja Waktu Tertentu</i>
PKWTT	:	<i>Perjanjian Kerja Waktu Tidak Tertentu</i>
POM	:	Palm Oil Mill
POME	:	Palm Oil Mill Effluent
PPE	:	Personal Protective Equipment
RKL/RPL	:	<i>Rencana Kelola Lingkungan/ Rencana Pemantauan Lingkungan</i> (Environmental Management Plan / Environmental Monitoring Plan)
RSPO	:	Roundtable on Sustainable Palm Oil
RTE	:	Rare Threatened Endangered
SARBUKSI	:	<i>Serikat Buruh Perkebunan Indonesia</i>
SCCS	:	Supply Chain Certification Standard
SERBUNDO	:	<i>Serikat Buruh Indonesia (Worker Union)</i>
SIA	:	Social Impact Assessment
SOP	:	Standard Operational and Procedure
SPSI	:	<i>Serikat Pekerja Seluruh Indonesia (Worker Union)</i>
SR	:	Severity Rate
SSU	:	Soil Sampling Unit
SPK	:	Surat Perjanjian Kerjasama/ Later Off Agreement
SPPD	:	<i>Surat Pemberitahuan Pajak Daerah/ regional tax payment letter</i>
UKL/UPL	:	<i>Upaya Kelola Lingkungan/ Upaya Pemantauan Lingkungan</i> (Environmental Management Efforts / Environmental Monitoring Efforts)
WTP	:	Water Treatment Plant
WWTP	:	Waste Water Treatment Plant

1.0	SCOPE OF THE CERTIFICATION ASSESSMENT		
1.1	Assessment Standard Used		
		<ul style="list-style-type: none">Principles and Criteria for Sustainable Palm Oil Production 2018, The Indonesia National Interpretation, Endorsed by the RSPO Board of Governors on 20 April 2020.RSPO Certification Systems for Principles & Criteria and RSPO Independent Smallholder Standard, Endorsed by the RSPO Board of Governors on 12 November 2020.	
1.2	Organisation Information		
1.2.1	Organization name listed in the certificate	PT Gersindo Minang Plantation and PT Permata Hijau Pasaman subsidiary of Wilmar International Limited	
1.2.2	Contact person	Jules Sonny Parapat	
1.2.3	Organisation address and site address	Head Office 56 Neil Road, Singapore 088830 Official Liaison Office: Multivision Tower Lt. 15 Jl. Kuningan Mulia Kav. 9B, Kuningan, Jakarta, 12980, ndonesia.	
1.2.4	Telephone	(62-21) 29380777	
1.2.5	Fax	-	
1.2.6	E-mail	jules.parapat@id.wilmar-intl.com	
1.2.7	Web page address	www.wilmar-international.com	
1.2.8	Management Representative who completed the application for certification	Jules Sonny (Certification Lead Indonesia)	
1.2.9	Registered as RSPO member	2-0017-05-000-00 15 August 2005	
1.3	Type of Assessment		
1.3.1	Scope of Assessment and Number of Management Unit	Mill: PT GMP Mill (Gersindo Minang Plantation) Supply Bases: <ul style="list-style-type: none">GMP Estate (PT Gersindo Minang Plantation)PHP-1 and PHP-2 (PT Permata Hijau Pasaman)	
1.3.2	Type of certificate	Single	
1.4	Locations of Mill and Plantation		
1.4.1	Location of Mill		
	Name of Mill	Location	Coordinate
			LatitudeLongitude
	Gersindo Minang Plantation	Jorong Tanjung Pangkal, Nagari Lingkung Aur, Pasaman Sub District, Pasaman Barat District, Sumatera Barat Province, Indonesia	N 0° 07' 10"E 99° 43' 10"
1.4.2	Location of Certification Scope of Supply Base		
	Name of Supply Base	Location	Coordinate
			LatitudeLongitude

	GMP Estate (PT Gersindo Minang Plantation)	Jorong Tanjung Pangkal, Nagari Lingkung Aur, Pasaman Sub District, Pasaman Barat District, Sumatera Barat Province, Indonesia.	N 0° 06' 48"	E 99° 43' 04"	
	PHP-1 Estate (PT Permata Hijau Pasaman)	Jorong Pisang Hutan, Kenagarian Sasak, Sasak Ranah Pasisie Sub District, Pasaman Barat District, Sumatera Barat Province, Indonesia.	N 0° 00' 39"	E 99° 44' 16"	
	PHP-2 Estate (PT Permata Hijau Pasaman)	Jorong Padang Jaya, Kenagarian Persiapan Maligi, Sasak Ranah Pasisie Sub District, Pasaman Barat District, Sumatera Barat Province, Indonesia.	N 0° 06' 47"	E 99° 37' 48"	
1.5	Description of Area Statement				
1.5.1	Tenure				
	• State		5,861.40 Ha		
	• Community				
	Total				
1.5.2	Area Statement				
		GMP (Ha)	PHP 1 (Ha)	PHP 2 (Ha)	TOTAL (Ha)
	Total area	3,600.00	1,247.00	1,014.40	5,861.40
	Mature area	1,612.60	214.66	881.39	2,708.65
	Immature area	1,489.69	513.00	-	2,002.69
	Land preparation	-	463.18	-	463.18
	Mill	13.00	-	-	13.00
	Road, trench, emplacement	143.34	56.16	28.69	228.19
	Unplantable Area	10.98	-	21.59	32.57
	Nursery	15.33	-	-	15.33
	Occupation	259.02	-	80.81	339.83
	HCV	56.04	-	1.92	57.96
1.6	Planting Year and Cycles				
1.6.1	Age profile of planting year				
	Planting Year	GMP (Ha)	PHP 1 (Ha)	PHP 2 (Ha)	TOTAL (Ha)
	1996	-	-	164.83	164.83
	1997	-	214.66	672.94	887.60
	1998	-	-	43.62	43.62
	2014	122.13	-	-	122.13
	2015	508.19	-	-	508.19
	2016	334.22	-	-	334.22
	2017	349.08	-	-	349.08
	2018	298.98	-	-	298.98
	Subtotal Mature Area	1,612.60	214.66	881.39	2,708.65
	2019	237.15	355.62	-	-
	2020	919.25	73.02	-	-
	2021	333.29	84.36	-	-
	Subtotal Mature Area	1,489.69	513.00	-	2,002.69

	TOTAL	3,102.29	727.66	881.39	4,711.34		
1.6.2	New Planting area after January 2010		- Ha				
1.6.3	Planting Cycle		1 nd Cycle				
1.7	Description of Mill and Supply Base						
1.7.1	Description of Mill						
	Name of Mill	Capacity (tonnes/ hour)	FFB Processed (tonnes/year)	CPO		Palm Kernel	
				Out put (tonnes)	Extraction (%)	Out put (tonnes)	Extraction (%)
	GMP POM	60	375,322	68,895.41	18.40	16,471.35	4.38
	<i>*Production data source 22 months before assessment (March 2020 to December 2021)</i>						
1.7.2	Description of Certification Scope of Supply Base						
	Name of Estate	Total Area (Ha)	Production Area (Ha)	FFB (ton/year)	Yield (ton/ha/ year)	Supplied to Mill	
						FFB (ton/year)	%
	GMP Estate	3,600.00	1,612.60	62,754.87	21.26	62,087.38	98.94
	PHP1 Estate	1,247.00	214.66	13,381.26	34.01	13,283.14	99.27
	PHP2 Estate	1,014.40	881.39	27,563.79	17.01	27,276.37	98.96
	TOTAL	5,861.40	2,708.65	103,699.92	20.89	102,646.89	98.98
	<i>*Production data source 22 months before assessment (March 2020 to December 2021)</i>						
1.7.3	FFB description from other source						
	Name of sources/Organization (RSPO certified / non-certified)	Type of Organization		number of smallholders	Production Area (Ha)	Supplied to Mill FFB (tones/year)	
	RSPO Certified						
	PT. PMJ INTI	Wilmar Group		-	-	3,124	
	PT. AMP 4 INTI	Wilmar Group		-	-	2,151	
	RSPO Non-Certified						
	PT. GMP PLASMA	Smallholder of PT GMP		1,039	2,030.23	53,206	
	PT. PHP I PLASMA	Smallholder of PT PHP 1		1,713	1,132.11	17,528	
	PT. PHP II PLASMA	Smallholder of PT PHP 2		1,708	921.12	12,351	
	OTHER	Independent supplier		-	-	184,588	
	TOTAL					267,673	
	<i>*Production data source 22 months before assessment (March 2020 to December 2021)</i>						
1.7.4	Product categories			FFB, CPO, PK			
1.8	Tonnage of Product						
1.8.1	Past Annual Claim Certified Product			Last Year Projected Certified Volume (Ton)		Actual Certified Volume from March 2020 to Dec 2021 (Ton)	
	FFB Processed			99,900		107,921.22	
	CPO Production			20,175		20,159.01	
	Palm Kernel (PK) Production			4,865		4,748.97	
	Actual certified volume added opening stock CPO 250.06 MT and PK 53.85 MT						
1.8.2	Product selling						
	Type of selling product			Actual selling product for last year (March 2020 to December 2021) (MT)			

	CSPO sold as RSPO certified product			10,315.84				
	CSPK sold as RSPO certified product			4,699.32				
	CSPO sold under another scheme			9,627.29				
	CSPK sold under another scheme			0				
	CSPO sold as conventional			0				
	CSPK sold as conventional			0				
	* Positive stock of and positive stok							
1.8.3	Estimate of Certified FFB Claim							
	Name of Estate(s)		Total Area (Ha)	Production Area (Ha)	FFB (tones/year)	Yield (tones/ha/year)		
	GMP Estate		3,600.00	1,612.60	40,700	25.24		
	PHP1 Estate		1,247.00	214.66	4,500	20.96		
	PHP2 Estate		1,014.40	881.39	18,500	20.99		
	TOTAL		5,861.40	2,708.65	63,700	23.52		
	*Projected FFB production for 12 months of certificate							
1.8.4	Estimate of Certified Palm Product Claim							
	Name of Mill	Capacity (tones/ hour)	FFB Processed (tones/year)	CPO		Palm Kernel		Supply Chain Module
				Out put (tones)	Extraction (%)	Out put (tones)	Extraction (%)	
	GMP POM	60	63,700	12,039	18.90	3,236	5.08	MB
	*Projected CSPO and CSPK production for 12 months of certificate							
1.9	Other Certifications							
	ISO 9001:2008			-				
	ISO 14001: 2004			-				
	OHSAS 18001:2007			-				
	ISCC			-				
	Others							
1.10	Time Bound Plan							
1.10.1	Time Bound Plan for Other Management Units							
	Management Unit		Estate (Supply Base)	Time Bound Plan	Location	Status		
	Mill	Time Bound Plan						
	Indonesia – Kalimantan Region							
	Mustika Sembuluh 1 POM Mustika Sembuluh POM 2 (PT Mustika Sembuluh)	2010	Mustika Sembuluh 1	2010	Central Kalimantan	Certified		
		2015	Mustika Sembuluh 2	2010	Central Kalimantan	Certified		
			Mustika Sembuluh 3	2010	Central Kalimantan	Certified		
			KUD Bitu Maju Bersama	2014	Central Kalimantan	Certified		
	Kerry Sawit Indonesia 1 POM	2011	Kerry Sawit Indonesia 1	2011	Central Kalimantan	Certified		
		2015	Kerry Sawit Indonesia 2	2011	Central Kalimantan	Certified		
			Kerry Sawit Indonesia 3	2011	Central Kalimantan	Certified		
			KUD Karya Bersama	2023	Central Kalimantan			

I	Kerry Sawit Indonesia 2 POM		KUD Sejahtera Bersama	2023	Central Kalimantan	Re Audit, initial certification to process after land title process
	(PT Kerry Sawit Indonesia)		KUD Tabiku Makmur	2023	Central Kalimantan	
			KUD Kosudra	2023	Central Kalimantan	
	Bumi Sawit Kencana POM	2013	Bumi Sawit Kencana 1	2013	Central Kalimantan	Certified
	(PT Bumi Sawit Kencana)		Bumi Sawit Kencana 2	2013	Central Kalimantan	Certified
	POM 1 and POM 2	2023	Sarana Titian Permata 1	2023	Central Kalimantan	-
	(PT Sarana Titian Permata)		Sarana Titian Permata 2	2023	Central Kalimantan	-
			Sarana Titian Permata 3	2023	Central Kalimantan	-
	Mentaya Sawit Mas POM	2015	Mentaya Sawit Mas 1	2015	Central Kalimantan	Certified
	(PT Mentaya Sawit Mas)		Mentaya Sawit Mas 2	2015	Central Kalimantan	Certified
			KUD Karya Makmur Pahirangan	2023	Central Kalimantan	Land title issue
	Rimba Harapan Sakti POM	2015	Rimba Harapan Sakti 1	2015	Central Kalimantan	Certified
	(PT Rimba Harapan Sakti)		Rimba Harapan Sakti 2	2015	Central Kalimantan	Certified
			KUD Makmur Sejahtera	2023	Central Kalimantan	Land title issue
	Karunia Kencana Permaisejati POM	2017	Karunia Kencana Permaisejati 1	2017	Central Kalimantan	Certified
	(PT Karunia Kencana Permaisejati)		Karunia Kencana Permaisejati 2	2017	Central Kalimantan	Certified
			Karunia Kencana Permaisejati 3	2017	Central Kalimantan	Certified
	Agro Nusa Investama POM	2019	Agro Nusa Investama (Sambas) Estate	2019	West Kalimantan	Certified
	(PT Agro Nusa Investama (Sambas))		KUD Cempaka Biru	2019	West Kalimantan	Certified
			KUD Sentama Lestari	2019	West Kalimantan	Certified
			Sri Maram Estate	2023	West Kalimantan	Land title issue
	Bumipratama Khatulistiwa POM	2016	Bumi Pratama Khatulistiwa Estate	2016	West Kalimantan	Certified
	(PT Bumi Pratama Khatulistiwa)		PT Buluh Cawang Plantation	2023	West Kalimantan	HGU is in process
			KUD Tuah Jubata	2023	West Kalimantan	Land title issue
	Agro Nusa Investama (Landak) POM	2023	Agro Nusa Investama (Landak) Estate	2023	West Kalimantan	Land title issue
	(PT Agronusa Investama (Landak))		Pratama Procentindo Estate (PT Pratama Procentindo)	2023	West Kalimantan	Land title issue
	Agro Palindo Sakti POM	2023	Agro Palindo Sakti Estate	2023	West Kalimantan	Land title issue
	(PT Agro Palindo Sakti 2)		Putra Indotropical Estate (PT Putra Indotropical Estate)	2023	West Kalimantan	Land title issue
			Daya Landak Plantation Estate	2023	West Kalimantan	Land title issue

		(PT Daya Landak Plantation)			
		Indoresin Putra Mandiri (PT Indoresin Putra Mandiri)	2023	West Kalimantan	Land title issue
Indonesia – Sumatera Region					
Pinang Awan POM (PT Perkebunan Milano)	2009	Sei Daun	2009	North Sumatra	Certified
		Batang Saponggol	2009	North Sumatra	Certified
		Marbau	2009	North Sumatra	Certified
Tania Selatan POM (PT Tania Selatan)	2010	Burnai Barat	2010	South Sumatra	Certified
		Burnai Timur	2010	South Sumatra	Certified
Kencana Sawit Indonesia POM (PT Kencana Sawit Indonesia)	2020	Kencana Sawit Indonesia	2020	West Sumatra	Certified
		KUD Swamata	2023	West Sumatra	-
AMP Plantation POM (PT AMP Plantation)	2011	AMP I	2011	West Sumatra	Certified
		AMP II	2011	West Sumatra	Certified
		AMP III	2011	West Sumatra	Certified
		AMP IV	2011	West Sumatra	Certified
		Primatama Mulia Jaya	2011	West Sumatra	Certified
		Koperasi Tompek Tapan Kandise	2014	West Sumatra	Certified
		Koperasi AWM	2014	West Sumatra	Certified
		Koperasi BST,	2014	West Sumatra	Certified
		Koperasi MSJ	2014	West Sumatra	Certified
Buluh Cawang Plantation POM (PT Buluh Cawang Plantation)	2012	Bumi Arjo	2012	South Sumatra	Certified
		Dabuk Rejo	2012	South Sumatra	Certified
		Sukamulya	2012	South Sumatra	Certified
		Bambu Kuning	2012	South Sumatra	Certified
Gersindo Minang Plantation POM (PT Gersindo Minang Plantation)	2012	Gersindo Minang Plantation	2012	West Sumatra	Certified
		Permata Hijau Plantation 1	2012	West Sumatra	Certified
		Permata Hijau Plantation 2	2012	West Sumatra	Certified
		PT Permata Hijau Pasaman (block 22)	2023	West Sumatra	-
Daya Labuhan Indah POM (PT Daya Labuhan Indah)	2013	Wonosari	2013	North Sumatra	Certified
		Sei Deras	2013	North Sumatra	Certified
		Cabang Dua (PT Milano)	2013	North Sumatra	Certified
Agro Palindo Sakti POM (PT Agro Palindo Sakti)	2014	Agro Palindo Sakti Estate	2014	South Sumatra	Certified (POM has been closed down)
Murini Samsam POM	2015	Murini Sam Sam Estate	2015	Riau	Certified
		Part of PT Murini Samsam areas (466 ha)	2023	Riau	-

(PT Murini Sam Sam)					
Musi Banyuasin POM (PT Musi Banyuasin Indah)	2023	Sei Selabu	2023	South Sumatera	-
		Sei Jarum	2023	South Sumatera	-
		KUD Karya Gatra	2023	South Sumatera	-
		KUD Karya Makmur Sriwijaya	2023	South Sumatera	-
		KUD Panca Karya Jaya	2023	South Sumatera	-
		KUD Sumber Makmur	2023	South Sumatera	-
		KUD Tri Tunggal Karya	2023	South Sumatera	-
Sinarsiak Dianpermai POM (PT Sinarsiak Dianpermai)	2023	Sinarsiak Dianpermai Estate	2023	Riau	-
Agro Indah Persada 2 POM (PT. Agroindo Indah Persada)	2023	Agro Indah Persada	2023	Bangko – Jambi	NPP Audit
Malaysia					
Sapi POM (PPB Oil Palms Berhad)	2008	Sapi 1	2008	Sandakan, Sabah, Malaysia	Certified
		Sapi 2	2008	Sandakan, Sabah, Malaysia	Certified
		Kiabau	2008	Sandakan, Sabah, Malaysia	Certified
Reka Halus POM (PPB Oil Palms Berhad)	2008	Reka Halus	2008	Sandakan, Sabah, Malaysia	Certified
Sabahmas POM (PPB Oil Palms Berhad)	2008	Sabahmas	2008	Lahad Datu, Sabah, Malaysia	Certified
Saremas 1 POM (PPB Oil Palms Berhad)	2010	Saremas	2010	Bintulu, Serawak, Malaysia	Certified
		Saremas 2 (Div D)	2010	Bintulu, Serawak, Malaysia	Certified
		Suai	2010	Bintulu, Serawak, Malaysia	Certified
Saremas 2 POM (PPB Oil Palms Berhad)	2010	Saremas 2 (exclude Div D)	2010	Bintulu, Serawak, Malaysia	Certified
		Kaminsky	2010	Bintulu, Serawak, Malaysia	Certified
		Segarmas	2010	Bintulu, Serawak, Malaysia	Certified
Ribubonus (PPB Oil Palms Berhad)	2010	Ribubonus	2010	Sandakan, Sabah, Malaysia	Certified
Terusan POM (PPB Oil Palms Berhad)	2010	Terusan 1 + 2	2010	Sandakan, Sabah, Malaysia	Certified
		Rumidi	2010	Sandakan, Sabah, Malaysia	Certified

Sri Kamusan POM (PPB Oil Palms Berhad)	2011	Sri Kamusan	2011	Sandakan, Sabah, Malaysia	Certified
		Hibumas 1	2011	Sandakan, Sabah, Malaysia	Certified
		Hibumas 2	2011	Sandakan, Sabah, Malaysia	Certified
		Jebawang	2011	Sandakan, Sabah, Malaysia	Certified
		Sekar Imej	2011	Sandakan, Sabah, Malaysia	Certified
		Sapi Sugut	2011	Sandakan, Sabah, Malaysia	Certified
		Laba Utama (Div of Jebawang)	2023	Sandakan, Sabah, Malaysia	-
Suburmas POM (PPB Oil Palms Berhad)	2023	Suburmas	2023	Bintulu, Serawak, Malaysia	-
Africa					
BOPP POM, Biase Plantation Limited	2014	Adum Banzo	2014	Western Region, Ghana	Certified
		Scheme Smallholder	2014	Western Region, Ghana	Certified
-	-	Treboum Smallholders	2022	Western Region, Ghana	
Biase Plantation Limited	2020	Calaro	2022	Cross River State, Nigeria	Mill construction complete. Delay due to Covid
		Calaro extension	2022	Cross River State, Nigeria	To be certified, NPP completed
Biase Plantation Limited	2020	Ibiae	2023	Cross River State, Nigeria	To be certified, NPP completed
Eyop Industries	2021	Ibad	2025	Cross River State, Nigeria	To be certified
Eyop Industries	2020	Kwa Falls	2025	Cross River State, Nigeria	To be certified
Eyop Industries	2021	Oban	2025	Cross River State, Nigeria	To be certified
Time bound plan Indonesia update Januari 2021, Malaysia update June 2021, Africa update May 2021					
<p>The revision of time bound plan because there is the change of certification time plan from year 2020 to year 2023 for some uncertified management units with reason is still in process to get land use right (Hak Guna Usaha). Some uncertified management units which changed from year 2020 to year 2023 are PT Agro Nusa Investama (Landak) and its supply based (PT Agronusa Investama 2 and PT Pratama Procentindo), PT Buluh Cawang Plantation in West Kalimantan (one of supply base from PT Bumipratama Khatulistiwa), PT Permata Hijau Pasaman (block 22), PT Agro Palindo Sakti in Sanggau District, West Kalimantan and its supply based (PT Agro Palindo Sakti, PT Putra Indotropical, PT Daya Landak Plantation and PT Indoresin Putra Mandiri), PT Sinarsiak Dian Permai in Riau and PT Musi Banyuasin Indah in South Sumatera.</p>					
<p>The revision of time bound plan because some scheme smallholders has paid all costs relate of develop of scheme smallholder areas so that it has excluded from the time bound plan. It are KUD Damai Sejahtera (DASTRA) I & II (scheme smallholder under PT AMP Plantation and PT Primatama Mulia Jaya), KSU Mutiara Bosa Sikilang, KUD Permata Sawit Maligi, KUD Rantau Pasaman – Sasak and KUD Kapar (its supply based from PT Gersindo Minang Plantations POM)</p>					
<p>The revision of time bound plan because two companies (PT Karya Agung Megah Utama & PT Perkebunan Anak Negeri Pasaman) has terminated the management agreement with PT AMP Plantation as stated in the termination agreement letter on 31 May 2019.</p>					

	<p>The result of internal discussion referring RSPO P&C Certification System, 2017 and communicating with auditee that Auditor has not accepted the revision of time bound plan for some cooperatives (KUD Karya Bersama, KUD Sejahtera Bersama, KUD Tabiku Makmur & KUD Kosudra) as supply base from PT Kerry Sawit Indonesia be year 2023 because it is not compliance with RSPO Certification System clause 4.1.3 so auditor has issued final decision as seen on table 8 above.</p> <p><u>The latest update</u> The revision of time bound plan because there is the change of certification time plan to 2022, 2023, and 2025 for some uncertified management units with reason is still in process to get land use right (Hak Guna Usaha) for some unit in Indonesia, pending NPP assessment for some unit in Africa, and delayed certification due to Covid 19 for some unit in Africa and Malaysia.</p> <p>Regarding the TBP more than 2023, Wilmar has communicated about the TBP to RSPO on 16 July 2021. RSPO response about the TBP is RSPO approved the latest TBP with some notes to take into consideration by Wilmar.</p>
1.10.2	Progress of Associated Smallholders and Outgrowers for Certifiable Standard
	-

2.0	ASSESSMENT PROCESS
2.1	Assessment Team
ASA-1.2 Remote Audit	<ol style="list-style-type: none"> Satria Adi Putra (Lead Auditor). Indonesian citizen, Diploma III majoring in Palm Oil Plantation. Have experience of work more than six years since 2009 as the operational staff of private oil palm plantations in Indonesia. Training have been followed including Occupational Health and Safety Expert, Orang Utan and Wildlife Management, ISPO Auditor Training, ISCC Auditor, IHT Potential Mapping and Conflict Resolution in Production Forests, OHSAS 18001, SA 8000, RSPO Lead Training, Lead Auditor Training for ISO 9001, ISO 14001, ISO 17021, ISO 17065, ISO 19011, ISO 22000. During this assessment he was verify the aspect of worker welfare, social and OHS. Haikal Ramadhan Kharismansyah (Auditor). Indonesian citizen, Bachelor of Agriculture department of plant and pest disease (Agrotechnology). He has 3 years experiences 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 he verify legality, SCCS, Partial Certification and Timebound Plan. Sansan Suhendar (Auditor). Indonesian citizen. Bachelor of Forestry from IPB University, with major in Forest Product Technology. Has experience as a Health, Safety and Environment (HSE Officer) Assistant at the Astra Agro Lestari Group from 2010 to 2016 and familiar with implementation on system management towards ISPO, OSH, Environment, HCV and HACCP in palm oil mill. He also has experience as an ISPO and RSPO Auditor, as well as a Technical Expert for auditing ISO 45001 and ISO 14001 in Forestry sector when he joined PT SAI Global Indonesia from 2017 to 2020. Trainings that have been attended are OHS Expert in 2011, High Conservation Value Forest / Area (HCVF / HCVA) in 2012, Food Safety (Hazard Analysis Critical Control Point) HACCP in 2013, ISPO in 2014, RSPO in 2018, Quality Management System (ISO 9001: 2015) in 2018, Occupational Health and Safety Management System (ISO 45001: 2018) in 2019 and Environment Management System (ISO 14001: 2015) in 2020. During this re-certification assessment, has verify BMP and transparency aspect. Radinal (Observer). Indonesian citizen. Diploma of seed industry technology, agriculture and horticulture program at Bogor Agricultural Institute. He has 5 years experiences as an Agronomy Staff in private oil palm plantation in Indonesia.
ASA-1.2 & ASA-1.3 Onsite Audit	<ol style="list-style-type: none"> Rizliani Aprianita Hasibuan (Lead Auditor). Indonesian Citizen. Bachelor and Magister of Agribusiness, Faculty of Agriculture. She had followed training such as RSPO Lead Auditor Training, SA 8000, Lead Auditor ISO 9001:2008, ISO 14001:2004, ISPO Auditor training and followed several IHT related to environment, BMP etc. She has been involved in several audit activities related to sustainable palm oil certification since 2015 covering social aspect, health and safety aspect, worker welfare and waste management aspect. During the assessment she assigned to verified legal and social aspect, SCCS, TBP and Partial Certification. Yudhi Yuniarto Tallutondok (Auditor). Indonesian citizen, Bachelor of Fisheries. Have experience of working over three years since 2013 as plantation operations staff in private palm oil plantation company in Indonesia. Training have been followed including Lead Auditor of ISO 9001:2015, Lead Auditor of ISO 14001:2015, ISPO Auditor Training, RSPO P&C Lead Auditor Training Course, RSPO SCC Lead Auditor Course, Social Accountability 8000, Basic Management Development Program Agronomy, Fire Anticipation on Land and Forest, Potential Mapping and Conflict Resolution in Production Forests, Awareness of OHS aspects, ISO 45001:2018, ISO 22000:2009, ISO 19011:2011, ISO 17021:2011, dan ISO 17065:2012. Has participated in audit activities for ISPO and RSPO scheme since 2017 for BMP, OHS, labour, social and legal aspects. In this audit activity performs the assessment of best management practices, and OHS. Arief Tajalli (Auditor). Indonesian citizen, Bachelor of Forest Resources Conservation and Ecotourism, Faculty of Forestry, Bogor Agricultural University. Has been involved as a researcher at a wildlife laboratory, Faculty of Forestry, IPB. The trainings that have been attended include training for ISO 9001; 2008, ISO 14001; 2004, ISO 17021; 2015, ISO 17065, ISO 19011 and ISPO Auditor training by Mutu Institute and RSPO Auditor Training by Checkmark, also participating in several IHT in the field of environment, BMP, and so on. Has participated in several audit simulation activities related to the sustainable palm oil certification system since 2020 with social, environmental, GHG, and waste management aspect. During this assessment, he verified the Environmental, GHG, and Waste management aspects. Mia Rahmah Qadryani (Trainee Auditor). Indonesian citizen. Bachelor of Agriculture Majoring in Pest and Plant

Disease, Universitas Padjadjaran. The training she has followed namely: ISO 9001, ISO 19011, Awareness ISO 17021, Awareness ISO 17065, Awareness ISO 9001, Awareness ISO 14001, Awareness ISO 45001, and Awareness ISO 19011. She has participated in several audit simulation activities related to the social and worker welfare. During this audit, she verified Worker Welfare and Transparencies under supervision by lead auditor.

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

2.2	Assessment Methodology, Assessment Process and Locations of Assessment
2.2.1	Figure of person days to implement assessment
ASA-1.2 Remote Audit	<p>Number of auditors: 3 auditors and 1 trainee auditor.</p> <p>Number of days for ASA-1.2 remote audit: 2 days.</p> <p>Number of working days for ASA-1.2 remote audit: 6 Working days.</p>
ASA-1.2 & ASA-1.3 Onsite Audit	<p>Number of auditors: 3 auditors and 1 trainee auditor.</p> <p>Number of days for ASA-1.2 & ASA-1.3 Onsite Audit: 5 days</p> <p>Number of working days for ASA-1.2 & ASA-1.3 Onsite Audit: 15 Working days</p>
2.2.2	Assessment Process
ASA-1.2 Remote Audit	<p>The assessment was aimed to measure PT GMP including its scheme smallholders that were full managed by the company, to the requirements of Principles and Criteria for Sustainable Palm Oil Production 2018, The Indonesia National Interpretation, endorsed by the RSPO Board of Governors on 20 April 2020 and RSPO Certification System for Principles and Criteria and RSPO Independent Smallholder Standard, Endorsed by the RSPO Board of Governors on 12 November 2020.</p> <p>For this section (Remote Audit ASA-1.2) The assessment was conducted in One method: document review, aiming to observe the sufficiency of types or substances from required documents. Some opportunities for improvement of the results ASA-1.2 Remote Audit by the MUTU auditor to the management unit and the results are the subject will be verified at the next assessment phase ASA-1.2 Onsite Audit. Improvement of findings from ASA-1.1 findings were observed by auditors at this ASA-1.2 assessment. All information obtained was recorded in Check List of PT Mutuagung Lestari (MUTU) and part of ASA-1.2.</p> <p>The opening meeting was held on Thursday 25 March 2021 at 08 am through a teleconference (zoom meeting). As for the participants who attended the opening meeting included the PHP, GMP Estate and GMP POM Manager, Supported Team Jakarta and other staff at PT GMP. While the closing meeting will take place on 26 March, 2021 at 16 pm. attended by the same participants as the opening meeting.</p> <p>The assessment program please find Appendix 2.</p>
ASA-1.2 & ASA-1.3 Onsite Audit	<p>The assessment was conducted by measuring the sufficiency of implementation with the consistency done by the PT GMP Plantation to the requirements of Indonesia National Interpretation of Principles and Criteria for Sustainable Palm Oil Production 2018, endorsed on 20th 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.</p> <p>The scope of certification of GMP POM with FFB supplied by three (3) Estates: GMP, PHP-1 and PHP-2 Estate. The assessment was conducted in three methods: (1) document review, aiming to observe the sufficiency of types or substances from required documents; (2) interview, aiming to obtain more detailed information and cross check the information; and (3) field observation, aiming to observe directly the sufficiency of implementation on site.</p> <p>Some opportunities for improvement of the results ASA-1.2 & ASA-1.3 delivered by the MUTU auditor to the management unit and the results are the subject will be verified at the next assessment phase (Recert). Improvement of findings from ASA-1.1 findings were observed by auditors at this ASA-1.2 & ASA-1.3 assessment. All information</p>

	<p>obtained was recorded in Check List of PT Mutuagung Lestari (MUTU) and part of ASA-1.2 & ASA-1.3</p> <p>The opening meeting was held on 24 January 2022. As for the participants who attended the opening meeting included Plantation Controller, General Manager, Estate and Mill Managers, Support Team from Jakarta and other staff at GMP POM. Closing meeting was held on 29 January 2022 attended by the same participants as the opening meeting. Management PT GMP accept all the onsite ASA-1.2 & ASA-1.3 audit results.</p> <p>The assessment program please find Appendix 2.</p>
2.2.3	Locations of Assessment
ASA-1.2 Remote Audit	<p>Will be completed during the onsite audit.</p>
ASA-1.2 & ASA-1.3 Onsite Audit	<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>PT GMP (GMP POM)</p> <ul style="list-style-type: none"> • Water Treatment Plant. Observations and interviews related work procedure, safety aspect, worker welfare, environment aspect etc. • WWTP. Observation related to effluent handling. • Water intake. Observation related to water usage monitoring. • Land Application Block 147 B. Observation related to effluent handling. • Reservoir. Observations and interviews related work procedure, safety aspect, environment aspect etc. • Grading Station. Observations related to FFB quality, handling of FFB that did not pass the criteria, OHS and employment. • Sterilizer Station. Observations related to best practices, OHS, license, and employment. • Engine room. Observations related best practices, OHS, and employment. • Boiler. Observations related to OHS, understanding of emergency response, and operator licenses • Workshop. Observation and Interview related to work procedure, OHS and workers welfare aspect. • Empty Bunch Area. Field observations related to empty bunch management. • Hydrant Simulation. Observation related emergency response, readiness of firefighting equipment. • Security post. Observation and Interview related to work procedure, emergency response, worker welfare, OHS implementation in mill, and supply chain aspect. • Weighbridge station. Observation and Interview related to supply chain aspect and worker welfare. • CPO dispatch station. Observation and Interview related to work procedure, OHS implementation, and supply chain aspect. • Hazardous waste temporary storage. Observation and Interview about storage condition, hazardous waste stock, emergency response facility, and waste management. • Oil storage. Observation about storage condition, MSDS, OHS implementation, emergency facility, and material stock. • Chemical material storage. Observation and Interview about storage condition, MSDS, OHS implementation, emergency facility, and material stock. <p>PT GMP (GMP Estate)</p> <ul style="list-style-type: none"> • Boundaries BTSI and BTSII Block 179, Field observations to see the suitability of the coordinates, position and condition of the stake. • Boundaries BTS XXXIV Block 170, Field observations to see the suitability of the coordinates, position and condition of the stake. • Boundaries BTS XXXI Block 159, Field observations to see the suitability of the coordinates, position and condition of the stake.

- **Boundaries BTS XX Block 153**, Field observations to see the suitability of the coordinates, position and condition of the stake.
- **Boundaries BTS 11 Block 160**, Field observations to see the suitability of the coordinates, position and condition of the stake.
- **Occupation Area Block 180 and Block 154**, Field observations to see potential conflicts and management of the occupation area carried out by the company.
- **EFB Application Area Block 168 dan Block 159**, Observations to see the potential for pollution, solid waste utilization activities, and BMP management.
- **HCV Riparian Pasaman River, Block 153**. Observation related to HCV management.
- **HCV Wetland Area, Block 162**. Observation related to HCV management
- **HCV Wetland Area, Block 165 and 176**. Observation related to HCV management
- **FFB Harvesting, Block 33AB**. Observation related FFB quality, harvesting round, OHS, and employment.
- **Pesticides Application, Block 30AB**. Observation related pesticide application and OHS.
- **Manual Weeding, Block 71A**. Observation related manual weeding procedure, OHS, and employment.
- **Barn Owl, Block 12AB**. Observations related to biological control agents.
- **Nursery, Block 27**. Observation related to nursery procedure, OHS, and employment.
- **Subsidence Pole and Piezometer, Phase 1**. Observations related to monitoring peat subsidence and groundwater level in peatlands.
- **Housing division 1 & 3**. Observation and interview about domestic waste management, hazardous waste management, emergency facilities, and facilities provided for workers.
- **Day care facility**. Observation about facility and interview about worker welfare, gender committee, and facility for worker.
- **Agrochemical storage**. Observation and interview about worker welfare, hazardous waste management, OHS implementation, and understanding of work procedure
- **Cleaning house for spraying and manuring worker**. Observation about condition of the house, waste management, and emergency response facility
- **PPE storage for spraying and manuring worker**. Observation and interview about OHS implementation, condition of the storage and emergency response facility
- **Fertilizer storage**. Observation and interview about worker welfare, OHS implementation, and understanding of work procedure
- **Workshop**. Observation and interview about worker welfare, OHS implementation, and waste management
- **Hazardous waste temporary storage**. Observation about storage condition, hazardous waste stock, emergency response facility, and waste management.
- **Firefighting storage**. Observation about condition about the firefighting facilities and equipment.
- **Clinic**. Observation and interview about clinic facility, waste management, medical check-up, work accident, and other health facility.
- **Oil storage**. Observation about storage condition, MSDS, OHS implementation, emergency facility, and material stock
- **Daycare**. Observation and interview related to work procedure, employment and grievance mechanism.

PT PHP (PHP-1 Estate)

- **Boundaries BPNIII and BPNIV Block 4A**, Field observations to see the suitability of the coordinates, position and condition of the stakes.
- **Boundaries BPNXXXXII and BPNXXXXIII Block 3B**, Field observations to see the suitability of the coordinates, position and condition of the stakes.
- **Boundaries BPNXXXIX and BPNXXXX Block 6C**, Field observations to see the suitability of the coordinates, position and condition of the stakes.
- **Fire tower**, Observation to see its condition and management.
- **Landfill**. Observation to see its condition and management.
- **FFB Harvesting, Block 015BC and 016A**. Observation related FFB quality, harvesting round, OHS, and employment.

- **Pesticides Application, Block 017B.** Observation related pesticide application and OHS.
- **Manual Weeding, Block 114D.** Observation related manual weeding procedure, OHS, and employment.
- **Manuring, Block 113FG.** Observation related to manuring procedure, OHS, and employment.
- **Subsidence Pole and Piezometer, Block 16A.** Observations related to monitoring peat subsidence and groundwater level in peatlands
- **Housing division 2.** Observation and interview about domestic waste management, hazardous waste management, emergency facilities, and facilities provided for workers.
- **Agrochemical storage.** Observation and interview about worker welfare, hazardous waste management, OHS implementation, and understanding of work procedure
- **Fertilizer storage.** Observation and interview about worker welfare, OHS implementation, and understanding of work procedure
- **Oil storage.** Observation about storage condition, MSDS, OHS implementation, emergency facility, and material stock
- **First aid Post.** Observation and interview about facility, waste management, medical check-up, work accident, and other health facility.
- **Workshop.** Observation and interview about worker welfare, OHS implementation, and waste management
- **Firefighting storage.** Observation about condition about the firefighting facilities and equipment.

PT PHP (PHP-2 Estate)

- **Boundaries BTS 6, 7, 8, 9, 10, 11, and 12 Block 5B,** Field observations to see the suitability of the coordinates, position and condition of the stakes.
- **Boundaries BTS 13 Block 5A,** Field observations to see the suitability of the coordinates, position and condition of the stakes.
- **Boundaries BTS 02S Block 5B,** Field observations to see the suitability of the coordinates, position and condition of the stakes.
- **Boundaries BTS 24 Block 28B,** Field observations to see the suitability of the coordinates, position and condition of the stakes.
- **Boundaries BTS 25 Block 28A,** Field observations to see the suitability of the coordinates, position and condition of the stakes.
- **Cultivated area block 28B,** Observation to see its condition and management.
- **HCV Riparian Alin River area blocks 5 and 23.** Observations to see the condition of the HCV area and its management.
- **FFB Harvesting, Block 9AB.** Observation related FFB quality, harvesting round, OHS, and employment.
- **Pesticides Application, Block 24AB.** Observation related pesticide application and OHS.
- **Barn Owl, Block 014.** Observations related to biological control agents.
- **Subsidence Pole and Piezometer, Block 026.** Observations related to monitoring peat subsidence and groundwater level in peatlands.
- **Fire Monitoring Tower.** Observation fire monitoring tower, and the fire patrol.
- **Agrochemical storage.** Observation and interview about worker welfare, hazardous waste management, OHS implementation, and understanding of work procedure
- **Fertilizer storage.** Observation and interview about worker welfare, OHS implementation, and understanding of work procedure
- **Hazardous waste temporary storage.** Observation about storage condition, hazardous waste stock, emergency response facility, and waste management.
- **Firefighting storage.** Observation about condition about the firefighting facilities and equipment.
- **Landfill at block 8C.** Observation related to domestic waste management.
- **Workshop.** Observation and interview about worker welfare, OHS implementation, and waste management
- **Daycare.** Observation and interview related to work procedure, employment and grievance mechanism.
- **First aid Post.** Observation and interview about facility, waste management, medical check-up, work accident, and other health facility.

2.3	Stakeholder Consultation and Stakeholders Contacted
2.3.1	Summary of stakeholder consultation process.
ASA-1.2 Remote Audit	Stakeholders' consultation will be verified on site audit.
ASA-1.2 & ASA-1.3 Onsite Audit	Summary of stakeholder consultation process Consultation of stakeholders for PT Gersindo Minang Plantation and PT Permata Hijau Pasaman was held by: <ul style="list-style-type: none"> • Public Notification on MUTU Website on 10 January 2022. • Public consultation with NGOs (by email) such as WALHI, WWF, and Sawit Watch on 14 January 2022. • Public consultation meeting with government institution 25 January 2022 • Public consultation meeting with communities on 25 and 26 January 2022. • Public consultation meeting with internal stakeholders and contractor on 25-27 January 2022.
2.3.2	Stakeholder contacted
	Please find appendix 1
2.4	Determining Next Assessment
	The next visit (ASA-1.4) will be conducted eight (8) months to twelve (12) months after date of annual license.

3.0 ASSESSMENT FINDINGS

3.1 Summary of Assessment Report of the RSPO Certification

MUTUAGUNG LESTARI has conducted an assessment of Gersindo Minang Plantation POM – PT Gersindo Minang Plantation, subsidiary of Wilmar International Limited consisting of one (1) mill and three (3) oil palm estates.

During the assessment, unit management of GMP POM and its supply base already comply with RSPO P&C and SCCS requirements. Further explanation of assessment result is provided in section 3.5.

MUTUAGUNG LESTARI found that Gersindo Minang Plantation POM – PT Gersindo Minang Plantation subsidiary of Wilmar International Group 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 continued.

Ref Std.	VERIFICATION RESULT of MUTU-Certification	
PRINCIPLE #1 BEHAVE ETHICALLY AND TRANSPARENTLY		
1.1 The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.		
1.1.1 & 1.1.2 In managing management documents that are open to the public or accessible to stakeholders, the company has shown a notification letter and its receipt related to Company Document Transparency to all stakeholders with the number: 05 / GMP-RO / BM-Ext / I-2021 on February 1, 2021. The company documents that are open or can be published are as follows: <ol style="list-style-type: none"> 1. Environmental impact plan and assessment (RKL-RPL) 2. Company policy 3. Company permits including location permits, IUP and HGU certificates 4. The operational area of the plantation and mill is accompanied by a map 5. Plantation and mill operational procedures 6. High Conservation Value (HCV) Report 7. Plan and social impact assessment (SIA) and corporate CSR reports 8. General summary of the certification assessment 9. Occupational Health and Safety (K3) and Environmental Plans 10. Pollution prevention and reduction plans 11. Records of complaints and their handling 12. SOP for conflict resolution 13. Continuous improvement plan 14. Reports (Mandatory labor reports, business and plantation development reports, P2K3 reports and RKL-RPL monitoring. <p>Examples of document receipts from several stakeholders related to Company Document Transparency include: Regent, West Pasaman DPRD, Bapada West Pasaman, ATR / BPN, Plantation Service, Forestry and Environment Service, Manpower and Transmigration Social Service, Transportation Service, Head of BPBD, One Stop Investment and Integrated Services Service, Commander of Kodim 02 Pasaman, Head of the Public Prosecutor's Office, Kapolsek Pasaman, Wali Nagari Lingkung Aur, etc.</p> <p>The company has submitted reports related to social and environmental aspects to the government with the following evidence:</p> <ul style="list-style-type: none"> • Receipt for reporting PT GMP Semester 2 of 2021 RKL-RPL Report No. 02/GMP/II/2022 which was reported to the Environmental Service of Pasaman Barat District on January 19, 2022. 		

- Receipt for reporting PT GMP Semester 2 of 2021 RKL-RPL Report No. 02/GMP/II/2022 which was reported to the Pasaman Barat District Plantation Office on 19 January 2022.
- Receipt for reporting PT PHP UKL-UPL Report semester 2, 2021 Number 031/PHP-EST/EXT/XII/2021 which was reported to the Environment Service and Plantation Service, Pasaman Barat District on January 18, 2022.
- Reporting receipt for PT PHP's UKL-UPL Report semester 2, 2021, which was reported to KLHK through SIMPEL on January 25, 2022 in the form of a receipt draft because there are still improvements to the SIMPEL system so the report has not been verified by the system.
- Receipt for reporting PT GMP Semester 1 2021 RKL-RPL documents reported to KLHK through SIMPEL on July 14, 2021 with TTE ID 1626235619-1947.
- Receipt for reporting PT GMP Semester 2 of 2021 RKL-RPL documents reported to KLHK through SIMPEL on 22 January 2022 in the form of a receipt draft because there are still improvements to the SIMPEL system so the report has not been verified by the system.
- PT GMP Hazardous Waste Management Report for the 4th quarter of 2021 and report it to the Environment Service and Plantation Office of Pasaman Barat District, with proof of receipt number 02/GMP/II/2021 dated 19 January 2021 and report to KLHK on 11 January 2022 with number TTE ID 1642839633-2924.
- PT PHP's Hazardous and Toxic Waste Management Report for the 4th quarter of 2021 and reporting it to the Environment Service and Plantation Office of Pasaman Barat District, with proof of receipt number 030/PHP-EST/EXT/XII/2021 dated 18 January 2022 as well as a report to KLHK on January 11, 2022 with ID TTE 1642839633-2924.
- Report on the realization of the HCV-PT GMP and PHP Management Plan Program in 2021, and has been reported to the BKSDA on December 31, 2021.
- Report on the Identification of Flora and Fauna in the Wilmar International Plantation Region HCV Agam and Pasaman Area for the 2021 period, and has been reported to the BKSDA on December 31, 2021.

UoC also showed the mandatory report submitted related to worker welfare in accordance with its period, here as follows:

- Reporting of Employment Report for PT GMP in 2021 via online on 30 May 2021 and must be reporting back on 30 May 2022.
- Reporting of Employment Report for PT PHP in 2021 via online on 26 May 2021 and must be reporting back on 26 May 2022.

Based on the interview with Agencies of Pasaman Barat District, they stated that if they needed information, they would contact the company through the mobile app and the company always responded and submitted mandatory report in accordance with its period.

1.1.3

The company has information service procedures for stakeholders with No. document PRO-BNM-006 revision 02 with an effective date of December 20, 2017 which has been approved by GEM (group estate manager). The Company responded to information requests with maximum time of 1 month since mail received.

UoC had recorded every requested information on a logbook of incoming and outgoing letters. Based on document verification, it was found that during 2021-2022 most incoming letters are requests for funds. There was one information request from the Regent of Pasaman Barat regarding the Plantation Business Development Report (*LPUP*) on 15 July 2021. This information request had been responded directly as the requested date.

Based on interview with villagers, they have understood mechanism of communication and consultation. Normally, headman of the village or communities would send a letter as a form of communication.

1.1.4

Unit of certification showed the SOP of handling information (PRO-BNM-006) validated on 01 September 2021 which explains the PIC of handling information, publicly accessible documents, the flow of handling information requests, and the maximum time limit of responding to the information request.

UoC also showed the record of the socialization regarding the procedure on 15 November 2021 to 88 participants consisting of workers, contractors, and surrounding communities. In addition, based on the interviews with the labor union and the gender committee, it is known that they had a good understanding of communication and consultation procedures.

1.1.5

UoC showed the current list of stakeholders which informed the internal and external stakeholders updated in November 2021. The stakeholders include the government agencies, heads of the community, cooperatives, local suppliers, contractors, companies around the village, community organizations, labor union organizations, non-governmental organizations, tribal councils, etc. In the current list of stakeholders, it was also explained the names, agencies/positions, addresses, categories and contact person numbers.

Status: Comply

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

1.2.1
Unit of certification had a policy concerning on the ethical codes in all operational activities and transactions. This policy stated in the Wilmar International Group Code of Conduct validated on 5 June 2019. This policy firstly explained that the principle of ethical code divided into 3 main principles, namely:

- Avoiding conflicts of interest.
- Avoiding the abuse of authority / position.
- Ensuring the confidentiality of the information and preventing the abuse of obtained information through the company operational activities, whether it's due to the personal purpose or the company's operational purpose.

Furthermore, it's specifically stated in article number 5 that the group prohibit their workers from any bribery, illegal, and unethical business practice. UoC's code of ethics had been socialized to the workers and contractors, for example:

- GMP Estate and Mill had carried out socialization on 19 January 2021 attended by 20 workers.
- PHP Estate had carried out socialization on 14 January 2022 attended by 29 workers.

Code of ethics policy has been implemented by the company in all business operations and transactions including recruitment and employment contracts. Code of ethics (anti-corruption and anti-bribery) are stated in every work agreement letter of third parties (contractors) and workers.

1.2.2
UoC has a system to monitor compliance and implementation of policies and overall ethical business practices on several SOPs, here as follows:

- SOP of recruitment (No. PRO-HRD-001-rev 03) validated on 1 September 2021 which stated that in recruitment the minimum age to apply is 18 years old and there was no cost in recruitment process.
- SOP of handling information (PRO-BNM-006-rev03) validated on 1 September 2021 which stated that the company regulated in delivering information based on the principle of free prior and informed consent, namely the freedom of speech and no pressure from any party.

Status: Comply

PRINCIPLE #2 OPERATE LEGALLY AND RESPECT RIGHTS

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

2.1.1
Compliance with Environment aspect:
PT GMP:

- The Company already has Environmental documents in the form of an Environmental Impact Analysis Addendum (ANDAL), Environmental Management Plan (RKL) and Environmental Monitoring Plan (RPL) for 2014 for the scope of oil palm plantations covering an area of 6000 Ha consisting of 3600 Ha own Estate and 2400 Ha Plasma Estate, as well as a Palm Oil Processing Factory with a capacity of 60 Tons FFB/Hour. The addendum was made because of the initiation for the construction of a new boiler with a capacity of 30 tons, a turbine with a capacity of 1600 kw and methane capture.
- The company already has a Certificate of Environmental Feasibility for ANDAL, RKL and RPL Documents for PT GMP's Oil Palm Plantation and Processing Mill activities based on the decision of the Pasaman Barat Regent Number 188.45/1079/BUP-PASBAR/2014 which was ratified on 8 December 2014.
- The company already has an Environmental Permit based on the Decree of the Regent of Pasaman Barat No. 188.45/1080/BUP-PASBAR/2014 concerning Environmental Permits for PT GMP's Palm Oil Plantation and Processing Mill activities in Pasaman Barat District which was ratified on 8 December 2014.

- The company has a temporary storage permit for hazardous and toxic waste based on the Hazardous and Toxic Waste Management Permit for the storage of PT Gersindo Minang Plantation Hazardous and Toxic Waste from the Investment and One Stop Service Office of Pasaman Barat District with number 503/02/ IPLB3/DPMPTSP/VII-2020 on July 30, 2020 which is valid for 5 years from the date of stipulation.
- The company already has a Land Application Permit based on the Decree of the Head of DPMPTSP Pasaman Barat District Number 503/02/LA/DPMPTSP/XII-2019 concerning Permit for Utilization of Palm Oil Industrial Wastewater on Soil at PT GMP's Palm Oil Plantation which was ratified on December 3, 2019 with validity period of 5 years from the date of stipulation.
- The company already has a Water Resources Concession Permit based on the Decree of the Governor of Sumatra Barat Number 570/1119-periz/DPM&PTSP/BI/2021 for the scope of PT GMP which was ratified on 8 June 2021 with a water intake quota of 65,000 m3/month. The permit replaces the previous permit issued in 2016 with a validity period of 10 years with a permitted capacity of 35,501 m3/month. The results of the verification of the water utilization recapitulation document for the 2021 period show that the company has utilized water that is still below the permitted quota, with an average of 53,791.33 m3/month. Based on this, the company has responded and improved the Opportunity of Improvement (OFI) given during the surveillance 1.2 remote audit stage related to the use of surface water that exceeds the quota of the permit it has by renewing the permit.

PT PHP:

- The company has UKL-UPL in 2004, for the scope of PT PHP's oil palm plantation in Pasaman District, Sumatera Barat Province. The scope of the document review is oil palm plantations covering an area of 4,170 Ha and 1200 Ha of which are plasma plantations. The document received a recommendation based on the official report Number 007/06/PLH/2004 on February 11, 2004 and there was a reduction in the scope of management to 3,800 hectares.
- The 2004 UKL-UPL document was approved by the Regent of Pasaman with documentary evidence No. 008/06/PLH/2004 on February 18, 2004 for the scope of PT PHP's oil palm plantation in Pasaman District, Sumatera Barat Province covering an area of 3,800 Ha.
- The company already has the Decree of the Regent of Pasaman Barat No. 188.45/236/BUP-PASBAR/2018 April 25, 2018 concerning Permit for Temporary Storage of Hazardous and Toxic Waste for the scope of the PHP-1 Estate Unit which is valid for 5 years.
- The company already has the Decree of the Regent of Pasaman Barat No. 188.45/632/BUP-PASBAR/2017 dated 13 October 2017 concerning Permit for Temporary Storage of Hazardous and Toxic Waste for the scope of the PHP-2 Estate Unit which is valid for 5 years.

Legal

The unit of certification has HGU for 5,861.40 Ha scope of certification as follow: HGU Certificate No. 1 Year 1997 for 3,600 Ha (GMP Estate), HGU Certificate No. 54 and 55 Year 2014 for 1,247 Ha (PHP-1 Estate) and HGU Certificate No. 18 Year 2005 for area 1,014.40 Ha (PHP 2 Estate). Based on information from external stakeholder and review on hectare statement of 2021/2022, there is no expansion and new planting areas issue. The scope of certification is on HGU area (5,861.40 Ha).

2.1.2

The company has a documented system to ensure legal compliance contained in the SOP document Identification and Evaluation of Legal Aspects and Applicable Regulations Number PRO-BNM-005 Revision 02 dated 1 September 2021 where there are changes from the previous version related to the addition of the RSPO standard, ISPO, and the latest ISCC. The document can be accessed in the form of an electronic or physical database containing applicable laws and regulations with elements that explain how these regulations are interpreted and complied with in carrying out operations. The procedure states that in the context of monitoring and updating laws and regulations, RSPO managers and staff must actively check and coordinate with relevant agencies or government. Example of a list of regulations and laws that have been made in the form of a form document for the environment with number FRM-EHS-008 which is valid on October 1, 2011 and has gone through 18 reviews with the last editorial being on December 1, 2021, which has included the most updated regulations.

The company also has personnel responsible for identifying legal requirements and ensuring compliance. Companies can also show a complete list of laws in international, national, sub-national and provincial scopes that detail specific requirements for mill and plantation operations for each aspect such as employment, environment, legality and best management practices. All relevant sections of the law have been identified and linked to activities within the unit of certification. The company carries out an internal RSPO audit on a regular basis every year, at which time the audit is carried out simultaneously with inspections related to compliance

with applicable regulations. In relation to third party contracts, the certification unit has also ensured that there is an evaluation of legal compliance for all contracts with third parties carried out according to the principle of continuous improvement. This can be proven from the evidence of socialization to contractors as well as the application of standards and procedures for third parties who enter the scope of the company's area.

2.1.3

The company has procedures related to the maintenance of boundary pole contained in the SOP for the Maintenance of HGU pole No. PRO-BNM-012 3rd revision on October 2, 2021. Based on the SOP, boundary maintenance is carried out every three months by a PIC appointed by the company

The company has routinely carried out maintenance of boundary pole every 3 months which is shown through records of maintenance of pole every 3 months, which is shown through documentation:

- Minutes of pole maintenance on June 30, 2021
- Minutes of pole maintenance on 15 September 2021
- Minutes of pole maintenance on December 21, 2021

Based on the results of field visits to the area of boundary pole for example, HGU pole No. BPNXXXII, BPNXXXIII and BPNXXXIX, known that the pole were found in a well-maintained condition. In addition, no indication of planting outside the HGU was found.

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

In monitoring the existence of contractors for plantation and mill activities, the certification unit had well-documented the list of contractors, type of business, contact persons, work agreements, and ensuring other matters related to compliance with laws and regulations in Indonesia. During the audit, UoC has contractors in each units collaborated in construction, here as follows:

- PHP-1: In cooperation with 3 contractors, namely CV Bella which has 2 workers, CV. Tri Mekar Jaya which has 2 workers, and CV. Waspada which has 2 workers.
- GMP: In cooperation with 9 contractors, namely CV Putra Ruslan, CV Bhaskoro Tractor, CV Allcity Karya, CV Khairat, CV Dian RP, CV Hazelfa, CV Harapan Jaya, CV Rizki Ananta, CV

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

- Work Agreement CV Tri Mekar Jaya (No. 007/SPK/PHP1-INTI/VII/2021) for Construction in PHP-1 Estate dated on 19 June 2021 which is valid for three months (01 July 2021 – 31 December 2021).
- Work Agreement of CV Allcity Karya (No. 054/SPK/GMP/11/2021) for Emplacement Renovation Work in GMP dated on 10 November 2021 which is valid for three months (10 November 2021-10 February 2022).
- Work Agreement of CV Khairat (No. 056/SPK/GMP/11/2021) for Construction in GMP dated on 16 November 2021 which is valid for two months (16 November 2021-16 January 2022).

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

2.2.2

UoC showed that there were several separate clauses on the work agreement between the company and the contractor related to fulfilling legal obligations in Indonesia. Some of these obligations are related to the registration of workers' health and social security insurance, the provision of minimum wages, the obligation to use PPE, other permits such as tax payment and others. To ensure compliance with these clauses, the certification unit always requests the requirements for the completeness before the contractor does work.

In addition, UoC has carried out an evaluation of each contractor to see the performance of the contractors, for example the evaluation of CV. Waspada was held on 29 November 2021. There were several important indicators in the evaluation including work quality, punctuality, competence of workers, compliance with company's regulation, discipline in using PPE, environmental awareness, and

the ability to achieve zero accident.

Based on the interviews with contractor workers and documents verification, it revealed that workers had received wages above the minimum wage and were registered in the BPJS program. For example:

- Proof of payment of wages for CV. Allcity Karya workers on behalf of ED (initial) who received wages above the minimum wage.
- Proof of payment of wages for CV. Dian RP workers on behalf of YL (initial) who received wages above the minimum wage.
- BPJS (Social Security Insurance) payments for CV Hazelfa, have been completely fulfilled and the last proof of payment is on 24 January 2022 for period of January 2022.
- BPJS (Social Security Insurance) payments for CV Allcity Karya, have been completely fulfilled and the last proof of payment is on 21 January 2022 for period of January 2022.

2.2.3

UoC showed that on each work agreement between the unit of certification and the contractor, there were clauses related to fulfilling legal obligations in Indonesia as one of the obligations that must be fulfilled by the contractors. Some of these obligations are related to anti bribery, anti corruption, anti forced and trafficked labor. To ensure compliance with these clauses, UoC always requests the requirements for the completeness before the contractor does work.

Based on the document review and field observation, it revealed that there were no workers under the age of 18 and the work provided was in accordance with the agreement when the initial worker worked.

Status: Comply

2.3

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

2.3.1

GMP POM received FFB directly from the source, from scheme smallholder and other company under Wilmar Group. Company showed the list of FFB supplier in document "List of FFB Supplier PT GMP – GMP POM 2021/2022". The document informed about name of supplier, PIC, address, phone number, coordinate location, and evidence of land owner.

2.3.2

The company shows a list of indirect suppliers for GMP POM which also informs name of supplier/vendor, PIC, address, phone number, coordinate location, and evidence of land owner. For example :

Name of vendor/Agent	coordinate location		Name of farmer	Sample of Evidence of land owner
	X (E)	Y (N)		
Mawarman	099.80457	00.15556	Anang	Land ownership No. 405 dated 29 June 1985
Afrizal	099.79659	00.07718	Inel	Land ownership No. 128 dated 18 February 2006
Deswelly	099.86091	00.12640	Ikul	Land ownership No. 4143 dated 12 December 2019

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 certification unit shows a long-term planning document that is described in a 5 (five) year plan, which is listed in the PT Permata Hijau Pasaman and Gersindo Minang Plantation Projections Periods 2018 – 2023 document. The planning document includes, among others, a replanting plan, production projections, yield projections, price estimates and financial indicators. For example, for the 2023 plan, there is no replanting plan, the projected FFB production is 38,600 tons, the estimated CPO price is IDR 9,156,000/ton and the estimated FFB price is IDR 2,0001,000/ton.

3.1.2

PT PHP showed documents of a replanting plan in a planned operational area of 84.36 Ha in September 2021. However, until now it has not been realized because of the social conflict with Wilayah Kapar which is currently still in the stage of being resolved at the Supreme Court. In addition, PT GMP also showed a replanting plan document which is planned for an area of 333.29 Ha in 2021.

Based on document verification and field observations, it is known that the replanting has been realized according to the predetermined plan.

3.1.3

The representative of the certificate holder explained that the evaluation related to the Business Plan had been carried out. He showed the Management Review Meeting document which was held in July 2021. The document discusses, among others, the effectiveness and results of internal audits of management system. In addition, the certification unit also shows internal audit documents for ISPO, RSPO and ISCC which were carried out on September 6, 2021 by the certification unit's internal auditors. From the audit results, it is known that there are several findings including: the condition of the PPE of spray workers is in a damaged condition so that it has the potential to enter chemicals and be exposed to chemicals. The certification unit in this case has followed up on these findings by replacing PPE and increasing monitoring in the future.

Status: Comply

3.2

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

3.2.1

For continuous improvement evaluation and monitoring, unit of certification has conducting internal and external audit, as well as periodic performance report by unit management. The action plan for continues improvement is implemented based on consideration of the main social and environment impact, for example as shows through several documents, as follows:

- Internal audit RSPO is conducted by internal auditors. The audit resulted there are totaling 9 non-conformity which all already comply.
- Monthly Estate and Mill Manager report which informed unit performance.
- Regulation pursuance as presented in document of Evaluation of Compliance with Regulations, Legislation and Other Requirements for the 2021 period.

In addition, the certification unit has also implemented continuous improvement by implementing an online reporting system called the Enablon System where the reported matters include: reporting of potential hazards, reporting of work accidents, reporting of fuel consumption, water, chemicals, electricity and all activities related to high-risk work.

Social and Environmental Impacts

The management unit has developed and implemented an action plan for continuous improvement and it is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification. such as:

- The company no longer uses pesticides with the active ingredient paraquat.
- The company has implemented biological pest control in this case by using host plants and owls to reduce the use of pesticides, especially insecticides and rodenticides.
- Management and monitoring of fires in company border areas that benefit the community.
- The use of renewable fuels accordance to reduce the use of fossil fuels.
- using renewable energy-producing technology, namely methane capture or biogas.
- The 2021 HCV Management Plan improved in terms of both the quantity and the quality of monitoring.
- Waste management and monitoring through WWTP pond management, testing the quality of the effluent and reporting it to the Environmental Agency of Pasaman Barat District.
- Air quality management and monitoring through road maintenance, air quality testing and reporting to the Environmental Agency of Pasaman Barat District.
- Management and monitoring of groundwater through testing ground water quality and reporting it to the Environmental Agency of Pasaman Barat District.
- Hazardous waste management through Hazardous Waste Storage in permitted, management and monitoring of Hazardous waste also reported to the Environmental Agency of Pasaman Barat District.
- Greenhouse Gas (GHG) Management. Implement a zero-burning policy, utilization of EFB, shells and fiber as renewable energy, regular engine maintenance, and regular emission quality tests.

3.2.2

The company has shown the auditor regarding the RSPO metric template Version 2.1 that has been filled in according to the facts

and data in the company's record documents, such as the number of workers, the area of production to the record of work accidents. Based on team auditor's review, the information has been match with others document, such as supply chain record, demographic workers, work accident, etc.

Status: Comply

3.3

Operating procedures are appropriately documented, consistently implemented and monitored.

3.3.1

The certification unit already has operational procedures consisting of SOPs for Agronomy and Palm Oil processing. In the agronomy procedures, it is regulated including oil palm planting, fertilization, weed control, water management, harvesting, pest control, replanting, fire prevention on land, PPE standards, pesticide management, and soil and water conservation. In palm oil processing procedures, among others, regulate the acceptance of FFB, supply chain, boiling (sterilization), stripping, digestion, pressing, clarification, separation of seeds and fibers, core stations, stockpiling of oil and palm kernel, laboratory management, boilers, engine power, types of factory machinery, security. and work safety, shipping, PPE standards, management of spills and spills, Lock Out and Tag Out, investigation of work incidents and accidents, as well as granting work permits.

3.3.2

The certification unit has a mechanism for examining the implementation of the procedures, which are contained in the PRO-GEN-003 procedure regarding the Internal Audit Management System Revision 03 Procedure which was ratified by the General Estate Manager on September 1, 2021. In this procedure, it is about the implementation, reporting, and documentation of the results of the Internal Audit.

3.3.3

The following is an example of the implementation of the inspection of the implementation of procedures at the GMP POM which is shown in the GMP POM PT GMP Risk Base Audit document for the inspection period September 2020 - August 2021. In the document it is known that the Internal Auditor carried out inspections related to productivity, throughput, inventory CPO and Palm Kernel, weighbridge condition, as well as a plan to repair any non-conformities. Based on field observations at Mill and estates also show that workers have carried out work according to work procedures and safe work practices.

Status: Comply

3.4

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

3.4.1

The certification unit has several documents related to social and environmental impact assessments which are carried out independently and in a participatory manner, involving affected stakeholders. The document covers the pre-construction activities, the operation stage and the post-operation stage. Some of the documents held by the certification unit include:

Environmental Impact Assessment (EIA)

PT Gersindo Minang Plantation Unit (Estate and POM)

- The company has conducted several environmental studies, starting in 2003 in the form of a UKL-UPL document, then an addendum was made to the Environmental Management and Monitoring Document (DPPL) in 2009 as a fulfillment of the Minister of Environment Regulation No. 12 of 2007 and the Sumatera Barat Governor's Regulation. Number 2 of 2008. Then, the company again made an addendum to environmental documents in the form of an Environmental Impact Analysis Addendum (ANDAL), an Environmental Management Plan (RKL) and an Environmental Monitoring Plan (RPL) in 2014. The addendum was made because of the initiation for the construction of a new boiler with capacity of 30 tons, turbine with a capacity of 1600 kw and methane capture. From all these environmental documents, the scope of the study did not change, namely with an oil palm plantation of 6000 Ha consisting of 3600 Ha of own Estate and 2400 Ha of Plasma Estate, as well as a Palm Oil Processing Factory with a capacity of 60 Ton FFB/hour.
- Based on the 2014 environmental documents, the company obtained a Certificate of Environmental Feasibility for ANDAL, RKL and RPL Documents for PT GMP's Plantation and Palm Oil Processing Mill activities based on the Decree of the Regent of Pasaman Barat Number 188.45/1079/BUP-PASBAR/2014 which was ratified on 8 December 2014.
- The company also has an Environmental Permit based on the Decree of the Regent of Pasaman Barat No. 188.45/1080/BUP-PASBAR/2014 concerning Environmental Permits for PT GMP's Palm Oil Plantation and Processing Mill activities in Pasaman

Barat District which was ratified on 8 December 2014.

PT Permata Hijau Pasaman Unit (PHP 1 and PHP 2 Estate)

- The company already has an Environmental Document in the form of an Environmental Management Effort and Environmental Monitoring Effort Document (UKL-UPL) in 2004, for the oil palm plantation of PT Permata Hijau Pasaman (PT PHP) in Pasaman District, Sumatera Barat Province. The scope of the document review is an oil palm plantation covering an area of 4,170 Ha which is divided into PHP 1 with an area of 2770 Ha, PHP 2 with an area of 1400 Ha and 1200 Ha of which are plasma plantations. The document has complied with the recommendations given by the Controlling Team for the Implementation of Environmental Management Documents, based on the official report Number 007/06/PLH/2004 dated February 11, 2004. Based on the recommendation, the management area was reduced to 3,800 hectares.
- Based on the UKL-UPL document and the recommendation letter above, the company obtained a Letter of Approval of Environmental Management Documents issued by the Regent of Pasaman No. 008/06/PLH/2004 on February 18, 2004 for the scope of the oil palm plantation of PT Permata Hijau Pasaman (PT PHP) in Pasaman District, Sumatera Barat Province covering an area of 3,800 Ha. This ratification letter is valid as long as it can implement all the provisions contained in the UKL/UPL document and fulfill the recommendations given by the Environmental Management Document Implementation Control Team.

In all of the documents mentioned above, each aspect and parameter must be monitored and managed with clear target information and implementation time contained in the UKL-UPL matrix. The company has 2 units that are included in the scope of certification with 2 environmental documents, so the company has the obligation to prepare 2 environmental management and monitoring reports (RKL-RPL) every semester.

Social Impact Assessment (SIA)

Certification unit already conducted a Social Impact Assessment (SIA), carried out in 2012 by AKSENTA Consultants. The SIA study is divided into 2 documents because there are 2 scopes of activities, namely for PT GMP which was carried out on 25 – 30 September 2012 which included GMP Estate and GMP POM, and 30 September – 4 October 2012 which included PHP 1 and PHP 2 Estate. This study explains the impacts arising from plasma activities, including: employment, natural resources, public health, economic development, physical development, population migration, and work safety. Social impact assessment is included as part of Complementary to all environmental impact assessments. The assessment involved all parties affected by both internal and external stakeholders, including employees, workers union, village heads around the plantations, local NGOs and smallholder (KSU Mutiara Bosa Sikilang, KUD Kapa, KUD Rantau Pasaman, etc.). Participatory evidence with affected parties is shown in the form of attendance at FGD meetings and photos during interviews. In addition, the SIA assessment has also been disseminated to villagers and stakeholders in the affected area with evidence of an invitation to Socialization conducted on 20 February 2013, as well as minutes of socialization of HCV Identification Results, Traditional Activities, Programs and Social Impact Procedures / SOPs related to company activities on February 22, 2013 which was attended by parties from around the plantation area.

Community representatives who became resource persons in this assessment were the village head, village apparatus, traditional leaders (*Ninik Mamak*), and farmers/fishermen/laborers. The types of data collected were primary and secondary data. Primary data collection for monitoring social impact management was obtained from informants as the affected party as well as local village officials who represented the community and as verifiers. The secondary data or indirect data collection is in the form of evidence, notes, archives or published historical reports as well as references in the form of AMDAL, HCV documents, local government literature, notes on CSR implementation and others. The aspects of the assessment are Economic Life (Natural Potential, Livelihoods, Local Economy, Food Security, Vulnerable Groups, Company Contribution, Plasma Plantation Development) and Social and Cultural aspect. Meanwhile, another secondary data is obtained indirectly through intermediary media in the form of published evidence, records, archives, or historical reports through literature studies. Secondary data is obtained from related units in order to document impact management as well as additional data from relevant affected parties. The reading material used is documentation of the implementation of impact management, internal company data, correspondence between the company and affected parties, and so on.

Negative and positive issues were summarized during the assessment included management recommendations. The data collection process was carried out by involving the community and workers as sources of information using interviews, focus group discussions and distributing questionnaires in the village. In the report, there is also a matrix on the Social Management Plan and Social Monitoring Plan and an Attachment to the Attendance List of participants in the data collection process in surrounding villages and within the scope of PT GMP and PHP employees.

3.4.2

Based on the results of document verification, it can be concluded that all management and monitoring parameters requested in environmental documents have been implemented. Certification unit has also evaluated for each significant impact monitoring parameter that is implemented as required in KepmenLH 45 of 2005, which includes an evaluation of trends, evaluation of critical levels, and evaluation of compliance. Based on the results of the evaluation, it is known that all parameters are still appropriate by the related Quality Standards, and there is no indication of environmental pollution in the area around the company, as evidenced by the results of field visits to the EFB area, WWTP and LA application areas as well as river border conservation areas. The results of interviews with the community around the company also stated that they did not feel any environmental impacts related to the company's operational activities.

The implementation of environmental management has been carried out in accordance with all RKL-RPL documents and Environmental Permits owned by the company. The certification unit makes an RKL-RPL report based on the attachment of the Environmental Permit, namely the environmental management and monitoring matrix. The environmental management report is carried out every 6 months and submitted to the relevant agency, namely the RKL-RPL Report for Semester 2 of 2021 which was sent to the Environment Agency of Pasaman Barat District with proof of receipt dated January 18, 2022 (PT PHP) and January 20, 2021 (PT GMP) and attached with the stamp, signature and name of the recipient as well as proof of sending documents notes. Based on the report on the implementation of the RKL-RPL in the semester 2 of 2021, it is known there is no negative impact caused by the unit of certification, such as all factory waste quality testing which is carried out periodically and in accordance with the quality standard set by the government.

Meanwhile, the social impact monitoring and management plan has been managed and monitored through the SIA Implementation Report PT GMP for 2021 based on the results of the SIA management plan 2019-2021. Social program from companies related to community development, economic improvement of the surrounding community, strengthening communication and networks with stakeholders, environmental improvement programs, and reforming the workforce. The program is equipped with activities to be carried out, challenges, opportunities, implementation strategies, expected outcomes, and implementation timelines. The planned program comes from the results of the Focus Group Discussion carried out in SIA activities that have been carried out in villages around company is added with the results of the analysis. The program is a general plan that will be implemented by the company based on the analysis of stakeholder needs and mapping of stakeholders related to company either directly or indirectly. Thus, the planned program is directed as far as possible to strengthen the company's relationship, communication and cooperation with all stakeholders in order to achieve the company's goals. Activities are derivatives of programs that have been planned and are technical activities that will be carried out by the company in the context of implementing the planned program.

Based on analysis document from SIA Management Plan 2019-2021, The social impact in this assessment is divided into positive impact, and negative impact. Positive impact is an influence arising from the company's activities that provide better benefits/conditions for a particular object, while the negative impact is an influence from the company's activities which makes certain objects worse off. The social impact assessment is carried out based on the perceptions of the representative's community in the assessment location that represents that community. Community perception is the perspective of a group of people who live together in a certain environment that is the same in providing conclusion to an object. Conclusion on an object is formed based on knowledge, vision, and observation so that the community with each other allows to produce a different perception different for the same object. the company has analyzed the positive and negative impacts arising from each activity specifically, for example physical assets for production activities that have positive and negative impacts on both external and internal levels, and so on. The company conducts an annual evaluation to align the SIA management program according to the needs in the field according to the conditions as for example in Document Social Impact Management Plans for 2021 set up on 10 January 2021 which explains, among other things:

- The need for employment for the community around the company is managed by providing work training outside the plantation sector because the company has limited recruitment of employees.
- Complaints arising from the community are managed by improving the quality of service or giving responses.
- There has been a decline in community interest in local arts and culture by providing facilities and funds for the implementation of local cultural activities.
- Assistance with facilities and infrastructure for education.
- The old road of the GMP and PHP which is damaged and dusty, is managed by routine maintenance, periodic watering, and road improvement consistently and continuously.

Based on the results of consultations with representatives' workers, there were no forms of discrimination against workers, no underage workers were found, the company has fulfilled the rights of its employees, several important facilities for employees have been provided by the company such as housing, water, electricity, places of worship, educational infrastructure (schools), and other facilities. The company also allocates resources for the maintenance of the entire facility. The company has also carried out socialization related to the PT GMP Social Impact Management and Monitoring Plan which was carried out on January 14 and 15 2022. The activity was carried out to review the SIA Management Plan for 2021 and the SIA management report for the 2019-2021 period as well as for the MP 2022-2024 program planning. Activities were also attended by the affected communities, local contractors and representatives of trade unions.

3.4.3

Environmental Impact Assessment (EIA)

The company has documents, the implementation of the results of the environmental permit including reports to agencies in the form of RKL-RPL documents which are conducted every semester. The company can show proof of reporting in the form of a document affixed with a stamp, the name and signature of the recipient which is sent to relevant agencies that explain in indicator 1.1.1 related to Environmental Aspect. The implementation of environmental management and monitoring is carried out in accordance with the direction of the RKL-RPL as described in indicator 3.4.1. The effectiveness of environmental management and monitoring can be seen from the results of environmental management and monitoring analysis, which can also be seen from the suitability between the management and monitoring plans and their implementation in the field. The RKL-RPL document also shows that the company has managed all the impacts recommended in the UKL-UPL Documents. In general, the forms of evaluation carried out by the company include Trend Evaluation, Critical Level Evaluation and Compliance Evaluation. The RKL-RPL report discusses about:

- PT. GMP has carried out environmental management by complying with and complying with statutory obligations regarding the environment and applicable laws and other requirements.
- PT. GMP has taken steps to prevent soil, water and air pollution by reducing the use of chemicals, managing waste properly and complying with proper waste disposal in each area.
- PT. GMP has made efforts to manage waste gas by utilizing it as biogas
- PT. GMP has made efforts to save the environment by protecting areas important for environmental sustainability such as river borders
- Conduct environmental studies to identify areas important for environmental conservation
- Manage and monitor the impact of potential land and Estate fires
- Manage and monitor impacts on soil, air, surface water and noise quality
- Environmental management is carried out by utilizing solid waste from palm oil mills. The shells are used as boiler fuel, the fibers are used as boiler fuel, the empty leaves are used as organic fertilizer in the Estate.
- Palm oil mill effluent (POME) is applied as a substitute for liquid fertilizer on plantations. All the liquid waste produced is used as fertilizer, none is discharged into water bodies/rivers.

Based on the results of field observations, it can be seen that the company has carried out environmental management in accordance with the RKL-RPL by installing signboard for conservation areas. In addition, there is also marking in the form of stakes and red paint for spray-boundary areas and other chemical applications. Based on the results of interviews with sprayer and fertilizer workers, they also stated that they were aware of the prohibition on applying chemicals to the buffer zone marked in red. In addition, they do not apply chemicals when they are close to water bodies such as canals, reservoirs or artificial ponds.

Social Impact Assessment (SIA)

The social management and monitoring plan is implemented, monitored and updated periodically in a participatory manner. In general, the social management plan of GMP POM is work programs from companies that are grouped into the social community, strengthening stakeholders, social culture and employment. The planned program is derived from the results of the Focus Group Discussions held in SIA 2019 activities in the SIA management report for the 2019-2021 that have been carried out in villages around company and the workers/employees within the company (already explain in 3.4.2).

Through the implementation of the SIA program, GMP POM applies the RSPO's 7 principles on responsible new plantation development. For this reason, company is currently carrying out the stages of the Free, Prior, Informed and Consent (FPIC) program to comply with the 7 RSPO principles. The principle of FPIC which is the basis for the company in carrying out the process of developing oil palm plantations in the CSR program involves women's representatives as community representatives who have an important role. Through this CSR program, it is hoped that it will be able to encourage women to be more active and involved in

decision making in villages that are CSR targets in accordance with the FPIC Principles. Referring to the results of the verification of the SIA 2012 study, GMP POM has implemented Free, Prior and Informed Consent (FPIC) in the management of its plantations and palm oil mills. The application of FPIC in every aspect of activities that involve interaction with the community is contained in the company's commitment to sustainability and in the company's obligations as a member of the RSPO. The implementation of FPIC is a manifestation of the company's respect for community rights and other social components related to company activities.

Based on the results of the study of the SIA document, The company has a Social Impact Assessment Management and Monitoring Plan (SIA) which is prepared every 2 years, by collecting data related to community perceptions which is carried out periodically every year. Based on the results of the study of the SIA Report 2021, information was obtained that the last public perception data collection already carried out as shown in the minutes of the event held on January 10, 2021 for the scope of GMP and PHP Estate. The results of interviews with management regarding the collection of community perception data in 2021 it will still be carried out even though it is during the covid-19 pandemic by means of in-depth interviews or direct visitors one by one to the resource persons who will be socialized and interviewed.

The company has also carried out socialization to the community and stakeholders around the company regarding the results of the 2019-2021 SIA management which was carried out on 14 and 15 January 2021. The socialization also explained related to the implementation of the 2021 SIA Management Plan where there are programs that have not been fulfilled, such as economic improvement activities. for groups that have been given assistance because there has been no progress report. Meanwhile, other assistance for economic improvement is still in the form of charity. As for education assistance, the company has provided computer assistance for learning media. Apart from that, other assistance is in the form of assistance for repairing roads and irrigation canals, assistance in accelerating vaccines for Covid-19, rehabilitation of religious facilities as well as arts and cultural activities.

In the SIA Management Results document for the 2019-2021 period, there are discussions related to conflicts that occur within the scope of the PT GMP Certification Unit. The last management plan preparation was carried out on March 5, 2019 which applies to the management period 2019 – 2021. While for the 2022 period, no preparation has been made, and is scheduled to be carried out in March 2022. The main problem is land disputes that cause disruption to company activities. For the period 2019 to 2021, there are a few main cases related to land disputes, as follows:

- The case with Nagari KAPA, the problem started in 2017 and was completed and obtained an agreement on March 23, 2020 through several stages of mediation carried out by the company and facilitated by several third parties namely Impartial Mediator Network (IMN), Nagari Institute Foundation, RSPO, Government Pasaman Barat Region, as well as the provincial and district Land Agency.
- The case with Nagari Maligi, the problem began in 2019 and was completed and obtained an agreement on March 10, 2020 through several mediation stages carried out by the company and facilitated by several third parties, namely the Nagari Sasak Customary Council, Earthworm Foundation, and the Regent of Pasaman Barat.
- The case with 33 Land Voters, the problem started in 2019 and was completed on March 10, 2020 based on the OMBUDSMAN's decision through letter number B/264/LM.29.K4/0110.2019/II/2020 dated February 5, 2020.
- The case with Nagari Kapar. The problem started in 2020 and until now has not been resolved, the company has made several mediation efforts by involving all related parties and has entered into the realm of law. The results of interviews with the Kapar Village Head and the company stated that they would act according to the applicable legal decisions, namely waiting for the Supreme Court's decision to consider the next steps.
- Other social issues are related to livestock in the form of cattle belonging to the community that enter the plantation area, causing damage to plantation land such as haul road, harvest bridges and drainage canals. the company has managed with FPIC to carry out control so that livestock owners understand the impact experienced by the company. Socialization activities were carried out for cattle herders to only enter areas with high oil palm plantations, and not to enter areas that have just been replanted. The company also provides a special zone that can be used by livestock owners to herd their cows. These problems only occur in the scope of the PHP-1 Estate area, while for GMP and PHP-2 Estate there are no livestock that enter the company's management area because they are far from the company's settlement.

Based on the explanation above, the company has responded to all social conflicts including land disputes that occurred within the company's area and followed up on these conflicts with mediation and facilitation methods involving several neutral parties.

Status: Comply

3.5

A system for managing human resources is in place.

3.5.1

UoC had procedures related to recruitment, appraisal, promotion, remuneration, and termination of employment which are generally described in the Collective Labor Agreement period 2021-2023 written in Bahasa. In general, these procedures describe:

- Recruitment of workers is based on the company's needs.
- The minimum age of workers is 18 years old.
- The workers who have been accepted will through three months of probation.
- Promotion of workers is based on needs, period of work, expertise and assessment of workers.
- The company is authorized to carry out the placement, transfer and promotion of workers by applicable regulations.
- Termination of workers can occur if the worker is on probation, resign as the worker's willing, ends on worker's period of the agreement, retire, etc.

In addition, the procedures of employee recruitment, appraisal, promotion, and remuneration are explained specifically in several SOPs. These procedures have been documented and socialized to all workers and their representatives, here as follows:

- SOP No. PRO-HRD-001-rev 03 dated on 01 September 2021 concerning on Recruitment.
- SOP No. PRO-HRD-003 dated on 04 November 2021 concerning on Worker's Appraisal.

Based on the interviews with workers (harvesters, pesticide sprayers, manuring workers, and mill operators), workers had a sufficient understanding of the procedures related to recruitment, promotion, and termination of employment. Workers explain that in the acceptance process carried out in accordance with the terms according to ability, promotion is based on an assessment of the performance of each employee each year, and termination of employment can occur if the worker has committed a serious violation and absent for five days continuously.

3.5.2

Unit of Certification documented all labor procedures that have been carried out properly, such as recruitment, promotion, performance appraisal, and termination. The following are some sample labor procedures that have been implemented and are well documented by certification unit, including:

- Recruitment document in accordance with the recruitment requirements such as employment request form, application letter, statement of police report, identity card (KTP), family identity card (KK), the result of written test, the result of interview test, and work agreement letter. For example, a worker on behalf of MHZ (initial) who started working with three months of probation on 03 December 2021.
- Promotion documents such as management decree for worker's promotion. For example, a worker on behalf of TND (initial) who had a promotion based on worker's appraisal, from class 2A to 2B .
- Termination document such as the management decree of employment's termination on behalf of YB (initial). UoC also showed other supporting documents such as the management decree of employment's termination, debt certificate, calculation of termination payments, and the proof of its payment in accordance with the applicable laws.

Based on the interviews with the Manpower Agency of Pasaman Barat, the company had been applied the existing labor procedures in accordance with the regulations. During 2021-2022, there were no issues related to manpower.

Status: Comply

3.6

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

3.6.1

The certification unit has carried out a risk assessment to identify Occupational Health & Safety issues in all operations, which are documented in the PT GMP and PHP Assessment for the 2021 period, which was approved by the Head of OHS Committee in May 2021. The document describes the type of work, potential hazards/risks that will arise, effects and risk categories, as well as risk control. This assessment covers all hazards and risks in estate, such as herbicide application, fertilization, harvesting, slashing, landscaping, FFB loading, transportation, desilting, thinning & care, pest and disease control, warehouses and so on. Based on field observations and interviews with workers in agrochemical warehouses, known that officers have understood the potential work risks and how to minimize these risks. The certification unit also shows the HIRAC document for the Mill unit which describes the results of hazard identification and its control in FFB weighing operations, loading ramp stations, sterilizer station operations, thresher stations, press station operations, boiler station operations and so on.

The certification unit showed the HIRAC socialization document located in front of the estate office on September 23, 2021. The socialization was attended by 98 employees. The certification unit in this case can show the materials, documentation and attendance list for the activity.

The certification unit demonstrates its mitigation plans and procedures through its OHS Policy document which explains that the certification unit is committed to providing a healthy, safe and conducive work environment for employees, contractors and visitors in carrying out activities, projects and programs across estate, mill and offices.

3.6.2

Monitoring the effectiveness of the OHS plan in dealing with health & safety risks is carried out on a regular basis through monthly OHS Committee meetings that discuss OHS issues in the certification unit. The following are some recordings of activities monitoring the effectiveness of the OHS plan through monthly OHS Committee meetings:

1. Minutes of the Safety Meeting for the period June 2021, on June 17, 2021, with discussions covering the work accident, OHS inspection, EHS report. The meeting was attended by 18 participants.
2. Minutes of the Safety Meeting for the period May 2021, on May 29, 2021, with discussions including commitments to the Covid-19 Health protocol, evaluation of work accident data for the May 2021 period and others, which were attended by 15 participants.

Based on interview with the Manpower Agency of Pasaman Barat District, it is known that occupational accidents have been reported regularly in the OHS Guiding Committee quarterly report. There are no cases of fatality.

Status: Comply

3.7

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

3.7.1 and 3.7.2

Unit of certification had training identification and program for 2021-2022 in order to improve the competence and expertise of all workers including contractors. The company had identified the needs of competence standard and the proposed training for each worker, for example:

- Training of OHS and first aid for workers in mill and estates.
- Training of pesticide application for pesticide sprayers.
- Training of fire simulation for workers in estates.

UoC also showed that they had properly documented every training activity and socialization that had been carried out to all workers, contractors, smallholders, and related stakeholders. The following is an example of training/socialization documentation that had been carried out, for example:

- Training of FFB quality improvement on 7 December 2021 which was attended by 25 smallholder workers from KSU Bina Tani Sejahtera.
- Training of harvesting procedure and the ergonomic way in harvesting on 9 December 2021 which was attended by harvesting workers.
- Training of first aid in work accident on 23 October 2021 which was attended by 18 workers.

Based on field observations and interviews with workers (harvesters, nursery workers, warehouse officer, and mill operators), it is known that the company provides some training programs due to upgrade the worker's expertise and competence. All workers also showed their understanding of duties and responsibilities for each job quite well.

3.7.3

Company showed the training documentation of supply chain aspect which conducted on 25 February 2021 attended by 17 participants including mill worker. Then, based on interview with security and weighbridge operator, it is known that they understand about the supply chain aspect.

Status: Comply

3.8

Supply Chain Requirements for Mills

3.8.1

Based on document verification of list of FFB supplier, it is known that GMP POM received FFB from uncertified source. Thus, GMP

POM implement MB module.

3.8.2

GMP POM applied SCCS Module MB since its received and processing the FFB from certified and uncertified sources. Based on verification of Mass Balance record, the mill has been recorded well the separation of FFB and products (CPO and PK) from certified and uncertified sources. The mill claims only the volume of oil palm products produced from certified FFB as MB.

3.8.3

Mill has an estimated total tonnage of certified CPO and PK for the next 12 months which can be seen in the table below

Product	Last Year Projected Certified Volume (Ton)	Actual Certified Volume from March 2020 to Dec 2021 (Ton)	Estimate Production of 12 month further (MT)
FFB	99,900	107,541	63,700
CSPO	20,175	20,159.01	12,039
CSPK	4,865	4,748.97	3,236

The estimation of FFB, CSPO, and CSPK product only from certification scope of supply base, not including from other source.

3.8.4

The Mill has registered as RSPO member under Wilmar International Ltd (No. 2-0017-05-000-00), and also registered in RSPO Palm Trace as PT Gersindo Minang Plantation with License ID CB104301, and Member ID RSPO_PO1000002133. The reporting requirements has been conducted by the Mill through RSPO Palm Trace.

3.8.5

GMP POM has the documents of SCCS procedures for Mass Balance models No. SOP – MILL- O23 Rev 6 dated 1 September 2021. The procedures established and covering all elements of the supply chain model requirements, records and reports of compliance with supply chain requirements including the definition, the FFB reception process, weighting, checking quality, processing, monitoring refined products, mass balance calculations and delivery of the product. The responsibilities of each key personnel describe in procedure of traceability for CPO and PK No. SOP – MILL- O11 Rev 5 dated 1 September 2021. The key personnel which are security, weighbridge operators, logistics, head of administrator and mill manager.

3.8.6

The unit of certification has conducted an Internal audit that ruled in No. SOP – MILL- O23 Rev 6 dated 1 September 2021 and No. Document PRO-GEN-003 Rev 3 on 4 November 2021 clausal 6.4 about mechanism of internal audit of SCCS, that held once a year.

For GMP POM the last RSPO internal audit was carried out on 7 September 2021 with the result that there were 36 non-conformities, all non-conformities have been closed with resolutions through quick fixes, identification of root causes and corrective actions, the last non-conformities were closed on December 2021.

3.8.7

GMP POM record the FFB production and received from certified and uncertified source in Mass Balance separately as well as CSPO and CSPK production. Below is the record of FFB received by POM from Maret 2020 – December 2021.

Months	FFB Received		Total
	Certified	Non-certified	
March 2020	5,985.26	8,227.70	14,212.96
April 2020	5,516.67	8,813.99	14,330.66
May 2020	5,622.50	10,732.80	16,355.30
June 2020	6,186.23	15,849.99	22,036.22
July 2020	4,908.96	10,624.23	15,533.19

August 2020	4,870.31	11,767.49	16,637.80
September 2020	3,339.82	7,002.66	10,342.48
October 2020	3,136.88	8,832.60	11,969.48
November 2020	3,482.85	8,500.54	11,983.39
December 2020	3,519.26	12,956.47	16,475.73
TOTAL	46,568.74	103,308.46	149,877.20

Months	FFB Received		Total
	Certified	Non-certified	
January 2021	4,305.12	12,682.02	16,987.14
February 2021	4,085.47	6,479.45	10,564.92
Maret 2021	7,346.18	12,882.90	20,229.08
April 2021	5,588.49	14,057.69	19,646.18
May 2021	4,773.51	16,542.84	21,316.35
June 2021	4,762.85	19,354.69	24,117.54
July 2021	4,816.12	14,805.78	19,621.90
August 2021	6,120.69	13,177.77	19,298.46
September 2021	5,465.29	15,634.80	21,100.09
October 2021	4,663.44	14,831.33	19,494.77
November 2021	4,574.19	11,950.28	16,524.47
December 2021	4,851.13	11,965.44	16,816.57
TOTAL	61,352.48	164,364.99	225,717.47

3.8.8

The CSPO and CSPK from the Mill were sold has met the requirements of certified product information. Supporting documents shown 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. Company showed the example for selling document such as:

- Weighbridge ticket dated 31 December 2021 informed about quantity of product, supply chain model, RSPO certificate number, and others information.
- Shipping announcement No. TR-09bbcbbe-88c4 informed about seller and buyer name, quantity of product, supply chain model, shipping date.
- Delivery Order No. 2752112008 informed about seller, buyer name, supply chain model, quantity, etc.

3.8.9; 3.8.10; 3.8.11

Gersindo Palm Oil Mill are not outsourced activities to independent third parties. CPO and PK transporter are under contract with buyer.

3.8.12

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

The Mill balancing the certified products and dispatch on a three-monthly basis. Based on the Mass Balance record, the Mill only sells certified products from a positive stock in three monthly periods.

The summary of Mass Balance data 22 months previous the audit can be seen on the table below:

CPO production and Dispatch GMP POM (March – Dec 2020)

Period	CPO Production (MT)		Total	CSPO Dispatch (MT)			Total
	Cert	Non Cert		RSPO	Other scheme (ISCC)	Conventional	
Opening stock	163.72	166.14	329.86				
March	1,122.99	1,536.72	2,659.71	-	1,073.18	-	1,073.18
April	1,015.81	1,625.43	2,641.24	-	1,050.00	-	1,050.00
May	1,014.41	1,964.67	2,979.08	-	480.72	-	480.72
June	1,182.91	2,897.84	4,080.74	-	1,756.33	-	1,756.33
July	910.71	1,950.76	2,861.47	-	899.22	-	899.22
Augt	938.18	2,230.37	3,168.55	-	620.19	-	620.19
Sep	637.19	1,311.00	1,948.20	-	442.66	-	442.66
Oct	581.76	1,633.36	2,215.12	-	975.88	-	975.88
Nov	604.44	1,577.94	2,182.38	-	484.31	-	484.31
Dec	701.11	2,365.95	3,067.06	-	840.69	-	840.69
Total	8,873.24	19,260.17	28,133.41	-	8,623.18	-	8,623.18

CPO production and Dispatch GMP POM (Jan – Dec 2021)

Period	CPO Production (MT)		Total	CSPO Dispatch (MT)			Total
	Cert	Non Cert		RSPO	Other scheme (ISCC)	Conventional	
Opening stock	250.06	353.33	603.39				
Jan	754.05	2,212.62	2,966.68	-	766.29	-	766.29
Feb	779.73	1,253.31	2,033.04	481.39	237.82	-	719.21
March	1,342.67	2,396.78	3,739.447	1,336.75	-	-	1,336.75
April	1,021.67	2,583.96	3,605,623	1,030.74	-	-	1,030.74
May	790.74	2,987.02	3,777,755	839.63	-	-	839.63
June	878.83	3,490.42	4,369,257	866.12	-	-	866.12
July	803.33	2,567.96	3,371,290	988.19	-	-	988.19
Augt	1,175.39	2,482.28	3,657,677	1,064.26	-	-	1,064.26
Sep	980.02	2,871.86	3,851,887	930.49	-	-	930.49
Oct	938.31	2,696.73	3,635,041	966.95	-	-	966.95
Nov	831.05	2,205.48	3,036,533	779.86	-	-	779.86
Dec	903.63	2,143.99	3,047,630	1,031.45	-	-	1,031.45
Total	11,449.48	30,245.74	41,695.22	10,315.84	1,004.11	-	11,319.94

PK production and Dispatch GMP POM (March – Dec 2020)

Period	PK Production (MT)		Total	CSPK Dispatch (MT)			Total
	Cert	Non Cert		RSPO	Other scheme	Non Cert	
Opening Stock	27.14	47.98	75.13				
March	276.60	388.61	665.21	239.06	-	-	239.06
April	245.62	395.20	640.82	266.82	-	-	266.82

May	242.35	484.07	726.42	209.57	-	-	209.57
June	289.88	720.36	1,010.23	306.65	-	-	306.65
July	217.25	472.90	690.15	240.94	-	-	240.94
Augt	214.77	522.97	737.74	200.00	-	-	200.00
Sep	139.58	291.84	431.41	182.35	-	-	182.35
Oct	144.79	408.84	553.62	128.20	-	-	128.20
Nov	147.96	378.66	526.62	135.20	-	-	135.20
Dec	168.81	570.30	739.11	179.25	-	-	179.25
Total	2,114.75	4,681.72	6,823.62	2,088.04	-	-	2,088.04

PK production and Dispatch GMP POM (Jan – Dec 2021)

Period	PK Production (MT)		Total	CSPK Dispatch (MT)			Total
	Cert	Non Cert		RSPO	Other scheme	Non Cert	
Opening Stock	26.71	66.99	93.69				
Jan	181.02	545.34	726.37	150.00	-	-	150.00
Feb	162.25	265.68	427.93	178.04	-	-	178.04
March	313.50	559.44	872.94	321.70	-	-	321.70
April	241.55	638.10	879.66	222.69	-	-	222.69
May	189.78	723.62	913.40	181.79	-	-	181.79
June	209.50	858.94	1068.44	270.08	-	-	270.08
July	204.85	662.24	867.10	194.35	-	-	194.35
Augt	280.35	597.84	878.20	267.72	-	-	267.72
Sep	215.48	655.36	870.84	218.49	-	-	218.49
Oct	216.84	652.86	869.70	212.02	-	-	212.02
Nov	182.67	492.65	675.33	174.23	-	-	174.23
Dec	209.72	490.39	700.11	220.16	-	-	220.16
Total	2,634.22	7,209.45	9,843.67	2,611.27	-	-	2,611.27

3.8.13

Extraction rates from CPO and PK production are based on actual production data. Over the past 22 months, the extraction rate for CPO was 18.40 % and PK was 4.38 %.

3.8.14

Estimates for extraction rates are based on actual production of CPO and PK from the previous month. Apart from production, it is also affected by the age of the oil palm plantations. The estimation of OER is 18.90 % and KER is 5.08 %.

3.8.15

The Mill only applying RSPO Supply Chain Module of Mass Balance.

3.8.16

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

- Member Name: PT Gersindo Minang Plantation
- Membership No: 2-0017-05-000-00 (Wilmar International Limited)
- Member ID: RSPO_PO1000002133
- License ID: CB104301

Whole transaction of CSPO/CSPK has been declared in RSPO IT Platform.

Based on shipping announcement verification, it is known that shipping announcement carried out not more than 3 months after

dispatch. For example :

- Shipping announcement of CSPO as much as 780.04 MT, with shipping date on November 2021 and confirmation date on 17 December 2021.
- Shipping announcement of CSPK as much as 180.57 MT, with shipping date on 31 December 2021 and confirmation date on 22 January 2022.

The company has also removed CSPO (Mar 20 – Dec 21): 9,715.37 (MT)

3.8.17

The products are claimed as mass balance and conventional. The Mill does not use RSPO logo on product or off product.

Status: Comply

PRINCIPLE #4 RESPECT COMMUNITY AND HUMAN RIGHTS AND DELIVER BENEFITS

4.1

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

4.1.1

UoC showed Wilmar International Group policy against deforestation, peat, and exploitation updated in November 2019. This policy explained that Wilmar Group committed to respect and protect human rights in order to create security for all workers from harassment, violence, modern slavery, sexual harassment, discrimination, child labor, and giving all the workers' rights including freedom of association and reproductive rights.

UoC's commitment in respecting the human rights has been well implemented proved by the absence of issues and incidents of human rights violations that occurred in the operational area of both mill and estate. This is evidenced by the statements from estate workers (harvesters, pesticide sprayers, and maintenance workers), mill workers (mill operators and warehouse workers) as well as contractors who state that so far there have been no incidents or issues of human rights violations occurring in the operational area of the certification unit.

4.1.2

Based on the interviews with the surrounding communities, tribal councils, and workers, it revealed that up until ASA-1.3 assessment, if there was any conflicts or disputes with the company, the resolution action taken was deliberation without involving any violence or mercenaries. Resolution of conflicts / problems using these deliberations has been quite effective and during the past year there have never been any conflicts / problems in UoC's work area.

Status: Comply

4.2

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

4.2.1

UoC showed some policies related to grievance system, here as follows:

- SOP No. PRO-HRD-005 rev-03 dated on 1 September 2021 concerning in handling internal grievance. The policy explained activities of handling grievances related to workers' grievance through bipartite mechanism or each worker's supervisor.
- SOP No. PRO-BNM-016 dated on 1 January 2022 concerning in handling external grievance. The policy explained the mechanism of external communication (e.g: contractors, suppliers, government agency, residents, and NGO) including the mechanism if there were any grievances.
- NDPE policy (Non Deforestation, Peat, and Exploitation) dated on 15 November 2019. This policy stated that Wilmar Group also concerning on whistleblowing system policy. The policy explained the company regulation in reporting violation complaints and protecting and providing security for whistleblowers or witnesses in Wilmar Group.

Based on the interviews with the surrounding communities, tribal councils, and workers, it revealed that they had a good understanding of the communication procedures and personnel who served as communicators between the company and the community so that illiterate people can be informed by the related communicators. In addition, during the past year, there were no complaints or disputes that occurred between the company and the surrounding communities.

4.2.2; 4.2.3; 4.2.4

Unit of certification showed SOP No. PRO-HRD-005 rev-03 dated on 1 January 2022 concerning in handling worker's grievance. The policy explained the activities of handling grievances related to manpower or non-manpower (e.g: facilities, etc). In the general mechanism of handling grievance, is stated as follows:

- The company's commitment to protect the anonymity of whistleblowers.
- Submission verbally or in writing to the contact person of the company or through labor union.

In addition, UoC also has SOP No. PRO-BNM-016 dated on 1 January 2022 concerning in handling external grievance. This policy explained that the responsibility of handling external grievance is on the General Manager, Assistant General Manager, and Branch Manager. All complaints will be recorded in the grievance logbook by the document control admin. However, illiterate people can submit their complaints through the village head or another representative from the stakeholder and also recorded in the grievance logbook.

Based on interviews with the government agencies, surrounding communities, tribal councils, and workers, it's known that they have understood the person responsible and the grievance mechanism in which the complainant's identity is protected.

Status: Comply

4.3

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

Based on the results of interviews with management and verification of documents, it is known that the company already has a community contribution program based on the results of consultations with the community contained in the CSR program. Consultations are carried out through annual meetings or through proposals submitted by the community. In addition, the company also showed several proposals for requests for assistance that submitted to the company.

The realization of CSR for the period 2020-2021 is as follows:

- Computer assistance to the school of Nagari Aia Gadang, assistance for sports activities, cement assistance at Al Hidayah School in January 2021.
- Computer assistance at SDN 28 Pasaman, futsal open tournament assistance in March 2021.
- Material assistance for fire victims of the Jorong Tanjung Pangka, assistance for coconut seeds Jorong Labuih Lurus & Jorong Tanjung Pangka, construction assistance of a prayer room in Nagari Lingkuang Aua, cement assistance for Jorong Tanjung Pangka, repair of the Labuih Lurus main road in June 2021.
- Assistance for maintenance of the Tanjung Pangka bridge in August 2021.
- Assistance for Alek Gadang activities in October 2021, etc

The results of interviews with representatives of the surrounding community known that the company had realized assistances or CSR as a form of community development contribution and was carried out based on consultation with the community.

Status: Comply

4.4

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

4.4.1

The unit of certification has HGU for 5,861.40 Ha scope of certification as follow: HGU Certificate No. 1 Year 1997 for 3,600 Ha (GMP Estate), HGU Certificate No. 54 and 55 Year 2014 for 1,247 Ha (PHP-1 Estate) and HGU Certificate No. 18 Year 2005 for area 1,014.40 Ha (PHP 2 Estate). Based on information from external stakeholder and review on hectare statement of 2021/2022, there is no expansion and new planting area. However, scope of certification is stick on HGU area (5,861.40 Ha).

4.4.2; 4.4.3; 4.4.4; 4.4.5; 4.4.6

PT. GMP and PT PHP are long-established plantations company since 1991. In related to the maps of an appropriate scale that showing legal, customary or user right through participatory mapping and copies of negotiated agreements detailing process of FPIC is not applicable. This is due to no longer records dating back to the time of the decision making.

The company has developed a mechanism of Implementation of Free Prior Informed Consent as document Process of land compensation has been appropriate with its procedure "SOP Pembebasan Lahan (SOP-IJIN LAHAN&OPS-006), dated 15 October 2008" that describes the mechanism of settlement of border land disputes, land occupation disputes, social issues. In such

mechanisms it has explained the procedures and methods of FPIC.

The lands of PT GMP and PT PHP are from customary lands. The company has been able to show a copy of the agreement on the transfer of the customary land rights between the company and Ninik Mamak. The Ninik Mamak (Customary leader), with the full knowledge of the heads of all the villages, handed over customary lands to the Regent of Pasaman, who further granted these areas to the oil palm investor. The handover was recorded in a land handover letter signed by the Ninik Mamak with full knowledge of the village heads, as follows:

- GMP Estate (PT. GMP): Agreement letter for releasing of Customary Right "Hak Tanah Ulayat Nagari Lingkuang Aur" dated 5 November 1991.
- PHP-1 Estate (PT. PHP): Record of Agreement letter for releasing of Customary Right "Hak Tanah Ulayat Nagari Sasak and Nagari Kapar" dated 6 February 1997.
- PHP-2 Estate (PT. PHP): Record of Agreement letter for releasing of Customary Right "Hak Tanah Ulayat Nagari Sungai Aur" dated 16 July 1992

Status: Comply

4.5

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

4.5.1; 4.5.2; 4.5.3; 4.5.4 4.5.8

Based on area statement document, interview with stakeholder known that there is no new planting in the area of PT GMP and PT PHP. There are only replanting activities on the area that previously had the land use right (HGU certificate).

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

Company has procedure to identify legal rights, customary, rights and procedure to identify orang-orang yang berhak mendapatkan kompensasi dalam dokumen SOP *Penyelesaian Sengketa Pertanahan* (SOP 30/BM/2/0320). This document explains about the factors that cause land disputes, which also includes the sequence for identifying people who are entitled to compensation.

4.6.2

Company has procedure to calculate the compensation in document of SOP *Panduan Teknis Perolehan Lahan/Pembebasan Lahan* (SOP 29/BM/0409) dated 13 April 2009. This procedure is the company' technical guide to ensure that the decisions and actions in the process of land acquisition is done properly and correctly according to the provisions and the applicable legislation, also for calculation of compensation. In the procedure has also informed the stage of the process involving the Village Head, Head of Regency and National Land Agency. Based on interviews with communities, stated that SOP has been disseminated.

4.6.3

Based on interviews with previous land owners, historical actors of land acquisition in the early stages of PT GMP and PT PHP plantations as well as interviews with Government Agency, information was obtained that the handover of customary land in the past was carried out by traditional leaders and Ninik Mamak to the Pasaman Barat District Government for granting Cultivation Rights to the company of palm oil plantation, and has been considered to be in accordance with local customary norms and there is no forced hand over. The process of land hand over to the Regional Government has been carried out in accordance with customary rights in Minangkabau.

4.6.4

The lands of PT GMP and PT PHP are from customary lands. The company has been able to show a copy of the agreement on the transfer of the customary land rights between the company and Ninik Mamak. The Ninik Mamak (Customary leader), with the full knowledge of the heads of all the villages, handed over customary lands to the Regent of Pasaman, who further granted these areas to the oil palm investor. The handover was recorded in a land handover letter signed by the Ninik Mamak with full knowledge of the village heads, as follows:

- GMP Estate (PT. GMP): Agreement letter for releasing of Customary Right “Hak Tanah Ulayat Nagari Lingkuang Aur” dated 5 November 1991.
- PHP-1 Estate (PT. PHP): Record of Agreement letter for releasing of Customary Right “Hak Tanah Ulayat Nagari Sasak and Nagari Kapar” dated 6 February 1997.
- PHP-2 Estate (PT. PHP): Record of Agreement letter for releasing of Customary Right “Hak Tanah Ulayat Nagari Sungai Aur” dated 16 July 1992

Based on the results of stakeholder consultations with government agencies of Pasaman Barat District and several traditional leaders, information was obtained that the handover of customary lands in the past had been carried out by traditional leaders and Ninik Mamak to the Pasaman Barat District Government for granting Cultivation Rights to the company of palm oil plantation, and has been considered to be in accordance with local customary norms and there is no forced hand over.

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
The company has procedure to identify legal rights, customary, rights and to identify persons entitled to compensation in the SOP document for Land Dispute Resolution (SOP 30/BM/2/0320). This document explains about the factors that cause land disputes, which also includes the sequence for identifying people who are entitled to compensation.

4.7.2
Company has procedure to calculate the compensation in document of SOP *Panduan Teknis Perolehan Lahan/Pembebasan Lahan* (Guidance for Land Acquisition) (SOP 29/BM/0409). This procedure is the company' technical guide to ensure that the decisions and actions in the process of land acquisition is done properly and correctly according to the provisions and the applicable legislation, also for calculation of compensation. In the procedure has also informed the stage of the process involving the Village Head, Head of Regency and National Land Agency. Based on interviews with communities, stated that SOP has been disseminated.

4.7.3
The company has several policies, as well as SIA management and monitoring plan, that has some purposes to improve livelihoods quality of surrounding communities, includes the previous landowner, such as acceptance of local workers and contractors if needed, economic development program, and any other CSR programs. Based on interview with surrounding communities known that company has provided village with economic development program and any other CSR programs.

Status: Comply

4.8

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

4.8.1; 4.8.2; 4.8.4
The company has shown documentation of land dispute resolution in its operational areas. The disputed issues have been reported to the competent authorities and have involved various parties. The following is a detailed explanation of the historical problems of the area/dispute as follows:

Land dispute between PHP-1 and Kerapatan Adat Nagari Kapa

The company has shown documentation of land settlement up to surveillance 1.3, which is briefly explained as follows:

- Based on the court's decision dated October 7, 2020, it is stated that the claim of the party making the claim/dispute with the company cannot be accepted. The lawsuit was filed against the company and Alman Gampo Alam Pucuk Adat Nagari Kapa.
- On November 11, the plaintiff (the claimer) filed an appeal
- The Padang High Court's appeal decision dated December 28, 2020, which rejected the appeal.
- Supreme Court Decision No. 2661K/PDT/2021 with a decision granting the appeal for cassation submitted by the head of the Adat/Pucuk Adat Nagari Kapa on 28 October 2021
- The Pasaman Barat District Court decision dated January 11, 2022 stated that the defendant who claimed/controlled the HGU land and prohibited the work activities of PT PHP 1 was found guilty and sentenced to 6 months in prison.
- Up to surveillance-1.3 assessment, the company is waiting for a copy of the decision from the Supreme Court regarding the

cassation filed by Alman Gampo Alam as the head of Adat/Pucuk Adat Nagari Kapa.

Land dispute between PHP-2 and Maligi Community, Sasak Ranah Pasisie District (completed)

The company shows the Conflict Resolution Agreement document between PT PHP and the Maligi community dated March 10, 2020. The document also explains that the parties in the problem resolution process have applied the principles of free, prior and informed consent (FPIC) and will serve as guidelines in plantation operations and in conflict resolution at a later date. The agreement has involved related parties such as the Regent of West Pasaman, the Head of the Kerapatan Nagari Sasak Customary and the Earthworm Foundation.

Disputes and Claims in PT GMP

The settlement of overlapping HGU with land owner of plasma

- On February 4, 2021, the company and KSU Bina Tani Sejahtera have coordinated with the Head of the Land Office of Pasaman Barat District to discuss the overlapping problem of the Tanjung Pangkal Plasma with PT GMP's HGU with the result that KSU is advised to fulfill the requirements for submitting measurements to BPN. Until the audit takes place, KSU still fulfills the requirements for submitting measurements to BPN.

Occupation

- There has been a court decision No. 07/PDTG/PN-OSB and the decision of the Padang High Court dated December 13, 2020 No. 177/PDT/2010/PT.PDG, one of which explained that the Pitan/Muslim CS Group immediately left block 54.
- In 2019, the company has sent a letter to the occupan to comply with the 2010 court decision. And in 2021, the company has given an appeal to the occupan to leave block 54.
- Until the audit took place, block 54 was still controlled by the Pitan/Muslim CS group

Land claim at phase IV (completed)

- Minutes of No. 1703/3/DPRD/Pasbar/2021 dated February 22, 2021 regarding the completion of PT GMP land area of 200 hectares which was carried out at the West Pasaman DPRD.
- Minutes of No. 12/S/ANZ/III/2021 dated March 17, 2021 regarding the agreement for the phase IV land settlement of PT GMP.

Land Claimed by Lujur DT Basa

- On 23 August 2019, Lujur DT Basa sued PT GMP, Pasaman Barat District Government and National Land Agency
- On July 23, 2020, civil case No. 34/PDT.G/2020/PN psb has been decided by a judge with the decision that the plaintiff's claim is unacceptable. Then Lujur DT Basa declares the appeal.
- On 17 December 2020 the appeal case was decided with decision No. 227/PDT2020/PT.PDG by stating that the plaintiff's claim was unacceptable.
- Then Lujur declared an appeal to the Supreme Court. Based on information from the Supreme Court's website, the Supreme Court's decision on November 17, 2021 has been issued with the cassation decision rejected.
- At the time of the audit, the company was still waiting for a copy of the Supreme Court's decision.

Ensuring the progress of solving land problems (OFI).

4.8.3

Based on field observation and stakeholder consultation with surrounding village and previous land owner, there is no evidence of dispossession and forced abandonment. The process of compensation is going through negotiation and has involved various parties.

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

The price used in the payment of plasma FFB uses the price of the Plantation Office, which can be accessed openly by related parties. In meeting the needs of FFB, the unit of certification is supplied by suppliers and middlemen. The company shows examples of payments for the period October, November and December 2021 which are paid directly to the supplier's account according to the

Plantation Office Price. Before payment is made, the verification of the correctness of the payment calculation has been checked by both parties in the FFB sale and purchase calculation document, so that all complaints and confirmations related to payments have been completed before the payment is made. FFB price are set in work agreement that agreed by both parties. Some considerations in determining the price of FFB such as CPO prices, transportation costs, and the proposed price from the supplier.

The current and previous FFB prices are publicly available and can be accessed by farmers online. In the SPK it is stated that the price of FFB is determined based on the decision of the governor or government which has duties and responsibilities in the process of determining the price of FFB every month. Currently, FFB pricing is based on the Sumatera Barat Provincial Plantation Service's pricing once a month. The Company shows the Minutes of Meeting Results of the FFB Purchase Pricing Team for October, November and December 2021.

The pricing mechanism has been explained in the FFB purchase agreement which was signed by both parties. The interview with management unit also obtained information if FFB prices that has been determined are available and could be accessed by suppliers, information on price changes was made via SMS, WA and telephone to the supplier's PIC.

5.1.2

Based on document review, field observation and interviews with staff and management, it is known that GMP POM also purchase FFB from third parties/ FFB suppliers. GMP POM accepts FFB from the own estate, own ex-plasma, and from TBS suppliers as described in indicator 2.3.1. Information about FFB price was obtained that all documents related to pricing issued by the Plantation Agency can be accessed by supplier directly from the Plantation Office or communication media (mobile phone). In addition, unit of certification regularly explains the FFB pricing to supplier, the company also has a mechanism to convey prices. Based on the results of interviews with Plasma farmers, stated that the price set by the company was in accordance with the price set by the local Plantation Service, where if there was a price update, the company immediately submitted the latest price through the FFB supplier communication group owned by the Certification Unit.

5.1.3

The company has made a fair price determination that has been agreed upon with the supplier, which is documented in the Letter of Agreement, in the document there is a statement that the price set to determine the FFB selling price is the price set by the Plantation Office Pricing Team, so that the parties hereby declare that they will obey the price fixing so that one party and the other party are not entitled to request an increase or decrease in price. There are also specifications and implementation requirements as well as sanctions that must be met by the second party.

5.1.4

The company can show evidence that parties from the organization's representatives have been involved in the decision-making process and understand the contents of the contract. This is stated in the document Letter of Agreement (MoU) signed by all representatives of the cooperative management and farmer groups. Letter of Agreement (MoU) contains the FFB sale and purchase agreement to independent smallholders, as well as an agreement on a partnership scheme with plasma farmers.

The company has made improvements to the welfare of the communities around the plantations by building and fully managing plasma plantations. The company assigns Managers and Assistants to help manage plasma. All cooperation that no longer joins in the scope of certification supplies all FFB to GMP POM. All members consist of farmers from surrounding villages, where members consist of all members who want to be involved, not limited to men or women. Women who are members of the cooperative are also involved in the company's operational activities such as the results of field visits to fertilizer and weeding workers who are all women. In addition, for positions such as foreman in cooperatives, the chairperson of labor unions and gender associations is a woman. They are also involved in determining the agreement between the two parties.

5.1.5

The agreement of certification unit with Lingkung Aur II – Cooperative was signed since October 14, 1994 number 33/GMP/SW/X-94. The agreement was signed by both parties (certification unit and cooperative official) and independent representative that was Pasaman Barat Regent. Based on Indonesian regulation, the smallholder determination was set in government level (Officials of Village, Sub-District, Regency, and Province). The smallholders commonly represented by family head (commonly gentlemen). The company cooperates with 6 cooperatives in the vicinity of its operational area, but currently the cooperation agreement has expired.

Based on review of contractual agreement, as well as consultation with Cooperative Official, the agreement has been set and the Official has been understood the provision of financial, FFB pricing, management, management fee, loan, dispute, etc. The agreement has been made with legal, fair, transparent, and has a time frame, that was one oil palm cycle and can be extended if agreed by both parties.

For other business services such as local contractors, the Company can show documents with No. 001/TBS-SOPVIII/2015 which was issued on August 10, 2015, the document contains the SOP for Purchasing Palm Oil Fresh Fruit Bunches which in the document states that the FFB sold is FFB originating from their own plantations and FFB purchased from third parties or from third party plantations that enter into FFB sale and purchase agreements with FFB suppliers to the company. FFB sold does not originate from partnership plasma plantations built by a company/group of companies, and the FFB sold is not stolen and/or from criminal activities. Based on consultation with EFB transporter contractor was known that the work contracts have explained the pricing of each work unit. The parties have understood the provisions of work contracts, the contracts have been made fairly, transparently and legally. Payment of work has been done in a timely manner, in accordance with the provisions in the contracts.

5.1.6

The Agreement contains payment procedures/systems. The payment of net proceeds from the sale of Plasma FFB is regulated and agreed as follows:

- Payment through a fund book-entry system at the Bank
- Payment every 3 months
- Payment is made based on the Minutes of Calculation of the sale and purchase of plasma FFB and the Minutes of Sale and Purchase of Plasma FFB which have been signed by the parties.

The company every quarter period makes a presentation related to the results and an explanation of the costs of plasma plantation products. This is indicated by the minutes of the presentation of the results and an explanation of the operational costs of plasma plantation results in the 3rd quarter of 2021 which were attended by representatives from cooperatives and companies. Payment has been made and can be proven through a receipt for payment. The results of interviews with cooperatives stated that currently all cooperatives that are members of the certification scope are independent and no longer have debt bonds with the company, but are currently collaborating with the company in future plans to carry out replanting activities which will be carried out in stages from 2023 until finished. The resource person also explained that while working with PT GMP there was never a delay in payment, and the price given was always in accordance with the agreement made, which refers to the price of the Plantation Service. The price is considered higher and profitable when compared to selling to collectors.

5.1.7

The company has tested the electronic weigh bridge which was carried out on September 20, 2021 for GMP POM and September 21, 2021 for PHP-1 and PHP-2 Estate by the Head of UPTD Metrology legal, Padang city government and valid until September 20, 2022 for AMP POM and September 21, 2022 for PHP Estate with evidence, among others:

- Test Result Certificate number 510.3/ 0401/ UPTD-ML/ SKHP/ VII/2021 with a maximum capacity of 60,000 Kg
- Test Result Certificate number 510.3/ 0400/ UPTD-ML/ SKHP/ VII/2021 with a maximum capacity of 60,000 Kg
- PHP Estate
- Test Result Certificate number 510.2/ 027/ SKHP/ UML/ IX-2021 with a maximum capacity of 40,000 Kg

The results of observations and interviews with weigh bridge operators obtained information that the certification unit has routinely performed the calibration of weighing equipment by third parties.

5.1.8

The company has conducted socialization related to RSPO certification to cooperatives/plasma farmers through annual meetings between the company and cooperative members. The company shows the Minutes of the annual meeting on January 15, 2021 at the GMP Office which was attended by the company, village government, community representatives and plasma farmers. In addition, the company also disseminated RSPO-SCCS & ISPO certification to Contractors, Management and Plasma Members which was carried out on the same date. From the results of the two meetings, it was stated that plasma smallholders would follow the company's initiation to include their lands in RSPO certification and would follow all existing requirements and regulations as long as they did not contradict the applicable customary regulations.

The results of interviews with the company's management stated that until now, the process carried out is still constrained by the legality of the land, but the company continues to assist the plasma farmers. The constraint faced by the cooperative is that land rights are currently held by one or a few landlords only (*Ninik Mamak*) because the status of the land they own is customary land.

5.1.9

Based on the results of interviews with FFB suppliers related to the complaint handling mechanism still referring to the Communication, Consultation and Coordination Procedures with Stakeholders with document SOP Number PRO-BNM-008, revision 02, November 4, 2021. These procedures as a technical guidance in receiving various complaints raised by stakeholders or another party and way to process of completion. Public complaints can also be submitted at the annual meeting by filling out the complaint form provided by the company and then stated in the Minutes of the Annual Meeting. Based on the complaint handling logbook document, there is no complaint from the FFB supplier during 2021. In addition, based on interviews with the plasma cooperative, it was found that the payment of the FFB price was in accordance with the price set by the Plantation Services.

Status: Comply

5.2

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

5.2.1

The certification unit has conducted consultations with farmers who are suppliers of FFB to GMP POM as shown by evidence of the RSPO Socialization that proven from the official report on January 15, 2022 which was attended by 20 participants. This activity contains, among others:

- Sustainable oil palm cultivation
- Implementation of the sustainability system in oil palm plantations (RSPO)
- introduction of non-environmentally friendly agricultural materials
- anticipation and management of forest and land fires

In this outreach activity, the certification unit also promoted the RSPO that in the future, outside suppliers of FFB must also follow RSPO certification. Based on the results of the socialization carried out to FFB suppliers, conclusions were obtained is not been able to realize certification activities. This is due to the legality of the land which is currently constrained due to the status of farmers' land, most of which cannot be certified. The results of interviews with independent smallholders stated that the company is currently helping to process the legality of the land it owns so that the certification process can be carried out. The informant stated that he was very interested in joining the RSPO certification because there were quite a lot of benefits, in addition to the increase in the price of FFB, the market demand will also be higher because of the status of the fruit that has been certified.

5.2.2

The company has made improvements to the welfare of the communities around the plantations by building and fully managing plasma plantations, which has created prosperity since 1995. The company assigns Managers and Assistants to help manage plasma. All cooperation supplies all FFB to AMP POM in accordance with the contract agreed by both parties, its members consist of more than 1000 farmers from surrounding villages, where members consist of all members who want to be involved, not limited to men or women. But for now, plasma has managed its plantations independently because the contract period has ended. The results of interviews with plasma parties are still selling FFB to the GMP POM. The results of the interview also stated that the plasma company would again cooperate with the company to carry out replanting.

5.2.3

For now, Company already has 6 cooperatives that are no more included in the scope of certification. that all cooperatives are still incorporated into the scope of PT GMP RSPO certification even though their condition is no longer under the management of PT GMP. they have managed their own cooperative independently, but are still assisted in non-technical matters such as training and mentoring. Currently the cooperative and the company are planning a collaboration for replanting activities that will be carried out around 2023. Other support provided by the company is providing training for cooperative workers and assistants for plantation activities. The supply of daily needs for plantation activities is also in collaboration with companies such as the provision of fertilizers, pesticides, PPE and others.

5.2.4

When the audit was conducted, the certification unit had been working with the smallholder scheme since 1995, but now the

operational activities of the cooperation have been completed and the overall management of the plasma is carried out independently by the plasma manager. All workers working in the cooperative have been trained by PT GMP staff so that pesticide handling training is only given to company workers, not farmers' schemes.

5.2.5
Based on the explanation on indicator 5.2.1 – 5.2.4, this indicator can no longer be applied, because all cooperatives that join in certification scope has been running independently and no longer depends on PT GMP. Meanwhile, other FFB suppliers have not been able to carry out the certification process.

Status: Comply

PRINCIPLE #6 RESPECT WORKERS' RIGHTS AND CONDITIONS

6.1 Any form of discrimination is prohibited.

6.1.1
UoC showed Wilmar International Group NDPE policy against deforestation, peat, and exploitation updated in November 2019. This policy explained that Wilmar Group committed to respect and protect human rights by providing fair and equal opportunities to all its workers. The company seeks to prevent discrimination in the workplace, stated specifically as follows:

- The Group provides equal opportunities in work requirements, including the payment of wages that meet or exceed legal requirements, taking into account reasonable production targets and working hours.
- Upholding the rights of workers to freedom of association, collective bargaining, and to form and join labor unions of their choice.
- Ensuring ethical recruitment such that workers do not incur any recruitment fees at any stage of the recruitment process, and no retention of passports/identity documents. Workers may voluntarily want to have their passports or identity documents held by the management for safekeeping purposes.
- Respect for diversity, and provision of a working environment free from discrimination, harassment and abuse.

Based on the workers' recruitment document and interviews with the workers, UoC had provided equal opportunities in recruitment and operational activities. In addition, in job vacancies that have been published by the company, there were no requirements that discriminated against gender, race or ethnicity, disability, sexual orientation, age, or belief.

Based on the interviews with the gender committee, women workers are given equal rights, wages and opportunities to get promotions with male workers of the same type of work, for example, there were several maintenance workers who were female workers.

6.1.2
UoC showed job vacancy announcements and work agreement letters between workers and company which showed that there was no payment requested during the recruitment process. In addition, in job vacancies that have been published by the company, there were no requirements that discriminated against gender, race or ethnicity, disability, sexual orientation, age, or belief.

Based on the interviews with the manpower agency, gender committee, labor union, and workers (harvesters and mill operators) at GMP Mill and Estate, PHP 1 Estate, and PHP 2 Estate, it is known that workers have never felt that the company has discriminated against them. It was explained that all activities from recruitment, performance appraisal, and promotion were given equal opportunity regardless of ethnicity, caste, nationality, religion, disability, gender, sexual orientation, gender identity, membership in labor unions, politics, or age. There was no difference in the communication between superiors and workers because of the things mentioned above, so the workers did not feel isolated or discriminated against by the superiors. The company also didn't request for any payment during the recruitment process.

6.1.3
UoC had procedures related to recruitment, appraisal, promotion, remuneration, and termination of employment which are generally described in the Collective Labor Agreement period 2021-2023 written in Bahasa. In general, these procedures describe:

- Recruitment of workers is based on the company's needs.
- The minimum age of workers is 18 years old.
- The workers who have been accepted will through three months of probation.
- Promotion of workers is based on needs, period of work, expertise and assessment of workers.

- The company is authorized to carry out the placement, transfer and promotion of workers by applicable regulations.
- Termination of workers can occur if the worker is on probation, resign as the worker's willing, ends on worker's period of the agreement, retire, etc.

In addition, the procedures of employee's recruitment, appraisal, promotion, and remuneration explained specifically in several SOPs. These procedures have been documented and socialized to all workers and their representatives, here as follows:

- SOP No. PRO-HRD-001-rev 03 dated on 01 September 2021 concerning on Recruitment.
- SOP No. PRO-HRD-003 dated on 04 November 2021 concerning on Worker's Appraisal.

During recruitment process, the company had set the standard of competence that required based on the offered position. Selection had include evaluation of skills, performance and medical test result. Furthermore, promotion is conducted based on work period, annual evaluation result and availability of position. All workers are treated equally in accordance with company regulation including rights of the worker as well. Records on manpower procedure had been documented, as verified randomly to the several documents, here as follows:

- UoC showed recruitment documents such as employment request form, job application letter, statement of police report, identity card, the result of writing test, the result of medical check-up, and work agreement letter. For example, a worker on behalf of MHZ (initial) who started working as a harvest worker with three months of probation on 03 December 2021.
- UoC showed promotion documents such as management decrees for promotion. For example, a worker on behalf of TND (initial) who had a promotion based on the worker's appraisal, from class 2A to 2B .

6.1.4

Based on field observation, interviews with the management and workers, also documents review, there were no woman worker in any pesticide application and fertilizing activities. All women workers placed in non-agrochemical works such as day care keeper, manual upkeep, and loose fruit picker.

UoC also showed list of pregnant woman and breastfeeding mothers that showed all women placed in non-agrochemical works (manual upkeep, loose fruit picker and office staff). There were no discriminatory in pregnancy testing given by the company.

6.1.5

Gender committees had been formed and still active until today in each unit (both estate and mill) which are chaired by the coordinator along with the head of gender committee. The structure of the gender committee consists of male and female workers. The main objective of forming a gender committee is to provide a forum that can accommodate the aspirations or complaints of workers (especially women).

UoC informed that they also handling complaints related to handling sexual harassment or violence grievance as stated on SOP No. PRO-HRD-004 rev-03 dated on 1 September 2021. This procedure stated that if there were any acts violate the regulations and laws, workers can communicate to the supervisor or gender committee.

Based on the interviews with several workers, they also knew of the existence of the gender committee because it had been routinely socialized by its management, the last socialization related to the sexual harassment and violence against women. Based on document review and the interview with gender committee, there was a complaint related to sexual harassment from male worker in 2021. Gender committee has responded and provided counselling to both victim and suspect.

6.1.6

Equal payment of wages has been made by the unit of certification properly, taking into account the ability, performance, expertise, work period and other factors as a basis for remuneration. So that the payment of wages provided is in accordance with the types of work respectively. In addition, based on the documents review of structure and scale wage, it was found that the UoC already had a wage scale structure for each worker based on position and class (not based on gender or origins).

Based on the interviews with workers (harvesters, maintenance workers, and mill operators), the workers already know that there was a wage scale structure for each level of workers and this has been proven by the difference in the monthly wage income presented on the pay slip. The monthly wages received are in accordance with the grade owned by each worker and so far, there have been no complaints / errors regarding this matter.

Status: Comply
6.2
Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).
6.2.1

UoC had procedures related to recruitment, selection, employment, promotion, retirement and termination of employment which are generally described in the Collective Labor Agreement period 2021-2023 written in Bahasa. It explained the working conditions and rights / obligations of workers such as recruitment, selection, transfer, promotion, performance appraisal, remuneration, discipline, overtime, and other provisions. The company regulation had been routinely disseminated by the certification unit to all employees, one of the socializations that was carried out on 22 January 2021 which was attended by 20 participants.

Based on the interviews with workers (harvesters and mill operators) and labor union representatives, it concluded that workers have a sufficient understanding of their rights (wages, overtime, incentives, etc.) listed in the collective labor agreement and in accordance with routine socialization provided by the certification unit. Workers' wages in 2020 and 2021 have been above the minimum wage set by the government, wage based on years of service, ability, attendance and job performance (structure and scale wage) and there were no late payments every month.

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

6.2.2; 6.2.3

UoC has collective labor agreement provided in Bahasa that explains the working conditions and rights / obligations of workers such as recruitment, selection, transfer, promotion, performance appraisal, working hours, remuneration, discipline, deduction, overtime, sick leaves, holiday entitlement, maternity leave and other provisions. These all stated in each worker's work agreement. Explanations related to the contents of the collective labor agreement, including:

- Article 20 concerning working time which explains that the working time in the company is 7 hours per day or 6 working days in a week (palm oil estate and mill), in which the total working hours are 40 hours in a week.
- Article 29 concerning wages which explains that the lowest wage of worker couldn't be lower than the minimum wage set by the government every year.

In addition, remuneration is generally stated in collective labor agreement, and specifically stated in a decree explain these matters, as follows: Internal Memorandum No. 001/WIP-HRR/Int-XII/2020 concerning Minimum Wage of Wilmar Group located in Sumatera Barat in 2021 is Rp. 2,484,041/ month (minimum) determined based on Sumatera Barat Minimum Wage Determination in 2021. For workers with the lowest wages are employees with 0-1 year of work period, and workers with greater than 1 year work period was giving work period allowance in accordance with their work period.

UoC showed overtime payment December 2021 that has been in accordance with applicable laws for workers on behalf of KN (initial) as boiler operator and ADY and SN (initial) as security. In the pay slip document, it's known that the nominal of the worker's overtime wages has in accordance with the overtime calculation.

A review of payslip document (security and mill operators) for December 2021, proved that the wages received are above the minimum wage and in accordance with the wage scale structure determined by the certification unit for 2021. For example, workers' wages on behalf of RE (initial), SD (initial), ADY (initial) have a different wage based on wage scale structure in 2021 and all wages above the minimum wage.

UoC also showed paid leave letter which showed that maternity leave was given 3 months of paid leave. For example, the paid leave letter on behalf of TES (initial), who had given 3 months and had been approved by the supervisor on 10 July 2021.

Unit of certification had shown their consistency in this ASA-1.3 assessment of work agreements that are owned by every worker so there were no policy to accept family members who work without a valid work association. In addition, in the field observation activities during the audit, there were no family members of workers who helped work in the field without work ties.

6.2.4

UoC has provided welfare facilities to occupants in the form of housing, water supply, educational facilities, masjid, school transportation and other facilities in each unit. Based on the field visit in the housing area, it revealed that workers were provided with adequate housing facilities with 2 bedrooms, 1 bathroom and there was daycare for children. The house is inhabited by 1 family and specifically for workers who are not married then 1 house will be filled by 2 workers.

In addition, the company also provided waste disposal sites for domestic waste management. For health services, the company provides clinics and paramedics. Based on field observations, it's known that the facilities and infrastructure provided for workers are still functioning properly.

In general, the facilities provided by the certification unit are in good condition and sufficient quantities related to the number of workers in each unit. Based on field observation, all housing has well-maintained drainage. The certification unit has also conducted monitoring for the condition of the feasibility of the facilities provided every year, such as housing which repaired if there were damage (usually if there were any damage, the worker will inform it and it will be handled directly by the company).

6.2.5

UoC has provided accessible food sources by providing small cafeteria in the workers' area for lunch. In addition, there were also workers who open small business stalls to sell daily necessities in each housing. UoC's work area was also able to access the nearest market.

Based on interviews with workers (harvesters and mill operators), labour unions and gender committees, it's known that workers have no difficulty in getting food sources because workers can buy needs to the markets around the company's area without any difficulties.

6.2.6

In Indonesia there were no living wage standard is established, so UoC still implemented the national minimum wages for all workers. In addition to the payment of minimum wages, certification unit has been conducting an assessment of the prevailing wages and in-kind benefits provided to workers in the certification unit aligned with the RSPO Guidance for Implementing a Decent Living Wage.

UoC has the determination of assessment prevailing wage and all kind of benefits for DLW simulation in 2022 has been included in the calculation of housing facility costs, taxes, cost of maintenance, electricity, water consumption, transportation cost, educational cost, daycare facility, health cost, and family gathering costs. The results of these calculations are known that the standard of prevailing wage currently given / simulated by the certification unit is above the stipulation of the minimum wage (IDR 2,484,050), as follows:

- GMP Estate: total prevailing wage is Rp. 3,590,728 per month
- GMP Mill: total prevailing wage is Rp. 3,189,766 per month
- PHP 1 Estate: total prevailing wage is Rp. 3,188,893 per month
- PHP 2 Estate: total prevailing wage is Rp. 3,227,059 per month

6.2.7

During the assessment, there were no workers with contract status (PKWT/daily workers) in main works. The current employee status are permanent workers, permanent workers with 3 months' probation, and contract workers. All contract workers placed in supporting works such as upkeep and compound.

Status: Comply

6.3

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

6.3.1

UoC had a policy concerning on the freedom of association stated in Wilmar International Group NDPE policy against deforestation, peat, and exploitation updated on 15 November 2019. This policy explained that Wilmar Group committed to upholding the rights of workers to freedom of association, collective bargaining, and to form and join labor unions of their choice.

In addition, UoC has a collective labor agreement which states that workers have the right to establish trade unions and become members / leaders of trade unions in accordance with applicable regulations.

Based on the interviews with labor union representatives, it explained that the company had given freedom of association and labor unions have been formed. The establishment of the union was in accordance with the applicable laws and regulations and has been recorded in Manpower Agency. UoC gave the freedom for worker to express their aspiration democratically and there were no intervention related to labor union activity.

6.3.2

UoC has well-documented the records of meetings between labor unions and management representatives as well as with internal unions. The following are examples of records of meetings conducted by labour unions in 2021, here as follows:

- The meeting between the labor union (PHP) and management representative on 26 January 2021 to discuss about the company's and labor union action plan on 2021-2022 attended by 17 persons.
- The meeting between the labor union (GMP) with management representative on 11 January 2022 to discuss about the minimum wage in 2022 and its work period allowance attended by 13 persons.

Based on the interviews with labor union representatives and their members who work in each unit, it's known that the labor union held meetings every month or whenever it's needed. The meetings accommodated in bipartite and internal meeting and there has been no labor issue that brought to Manpower Agency.

6.3.3

Based on the interviews with the labor union representatives, there were no interference in the selection or labor union operational activities. All processes of selecting, decisions making and planning activities, members' aspirations to their representatives run democratically. The worker who is currently placed as the Chairman of the Labour Union in each unit is a worker at mill and estate, then there will be no conflict of interest that occurs with the company because there were no workers who have the authority as decision makers (staff class and above). UoC also involved the labor union in drafted company regulation.

The establishment of the union was in accordance with the applicable laws and regulations and has been recorded at the Manpower Agency. Unit of certification was giving freedom for workers to express their aspirations and did not give any intervention related to labor union activity.

Status: Comply

6.4

Children are not employed or exploited.

6.4.1; 6.4.2; 6.4.3; 6.4.4

UoC had a policy concerning on children/underage worker protection validated by *Group Plantation Head* and *Group CSR Head*. This policy applies to all operational areas of Wilmar Group. It stated that the group prohibited to recruit employees under the age of 18 years old and prohibited the workers to bring children along in doing work (moreover to help the workers doing their work). Uoc also showed that they had socialized the policy to all parties including smallholders and contractors for instance the socialization held on 20 November 2021 to all smallholders and contractor's workers.

Uoc recognized that children who are forced to work, or who choose to work, are children who are deprived of their rights to childhood and education and are at risk of endangering their physical, mental and social well-being as stated in related regulation. UoC also showed recruitment policy No.PRO-HRD-001-rev 03 which stated that in recruitment the minimum age to apply is 18 years old.

Based on documents verification and field observation, there were no workers under the age of 18 and there were no child around the work area. In addition to having a policy governing the minimum age for workers for workers, the certification unit also includes clauses on child protection and prohibitions on hiring workers under the age of 18 in any agreement. UoC also put a warning board which disallowance the children existence in the work area.

Status: Comply

6.5

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

6.5.1 and 6.5.2

UoC had a policy concerning on sexual harassment, violence, abuse, and reproductive rights updated in January 2018. This policy applies to all operational areas of Wilmar International Group. The documents stated that the group committed to provide a conducive work place defined by the equality. In terms of that, this sexual harassment policy encourage the workers to report of all sexual harassment experienced by any individual, including gender or age. It's also stated that the company regulate the reproductive

rights including the freedom of reproduction and reproductive health of workers.

Based on the documents review and interviews with workers (harvesters, maintenance workers, and mill operators), disallowance of sexual harassment and violence had been routinely socialized by the management and gender committee, the last socialization related to sexual harassment and violence. The activity was carried out on 17 September 2021 which was attended by both female and male workers.

Based on the interviews with the gender committee and daycare officer, the company had given 15 minutes for breastfeeding woman and provided certain place for breastfeeding.

6.5.3

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

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

6.5.4

UoC showed the procedure to accommodate complaints and grievances from employees specifically in sexual harassment and violence (No. PRO-HD-004 rev-03) validated on 1 September 2021. In the procedure described that if requested, the company guarantees the confidentiality of the reporting identity and the disclosure of disgrace or incident (whistleblower).

Based on the interviews with workers it's known that the workers already have sufficient understanding of the grievance mechanism. Related complaints of sexual harassment (women's issues) can be submitted to the gender committee. In the last year period, there was a complaint related to sexual harassment from male worker in 2021. Gender committee has responded and provided counselling to both victim and suspect.

Status: Comply

6.6

No forms of forced or trafficked labour are used.

6.6.1

UoC had a policy concerning on force-labor ban stated in Wilmar International Group NDPE policy against deforestation, peat, and exploitation updated on 15 November 2019. This policy explained that Wilmar Group committed to respect and protect human rights by providing fair and equal opportunities to all its workers, stated specifically as follows:

- The Group provides equal opportunities in work requirements, including the payment of wages that meet or exceed legal requirements, taking into account reasonable production targets and working hours.
- Elimination of forced, bonded (including debt bondage) or indentured labour, slavery and trafficking of persons, and restrictions on workers' freedom of movement. Wilmar is committed to upholding the rights to freedom of movement and the right to resign from employment.
- Ensuring ethical recruitment such that workers do not incur any recruitment fees at any stage of the recruitment process, and no retention of passports/identity documents. Workers may voluntarily want to have their passports or identity documents held by the management for safekeeping purposes.

UoC showed that on each work agreement between the certification unit and the contractor/supplier, there were clauses related to fulfilling legal obligations in Indonesia as one of the obligations that must be fulfilled by the contractors. Some of these obligations are related to anti bribery, anti corruption, and anti forced labor. To ensure compliance with these clauses, the certification unit always requests the requirements for the completeness before the contractor does work.

Based on the interviews with manpower agency, gender committee, labor union, and workers at Mill and Estates, it's known that workers have never felt discriminated and forced to work by the company. There were no significant obstacles related to employment or violations of company regulations. UoC provided output targets that can be obtained in less than 7 hours of work. If the harvester obtains more output within or more than 7 working hours, then the harvester will get the incentive payment. No penalty was given to

the harvester if it does not get output due to natural factors such as rain. Based on payment list, the harvesters have earned above the minimum wage.

There were no pressure/forced in doing overtime work, workers who had overtime at the company can refuse if ordered to do overtime activities because overtime is not the worker's obligation.

6.6.2

UoC still have workers with contract status (*PKWT*) for few works such as upkeep and compound. All the rights for each employment status has been distinguished for workers with contract status (*PKWT*) and the permanent status (*PKWTT*).

Status: Comply

6.7

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

6.7.1

The certification unit shows the document ratifying the OHS committee organizational structure through the Decree of the Head of the Manpower and Transmigration Office of Central Kalimantan Province with No. KEP. 89/DISNAKERTRANS/IX/2021 dated September 29, 2021. The document explains that Agustian is the secretary of OHS committee. The certification unit in this case shows the following documents:

- Decree of the Minister of Manpower of the Republic of Indonesia with No. 5/5641/AS.02.04/VII/2020 dated July 7, 2020 regarding the Appointment of OHS Expert on behalf of Agustian and valid for 3 years from the date of stipulation.
- OHS Expert Authority Card on behalf of Agustian with No. Reg. 13596/PK3/AJ/62/2020/P1 which is valid until July 7, 2023.

Certification unit can show regular meeting activities, including;

- OHS Committee Meeting held on October 30, 2021. The topic of discussion is work accidents and occupational diseases of employees, PPE and fire extinguishers, training and socialization of OHS and prevention of COVID-19 in the certification unit's operational areas. The certification unit can show documentation and attendance list for the event.
- OHS Committee Meeting held on November 30, 2021. The topic of discussion is discussing the implementation of the OHS Committee work program in November 2021 along with reports from each team and evaluation of work accidents along with recommendations for prevention. The certification unit can show documentation and attendance list for the event.
- OHS Committee Meeting held on December 30, 2021. The topic of discussion is discussing the implementation of the OHS Committee work program in December 2021 along with reports from each team and evaluation of work accidents along with recommendations for prevention. The certification unit can show documentation and attendance list for the event.

6.7.2

The certification unit has emergency and work accident response procedures, which are listed in the Emergency Response Procedure. These procedures, among others, regulate emergency response to fires, leaks, accidents, explosions, natural disasters, riots and pollution. In addition, there are also First Aid Procedures, Work Accident Reporting Procedures and Work Accident Investigation Procedures.

The certification unit has also provided workers who are assigned to the field and other work locations and have received First Aid training. In addition, the certification unit has a licensed first aid officer with certificate number 01/P3K/DSTK-TRAN/2021.

The certification unit has also provided first aid kits in the workplace, the contents of which refer to the applicable regulations, namely 21 items. The certification unit shows the results of monitoring the completeness of the contents of the first aid kit for the period January – September 2021 located in buildings such as process stations, laboratories, process stations, workshops, warehouses, security posts and temporary storage of toxic and hazardous waste and offices. The certification unit also provides a first aid bag that is in the field and brought by the field foreman.

Auditors have checked and verified documents regarding the availability of First Aid Kits at estates and mill. The verification results show that the certification unit has provided First Aid Kits with various packages as required by PER.15/MEN/VIII/2008 attachment 3 (Boxes type A, B, and C), for example the number of First Aid Kits at Mill is 3 boxes with 144 employees while the number of First Aid Kits at GMP Estate is 79 boxes with 7,851 employees. The certification unit shows the First Aid Kit inspection data at PHP Estate for the period of November 2021 which states that all the items in the First Aid Kit are in complete condition, none of which have expired and all item are ready to be used.

Based on interviews with management, if there is an emergency in the mill area, the workers will report to their superiors, then they will submit it to the head of the emergency response team and EHS. Then the emergency alarm was turned on at the security post and CPO dispatch. All gathered at the assembly point in front of the mill office according to the evacuation directions that had been installed.

Based on checking the first aid kit for harvesting activities located in PHP Estate with a total of 15 employees, it is known that the number of first aid kit items (Category A) is in accordance with applicable regulations, for example: quick plaster with an amount of 10 pcs.

Based on the above, it is known that the certification unit has provided sufficient first aid kits as required by regulations where the number of items in the first aid kit (category) corresponds to the number of employees in the field.

6.7.3

The certification unit already has SOP for Personal Protective Equipment. The SOP explains the PPE standards for each job starting from harvesting, spraying, fertilizing, heavy equipment operators, loading FFB, mechanics, welders, manual maintenance, field staff, civil engineering, gardeners, foremen, warehouse officers, generator operators and solar tank activity.

It was further explained that the certification unit had disseminated PPE SOPs to employees, for example the OHS Socialization and Use of PPE on September 23, 2021 in front of the estate office which was attended by 87 workers. The certification unit can show the documentation, attendance list and socialization materials.

In addition, the certification unit also showed samples of the PPE handover documents for 2021 through the PPE Handover Minutes document on July 8, 2021 for rubber gloves and cloth mask. The certification unit also shows sample documents for employee PPE replacement through the Minutes of PPE Replacement document on July 17, 2021, for boot.

Based on field observations and interviews with estate, mill and contractor employees revealed that the certification unit had provided PPE to employees in accordance with the risk assessment that had been carried out previously. PPE can also be replaced if the PPE used is damaged.

6.7.4

The certification unit shows proof of payment of *BPJS Kesehatan* and *BPJS Ketenagakerjaan* for estate and mill for the period October – December 2021. From the results of document verification, it is known that all workers have been included in the *BPJS Kesehatan* and *BPJS Ketenagakerjaan* program, for example proof of payment of *BPJS Kesehatan* and *BPJS Ketenagakerjaan* for the period November 2021 for 201 employees paid on December 15, 2021.

Based on field observations and interviews with estate, mill and contractor employees revealed that each employee had been included in the *BPJS Kesehatan* and *BPJS Ketenagakerjaan*, further explained that employees had used *BPJS Kesehatan* for treatment at public health services.

6.7.5

The certification unit has recorded work accidents using Lost Time Accident (LTA), which is listed in the Work Accident Board document. These documents include explaining the level of work accidents such as death, serious injury (lost time > 3 days), minor injuries (lost time < 2 days), first aid (without lost time), total employees, total reportable accidents, total work accident cases (lost time > 3 days), total working hours, FR and SR as well as work accident statistics for the 2021 period per month.

Based on the 2021 Lost Time Accident document verification for the PHP and GMP Estate units revealed that there were no work accidents with medical treatment (minor category) while for the Mill unit there was 1 work accident with 63 working days lost.

Status: Comply

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

7.1 Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated

Pest Management (IPM) techniques.
7.1.1

The certification unit has procedures related to Pest and Disease monitoring. Based on document verification and interviews during the onsite audit, it is known that there has been no revision of the procedure. The procedure for setting up an early warning system is routine enumeration of potential pests and diseases, with emphasis on mechanical and biological control, such as planting beneficial plants (*Turnera subulata*, *Cassia cobanensis*, and *Antigonon leptosus*) to anticipate fire caterpillars, as well as installation and monitoring of barn owl box to anticipate rat attacks. The procedure also sets an economic threshold for each pest and disease, that chemical control is only carried out if the attack is above the economic threshold.

The certification unit has conducted regular pest and disease censuses. For example, rat census during the period of July – December 2021, there were no attacks that exceeded the threshold.

7.1.2

The certification unit explained that biological control of leaf eating caterpillar uses beneficial plants such as *Turnera subulata*, *Casia cobanensis*, *Antigonon Leptosus*, and *Turnera ulmifolia*. *Turnera ulmifolia* has been identified by the certification unit as an invasive species according to LHK Ministerial Regulation No.P. 94/MENLHK/SEKJEN/KUM.1/12/2016, and control measures have been carried out with regular maintenance. Based on field observations showed that the beneficial plants had been well cared for. The certification unit also develops Owls as natural predators of Rats.

7.1.3

Based on interview, verification document, and field visits revealed that there was no pest control using fire. Pest and disease control only uses biological and chemical means.

Status: Comply

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

The certification unit has a pesticide use program contained in the annual budget document, while the realization is reported in the Estate Manager's monthly report. The document explains the trademark and active ingredients of pesticides, target weeds, dosages per hectare, monthly use of materials and recapitulation, and the extent of application

For biological control purposes, estate management has conducting planting of beneficial plants (*Turnera subulata*, *Antigonon leptopus* and *Cassia cobanensis*) for leaf eating caterpillar and bagworm population control. This in confirmed during field observation along the edge of main road and collection road.

Based on the document verification, interviews, and field observations, it is known that the certification unit already has justification for the application of pesticides in the 2021 Pesticide Recommendation List document. As well as pesticide class according to WHO. For example, the rat pest uses the Racumin with the active ingredient Coumatetralil, which is categorized as class III.

7.2.2

The certification unit has documentation of the use of pesticides along with the active ingredients used, the LD50 of the active ingredients, the targeted area, the amount of active ingredients per ha and the total active ingredients applied, some examples of pesticides used by the certification unit are as follows:

Pesticide Brand	Active Ingredients	WHO Class	LD50 (mg/kg)
Tiara 20 WG	Methyl metsulfurone	U	> 1000
Garlon 670 EC	Triklopir butoksi etil ester	II	> 2000
Supremo	Isopropil amina grlifosat	III	> 5000
Basta	Amonium glifosinat	III	> 5000
Kenlly 20 WG	Methyl metsulfurone	U	> 1000
Ken Anime	Dimetil amina	III	> 2000

Based on this data, it is known that the certification unit has a record of pesticide use for 2021.

7.2.3

The certification unit has an integrated pest management plan listed in the division's work document and document pest control activity plan consisting of detection and identification of pests, rat census, census of leaf eater caterpillar, application of chemical rat control and planting of beneficial plants (*Turnera subulata* and *Antigonon leptopus*).

The certification unit is committed to minimizing the use of pesticides in the context of applying IPM, in this case the certification unit uses a natural predator of owls (*Tyto alba*) to control rodents. The certification unit has shown monitoring of gupon checks for the period of December 2021. Based on document verification show that there are 157 gupons scattered in the certification unit operational area with a coverage area for 1 gupon is 30 Ha.

7.2.4

Based on document verification, field observations and interviews with operational employees show that the certification unit does not use pesticides preventively to prevent pests and diseases. It is further explained that the use of pesticides is allowed if the census results are above the established normal threshold.

7.2.5

Based on interviews with management representatives, it was found that there was no use of pesticides which included pure WHO Class 1A and 1B pesticides, or included in the Stockholm/Rotterdam convention, as well as paraquat. From the rat census data, it is known that there were attacks above the 5% threshold in PHP1 and PHP2 Estate. Based on interviews with management representatives, it is known that these pests are controlled with the Racumin with the active ingredient Coumatetralil, which is categorized as class III.

Based on field observations in the circle and path spraying activities it was found that the ingredients used were Isopropyl amine glyphosate and methyl metsulfurone which were not included in WHO class 1a and 1b pesticides, or in the Stockholm/Rotterdam convention.

7.2.6

The certification unit shows a document on the 2021 training realization which explains that the certification unit has conducted training on the use of Basta which was held on July 28, 2021 which was attended by 57 employees and socialization related to the prohibition of pesticide application for pregnant and lactating women located in front of the estate office on July 16, 2021. The socialization was attended by 44 employees. The certification unit in this case can show the materials, documentation and attendance list for the activity.

Based on interviews with pesticide applicator indicated that the certification unit always provided training on the use and handling of pesticides at work. Based on field observations in the chemical warehouse show that the certification unit has provided MSDS in understandable language. In addition, during the spraying activity the foreman also carries an MSDS as a guide in case of work accidents (poisoning). The certification unit also conducts risk analysis in applying pesticides and considerations on product labels. Including the application of spray PPE according to the MSDS, namely masks, face shields, rubber gloves, aprons, boots

7.2.7

The company has a material and chemical management procedure (PRO-EST-006) which explains the inspection of materials and characteristics including hazardous chemicals. Officers who control are warehouse officers. Officers periodically monitor the condition of stored materials to find out damage and expiration.

Based on the results of field visits in the pesticide (chemical) storage warehouse at GMP Estate, PHP 1 Estate and PHP 2 Estate it is known that the storage of all pesticides is in accordance with the procedure and does not mix with other materials.

7.2.8

The company can show the SOP for Control of Hazardous and Toxic Waste with document number SOP-EHS-006 Revision 03 dated November 4, 2021, which is legalized by the General Estate Manager. The SOP describes the mechanism for storing pesticides in a special warehouse, including a place for mixing pesticide ingredients to be used in the field in a special isolated place so that there is no potential for chemical exposure outside the warehouse. Storage of used pesticide packaging is stored in a temporary storage area for Hazardous Waste and then sent to a licensed collector. In addition, the company also has the Use of Pesticides Number PRO-EST-006 Revision 00 dated October 01, 2011. All waste water management activities from washing fertilizer sacks or used

agrochemical packaging are carried out in special washing areas in each estate and carried out by special officers who have appointed, in addition to that, the waste water that has been collected from washing poison packaging can be reused for the next chemical mixing. After the completion of the washing activity, the packaging is stored, counted, recorded and there is evidence of periodic monitoring and the amount is accumulated. The company also showed the socialization of the prohibition on the use of Hazardous and Toxic waste packaging on March 13, 2021.

Based on field visits to pesticide warehouses and temporary storage areas for GMP Hazardous Waste and PHP Estate, it is known that pesticide storage areas are well managed, oil traps are available, adequate and isolated air ducts so that there is no potential for pesticide materials to leave the warehouse. Pesticide waste such as used pesticide packaging which is classified as Hazardous Waste is also found stored in a well-monitored temporary storage warehouse for Hazardous Waste which is then collected to licensed collectors. Before being stored in the Hazardous Waste Warehouse, used pesticide packaging in the form of jerry cans is chopped first, this is done by management to avoid reusing pesticide packaging and make storage space efficient.

Based on interviews with employees and foreman of pesticide application at GMP and PHP, it was found that all containers used for pesticide packaging were returned and sent to the Hazardous Waste Warehouse and not used for any other purpose other than pesticide application activities. All used packaging containers, work tools and work clothes are stored in a special storage area. Thus, no contaminated items are taken home. The results of observations at employee housing estates revealed that it was not found that used pesticide packages were disposed of in landfills and were not used for other purposes such as trash cans, flower pots and so on.

7.2.9

Based on information from unit management, surrounding communities and government institutions, it was known that there is no aerial pesticide application in certification unit. All pesticides were applied conventionally.

7.2.10

The certification unit shows evidence of communication with the Technical Implementation Unit of the OHS Office of the Manpower and Transmigration Office of Sumatera Barat Province regarding the application for employee health checks in 2020 and 2021. The Technical Implementation Unit of the OHS Office of the Manpower and Transmigration Office of Sumatera Barat Province responded to a letter from the certification unit stating that the inspection 2020 and 2021 employees were postponed due to the COVID-19 pandemic situation until the situation was declared back to normal by the authorities.

7.2.11

The certification unit shows memorandum regarding pregnant and breastfeeding workers which stated that the certification unit places female workers who are pregnant or breastfeeding (until the baby reaches 9 months old) in a section that does not endanger the health of the mother and baby. Prohibited from working on job related to chemicals.

Pregnancy checks are only carried out on spray workers every month to find out whether they are pregnant or not. Pregnancy examinations are only carried out for female workers who do not use contraceptives. This is in accordance with applicable laws and regulations. Based on field observation and interview with spray worker in the estate, there were no pregnant workers and all workers were aware of policies related to pregnant and breastfeeding mothers.

Status: Comply

7.3

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

7.3.1

The company has identified the waste contained in the Waste Identification and Waste Management Plan 2021 documents that are made by each unit. The identification is grouped by activities that produce waste, waste name, waste code, solid or liquid type, and its management. Determination of the waste code based on PP number 101 of 2014. For the scope of GMP Estate and POM, identification of waste generated from plantation activities is listed in the waste source identification document with document number FRM-EHS-036, identification of waste sources is listed in the Waste and Pollution Source Identification document which contains the results of identification of waste sources for each location, for example loading ramp stations, sterilizers, threshers, presses, clarifications, kernels, boilers, engine rooms, water treatment plan, and mill housing.

The certification unit has procedures for managing waste generated by the company, including:

- SOP document for Hazardous and Toxic Waste Control Number PRO-EHS-006 Revision 03 dated November 4, 2021, which was approved by the General Estate Manager.
- Waste Management SOP Document Number PRO-EHS-004 Revision 03 dated November 4, 2021 which was legalized by the General Estate Manager.
- Documents for washing of used poison and used fertilizers as well as waste water management of used washings Number SOP-EHS-016 Revision 00 dated October 1, 2011.
- SOP Document on the Use of Pesticides Number PRO-EST-006 Revision 00 dated October 1, 2011.

In the realization of waste management, it is divided into several types based on the characteristics of the waste it produces, including:

Hazardous and Toxic Waste

The company already has a 3-unit-licensed hazardous and toxic waste storage area, including:

GMP Unit Scope

- Temporary Storage Permit for Hazardous and Toxic Waste in accordance with Permit for Management of Hazardous and Toxic Waste for the storage of Hazardous and Toxic Waste of PT Gersindo Minang Plantation from the Investment and One Stop Service Office of Pasaman Barat District with number 503/02/IPLB3/DPMPSTSP/VII-2020 on July 30, 2020 which is valid for 5 years from the date of stipulation.
- PHP Unit Scope
- Scope of PHP-1: Permit Based on the Decree of the Regent of Pasaman Barat Number 188.45/236/BUP-PASBAR/2018 dated April 25, 2018 regarding the Extension of the Hazardous and Toxic Waste Management Permit for Hazardous and Toxic Waste Storage Activities to PT PHP-1. This permit is valid for a period of 5 years from the date of stipulation.
- Scope of PHP-2: Permit Based on the Decree of the Regent of Pasaman Barat Number 188.45/632/BUP-PASBAR/2017 dated October 13, 2017 concerning Permit for Hazardous and Toxic Waste Management for Hazardous and Toxic Waste Storage Activities to PT PHP-2. This permit is valid for a period of 5 years from the date of stipulation.

Based on this permit, it is known that the types of hazardous and toxic waste that are allowed to be stored are used oil, used filters, used batteries, pesticide packaging, spill kit rags, used cartridges, TL lamps, and clinical waste. Companies are also required to provide occupational safety and health equipment, including fire extinguishers, eyewash, and other emergency response facilities.

Regarding the management of hazardous and toxic waste, the waste transportation system is carried out in the different time depending on the scope of the unit. For GMP Estate and POM that sought out in October 28, 2021 and for GMP Estate sought out in October 29, 2021, so that for the Festronik Document there are have 2 copies. The company has preserved records properly so that waste management data can be traced easily and there are no recording differences. The company also records the incoming and outgoing hazardous and toxic waste in every warehouse, this is also regulated and is in accordance with the company's SOP.

Regarding the transportation of hazardous and toxic waste, the company cooperates with the official waste collection contractor, namely PT Shali Riau Lestari (PT SRL). The company can show the cooperation agreement and licensing requirements as a waste carrier. The company has and can show documents for storing and handling Hazardous and Toxic Waste in accordance with SOPs for storing and handling waste and Government Regulation Number 101 of 2014. These documents include balance sheets, logbooks and Hazardous and Toxic waste manifests. Based on the results of the document review by comparing the balance sheet and logbook, it can be seen that the delivery of waste to GMP and PHP Estate waste warehouse in September, October and November 2021 was appropriate and there was no difference in the amount submitted. Similarly, the comparison between the balance sheet and Manifest waste transportation carried out on October 28 and 29, 2021 shows that the balance document states the amount of waste in the month after transportation (November 2021) starting from empty.

Thus, it can be concluded that there are no recording errors and differences based on the Balance Sheet, Logbook and Festronik documents, this shows that the company has properly documented the storage and handling of Waste. In addition to waste that is contaminated with chemicals, clinical waste is also classified in this section, clinical waste is given special treatment that is directly transported to a licensed container. The company can also show the manifest and minutes of transportation by a licensed party, namely PT SRL on October 28, 2021 and will be transported to PT Andhika Makmur Persada. The company can show all licensing documents for the transporters, processors and users of hazardous and toxic waste as well as medical waste, from the results of document verification it can be concluded that PT GMP has collaborated with all waste management parties who have permits and are still valid until the next surveillance is carried out.

The results of field visits to hazardous waste warehouses in GMP and PHP Estate also show that the company has carried out hazardous waste management quite well with no discrepancies found in these locations. All requests for hazardous waste storage permits have been completed, such as the presence of fire extinguishers, showers, eyewash, coordinates, alarms, first aid kits, oil traps and appropriate labeling. In addition, lighting and air ventilation are well provided, on the outside of the warehouse there are also good drainage channels to anticipate pollution to the surrounding environment. The results of the interview with the warehouse manager also showed that the manager had fully understood the SOP in the management of hazardous waste. The results of interviews with the company stated that there is no specific transportation schedule, transportation is carried out when the results of identification of the warehouse have been declared full, but so far, transportation is carried out about every 6 months.

Non-Hazardous and Toxic Waste

Non-hazardous and toxic waste, including domestic waste, is managed in the form of reuse for items that can still be used, such as used fertilizer sacks, as well as plastic layers inside the sacks to transport loose fruits and tie the sacks. In addition, waste that cannot be reused will be collected, if it still has economic value such as scrap metal and used tires, it will be sold. Non-hazardous waste that cannot be reused will be disposed of in a landfill with a landfill system when it is full. Transportation of non-hazardous waste from employee housing or emplacement areas is carried out once 2 times every week using dump trucks and directly disposed of to the Landfill.

For the waste of used fertilizer packaging and chemical packaging that can still be used such as oil barrels, further management is carried out through the process that has been regulated in SOP-GEN-006. such as sacks of fertilizer, the company already has a special tub for soaking and washing the sacks so that they are suitable for reuse. This is done by the company to reduce waste production with the principles of reuse, recycle and reduce.

Liquid, Solid and Air Waste

The company does utilize waste water which is used as a biogas power plant, and the company does utilize liquid and solid waste. For liquid waste (POME) utilization is carried out as a Biogas in Methane Capture and land application which is pumped from the WWTP to an application area that already has a permit. Meanwhile, solid waste such as shells and fiber are used as a substitute for diesel fuel as boiler fuel. Meanwhile, other solid wastes such as sludge and EFB are used for composting and applied to land for fertilizer substitution.

The company already has a hazardous and toxic waste SOP with the number PRO-EHS-006 and a hazardous and toxic waste identification list. However, the results of field observations show that there is several used packaging of hazardous and toxic waste both in the Estate and in the POM that are not located in the dangerous and toxic warehouse. The company can show corrective action by placing all of the hazardous and toxic waste into the hazardous and toxic waste warehouse and showing evidence of socialization activities to the owner of the waste. Based on this, the company has improvement opportunities to ensure that the implementation of hazardous and toxic waste management can be carried out consistently in accordance with the procedures they have. **OFl.**

7.3.2

Based on interviews with company management and the Head of the Hazardous and Toxic Waste Warehouse at the sampling location, it was found that they had an understanding of the handling of waste disposal, especially hazardous waste and domestic waste, and the management of hazardous waste in accordance with procedures owned by the management unit. In addition, respondents also stated that these regulations are strictly enforced and there are sanctions for those who violate them. All waste disposal facilities have also been provided by the company such as organic, non-organic and hazardous waste bins and landfills. The respondent's understanding of waste management is the result of routine and consistent socialization and training as evidenced by the minutes that were held on 7 November 2021 to all GMP and PHP Estate staff and employees with photo evidence and attendance list.

Regarding the transportation of hazardous and toxic waste, the company cooperates with the official waste collection contractor, namely PT Shali Riau Lestari (PT SRL). The company can show the cooperation agreement and licensing requirements that have been owned by all parties involved in the transportation, processing, and utilization of waste. The company has and can show documents for storing and handling Hazardous and Toxic Waste in accordance with SOPs for storing and handling waste and Government Regulation Number 101 of 2014. These documents include balance sheets, logbooks and Hazardous and Toxic waste manifests. For the transportation of non-hazardous waste from employee housing or emplacement areas, it is carried out every 2

times a week using a dump truck and immediately disposed of to the Landfill and will then be stockpiled when the landfill is full.

Based on the results of visits to the GMP Hazardous Waste Warehouse and PHP Estate, information was obtained that the last transportation was carried out on October 28, 2021 for PT GMP and October 29, 2021 for PT PHP, so the condition of the warehouse during the visit was relatively empty. In addition, a visit to the landfill also shows that there are landfills that are full and have been stockpiled. For the new landfill, it is not in full condition and there are also no traces of waste burning activities at that location. Landfill is divided into two types, namely organic waste and non-organic waste. The results of the field visit for the PHP 2 Landfill area obtained former fertilizer sacks and plastic inner, this is an opportunity for improvement in indicator 7.3.1.

The results of interviews with workers and people living in the company's area also stated that the waste management carried out by the company was very good and regular. Trash cans are provided properly and are replaced if damaged. Regulations related to waste disposal are also strictly enforced and there are sanctions for those who violate them. Resource persons understand very well how to separate the types of waste they produce. The field visit also showed that the housing conditions were very clean and there was no scattered garbage. Based on interviews with management and employees, they already know and understand the waste management implemented by the company. PT GMP and PHP also routinely report on hazardous and toxic waste management every 3 months as described in indicator 1.1.1.

7.3.3

The company does not carry out open burning for waste culling, this can be proven from a field visit to the Landfill at GMP, PHP-1 and PHP-2 estate where there are no encounters of incinerated waste. The results of interviews by mill and estate employees also stated that there was no burning of rubbish, because they were aware of the prohibition on burning activities and the sanctions they would receive if burning incidents. Organic waste from housing is managed by burial, while inorganic trash is disposed of in the space provided, then transported every 2 times a week and dumped into Landfill and then buried when the Landfill is full.

The results of field observations in the employee housing area also showed that there were no traces of burning activities, besides that there were also many warnings to prohibit waste burning activities as well as the dangers that could arise from burning activities. Interviews with employees who live in the housing estate also stated that they had never burned waste due to sanctions.

Status: Comply

7.4

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

7.4.1

The certification unit can show procedures regarding fertilization No: SOP-EST-001 effective December 18, 2015, namely activities to provide nutrients for plants, in this case fertilization with chemicals with the aim of providing nutrients for plants to produce good FFB production.

Records of implementation of best cultivation practices that have been carried out by the certification unit include records of soil and leaf analysis activities and nutrient recycling strategies as regulated in the procedure for managing soil fertility.

Based on field observation and interview with Fertilizer Applicators, known that the applicators were able to explained and demonstrate several technical implementation such as time of application, macro and micro nutrient fertilizer placement, prohibited areas to be applied with fertilizer (i.e. conservation and riparian areas) and PPE used.

7.4.2

The unit of certification has shown documentation of soil and leaf sampling which can be detailed as follows:

1. Soil Analysis

The last GMP, PHP I and PHP II soil samples were taken in 2015. Based on interviews with management, soil sampling is not routinely done every year, but every 5 years. The results of the 2015 Soil Sample Analysis were published by EMU Laboratory Wilmar International Plantation. The analysis results detail the results of laboratory analysis on the condition and nutrient content of the soil in the 8 samples taken. Parameters measured include: Texture, acidity (pH), content of C, N, P, K, Mg, Ca, Na, BS, CECu, Zn, Mn.

a. The GMP soil analysis report was published on 27 November 2015 as many as 8 samples.

- b. Soil analysis report PHP I published on 26 October 2015 as many as 8 samples.
- c. PHP II soil analysis report published on 27 November 2015 as many as 8 samples

2. Leaf Analysis

Leaf analysis is carried out annually. For example, PT PHP in 2020 was carried out based on the Foliar Analysis Report dated 01 - 27 May 2020. The parameters tested consisted of macro elements (N, P, K Mg, Ca) and micro elements (B, Cu and Zn).

Based on interviews with management representative revealed that soil and leaf sampling for 2021 was postponed indefinitely due to the Covid-19 Pandemic.

7.4.3

The recycling of nutrients implemented by the certification unit includes empty bunch applications, POME land applications, and recycling of organic materials during replanting. Based on interviews with management, the EFB application block is a recommendation from the research department, taking into account soil types and fertility levels, it is known that the certification unit is implementing EFB applications on mineral soils, with a spot system between rows of plants at a dose of 40 tons/Ha/year.

7.4.4

According to fertilizer monitoring program 2021 which informed type of fertilizers, dosage, volume and hectares of application, time of application. According to estate review, it was known that manuring program for period 2021 is still in progress. Among fertilizer recommended are Borate, Empty Bunch, Super Dolomite, CPD HIK and Hikay. Estate management has monitored the used of fertilizers and satisfactory documented. Monitoring of fertilizer application is reviewed every month that presented in document of "monthly report".

	Status: Comply
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7.5

Practices minimize and control erosion and degradation of soils.

7.5.1

The certification unit can show maps of the distribution of marginal soils such as mineral soils, peat soils, and topography. The map is available with sufficient scale and legend. Marginal soil map prepared by Parama Agricultural Soil Survey (M) SDN. BHD. The details of the distribution of the land distribution map for each division can be explained as follows:

- **GMP Estate**
The certification unit has a soil type distribution map (Soil Map) with a scale of 1: 30,000 available in its working area consisting of mineral soils (56.4%) and peat soils (44.4%). The map also explains the depth of the peat, namely; peat with a depth of less than 1 meter, covering an area of 274.2 Ha or 6.6% and peat with a depth of 150 - 300 cm with an area of 1,497.2 Ha or 37.2%.
- **PHP-1 Estate**
Mineral soils (28.6%) and peat soils (72.4%), depth of peat less than 1 m covering an area of 16.3 Ha (1%), depth 150 - 300 cm covering an area of 1,204.8 Ha (71.2%).
- **PHP-2 Estate**
A map of the distribution of soil types available in the working area consists of mineral soils (78.1%) and peat soils (21.9%). The map also explains the depth of the peat, namely; peat with a depth of 150 - 300 cm with an area of 189.3 Ha or 21.8%.

7.5.2

Based on document verification show that the certification unit has replanted since 2014-2021 with a total area of 3,615.29 Ha. Replanting is carried out on peat and mineral areas but not on areas with steep slopes.

7.5.3

Based on the document verification of area statement revealed that the certification unit was not carrying out new planting activities. The last new planting was carried out in 1998 with an area of 43.62 Ha located in PHP-2 Estate which is in the estate consists of mineral soils (78.1%) and peat soils (21.9%).

	Status: Comply
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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

The certification unit can show document No. SOP-EST-008 which was issued on 01 October 2012 regarding the proper management and monitoring of peat soils for oil palm cultivation, this procedure was prepared as a guideline for the appropriate and appropriate peat soil management and monitoring system for the company. The document also states that the water level from the ground level must be maintained between 50 and 75 cm, whereas the lowest water level (75 cm) is during the dry season.

Based on the data presented by the certification unit, it is known that the PT PHP II area has a slope of 0-4°, and the peat area is 18.71%. The realization of peat management includes installing subsidence stakes, constructing bund offs, and monitoring the water level.

Based of the semi-detailed soil survey document study showed that in PT GMP and PHP, there were no other critical/fragile soils apart from peat soils. There is no soil with high sandy content, acid sulfate, or slope factor.

The existence of soil map containing information on soil classification, texture, drainage, limiting factors, rocks, and suitability information for the development of oil palm plantation has helped the company used by the company to arrange the block, roads, drainage, bridge, etc. The certification unit also has a Road Maintenance Program equipped with the proper infrastructure and facilities to do such work.

7.6.2 and 7.6.3

Based on verification document, interviews with management and field observations at GMP and PHP, it is known that there are plantings in peat areas. For peat areas, it is known that the management carried out by the water management, such as the construction of stop bunds/permanent dams. In addition, measurements of water level and peat soil subsidence are also carried out on a regular basis.

Status: Comply

7.7

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

7.7.1; 7.7.2; 7.7.3; 7.7.4; 7.7.5

Based on document review and interviews with management, it can be explained that there has been no new planting on peatlands since 15 November 2018. This is evidenced by the planting years of oil palm in the two companies, among others: 1992 - 1997 (GMP), 1996-1999 (PHP-1) and 1996-1998 (PHP-2).

The certification unit can show the peat inventory document which is routinely reported to the RSPO, which states that the peatland area in Sumatra under the auspices of PT Wilmar Ltd is 2,213.55 Ha.

There is a difference between the PIPPIB (Indicative Map for Delaying New Permits) and the results of the land survey conducted by the Parama Agricultural Soil Survey, however the company can show evidence of routine reporting to the last RSPO on 23 April 2020 via email, the report states that there is no statement that needs to be followed up and accept that the certification unit follows the regulations from PIPPIB, provided that if there are things that need to be further verified, they can be directly submitted to the RSPO

The certification unit has a subsidence monitoring benchmark with details:

1. GMP Estate has 7 subsidence stakes with peat area of 1,235 Ha.
2. PHP 1 Estate has 8 subsidence stakes with peat area: 913.24 Ha.
3. PHP 2 Estate has 2 subsidence stakes with peat area: 189.81 Ha.

The certification unit shows monitoring data for the subsidence stakes, which can be concluded that there is no significant change in the decline at each subsidence benchmark point for each plantation unit.

7.7.6

The certification unit has a peatland management procedure in which the procedure refers to the RSPO Peatland Working Group Meeting guidelines where the certification unit must have 1 subsidence marker in every 240 Ha of peatland. For peatlands with more than 5000 Ha, the number of stakes can be reduced from this requirement if the certification unit has justification.

Based on field observations in peat areas, it shows that the construction of drainage canals is based on topography. In addition to the Piezometer, the unit of certification measures the water level in the waterways as found during field observations at GMP Estate,

PHP-1 and PHP-2 Estate, it is known that the water level above ground level is ± 55 cm. Downstream of the ditch, in the same block, a floodgate has been installed, to protect the water supply in the block from drought and flooding.

7.7.7

Based on document verification of PT GMP and PHP areal statement 2021 known that all peat and mineral areas have been planted.

Status: Comply

7.8

Practices maintain the quality and availability of surface and ground water

7.8.1

Based on the ANDAL, RKL-RPL 2014 document for PT GMP and UKL-UPL 2004 for PT PHP, document identification of HCV 2012, as well as maps of river flows and water sources it can be seen that there are several water sources points in the operational area of PT GMP and PHP, namely the Pasaman River, Alin River, and Sasak River. Based on the document, it is also known that the management plan for water sources is to test the quality of surface water every 6 months and monitoring wells every 6 months. All tests are carried out by a KAN accredited laboratory (LP-1247-IDN). Regarding this, the company shows the results of surface water quality testing for all identified water sources contained in all RKL and RPL reports for the semester 2 of 2021. The company conducted a surface water test with 16 indicators in accordance with the matrix request in the AMDAL 2018 which was carried out in 10 sample locations. The Quality standards based on Regulation Government Number 22 of 2021, class 2. Based on the test results for all these locations indicate that there is no parameter value that is above the applicable quality standard. The results of testing on monitoring wells carried out for semester 2 of 2021 also show that there is no test result value above the applicable quality standard, namely Permenkes No. 32 Year 2017. All of these tests were carried out on December 12, 2021.

The unit of certification also does not limit access to clean water, and workers also have adequate access to clean water. Based on the results of field observations in the Estate housing area as well as interviews with fertilizer workers, spraying workers, and harvest workers, information was obtained that clean water facilities for housing were obtained from drilled wells provided by the company and for factory workers who lived in factory housing, the water source came from reservoirs which has been processed in WTP. The unit of certification has consistently had a water management plan for mills and plantations that is stated in the Environmental Management and Monitoring document as well as riverbank management programs and other water sources. Testing for drinking water is also carried out by the company to see the quality and quantity of ground water taken from monitoring wells and drilled wells. The guidelines used in measuring and testing drinking water quality use the Minister of Health Regulation Number 492 of 2010, concerning Environmental Health Quality Standards and Water Health Requirements and it appears that all parameters are below the standard quality standards. The tests are carried out by a KAN accredited laboratory (LP-1247-IDN) on December 12, 2021.

The company also have a river boundary management plan - riparian belt described in procedure SOP-GEN-018, Rev 02, effective date November 04, 2021 approved by General Estate Manager. For those with river and tributary status, they follow the law, namely the border width for the river is 100 meters and the tributary is 50 meters wide from the riverside. The realization of water quality improvements that have been carried out by the company include:

- Conduct socialization to all employees and the surrounding community not to use the water for consumption activities.
- Maintain a hygienic environment around water sources so that sources of pollutants can be minimized.
- Create a program to improve water quality gradually with the provisions of the applicable laws.
- Report the results of the examination in accordance with the provisions of the applicable laws.
- Testing the quality of river water and boreholes listed in the RKL/RPL report
- Management of surface water erosion and runoff, water management in low-lying areas and monitoring of surface water quality as stated in the implementation of the semester RKL-RPL
- Management of riverbanks and water sources in the form of reservoirs.
- Waste water management using WWTP and utilizing it in licensed application areas as well as monitoring the quality of wastewater and monitoring wells
- Monitoring the use of water for palm oil processing and evaluating its use.
- Recording of flow meters in WTP
- Checking for water faucet leaks at the factory and flowmeter calibration
- Distribution control and maintenance of water distribution pipes to housing
- Creation of water saving posters and water saving campaigns
- Socialization of water usage savings in mills and housing.

- Planting of plant species in the riparian areas of the River in GMP and PHP-2 such as *Bamboo*, *Mahogany*, *Sengon*, *Trembesi*, etc.

7.8.2

The company has SOPs for identification, management and maintenance of water sources and quality as stated in the Riparian Belt SOP Number SOP-GEN-018 revision 02 dated November 4, 2021, which was approved by the General Estate Manager. The SOP describes:

- Identification of water sources is carried out through 2 methods namely identification of underground water sources, carried out by local unit management and Identification of surface water sources, carried out during the assessment of protected areas/High Conservation Value (HCV) - HCV Assessment.
- Management of water sources by maintaining a clean environment around water sources so that sources of pollution can be minimized.
- Maintenance of water sources by creating a chemical-free area on riverbanks and reservoirs by determining the width of the river border area as wide as 100 meters; tributaries are 50 meters wide and the width of the border for an artificial reservoir is 10 meters.

The SOP also describes efforts to manage river borders and other water sources, including:

- Installing a boundary sign in the form of a red boundary marker.
- Periodically monitor the condition of the river border from disturbances and fires every month.
- Conduct socialization to employees in conservation efforts every semester.

The company has also planted woody plants on riverbanks, during 2020 it is known that 1000 tree trees have been planted consisting of *Bayur*, *Mahogany*, *Bamboo* and *Vertifer Grass*. There are several activities that have been carried out by the company as a form of protection for river border areas based on field visits, such as:

- Placing warnings on no hunting, HCV areas, no application of chemicals or fertilizers.
- Do not apply chemicals in the HCV area with a distance of ± 100 meters.
- Marking the boundaries of the managed area (chemical application) with a yellow mark on the tree.
- Carry out enrichment by planting mahogany plants.
- The company has also disseminated the prohibition of spraying on the edge of water bodies to workers.

7.8.3

The management of POME from the processing of palm oil from the GMP POM with a capacity of 60 tons of FFB/hour is carried out in an WWTP pond located in the company's area. Before being channeled to the Land Application (LA), all POME is put into the WWTP with a single-feeding system which is then processed to reduce pollutant elements so that it is suitable for application to land. The certification unit has 4 WWTP pools. POME is managed according to the applicable national regulations, namely KepmenLH No.28 & 29 of 2003 regarding Technical Guidelines for the Assessment of Wastewater Utilization from Palm Oil Plantations for Land Application. The waste that was applied to LA came from pond number 4 (Outlet).

The company already has a Liquid Waste Utilization Permit for Land Application (LA) based on the Decree of the Head of DPMPSTSP Pasaman Barat District Number 503/02/LA/DPMPSTSP/XII-2019 dated December 3, 2019. The permit is valid for 5 years. The liquid waste permit is used to be channeled into plantation land covering an area of 209.01 Ha in blocks 127, 128, 129, 147 and 148 and control land covering an area of 43.43 hectares in block 146. The company has a Waste Water Treatment Plant (IPAL) as a form of waste management. liquid FFB processing before being discharged to Land Application. The WWTP consists of 9 ponds consisting of 1 Methane Capture Pond, 6 wastewater treatment ponds, and 2 reserve ponds. Based on the WWTP plan shown by the company, the liquid waste that flows into the Land Application comes from the output pool located in pool number 7 (Aerobic pond II).

The company can show documents regarding the results of the measurement of the quality of liquid waste, namely the Water Management Report per quarter and the RKL-RPL Implementation Report per semester which includes the results of the measurement of the quality of liquid waste every month. The test is carried out by a laboratory that has been accredited by KAN (LP-1247-IDN) with reference to the KepmenLH regulation Number 29 of 2003. Based on the results of the analysis of the test document, it shows that all the parameters tested are in accordance with the applicable quality standards. From the results of the Quarter 1 to 4 data analysis in 2021, there has never been a test result value that is above the specified quality standard. This shows that the liquid waste generated from FFB management activities is feasible to be applied to land (Land Application).

7.8.4

The company already has a water use/utilization permit that is owned by the company, namely based on the Decree of the Governor of Sumatra Barat Number 570/1119-periz/DPM&PTSP/BI/2021 dated 8 June 2021 concerning Water Resources Concession Permit. This permit decision comes into effect from June 8, 2021 until 5 years from the date of stipulation. It is explained that the company has an obligation to collect water with a quota that can be utilized of 65,000 m³/month.

The company can also show documents for recording daily water use, as well as the results of the recapitulation of water use for palm oil processing units every month, for example for the period January - December 2021. Based on surface water utilization data, the average use of water for FFB processing is equal to 26,459.33 m³/month. However, when calculating the overall water use (domestic and office), the total water use is 53,791.50 m³/month, where this value is still below the permitted quota.

The company can also show proof of payment of the water levy to the Sumatera Barat Provincial Government Revenue Agency for the period from July to December 2021 with the payment period being made every month. An example of proof of payment of water levies that was last made is based on proof of payment paid on December 17, 2021.

The results of field visits to the Water Treatment Plan (WTP) and Water Intake also show that the flowmeter used is still functioning properly, and the officer responsible for the PAP is very familiar with how the WTP works and recording flowmeter data. Officers can also show data in and out of water which is recorded every day.

Status: Comply
7.9
Efficiency of fossil fuel use and the use of renewable energy is optimized.
7.9.1

The Certification Unit utilizes solid waste to increase the efficiency of the use of fossil fuels and to optimize renewable energy which can be proven by records of the implementation of solid waste utilization. This can be shown in the document recapitulation of waste utilization for the period January – December 2021 with the following data as follow:

Description	Unit	TOTAL
FFB Process	Ton	233,405.333
Shell used	Ton	20,153.074
Fiber used	Ton	29,630.554
Methane capture energy used	KWh	1,056,222
Energy required for the process (KWh)	KWh	3,984,890
Calories generated from biomass (KKAL)	KKAL	148,004,906
Energy is generated from biomass	KWh	273,350
Energy from the biomass used for the process	%	12.5
Energy use of biomass per tons of FFB	KWh/Ton TBS	1.41

Solid waste in the form of shells, and fiber is used to substitute diesel as boiler fuel. Based on the data on the results of solid waste utilization carried out by the company during this period, it can produce energy efficiency of 1.41 KWh/Ton FFB. Based on data on the use of diesel from January to December 2021, it can be concluded that the use of shells and fiber can save the use of diesel fuel by **12.5 %** of the total process demand. However, this is influenced by the supply of FFB entering the POM. If the supply of FFB decreases, the use of diesel fuel will increase as happened in June 2021. In addition to being used as fuel in boilers, shells are also sold to refineries belonging to the Wilmar group, for the period 2021 the number of shells sold is 5,905.060 tons.

The company also performs calculations for the efficiency of using diesel fuel both for the FFB processing and for transportation during 2021, the diesel fuel that can be saved is 1.14%. In addition to using diesel fuel and solid waste for boiler fuel, the company also uses electrical energy generated from methane capture (biogas). Based on the data from the recapitulation of the period January – December 2021, the company's methane capture can produce energy 88,018.5 kwh/month or 4.5 kwh/ton FFB. The results of interviews with factory management stated that if all solid waste in the form of shells and fiber and the energy produced from biogas is used to process FFB, then the need for using diesel fuel is only for minor needs such as turning on generators.

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 minimize GHG emissions.
7.10.1

Certification Unit has carried out a GHG inventory within the scope of GMP POM, it can be concluded that the company has identified the source of GHG produced by GMP POM unit and its supplier plantations. Identification of significant sources of GHG emissions is identified and a mitigation plan has been developed by the company covering mills and plantations. Significant GHG emissions include land use change, POME processing, use of fertilizers and pesticides, use of fossil fuels for operations and transportation. The mitigation plans include, among other things, the right dose of fertilizer use and application as recommended, reduction of reuse and recycling actions, restrictions on electricity use, transportation and machine maintenance, and periodic air quality tests. The company has also reported the results of the GHG calculation to the public with a summary report that can be viewed on the RSPO website.

Reduction of fossil fuels at GMP POM has been implemented by using fiber, and shells and biogas from methane capture for substitution boiler fuel. The company also uses POME with test results from the monitoring period January - December 2021, showing that all wastewater testing parameters have met the applicable quality standards. Based on the review of documents for example: monitoring of pesticide use, monitoring of diesel fuel, identification of HCVs and others it is found that accurate data have been entered into the RSPO palm oil GHG Calculator. GHG calculation using palm GHG Calculator 4.0. The summary of GHG emissions for the period January - December 2021, is listed as follows:

Unit

Association	No. of Estates/Plantations	FFB Processed (t)	Planted Area (ha)
Own Plantation	3	56,078.15	4,711.34
Group Plantation	2	5,274.33	2,057.24
3rd Party	1	163,995.43	0.00
Total	6	225,347.91	6,768.58

Summary Emissions

Description	Value	Unit	Description	Value	Unit
CPO	1.19	tCO ₂ e/tProduct	Oil palm planted on mineral soil	5,521.28	Ha
PK	1.19	tCO ₂ e/tProduct	Oil palm planted area on peat	1,247.30	Ha
PKO	0	tCO ₂ e/tProduct	Total oil palm planted area	6,768.58	Ha
PKE	0	tCO ₂ e/tProduct	Conservation area (Forested)	6.19	Ha
OER	18.23	%	Conservation area (non-Forested)	119.37	Ha
KER	4.33	%	FFB Production per hectare	39.76	t/ha

Mill Emissions and Credits & Emissions from Palm Kernel Crusher

Mill Emissions and Credits			Emissions from Palm Kernel Crusher	
Emission Source and Credits	tCO ₂ e	tCO ₂ e/t FFB	Emission Source	tCO ₂ e
POME	7,173.68	0.03	PK from own mill	0.00
Fuel Consumption	292.07	0.00	PK from other sources	0.00
Grid Electricity Utilization	0.00	0.00	Fuel Consumption	0.00
Export of Excess Electricity to Housing & Grid	0.00	0.00	Total Crusher Emissions	0.00
Sale of PKS	-12,991.13	-0.06		
Sale of EFB	0.00	0.00		
Total	-5,525.38	-0.03		

Estate / Plantation Field Emissions and Sinks

Description	Emission (tCO ₂ e)			TOTAL
	Own	Group	3rd Party	
Emission Source				
Land Conversion	45,636.05	2,230.55	0.00	47,866.60
CO ₂ Emissions from Fertilizer	3,204.19	48.80	0.00	3,252.99
N ₂ O Emissions from Peat	0.00	1,009.54	0.00	1,009.54
N ₂ O Emissions from Fertilizer	1,867.61	45.54	0.00	1,913.15

Fuel Consumption	875.59	49.05	0.00	924.65
Peat Oxidation	0.00	7,363.46	0.00	7,363.46
Sinks				
Crop Sequestration	-41,738.22	-2,114.26	0.00	-43,852.49
Sequestration in Conservation Area	-55.67	0.00	0.00	-55.67
Total	9,789.55	8,632.69	47,558.67	65,980.91

FFB Supplier

Supplier Name	FFB Production by Estate/Plantation (t)	FFB Supplied by Estate/Plantation (t)	Percentage of FFB supplied by Estate/Plantation (%)
GMP Estate	34,842.06	34,174.57	98.08
PHP 1 Estate	4,112.77	4,014.65	97.61
PHP 2 Estate	18,176.35	17,888.93	98.42
External suppliers	163,995.43	163,995.43	100.00
AMP 4 Estate	19,109.12	2,150.72	11.25
PMJ Estate	28,889.61	3,123.61	10.81

Palm Oli Mill Effluent Treatment

Description	Unit	Value
POME Produced	t/yr	161,961
Diverted to Compost	%	0
Diverted to anaerobic digestion	%	100
POME to anaerobic pond	%	14
POME to methane capture (flaring)	%	59
POME to methane capture (electricity generation)	%	27
COD value before anaerobic digestion	mg/l	38,885.5
COD value after anaerobic digestion	mg/l	3,136.1
COD removed during digestion	tCOD/tPOME	0.04
POME Produce	t/yr	161,961
CH ₄ (Total)	t/yr	322.41
Applied N in POME	t/yr	72.88
Total N ₂ O emission from POME	tCO ₂ e/yr	0.49

*POME is processed in WWTP and Methane Capture

The GHG calculation data is based on the period January – December 2021. The value generated from the RSPO GHG calculation is due to the use of POME processing using Methane Capture which significantly reduces emissions in the GHG calculation.

7.10.2

Certification Unit did not carry out new developments above 2014, but the company continued to manage GHG by conducting an inventory of emission sources. They can show identification documents of activities that produce emissions for the period 2021 for Mill and Estate. This is made to estimate carbon stocks in the management area along with potential sources of emissions that can occur directly as a result of the management, and plans to minimize these emissions are drawn up and implemented.

The GHG emission reduction mitigation plan developed by the company is the use of renewable fuels in the form of shells, fiber and EFB as a substitute for diesel, performing maintenance on operational equipment such as boilers on a regular basis, doing reforestation around the factory and residential areas, and applying POME to the surrounding LA area. Records of GHG mitigation for Estate and Mill units, for example the use of fertilizers in accordance with the dosage, routine maintenance of operational vehicles, socialization of the prohibition of burning waste, applying efficient use of electricity and integrated pest control to minimize the use of pesticides.

Boiler burning activity at GMP POM is not significantly negative impact on air quality. PT. GMP is committed to always monitoring/testing periodically with the installation of Smoke Density, and environmental improvements through air pollution reduction programs such as reforestation programs around factories, improving work safety for factory employees by wear protective clothing

(masks) and tightly cover office walls and equip it with air conditioning and perform maintenance on machines boiler equipment regularly. The unit of certification also carries out measurements and testing of stationary source emissions carried out on boilers and generator chimneys. Based on the analysis of the value of the test results, it can be concluded that there is no value that is above the applicable quality standard, namely Minister of Environment Regulation Number 15 of 2019 for Gensets and Number 07 of 2007 for Boiler.

Based on the results of field visits and interviews with management, the company has also taken several actions in managing emissions, including:

- Measure the height of the chimney according to the required height standards
- Planting reforestation trees as a green line in the factory and reservoir areas
- Using the recommended chimney exhaust emission technology, in reducing Air Pollution and noise in the processing plant environment
- Equip the chimney with holes for measuring air quality emissions, measuring instruments and wind speed directions, and safety ladders
- Testing and inspection of operational machines has been carried out by the company in cooperation with the relevant local government. This is indicated by the engine permit and the results of the 2021 inspection from the relevant agency
- Operational maintenance of stations in Mill as indicated in the realization document and factory machine maintenance plan for 2021

7.10.3

The certification unit already has the SOP for Handling Immovable Source Disturbances Number PRO-MIL-013, revised 02 September 1, 2021. The SOP contains a flow chart from identification activities to reporting and evaluation of performance in handling fixed source disturbances. The identification of sources of greenhouse gas emissions is listed in the GHG emission inventory document, this document describes the sources of emissions produced and the mitigation actions taken by the company.

The company has carried out standard technical measurements of disturbance levels from immovable sources for the period of Semester 2 of 2021 carried out by a KAN accredited Laboratory (LP-607-IDN) on October 29, 2021 which is contained in the test results document and the RKL-RPL document for Semester 2 of 2021. Tests carried out by the company include odor, vibration, and noise tests in the work area and housing. Based on the results of the verification of the document, it shows that all test results are in accordance with the quality standards set for each applicable law and regulation, including:

- Noise quality standard based on Ministry of Environment Decree No. 48 of 1996
- Vibration quality standard based on Ministry of Environment Decree No. 49 of 1996
- Odor quality standards are based on Ministry of Environment Decree Number 50 of 1996

However, for the results of noise measurements, based on Permenakertrans No. 5 of 2018 the area of the Boiler, Kernel, and Engine Room Stations shows that they are above the required quality standard values and for Thresher and Sterilizer stations are still in accordance with the required quality standards. With these conditions, in order to reduce potential hazards in the form of noise in the workplace and decrease health status (employee hearing), several control actions plan (programs) have been prepared to reduce the impact on the health factors of operators working at the location/station in accordance with the control hierarchy. danger and does not conflict with the basic principles of factory planning, namely economic feasibility factors, ease of tool operation, ease of maintenance factors and safety factors. Efforts that have been made by the company include:

- Replacement of components / redesign of tools / machines so that noise can be reduced, program maintenance of tools / machines periodically so that they are maintained
- Arrangement of working time by means of job rotation so that the amount of noise exposure to workers can be controlled (should not be >8 hours/day for a noise level of 85 dBA).
- Preparation of HIRARC (Hazard Identification Risk Assessment & Risk Control) documents for all activities at the Mill and socializing it to all related employees
- Conduct periodic SOP socialization and training to related operators.
- Installation of a "Noise Zone" warning signboard and mandatory use of PPE.
- Inspection and evaluation of the health of the workforce and the routine work environment at stations with a level of potential noise hazard.

- Inspection / inspection of the use of PPE by safety officers related to the discipline of using PPE and monitoring the condition and number of existing PPE.
- Provide PPE in the form of earplugs and earmuffs as well as perform audiometric health checks for factory employees.

Status: Comply

7.11

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

7.11.1

PT GMP and PT PHP show the SOP for preventing and overcoming land fires in the document Number SOP-EHS-014, Revision 02 which is legalized by the General Estate Manager, effective November 4, 2021. Land clearing procedures are carried out including by:

- Carry out land clearing by not burning but doing work on crushing, felling trees and clearing planting holes.
- It is prohibited to clear land in HCV areas, watersheds or on land with a slope of > 40 % or 25° slope.
- The scope of the SOP includes planning, prevention, suppression, post-fire management and reporting and coordination of work for firefighting and Land Preparation, where the procedure explains that land clearing is carried out by mechanical means and Zero Burning.

In addition, Wilmar International Ltd as the parent of the Wilmar Group Indonesia also has a 2010 environmental policy by the Group Plantation Head which explains that the company will implement Zero Burning in all plantation development activities and waste disposal.

Until field observations were carried out in 2022, the certification unit had carried out replanting activities several times. Based on interviews with management and the Environment Agency, it was also stated that the company is committed not to burning for land clearing. Based on the results of field visits to the GMP and PHP-1 plantations, there were no signs of land clearing or land clearing by burning, all land clearing was carried out mechanically by the company. The results of the field visit to PHP-2 have not had any replanting activities and there are no plans for replanting in the near future.

7.11.2

The company already has procedures related to fire prevention and control that have not changed, which are presented in several documents, as follows:

- Procedure No. SOP-GEN-012 revision 04, dated November 4, 2021 regarding emergency response to building and equipment fires.
- Procedure No. SOP-GEN-014 revision 02, November 4, 2021 regarding prevention and control of land fires.
- Procedure No. SOP-GEN-015 revision 02, November 4, 2021 regarding land and forest fires.
- Procedure No. SOP-GEN-021 revision 04 dated November 4, 2021 regarding light fire extinguishers (APAR).

Based on the document review above, it is known that the fire control techniques owned by the company have referred to the prevailing laws and regulations in Indonesia, including Law no. 18 of 2004, Law no. 32 of 2009, PermenLHK No. 32 of 2016 and Ministry of Agriculture No. 5 of 2018. The fire control and prevention program has been included in the PT GMP and PT PHP OHS programs, for example, including Fire Extinguisher monitoring, monitoring firefighting equipment and fire simulations. The company has also managed and monitored the prevention and control of land and forest fires, including the following:

- Manage and monitor the source of the impact of fires by providing fire alert trenches on plantation land
- Keeping the peat area soft by wetting the area
- Isolate the disposal of former bunches
- Natural dams in each oil palm plantation block are left as they are or are not planted with oil palm
- Establishment of a firefighting team equipped with the necessary equipment
- Provide firefighting equipment such as fire trucks, shovels and other equipment.
- Conducting firefighting drills and increasing the frequency of fire patrols by involving the local community
- Training on Land Fire Fighting Simulation and Fire Extinguisher Simulation for the firefighting team and GMP Estate Employees.

The company can also show a list of facilities and infrastructure owned by referring to the standardization of equipment in Ministry of Agriculture 5 of 2018. The results of field observations at the Firefighter Warehouse show that all facilities and infrastructure are in good and well-maintained condition, firefighting simulation activities are also running well and equipment used to function optimally.

The company already has complete facilities and infrastructure as shown in the document List of Fire Extinguishing Equipment and Other Equipment with the latest update in October 2021. Based on field visits and at the location of the fire tower and reservoir, it shows that the company is managing these facilities and infrastructure well, the results of interviews with several employees also stating that the company has made efforts to prevent and control fires through the installation of signboards, socialization, and fire simulations by the GMP POM firefighting team as well as GMP and PHP Estate.

The company also has a system to detect early fires using hotspot monitoring technology via satellite which is processed on the website (<https://gisportal.wilmarapps.com/portal/apps/opsdashboard>) belonging to the Wilmar International Group and will be immediately informed to each insurer. answer via Telegram communication media. The response made by the company is then updated into Telegram to ensure that the information provided by the head office has been responded to, and if it is not responded to immediately and/or there is no indication that the hotspot has been turned off, sanctions will be imposed on the company concerned. The results of the verification of the fire handling documents and the application obtained information that there has never been a forest and land fire incident for the 2020-2021 period. However, the company continues to handle forest and land fires that occur outside the company's management area. This is due to the occurrence of fires in community-owned fields due to the burning of crop residues. The company takes action because it is contained in the SOP which states that fire management is carried out for a radius of 5 Km from the company boundary.

7.11.3

The company showed the Minutes of the training and simulation of forest and land fires, the training was attended by representatives from the assisted villages, cooperatives, estate and POM. The company has also demonstrated a shared commitment between GMP and the surrounding village community regarding fire prevention and control. commitment content:

- Cooperating in the prevention and control of forest and land fires in the area around the village area
- Protect each other's land from the possibility of fire
- Do not clear land by burning
- Assist each other in preventing and controlling forest and land fires.

The company also has a firefighting team at each estate and a POM owned by 15 administrators and 30 members. The cooperative also has its own firefighting team consisting of 5 people and will coordinate with the company in the event of a fire. In fire management, the company monitors hotspots with a radius of 5 Km from the company area so that they can cover the surrounding villages, this is shown from the report on the fire on August 6, 2021 which was found in Sasak Village, based on the report stating that There were no fire incidents, the identification of the hotspot was caused by the community burning corn agricultural waste. The company then provides assistance and socialization in the prohibition of land burning activities to minimize the risk of greater fires.

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

The company has sent the Liability Disclosure and LUCA of PT GMP to the RSPO and can show approval for PT GMP's Disclosure Liability which has been reviewed by RSPO with a statement of zero liability.

7.12.2

The first land clearing was carried out in 1995 to 1999 for the scope of PT GMP and from 1996 to 1999 for the scope of PT PHP. Based on the land clearing data and there is no indication of new land clearing after 15 November 2018, the company has no obligation to conduct a High Carbon Stock (HCS) study. The area to be managed has been assessed for HCV on September 25 – October 4, 2012 with Final documents in 2012. The HCV assessment was carried out by AKSENTA using the 2008 HCV toolkit. The HCV area identification activity was divided into 2 stages, namely for the scope of PT GMP and PT PHP. The HCV assessment was carried out in a participatory way through participatory mapping and public consultation which was conducted on 4 October 2012 and was attended by 47 people (including representatives of affected parties from Jorong Sikilang Village, Jorong Maligi, Jorong Padang Halaban, Jorong Kaar Selatan, Jorong Tanjung Pangka. and representatives of *Ninik Mamak*. The HCV identification assessment was carried out for the scope of the PT GMP Unit, namely the nucleus with an area of 6,000 Ha and PHP 3,800 Ha. The following is the data from the 2012 HCV assessment, including:

Description Area

HCV Area (Ha)

	GMP	PHP	Lokasi
River Border	-	1,92	Own Estate
Freshwater swamp forest	54,63	-	Own Estate
Former old village	7,5	-	Plasma
Old cemetery complex	2,4	-	Plasma
Siganggan river border	6,7	-	Plasma
slippery water river	9,8	-	Plasma
Catchment area	33,5	-	Plasma
TOTAL	114,53	1,92	

The entire HCV area of PT GMP is divided into two types of management, namely the own Estate conservation area with a total area of 54.63 Ha and the plasma area with a total area of 59.9 Ha. Meanwhile, the area data included in the scope of the audit is only a conservation area located in the Own Estate area, because the plasma area is no longer under company management because currently plasma is independent and manages its own area. The HCV area based on the basic info is 56.04 Ha due to an additional 1.40 Ha HCV area on the Pasaman River Border based on the results of the company's internal HCV management study. Meanwhile, the entire HCV area owned by PT PHP which is 1.92 Ha is only located in PHP-2, while for the PHP-1 area there is no HCV area. Based on this data, the area of the certification unit's HCV management area is 57.96 Ha.

Based on the data above, there is an increase in the area of the HCV area from the results of the initial study in 2012 for the Own Estate area. The HCV area in Plasma is not included in the HCV area in the data area statement because it has been managed independently. Changes in the HCV area from the previous identification results are due to the character of the Pasaman River which always changes in the event of a flood, this is evidenced from the results of the map analysis from 2010 to 2016 and its comparison with the results of the 2021 field visit where there is an expansion of the river so that the border area is included in the management area. company. This character is common in large rivers on the island of Sumatra because of the high level of erosion and high-water levels that rise during floods.

7.12.3

Indicator 7.12.3. currently irrelevant to Indonesia, until further decisions from the RSPO.

7.12.4

Based on the results of HCV identification, it is known that there is an HCV area within the company's Manage area of **57,96 Ha** with several types of RTE species consisting of *mammals*, *aves* and *reptiles*. The company has compiled and determined the HCV management plan in the 2021 and 2022 HCV Management Program Matrix document with the scope of Management for each Unit. The integrated management plan was developed in consultation with relevant stakeholders and covers the areas that are directly managed and takes into account the relevant wider landscape level carried out in conjunction with the Realization and Review of PT GMP HCV Management Plant Document for each Unit. The HCV still maintained and cared for by the company by providing boundary stack, signboards and provide a border marking the boundaries of the HCV area in the form of a ditch that surrounds the entire HCV peat area. A management and monitoring plan is implemented for each type of HCV with the following programs:

- Monitoring of areas that have been designated as HCV areas, river borders and swamp forests on a regular basis to see threats
- Conducting socialization to all employees and the surrounding community, as well as inviting the community to conduct participatory monitoring of HCV areas
- Conduct rapid surveys for flora and fauna inventory
- Making, installing and maintaining boundary markers in the form of stakes or yellow paint as well as adding or replacing damaged stakes
- Carry out monitoring and maintenance of information boards
- Periodic checks or riparian monitoring for signs of damage
- Plant enrichment in riparian areas with local plant species
- Drilling wells in the peat HCV area
- Making transects for observing animals and installing camera traps
- Creating and developing forest plant nurseries
- Identify and establish communication with communities who are already working on HCV areas.

To protect the existence of RTE species, the company also has a policy contained in the SOP for the protection of endangered species with document No. SOP-GEN-019 revision 02, effective date September 1, 2021. The purpose of the SOP is to minimize threats to endangered species in all areas of the company. The procedure also explains that it is not allowed to capture, maintain or kill animals, whether protected by state regulations or those that are not protected without the company's permission. In addition, it is not allowed to trade these animals.

The implementation of HCV management and monitoring for 2021 is carried out in accordance with the 2021 HCV management plan where the implementation time and intensity are also appropriate, which can be shown based on the following documents:

- Carry out plant care in riparian areas, during 2020 it was found out that 100 plants had been planted, consisting of *Bayur*, *Mahogany*, *bamboo* and vetiver grass and for 2021, the company will focus on taking care of the plant.
- Outreach has been carried out to the public or company employees, such as the socialization on June 2, 2021 to PHP-2 employees attended by 116 participants, and January 15, 2021 to community around PHP-2 attended by 19 employees.
- As well as outreach to the community which was held on March 10, 2021 to the community around GMP which was attended by 14 participants.
- Socialization to harvest and maintenance officers on October 10, 2021 which was carried out in the field in front of the GMP with a total of 23 participants.
- Socialization to contractors on April 27, 2021 at the GMP POM office with 5 participants.
- Indirect socialization by installing information boards and brochures warning signs related to conservation areas and the existence of endangered plants and animals that are protected in places that are easily visible, such as Estate entrances, Estate roads that are often crossed by the community, and other strategic places. For example, evidence of the installation of warning signs for the presence of crocodiles in the HCV area of the Pasaman River border, GMP, on April 24, 2021.
- Rapid Survey of Flora and Fauna conducted in July - December 2021.

PT GMP and PHP already has a Protected Area Map of protected areas GMP and PHP with scale 1:35,000; There is information about: map title, cardinal directions, map legend, map date October 1 2018, and map source. The area of the protected area consists of Riparian and wetland area.

The company has conducted a review related to management and monitoring activities in 2021 which is contained in the report on the implementation of management and monitoring of high conservation value herds in 2020 which contains evaluation and recommendations for management and monitoring as an improvement effort. Based on the results of the field visit to HCV Area in GMP and PHP-2 Estate, it can be seen that the management has been carried out by the company in the HCV area, such as installing signboards in all HCV areas visited, marking the boundaries of chemical application areas with yellow paint and planting local plants in river border areas. Interviews with management, workers and surrounding communities also stated that they knew the location of the HCV and the regulations that had to be complied with. Regarding conflicts with animals in the company area, the interview results stated that there had never been a conflict with animals in the last 5 years, although the river area in HCV was informed that there were crocodiles (*Crocodylus porosus*), but because the condition of the condition of the river which is quite large and not used for community activities, there is never a conflict with the crocodile.

7.12.5

The company has identified the needs of the community as well as the areas needed by the affected community to meet their basic needs, taking into account the potential positive and negative changes in their livelihoods as a result of the company's operational activities. This can be proven by the existence of mediation between the company and the community around PHP-1 in providing an area for herding cows, because some people who live around the company's area have cattle with a cattle system without drums. This condition has been managed optimally by the company which can be proven from the 2021 Social Impact Assessment report document where the company has identified all management components and carried out activities to minimize risks and impacts.

The unit of certification has also considered various management and tenure options to protect HCV management areas in a way that also protects the rights and livelihoods of local communities. Because the area managed by the company has entirely become oil palm plantations by both the company and the local community, and there is no HCV area directly adjacent to the settlement, the level of conflict between the HCV area and the community is very low.

The results of the field visit to the HCV area managed by the company, it was found that there were no HCV 5 and 6 areas where the rights to culture and important places for the surrounding community were not identified in the company area. The company's environmental conditions both within the scope and in the community, area is almost entirely planted areas of oil palm. The company

also has a joint agreement with the surrounding community, for example for monitoring and patrol activities, the company has made an agreement with the community who has activities in the company's area not to hunt and trade wild animals. This is evidenced by the minutes of the agreement on the supervision and maintenance of protected areas and animal habitats in the PT GMP HCV area on January 10, 2021 for residents around the company.

7.12.6

The Certification Unit already has a policy contained in the SOP for the protection of endangered species with document No. SOP-EHS-030 revision 01, effective date November 4, 2021. The document contains procedures consisting of preventive and repressive measures in the effort to protect protected wild animals and plants such as sustainability principle, all employees are advised not to hunt, capture, kill and sell endangered protected animals and plants and report any such activities. Maintain and not disturb the area designated as HCV area and report any illegal acts. Employees who do not comply will be subject to sanctions in accordance with applicable laws and regulations. The company also installs no hunting signboards with photos of species and sanctions for violating government regulations in all HCV areas.

Based on the 2012 PT GMP and PT PHP Protected Area Identification Report document by an external consultant, namely AKSENTA, 63 species of herpetofaunas, 107 species of birds, and 37 species of mammals. Of the total 207 fauna species, there are several protected species in the company area, including (*Crocodylus porosus*) Saltwater crocodile, (*Elanus caeruleus*) Rat eagle, (*Haliastur indus*) Bondol eagle, (*Ichthyophaga humilis*) Small fish eagle, (*Nisaetus cirrhatus*) Dark-phase brontok eagle, (*Rhipidura javanica*) Striped Kipasan, (*Spilornis cheela*) Bido snake-eagle, (*Prionailurus bengalensis*) Kuwuk cat/ Jungle cat, and (*Trachypithecus cristatus*) Cingkuak/lutuang, (*Alcedo euryzona*) Blue-necked king prawn, (*Anthracoseros albirosis*) White-bellied kakareng, (*Haliastur indus*) Bondol eagle, (*Ichthyophaga humilis*) Small fish eagle, (*Prionailurus bengalensis*) Kuwuk cat, and (*Tomistoma schlegelii*) Sinyulong which uses protection based on Government Regulation Number 7 of 1999.

The company also shows the results of HCV monitoring carried out in 2021, based on data from routine monitoring using animal encounters in the field and information on the existence of protected and endangered species that can still be found in the plantation area. The results of observations of fauna in the plantation area still found protected animals such as *Crocodylus porosus* and *Trachypithecus cristatus* as well as several other species that are included in the protection status according to the Minister of Environment and Forestry Regulation Number 106 of 2018.

The company has also carried out socialization of the existence of endangered plants and animals to all employees and the surrounding community, which is shown in the minutes of socialization document that already explain in indicator 7.12.4. All activities can prove with photos and the attendance list that attached to the document. Indirect socialization is also carried out by installing information boards and brochures warning signs related to conservation areas and the existence of endangered plants and animals that are protected in easily visible places, such as Estate entrances, Estate roads that are often crossed by the community, and other strategic places like office, and other public facilities.

Based on the results of interviews with management units and company employees regarding animal protection, the company has committed to protecting animals that are within the scope of corporate governance, such as implementing a ban on hunting, killing and maintaining wild animals in the company's environment. The procedures for animal protection also regulate the existence of sanctions or penalties for violating the provisions.

7.12.7

Monitoring of protected areas in 2020 and 2021 is carried out periodically every week to ensure the security of the area. The monitoring activities were carried out at several river border locations. This monitoring is carried out to see the progress of the results of HCV management from the initial stage to the current conditions. The results of field visits to several conservation areas show that the company has carried out management of protected areas such as replanting local species, not logging, not using chemicals, and installing Protected Area signs and prohibiting hunting. Avoid and prevent illegal hunting and/or encroachment of HCV areas that have been determined by PT. GMP and PT PHP, several warning boards have been installed regarding the prohibition of poaching and encroachment. Routine monitoring of HCV areas is carried out by several personnel appointed by the company. The results of field observations also indicate that there are signs that prohibit hunting of protected animals, burning, and marking the boundaries of conservation areas.

The company also conducts annual monitoring and evaluation for the management of HCV areas where these activities are aimed at

identifying risks and impacts on conservation areas and enhancing protection efforts. The company also carries out an HCV area management plan which is made every 2 years which is carried out in conjunction with the SIA program preparation activities by involving all relevant stakeholders in the company's operational areas. In its evaluation activities, the company also involves local communities, especially landlords and law enforcement. Several activities are proposed based on the results of the 2021 evaluation conducted in 10 January 2021, including:

- Monitoring the presence of key animal species in their distribution locations
- Monitoring habitat conditions and threats/ disturbances
- Identify and map areas prone to hunting and logging activities
- Monitor the condition of the reflux and the threat/disruption
- Monitoring river water quality with integrated activities
- Monitor the effectiveness of controlling the use of agrochemicals
- Monitoring cases of fire incidents and the area of burned land
- Monitor the condition of the signs, the accuracy of their placement, and the level of understanding of employees and the public about the information contained therein
- Carry out maintenance and planting of forestry plants in river border areas
- Perform boundary sign maintenance, signboard and borehole maintenance.

All the evaluation results will be reviewed and will be adjusted to the HCV management program in the 2022 period. the evaluation results also show that there is an increase in the results of the management of the HCV area where for areas that have previously been planted with oil palm, then restoration is carried out with forestry plants, currently the condition of the plant already has a diameter of 20 cm and is well maintained, therefore there is an increase in the HCV area from the previous surveillance because the area that was previously classified as a well-known oil palm area is now classified as a forested HCV area.

7.12.8

The Certificate Holder (PT GMP) has performed the HCV identification on 2012 by RSPO Approved HCV Assessor. Management unit has shown confirmation from RSPO related status of the Certificate Holder liability. Explanation from RSPO Secretariat that PT. GMP has submit Disclosure of Liability with status of Zero Liability and has been approved from RSPO with zero liability status.

Based on the verification of the planting year and other document, the company does not have any compensation obligation because apart from having conducted an HCV assessment in 2012, all areas included in the scope of certification also had no plantings above 2005 which were carried out prior to the HCV assessment.

Status: Comply	
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3.2 Conformity Checklist of Certificate and Trademark Use

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

3.3 Summary of RSPO Partial Certification.

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

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

MUTU has verified partial certification for un-certified unit's subsidiary of Wilmar International Ltd based on their Time Bound Plan. There are seven (7) uncertified mills and twenty (20) uncertified estates and fourteen (14) uncertified smallholders of Wilmar International Ltd. MUTU Auditor verified positive assurance against the company internal audit and supporting evidence as well as any information from others sources.

MUTU Auditor has verified company partial certification and concludes that:

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

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
2.1.1	Did the company conduct an internal audit? If so, has a positive assurance statement been produced?	<p>Yes, and positive assurance is produced for these units.</p> <p>Auditor verification Internal audit has conducted, for example:</p> <ul style="list-style-type: none"> - PT Sarana Titian Permata on January 2021 - PT Agronusa Investama on February 2021 - Treboun Adum smallholder on July 2021 <p>There is some non-conformance find in internal audit and the company has produced the positive assurance for these units.</p>
2.1.2	<p>No replacement after dates defined in Nis Criterion 7.3 of:</p> <ul style="list-style-type: none"> • Primary forest. • Any area identified as containing High Conservation Values (HCVs). • Any area required to maintain or enhance HCVs in accordance with RSPO criterion 7.3. 	<p>There is no replacement of primary forest since November 2005. Uncertified management units has conducted HCV assessment such as :</p> <ul style="list-style-type: none"> • PT Sarana Titian Permata in June 2008, • 4 unit scheme smallholders under PT Kerry Sawit Indonesia in year 2008, • PT Agronusa Investama - Sambas and their scheme smallholders in year 2011, • PT Agronusa Investama - Landak/Pahauman in year 2011 (re-assessment in year 2014), • PT Buluh Cawang Plantation-West Kalimantan in year 2016, • PT Agro Palindo Sakti 2 in July 2009, • PT Indoresin Putra Mandiri in March 2009, • PT Daya Landak Plantation in July 2009, • PT Putra Indotropical in November 2008, • PT Putra Procentindo in December 2008, • PT Permata Hijau Plantation (block 22) in year 2012, • PT Kencana Sawit Indonesia in year 2010,

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<ul style="list-style-type: none"> • PT Murini Samsam in year 2014, • PT Musi Banyuasin Indah in year 2013, • PT Sinarsiak Dianpermai in year 2014, • PT Agro Indah Persada in year 2011 and • Biase Plantation Limited in year 2011 & September 2014 (Calaro extension) <p>Some management units has carried out land clearing activities since November 2005 without preceded by HCV identification/assessment. Based on RaCP tracker (per November 2019) in RSPO website and the result of correspondence with RSPO compensation panel that the management units under Wilmar International Limited have :</p> <ul style="list-style-type: none"> • 24 management units with potential liability consist of 11 uncertified management units (2 uncertified management units still processing recertificatio) and 13 certified management units • RSPO member has submitted LUCA amount of 24 Management Units • LUCA of 20 management units has passed and 4 management units has reviewed and requiring clarification from RSPO member. • The 11 of 20 Management Units need/required Concept Note (CN). There are the 3 additional Management Units need Concept Note if compared with information of RaCP tracker per January 2019 (8 Management Units need Concept Note (3 uncertified management unit and 5 certified management unit)). Auditor has carried out clarification to the RSPO members and the RSPO secretariat. RSPO member do not know the name of the 3 additional management units because LUCA has been reviewed by RSPO but it is yet incomplete. Whereas, the result of clarification with the RSPO Secretariat that the compensation team is still updating the database so that the addition can occur due to duplicate. RSPO Secretariat will be informing to auditor again after updating finish. • 1 Management Units has submitted Concept Note (CN). Based on information from RSPO member that they has submitted Concept Note amount of 2 Management Units but the last of submit is January 2020 so that it not covered on RaCP tracker per November 2019. <p>Following up one of resolution from 35th BHCVWG meeting year 2017 are pushing certified management unit to submit annex 7 & 8 (compensation concept note & compensation plan) to RSPO compensation panel in annual surveillance audit by each certification body according time frame which has decided in meeting. The progress of the concept note approval can be saw in indicator of 7.12</p> <p>Information of LUCA for some uncertified management units as follow as :</p> <ol style="list-style-type: none"> 1. PT Agronusa Investama (Landak/Pahauman) : LUCA and disclosure of non-compliant land clearing was available and it

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<p>has submit to RSPO secretariat year 2015 and LUCA has passed with the result of liability assessment is presence liability (per 27 February 2017 and total of liability areas is 53.50 ha). The concept note has developing by internal team so it has not been submitted to RSPO secretariat.</p> <p>2. PT Buluh Cawang Plantation in West Kalimantan : LUCA and disclosure of non-compliant land clearing was available and it has submit to RSPO secretariat year 2015 and LUCA has passed with the result of liability assessment is presence liability (per 13 March 2017 and total of liability areas is 46.62 ha). The concept note has been developing by internal team so that it has not been submitted to RSPO secretariat.</p> <p>3. PT Agro Palindo Sakti 2 : LUCA and disclosure of non-compliant land clearing was available and it has submit to RSPO secretariat year 2016 and LUCA has passed with the result of liability assessment is zero conservation liability.</p> <p>4. PT Indonesia Putra Mandiri & PT Daya Landak Plantation : LUCA and disclosure of non-compliant land clearing was available and it has submit to RSPO secretariat year 2015 and LUCA has passed with the result of liability assessment is zero conservation liability.</p> <p>5. PT Putra Indotropical & PT Pratama Procentindo : LUCA and disclosure of non-compliant land clearing was available and it has submit to RSPO secretariat year 2015 and LUCA has passed (date on 13 March 2017) with the result of liability assessment is zero conservation liability.</p> <p>6. PT Sarana Titian Permata : LUCA and disclosure of non-compliant land clearing was available and LUCA has passed with the result of liability assessment is zero conservation liability.</p> <p>7. Based on the result of communication with RSPO that LUCA on behalf remaining uncertified management units has submitted and passed with the result of liability assessment is zero liability (2 uncertified management units) so not concept note required and presence liability (1 uncertified management unit) so concept note required. It has submitted concept note before November 2019.</p> <p>8. PT Musi Banyuasin Indah, PT Sinarsiak Dianpermai, PT Murini Samsam (466 ha) & PT Permata Hijau Plantation (block 22) : There are no planting after 1 November 2005 so RaCP status is not applicable.</p> <p>Auditor verification Auditor has verified the supporting evidence of above the company statement. The above statement in accordance with the supporting evidence provided.</p>
2.1.3	Any new plantings since January 1 st 2010 must comply with the RSPO New Plantings Procedure.	There are some newly developed plantation areas under Wilmar International and have undergone the New Planting Procedure (NPP). It has announced on RSPO website during 30 days with complete status such as in Jambi Province (PT Agrindo Indah Persada 2) & West Kalimantan Province (PT Agro Nusa Investama

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<p>(Sambas)) - Indonesia and Nigeria (Biase Plantation Limited & Biase Plantation Limited (Calaro extension).</p> <p>Benso Oil Palm Plantation has proposed new planting smallholder oil palm project on 1,477 Ha communal farmland located in Treboun in the Mphohor District of The Western Region of Ghana.</p> <p>Auditor verification Auditor has verified the supporting evidence of above the company statement. The above statement in accordance with the supporting evidence provided.</p>
2.1.4	Any Land conflicts are being resolved through a mutually agreed process, e.g. RSPO Grievance procedure or Dispute Settlement Facility, in accordance with RSPO criteria 6.4, 7.5 and 7.6.	<p>Uncertified management unit have technical procedure/guidance for land acquisition (SOP 001/WIP-KB/(0)/0610) and procedure of calculation & compensation payments (SOP 01/WIP-KB/(1)/1215). The records and documents of land compensation was available such as list of recapitulation of land compensation/acquisition, minute of measurement and their maps, profile/identity of land ownership and minute of agreement/negotiation between company and land ownership regarding handover/release of land. Based on self-assessment report that some uncertified management units (PT Daya Landak Plantation, PT Agronusa Investama – Pahuman, PT Putra Indotropical, PT Pratama Prosentindo, PT Agrindo Indah Persada 2 & PT Sarana Titian Permata – POM 2) has carried out some activities in order land acquisition process such as socialization to stakeholder and land owner, verification of land owner identity, measuring land/area in field together land owner, negotiating and agreeing on the price of land compensation and their plants, paying land compensation appropriate with the result of agreeing together.</p> <p>Community who loses access and land right for plantation areas has given the opportunity to benefit (direct and indirect) from plantation development as sample in form of scheme smallholder areas, as employee, as contractor (transportation, supplier for daily food, etc), as FFB supplier, using infrastructure/road as access from village to town or vice versa, as trader while employee has got wage, etc.</p> <p>Refer to case tracker or status of complaints under Wilmar International Limited period of February 2011 to conducting audit that the object of complaint has dominated by certified management unit and the majority of cases has closed. There are 2 case of complaints still in investigation process (PT Permata Hijau Pasaman and PT AMP Plantation). Further details on this case are available here: http://www.rspo.org/members/complaints/status-of-complaints/view/26</p> <p>Based on self assessment that no land conflict in the location of uncertified management units</p> <p>Auditor verification There is no information from public source and RSPO website on any land conflict for uncertified unit of the group subsidiaries.</p>

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		Based on the company record there is documentation on land compensation recapitulation updated on 1 October 2007, participatory mapping, agreement letter on compensation between company and land owner, land owner identity and procedure on compensation technical guidance SOP 001/WIP-KB/(0)/0610 dated June 2010.
2.1.5	Any Labour disputes are being resolved through a mutually agreed process, in accordance with RSPO criterion 6.3.	<p>There is a grievance and complaint form/procedure used by the company to collect and collate all complaints from communities and employee as sample in Indonesian is SOP 004/WIP-KB/(0)/0610, SOP 003/WIP-KB/(1)/0911, PRO-PGA-001 and Whistleblowing Policy (effective date on 5 August 2015). Procedure of grievance & complaint from employee has not been dissemination to employee in PT ANI-Pahuman, Cooperative of Tuah Jubata (scheme smallholder), PT Daya Landak Plantation, PT Indoresins Putra Mandiri & PT Putra Indotropical. It will be doing by auditee based on correction action plan.</p> <p>Based on self-assessment that uncertified management units have provided documentation of both the process which a dispute was resolved and the outcome and log book about handling grievance & complaint from internal (employee) & external. Based on log book that there are grievance & complaint from employee but there is no identified labor disputes ongoing at subsidiary companies of Wilmar International Limited.</p> <p>Auditor verification There is no information from public source and RSPO website on any labour conflict for uncertified unit of the group subsidiaries.</p> <p>The company has mechanism to handle employee complaint and grievance that is stated in SOP 005/WIP-KB/(0)/0610 for communication and consultation with community and SOP 004/WIP-KB/(0)/0610 on complaint and grivance mechanism and solving any dispute out off court.</p> <p>There is no list of employee and stakeholder complaint and grievance.</p>
2.1.6	Any Legal non-compliance is being resolved in accordance with the legal requirements, with reference to RSPO criteria 2.1 and 2.2.	<p>Uncertified management units have the list of laws & regulations or law register relate of plantation, environment, man power and OSH issue. The result of evaluation law and regulation with implementation by company.</p> <p>The evidence of compliance to laws and regulations such as land use right or land title (except uncertified management units as below), location permit for the location of uncertified management units in Indonesia, environment document has approved by local government (especially in Indonesia), minimum wage, minimum age as employee, etc. Whereas, Eyop Industries Limited and Biase Plantation Limited have deed grant, Deed of conveyance, Certificate of Occupancy and MoU with communities.</p>

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<p>Based on self-assessment report that there are not changing significantly if compare with previous condition i.e some of Wilmar's uncertified management units have not complied with certain legal requirements, i.e. :</p> <ul style="list-style-type: none"> Land use right (HGU) : PT Sarana Titian Permai (1 & 2), PT Agro Nusa Investama (Landak/Pahauman), PT Sinarsiak Dianpermai, PT Permata Hijau Pasaman (block 22), PT Murini Samsam (466 ha), PT Pratama Prosentido, PT Putra Indotropical, PT Indoresin Putra Mandiri, PT Buluh Cawang Plantation in West Kalimantan, PT Agroindo Indah Persada 2, and PT Daya Landak Plantation, where the land use right (HGU) are still under process. At time of this audit, the company was still making efforts to close these legal non-compliances. Forest areas release permit : part of PT Musi Banyuasin Indah areas and two estates under Eyop Industries Limited <p>Uncertified management units has carried out monitor of pillar boundary regularly except PT Agroindo Indah Persada 2 because has not been carried out cadastral measurement.</p> <p>Auditor verification</p> <p>PT Agroindo Indah Perkasa 2</p> <ul style="list-style-type: none"> There is HGU on propose. <p>PT. Buluh Cawang Plantation</p> <ul style="list-style-type: none"> HGU on process <p>PT Agronusa Investama Pahauman</p> <ul style="list-style-type: none"> The continues changing on PIPB map. In accordance to PIPB 10 there is no area of the company (based on location permit) that is in the moratorium area. When PIPB 11 released, some area of the company is in the updated peat moratorium map. <p>PT Agro Palindo Sakti 2</p> <ul style="list-style-type: none"> There is an obstacle on processing HGU is before continuing the HGU process, the company has to complete the requirement for 20% area allocation for smallholder. Based on Bupati Sanggau Decree No. 137 year 2011 dated 25 March 2011 for 623 ha of smallholder scheme for 2 koperasi of Batu Ceramin and and Maju Bersama. Later, koperasi Maju Bersama split into Koperasi Maju Bersama and Koperasi Harapan Baru. And Koperasi Harapan Baru wants to take about 136 ha within company proposed HGU area. The company needs to resolve this issue first before be able to continue HGU process. <p>PT Musi Banyuasin Indah</p> <ul style="list-style-type: none"> Overlay the map of land use with attachments Ministerial Decree No. SK.822/Menhut-II/2013 PT MBI entered in production forest area.

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<ul style="list-style-type: none"> - Planting outside HGU Kebun Sei Selabu (block 010, 024 and 027). - Explanation management unit following the legal department still perform continuous coordination with the government while waiting for a change of government decisions regarding the status of the area. <p>PT Sinarsiak Dianpermai</p> <ul style="list-style-type: none"> - HGU 1,002 Ha on process - Status of Other Use Areas based on Appendix SK 878 / Menhut-II / 2014 dated September 29, 2014 and letter no. S.160 / BPKH.XIX-3/2016 dated March 31, 2016 <p>Explanation management unit as follows:</p> <ul style="list-style-type: none"> - Disagreement between the ministry of forestry by the Riau provincial government on the status of land PT SSDP (between the status of forest and APL), which led to the process of making the concession inhibited. - There are some estate areas around the Mill that does not have permission locations. The process of acquiring a location permit was hampered due to the reasons in point 1 as well. - The legal department is still doing continuous coordination with the government while waiting for a change of government decisions. <p>Based on website date on 13 & 21 June 2019 and 27 July 2019 that PT Putra Indotropical, PT Indoresin Putra Mandiri and PT Pratama Prosentindo have not been land use right (Hak Guna Usaha). The result of clarification from auditee that they are still in the process of completing the requirements in other ministries. This is one of requirements to apply for land use right at National Land Agency.</p>

3.4 Identification of Findings, Corrective Action, Observations, Opportunity for Improvement and Noteworthy Positive Components.

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

NCR No.	: 2020.01	Issued by	: Hasiholan Sihombing
Date Issued	: 6 March 2020	Time Limit	: ASA-1.2
NC Grade	: Non Critical	Date of Closing	: 26 March 2021
Standard Ref. & Requirement	6.7.2 Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in the appropriate language of the workforce. Assigned operatives trained in first aid are present in both field and other operations, and first aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed		
Evidence observed (filled by auditor): Based on field observations and document reviews, the following evidence was found: <ul style="list-style-type: none"> - The results of visits to 3 locations in GMP Estate (temporary storage of hazardous and toxic waste, fuel station and chemical warehouse) as well as at 1 location in GMP POM (first aid room), it was found that one of the contents of the first aid box namely Povidone Iodine had expired in February 2020. - The results of a visit to the GMP Estate Workshop, Povidone Iodine not found in the first aid box. - First aid training documentation was shown to first aid officers of PT GMP on 26 October 2019 where it was explained that the contents of first aid boxes were 21 items and conduct monitoring the contents of first aid boxes every month. 			
Non-Conformance Description (filled by auditor): Based on this evidence, the monitoring of the contents of the first aid kit and its validity period has not effective.			
Root Cause Analysis (filled by organization audited): Monitoring of first aid box by person in charge limit for completeness only.			
Correction (filled by organization audited): Replacing the expired of Povidone Iodine			
Corrective Action (filled by organization audited): 1. Improve the monitoring of first aid kit 2. Replacing the expired kit 3. Ensure the monitoring on schedule			
Assessor Evaluation and Conclusion (filled by auditor): Verification 26 March 2021 The unit of certification shows evidence of improvement in the form of: <ol style="list-style-type: none"> 1. Re-socialization of First Aid including job descriptions of those in charge of First Aid officers which was held on June 10, 2020. The meeting was attended by a total of 22 participants including the person in charge of First Aid. 2. Example of first aid monitoring in April in which the inspection form has added observations on the expiration period of the contents of the first aid box/first aid bag 			

3. Minutes of completing the contents of the first aid kit and replacement of Povion Iodine expired on 04 March 2020
4. Confirmation and explanation that the person in charge of monitoring first aid every month is a clinical nurse.

Based on root cause analysis, corrections, and corrective actions, as well as evidence of improvements submitted. The non-conformance is declared fulfilled. Consistency and implementation of the determined plan will be re-verified during the activity onsite audit carried out.

Verified by : **Haikal Ramadhan Kharismansyah**

NCR No.	:	2020.02	Issued by	:	Leonada
Date Issued	:	6 March 2020	Time Limit	:	ASA-1.2
NC Grade	:	Non Critical	Date of Closing	:	26 March 2021
Standard Ref. & Requirement	:	7.8.1 A water management plan is in place and implemented to promote more efficient use and continued availability of water sources and to avoid negative impacts on other users in the catchment. The plan addresses the following: a) The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities b) Workers have adequate access to clean water			
Evidence observed (filled by auditor): The company has a SOP for River-Riparian Belt Management with Document Number SOP-EHS-018, which explains that spraying is not carried out in river border areas and does not spray for the manufacture of harvest roads, harvest roads are made manually. River border area is given a sign or symbol that is attached to mark the river border area in the form of a live plant peg with yellow paint, with a distance of 5 palm oil from the river's edge. Based on a field visit to Batang Alin Block 023 PHP 2 Estate, it was found that the river border area has been given a yellow paint marker on the palm oil base, but in the river border area there are traces of chemical use. Non-Conformance Description (filled by auditor): Based on that, the company has not implemented management of river banks in accordance with the procedures.					
Root Cause Analysis (filled by organization audited): <ul style="list-style-type: none">Socialization of chemical procedure on riparian are not optimizedThe sign of bufferzone (yellowline) was faded					
Correction (filled by organization audited): <ul style="list-style-type: none">Registering area that have been spray and the sign of bufferzoneImprove the socialization of chemical procedure and bufferzone					
Corrective Action (filled by organization audited): <ul style="list-style-type: none">Socializing the procedure to the person in charge phaselyImprove the supervisingDiscipline to the workersRemarking the sign of bufferzonePlanting a bamboo on HCV area					
Assessor Evaluation and Conclusion (filled by auditor):					
Auditor Verification dated 26 March 2021:					

The company has shown some evidence of improvement including:

1. The company has shown evidence of improvement in the form of an official report on the repetition of delineation using yellow paint on palm oil stems around the HCV PHP II area in blocks 5 and 23 on March 13, 2020, with a total of 110 palms given yellow paint. The minutes have been accompanied by photos of painting activities.
2. The company has shown an official report on planting bamboo around the HCV PHP II area, with 20 clumps in block 23 and 15 clumps in block 5 on 17 April 2020, 25 clumps planted on 16 September 2020 and 50 bayur trees planted in block 23 and 50 stems in block 5 on October 21, 2020. Minute of meeting has been accompanied by photos of planting activities in the field.
3. The company has shown proof of socialization (refreshment) of the HCV Area and its management to staff and employees including spray workers on August 27, 2020, in the socialization it was conveyed that spraying was not allowed in the riverbank area and if there were weeds on the riverbank then control was carried out. with a weeping system.

Auditor's conclusion:

From the evidence of repairs sent, the Company has made quick fixes (corrections), root cause analysis and corrective action on the root of the problem so that the same problem does not have the potential to recur. Non-conformities are declared met. The consistency and implementation of the stated plans will be re-verified when the onsite audit activities are carried out.

Verified by	:	Sansan Suhendar
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3.4.2. Identification of Findings, Corrective Actions and Observations at ASA 1.2 Assessment (Remote Audit)

NCR No. :		Issued by :	
Date Issued :		Time Limit :	
NC Grade :		Date of Closing :	
Standard Ref. & Requirement :			
Evidence observed (filled by auditor): Non-Conformance Description (filled by auditor): There is no NC during the remote audit ASA-1.2 Remote Audit			
Root Cause Analysis (filled by organization audited):			
Correction (filled by organization audited):			
Corrective Action (filled by organization audited):			
Assessor Evaluation and Conclusion (filled by auditor):			
Verified by :			

3.4.3. Identification of Findings, Corrective Actions and Observations at ASA-1.2 & ASA-1.3 Assessment (Onsite Audit)

NCR No.	:		Issued by	:	
Date Issued	:		Time Limit	:	
NC Grade	:		Date of Closing	:	
Standard Ref. & Requirement	:				
Evidence observed (filled by auditor): Non-Conformance Description (filled by auditor): There is no NC during the audit					
Root Cause Analysis (filled by organization audited):					
Correction (filled by organization audited):					
Corrective Action (filled by organization audited):					
Assessor Evaluation and Conclusion (filled by auditor):					
Verified by	:				

3.4.4. Opportunity for Improvement

No	Ref. Std.	Description
1	7.3.1	<p>There is a waste management plan that is documented and implemented in accordance with applicable laws and regulations, including reduction, recycling, reuse, and disposal, based on the characteristics of toxicity (toxicity) and other hazards.</p> <p>The company already has a hazardous and toxic waste SOP with the number PRO-EHS-006 and a hazardous and toxic waste identification list. However, the results of field observations show that there is several used packaging of hazardous and toxic waste both in the Estate and in the POM that are not located in the dangerous and toxic warehouse. The company can show corrective action by placing all of the hazardous and toxic waste into the warehouse and showing evidence of socialization activities to the owner of the waste. Based on this, the company has improvement opportunities to ensure that the implementation of hazardous and toxic waste management can be carried out consistently in accordance with the procedures they have.</p>
2	4.8.4	Ensuring the progress of solving land problems

3.4.5. Noteworthy Positive Components

No	Description
1	The company's commitment to implementing a sustainable palm oil management system.
2	Have BLUE PROPER assessment results for the 2020-2021 period
3	Have ISCC certificate (EU-ISCC-Cert-ID218-2020040)
4	Have Methane Capture as a renewable energy producer and minimize GHG emissions
5	Has an integrated and online-based fire detection facility
6	Implementing an online reporting system under the name Enablon System which includes reporting of potential hazards, work accidents, use of fuel, chemicals and all activities related to High-Risk Work.

3.5 Summary of Arising Issues from Public and Auditor Verification

Public Issues (Institution/ NGO/Community)	Auditor Verification
Environmental Agency of Pasaman Barat District Date: 25 January 2022 <ul style="list-style-type: none"> The company had reported the periodic reports of environmental related to environmental regulations. The company already has a permit of waste utilization permit (Land Application) and temporary storage of hazardous waste. There were no issues from the community and local NGOs related to environmental pollution or conflict. The environmental service had conducted annual monitoring routinely to ensure that environmental management has been carried out properly. 	<p>There were no negative issues that need further clarification. Several explanations have been described in the report.</p>
Manpower Agency of Pasaman Barat District Date: 25 January 2022 <ul style="list-style-type: none"> Mandatory reports related to manpower have been submitted regularly in accordance with its period and the existing regulation. The company has registered 3 labor unions. The agency reported that only 2 labor unions which were active until this assessment. No complaints regarding labor issues (child labor, worker discrimination, forced labor and so on). There were no information request or complaint from Manpower Agency of Pasaman Barat District. Every communication with the company is carried out through mobile applications. There were no complaints related to salary shortages. 	<p>There were no negative issues that need further clarification. Several explanations have been described in the report.</p>
Plantation Agency of Pasaman Barat District Date: 25 January 2022 <ul style="list-style-type: none"> Last assessment of plantation grade was conducted in 2021 by the Regency. The company has reported its Progress Report of Plantation Business (<i>Laporan Perkembangan Usaha Perkebunan/ LPUP</i>) quarterly. Fire facilities are sufficient in accordance with the regulation. CSR activities have been conducted for the surrounding villages and had been reported to the agency. There were no fire incident occurred in the company's operational area both in Mill and Estates The company has responded to information requests quickly and transparently. 	<p>There were no negative issues that need further clarification. Several explanations have been described in the report.</p>
Gender Committee of GMP Interviewee: Secretary of Gender Committee	<p>There were no negative issues related to gender discrimination that need any further verification. The explanation regarding the interview output had been explained specifically in summary report.</p>

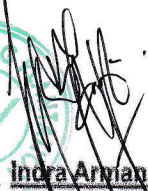

Public Issues (Institution/ NGO/Community)	Auditor Verification
<ul style="list-style-type: none"> There were no complaints regarding issues related to sexual harassment and violence against women. All woman in pesticides applicator worker and others work which related to chemical material if reported pregnant, the worker would be transferred to non-agrochemical work (e.g.: compound and daycare officer). The gender committee had socialized some policies related to pregnancy and sexual harassment. The company has had a policy to protect female workers from sexual harassment in the workplace as well as a grievance mechanism. The company also implemented some regulations related to reproductive rights such as menstruation leave and maternity paid leave. There was a complaint related to sexual harassment from male worker in 2021. Gender committee has responded and provided counselling to both victim and suspect. 	
Village Official Interviewee: <ul style="list-style-type: none"> Head of Nagari Jorong Labuah Loros Secretary of Nagari Tanjung Pangkal Date: 25 January 2022 <ul style="list-style-type: none"> The company has made efforts to develop the surrounding community through CSR programs in a participatory manner, the usage of local labor and local contractors. There were no complaints related to environmental pollution There was no dispute and conflict regarding the land ownership between the company and the surrounding communities. Communication between the village official and the company was good. 	<p>There were no negative issues related to gender discrimination that need any further verification. The explanation regarding the interview output had been explained specifically in summary report.</p>
Agricultural and Plantation Workers Union (PT GMP) Head of Workers Union <ul style="list-style-type: none"> Joint SPPP was formed in 2014 where the members are a combination of mills and plantations. There are approximately 585 members, with 142 POM and the rest are Estate. The TKB is drawn up every 2 years, but there is an extension of 1 year for the 2021 period (so 3 years). Warning Letter is given after the Admonition Letter Complaints: No increase in trip count Complaints: From harvesters, if there are damaged fruit it is not counted. Complaints: If it rains, keep working. 	<p>There are no issues and complaints that need further verification, all issues and complaints submitted have been thoroughly verified and explained in the relevant indicators.</p>
Worker union SARBUKSI PT. Gersindo Minang Plantation Date: 25 January 2022	

Public Issues (Institution/ NGO/Community)	Auditor Verification
<ul style="list-style-type: none"> Bipartite meetings of Worker union were held at least once a month, while internal meetings once a month or whenever it's needed. The wages paid by the company were in accordance with the applicable minimum wage. Workers' pay-slips provided in non-understandable language for some workers (English). There were no work accidents during 2020-2021. Worker union were not involved in the Collaborative Labor Agreement drafting process. 	<p>Based on the document reviews and interviews with workers, it is known that the pay-slip provided in understandable language since 2021 (<i>Bahasa</i>).</p> <p>Based on the document review and the interviews with representatives of UoC's management, it is known that the member of <i>SARBUKSI</i> have not reached 50% of the total workers.</p>
SPSI of PHP 1 & PHP 2 <ul style="list-style-type: none"> The company has paid wages in accordance with applicable regulations. There were no serious or fatal work accidents in the last 2 year. There have been several complaints submitted through the union. Some have been submitted to management and some have not been submitted to management. As for some of the complaints submitted such as the provision of work tools, fooding and etc. The company has provided PPE to workers for free The company has also carried out periodic and special health checks for workers All workers are permanent workers and there are no contract or casual workers 	<p>There are no issues and complaints that need further verification, all issues and complaints submitted have been thoroughly verified and explained in the relevant indicators.</p>
PT PHP Employee Cooperative <ul style="list-style-type: none"> Cooperative business in the form of savings and loans Cooperative members as many as 24 workers The annual meeting for 2020 has been carried out on January 22, 2022. The annual meeting for 2021 is planned to be held in February 2022. 	<p>There are no issues and complaints that need further verification, all issues and complaints submitted have been thoroughly verified and explained in the relevant indicators.</p>
Tribal Councils Interviewee: <ul style="list-style-type: none"> Ninik Mamak Dt. Toldo Dirajo Ninik Mamak Dt. Majo Leko Date: 25 January 2022 <ul style="list-style-type: none"> There was a case of land dispute between the community and the company. The company then returned the land to the customary land through a notary. However, up until the audit was conducted, there was still a conflict between 2 <i>Nagari</i>. The company has made efforts to develop the surrounding community through CSR programs in a participatory manner, the usage of local labor and local contractors. 	<p>The explanation regarding the interview output had been explained specifically in summary report.</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<p>Worker Union <i>SERBUNDO</i> PT. PHP Date: 27 January 2022</p> <ul style="list-style-type: none"> Internal union meetings were held whenever it's needed, and at least twice a month. The wages paid by the company were in accordance with the applicable minimum wage. The school bus was once damaged so children who went to school were transported by truck. There were no work accidents during 2020-2021. Worker union were not involved in the Collaborative Labor Agreement drafting process. There was a pesticide application worker who got itching/allergies. 	<p>Based on the document review, it was found that the company had rented a bus for 2 (two) months when the school bus was in damaged.</p> <p>Based on the document review and the interviews with representatives of UoC's management, it is known that the member of <i>SERBUNDO</i> has not reached 50% of the total workers.</p> <p>Based on the document review and interviews with the doctor in the clinic, it was found that the worker who got itching is not because of the contact with chemical stuff. This worker also had been transferred from pesticide application workers to manual upkeep workers after the check-up.</p>
<p>Gender Committee (PT PHP) Chair of the Gender Committee</p> <p>Based on the results of the interview, there were no issues related to gender. The manager has routinely carried out socialization and received aspirations or complaints from workers. The company provides maximum support in implementing gender equality in its company area.</p>	<p>There are no issues that need further verification.</p>
<p>Jorong Pisang Sasak Head of Jorong and Local Contractor</p> <ul style="list-style-type: none"> Including one of the parties who handed over the land. Former employees in the company. Has been the holder of a replanting project. Only 2 workers registered by BPJS are permanent workers, the rest are short contract workers. CSR is smooth, proposals can be submitted at any time, all proposals are responded to and followed up. The Cooperative involved in plasma is Cooperative Rantau Pasaman and is now independent. Plasma land status is still customary land. Socialization on RSPO and BMP assistance is still ongoing. 	<p>There are no issues that need further verification.</p>
<p>Nagari Kapar Wali Nagari Kapar (Temporary)</p> <ul style="list-style-type: none"> The conflict has occurred since 2017/2018 where the first time the KAN (<i>Kerapatan Adat Nagari</i>) was formed, the inauguration was carried out by the West Sumatran central customary management. <i>Ninik Mamak</i> The plaintiff is the newly appointed <i>Ninik Mamak</i>. The defendant <i>Ninik Mamak</i> stated that the land had been handed over to the company since 1997, the agreement was 	<p>There are no issues that need further verification. All information obtained has been verified in depth and explained in the relevant indicators.</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<p>also attended by the Heads of North and South Kapar Villages.</p> <ul style="list-style-type: none"> • The decision of the village head is pending the outcome of the decision of the Supreme Court (MA), and so far, has not received any information on the decision. • Mediation efforts have been made, but both <i>Ninik Mamak</i> do not want to meet. • The defendant consists of several parties, the company is one of them. • There were cases of arrests of the Kapar community due to conflicts with the company. 	
<p>Nagari Maligi Wali Nagari Maligi (Temporary)</p> <ul style="list-style-type: none"> • there are no conflict issues from 2018/2019. • Got plasma, and now independent. • Smooth CSR (giving computers, road assistance, covid assistance, etc.). • Received assistance in constructing road and ditch infrastructure from the company. • Expectations: road piling with coral. • Expectations: The government is currently having a program for making MCK, it is hoped that the company can contribute and be synergistic with government activities. 	<p>There are no issues that need further verification. All information obtained has been verified in depth and explained in the relevant indicators.</p>
<p>Nagari Sikilang Wali Nagari Sikilang (Temporary)</p> <ul style="list-style-type: none"> • there are no conflict issues since 2004. • Got plasma, and now independent. • CSR (giving computers, road assistance, covid assistance, etc.). • Received assistance in constructing road and ditch infrastructure from the company. • Expectations: road and irrigation improvements. 	<p>There are no issues that need further verification. All information obtained has been verified in depth and explained in the relevant indicators.</p>
<p>KSU Bina Tani Sejahtera Date: 25 January 2022</p> <ul style="list-style-type: none"> • There was no negative issue. The FFB payment has been made on time in accordance with the provisions in the agreement, based on pricing mechanism from Plantation Agency. • No obstacles related to cooperation with the unit of certification, because the UoC is open to consulting related work issues such as transparency in payments, loan and any cost. • The company has conducted trainings and socializations related to company's policy and SOPs to smallholder workers. 	<p>There were no negative issues related to gender discrimination that need any further verification. The explanation regarding the interview output had been explained specifically in summary report.</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<p>Related Worker Welfare issues from the internet sourced as in following link:</p> <p>https://nakertrans.sumbarprov.go.id/details/news/94</p> <p>Based on internet surfing, there were some issues related to manpower, the problems raised include: The workers' grievances against the wages paid by the company wasn't in accordance with the minimum wage determined by the government and some workers' did not register in social security insurance (BPJS).</p>	<p>In terms of clarifying the issues, the company has been able to show supporting documents and this matter also had been explained specifically in its related indicator (4.3.1 regarding the workers' wage and 4.3.5 regarding the social security insurance)</p>

4.0	CERTIFIED ORGANISATION'S ACKNOWLEDGEMENT OF INTERNAL RESPONSIBILITY
4.1	Formal Sign-off of Assessment Findings
	<p>Hereunder sign by management representative from inspected company to acknowledge a field assessment and agree for all content explained in this assessment report, included of non-compliance findings.</p> <p style="text-align: center;">Signed on behalf of:</p> <div style="display: flex; justify-content: space-around; align-items: flex-end; margin-top: 100px;"> <div style="text-align: center;"> <p>PT Gersindo Minang Plantation Group Estate Manager</p>  <p><u>Indra Arman</u> Friday, 11 February 2022</p> </div> <div style="text-align: center;"> <p>Mutuagung Lestari Lead Auditor</p>  <p><u>Rizliani Aprianita Hasibuan</u> Friday, 11 February 2022</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	Manpower Agency	Pasaman Barat District	-	Via phone	25 Jan 2022	✓	
2	Plantation Agency	Pasaman Barat District	-	Via Phone	25 Jan 2022	✓	
3	Environmental Agency	Pasaman Barat District	-	Via Phone	25 Jan 2022	✓	
4	Land Agency	Pasaman Barat District	-	Via Phone	25 Jan 2022		✓
5	Worker Union SARBUKSI-PT.GMP	Pasaman Barat District	-	Via Phone	25 Jan 2022	✓	
6	Gender Committee PT. GMP	Pasaman Barat District	-	Direct Interview	25 Jan 2022	✓	
7	Head of Nagari Jorong Labuah Loros	Pasaman Barat District	-	Via phone	25 Jan 2022	✓	
8	Secretary of Nagari Tanjung Pangkal	Pasaman Barat District	-	Via phone	25 Jan 2022	✓	
9	Ninik Mamak Dt. Toldo Dirajo	Pasaman Barat District	-	Via phone	25 Jan 2022	✓	
10	Worker Union SPPP (PT GMP)	Pasaman Barat District	-	Direct Interview	25 Jan 2022	✓	
11	Ninik Mamak Dt. Majo Leko	Pasaman Barat District	-	Via Phone	25 Jan 2022	✓	
12	KSU Bina Tani Sejahtera	Pasaman Barat District	-	Via Phone	25 Jan 2022	✓	
13	Gender Committee (PT PHP)	Pasaman Barat District	-	Via Phone	26 Jan 2022	✓	
14	Worker Union SERBUNDO (PT GMP) & SPSI PT PHP	Pasaman Barat District	-	Direct Interview	27 Jan 2022	✓	
15	Head of Jorong Pisang Sasak	Pasaman Barat District	-	Via Phone	26 Jan 2022	✓	
16	Local Contractor (PT PHP)	Pasaman Barat District	-	Via Phone	26 Jan 2022	✓	
17	Wali Nagari Kapar	Pasaman Barat District	-	Via Phone	26 Jan 2022	✓	
18	Wali Nagari Maligi	Pasaman Barat District	-	Via Phone	27 Jan 2022	✓	
19	Wali Nagari Sikilang	Pasaman Barat District	-	Via Phone	27 Jan 2022	✓	
20	LA Officer	GMP Estate	-	Direct Interview	25 Jan 2022	✓	
21	Methane Capture Officer	GMP POM	-	Direct Interview	25 Jan 2022	✓	
22	HCV management officer	GMP and PHP Estate	-	Direct Interview	25 Jan 2022	✓	
23	Gender Committee (PT PHP)	Pasaman Barat District	-	Via Phone	26 Jan 2022	✓	

No	Institution/ NGO/ Community	Address	Phone/ Email	Form of Communication	Date of Contact	Response	
						Yes	No
24	Head of Jorong Pisang Sasak	Pasaman Barat District	-	Via Phone	26 Jan 2022	✓	
25	Local Contractor (PT PHP)	Pasaman Barat District	-	Via Phone	26 Jan 2022	✓	
26	GMP POM: <ul style="list-style-type: none"> • 2 security • 2 weighbridge operators • 2 Grading worker • 1 Boiler operator • 1 Sterilizer operator • 1 Press operator • 2 Engine room operator • 3 Emergency Response Team. • 1 WWTP Operator • 1 WTP Operator • 1 Workshop Operator • 1 Warehouse officer • Methane Capture Officer 	Pasaman Barat District	-	Direct Interview	25 Jan 2022		
27	GMP Estate: <ul style="list-style-type: none"> • 5 Manuring Workers • 5 Circle Racking Workers • 4 Harvesters • 6 Pesticide Application Workers • LA Officer 	Pasaman Barat District	-	Direct Interview	25 Jan 2022		
28	PHP-1 Estate: <ul style="list-style-type: none"> • 4 Pesticide Application Workers • 4 Harvesters 	Pasaman Barat District	-	Direct Interview	26 Jan 2022		
29	PHP-2 Estate: <ul style="list-style-type: none"> • 5 Pesticide Application Workers • 3 Harvesters 	Pasaman Barat District	-	Direct Interview	27 Jan 2022		
30	Worldwide Fund	Pasaman Barat District	wwf-indonesia@wwf.or.id	Via email	14 Jan 2022		✓
31	Wahana Lingkungan Hidup Indonesia	Pasaman Barat District	informasi@walhi.or.id	Via email	14 Jan 2022		✓
32	Sawit Watch	Pasaman Barat District	info@sawitwatch.or.id	Via email	14 Jan 2022		✓

Appendix 2. Assessment Program

DATE	25 to 26 March 2021 (Remote Audit)	
PROGRAM	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
Thursday, 25 March 2021		
08.00 – 09.00 WIB	Opening Meeting via Zoom (Recorded Video Conference) • Auditee Speech (Introduction of PIC, Profile of Certified Management Unit) • Auditor Team Speech (Introduction, Audit Objective, Audit Scope, Audit Plan Discussion, Determine of Audit Sample, Transparency and Confidentiality Clarification)	• All Auditor
09.00 – 12.00 WIB	• Review of Previous Finding • Document Verification on OHS, Social and Worker Welfare • Document Verification on Legality, SCCS, Partial Certification and Time Bound Plan • Document Verification on Best Management Practices and Transparencies. • Document Verification on Environment, GHG and HCV	• All Auditor • SAP • HRK • HRK • SSD
12.00 – 14.00 WIB	• Break	• All Auditor
14.00 – 16.30 WIB	• Continuing Document Verification	• All Auditor
16.30 – 17.00 WIB	• Daily progress via Zoom	• All Auditor
Friday, 26 March 2021		
08.00 – 11.30 WIB	• Document Verification on OHS, Social and Worker Welfare • Document Verification on Legality, SCCS, Partial Certification and Time Bound Plan • Document Verification on Best Management Practices and Transparencies. • Document Verification on Environment, GHG and HCV	• SAP • HRK • HRK • SSD
11.30 – 14.00 WIB	Break	• All Auditor
14.00 – 15.00 WIB	Preparation for Closing Meeting	• All Auditor
15.00 – 17.00 WIB	Closing Meeting Via Zoom	• All Auditor

[illegible]

DATE	24 – 29 January 2022 (Onsite Audit)	
PROGRAM	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
	<ul style="list-style-type: none"> Implementation of Agronomy Aspect (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application) Implementation of Environmental, Conservation/HCV and Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management) Implementation of Occupational Health & Safety Aspect Implementation of Employment Procedure and Mechanism Aspect Observation of Workers Facilities (Housing, School, Worship Place). 	All Auditor
12.00 – 14.00	Break	
14.00 – 17.00	<ul style="list-style-type: none"> Document review and completing audit checklist. Presentation of Daily Progress. 	All Auditor
Thursday, 27 January 2022		
08.00 – 12.00	Field Observation to PHP-2 Estate Aspect to be verified: <ul style="list-style-type: none"> Implementation of Legal Aspect (Land Ownership, Legal Boundaries); Implementation of Agronomy Aspect (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application) Implementation of Environmental, Conservation/HCV and Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management) Implementation of Occupational Health & Safety Aspect Implementation of Employment Procedure and Mechanism Aspect Observation of Workers Facilities (Housing, School, Worship Place). 	All Auditor
12.00 – 14.00	Break	All Auditor
14.00 – 17.00	<ul style="list-style-type: none"> Document review and completing audit checklist. Presentation of Daily Progress. 	All Auditor
Friday, 28 January 2022		
08.00 – 12.00	<ul style="list-style-type: none"> Document review and completing audit checklist. 	All Auditor
12.00 – 14.00	Break	All Auditor
14.00 – 16.00	Internal discussion by auditor team preparing for Closing Meeting	All Auditor
16.00 – 17.00	Closing Meeting: <ul style="list-style-type: none"> Presentation of audit findings (Noteworthy Positive Component, Non-Conformities, OFI, Timeline of CAR's, Conclusion)/ Comments, Responses and Questions 	All Auditor
Saturday, 29 January 2022		
06.00 – 11.30	SITE → MINANGKABAU AIRPORT	All Auditor
12.55 – 14.55	PADANG (PDG) → JAKARTA (CGK)	All Auditor