

Roundtable on Sustainable Palm Oil Certification
R S P O

[✓] Surveillance

Name of Management Organisation : Sungai Pinang Palm Oil Mill – PT Bina Sains Cemerlang subsidiary of Sime Darby Plantation Berhad

Plantation Name : PT Bina Sains Cemerlang – Sungai Pinang Estate and Bukit Pinang Estate

Location : Village of Sungai Pinang, Sub District of Muara Lakitan, District of Musi Rawas, Province of Sumatera Selatan, Indonesia

Certificate Code : **MUTU-RSPO/020**

Date of Initial Registration : 11 September 2012

Date of Last Issued : 29 November 2017 Date of License Issue : 18 May 2022

Date of Certificate Expiry : 10 September 2022 Date of License Expiry : 10 September 2022

Assessment	Assessment Date	PT. Mutuagung Lestari Auditor	Reviewed by	Approved by
ASA-1.3 (Remote Audit)	03 to 05 November 2020	Rizliani Aprianita Hsb (Lead Auditor), Bayu Yogatama, Asystasya Aishah Silalahi, Sentot Adi Subandono	Ardiansyah	Leonada
ASA-1.3 & ASA-1.4 (Onsite Audit)	18 to 21 January 2022	Hasiholan Sihombing (Lead Auditor), Rindu Galih Rezza Rachmansyah, Septian Maulana and Ayu Lestari		

Assessment	Approved by MUTUAGUNG LESTARI on:
ASA-1.3 & ASA-1.4 (Onsite Audit)	29 April 2022

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Figure 1. Location Map of PT Bina Sains Cemerlang

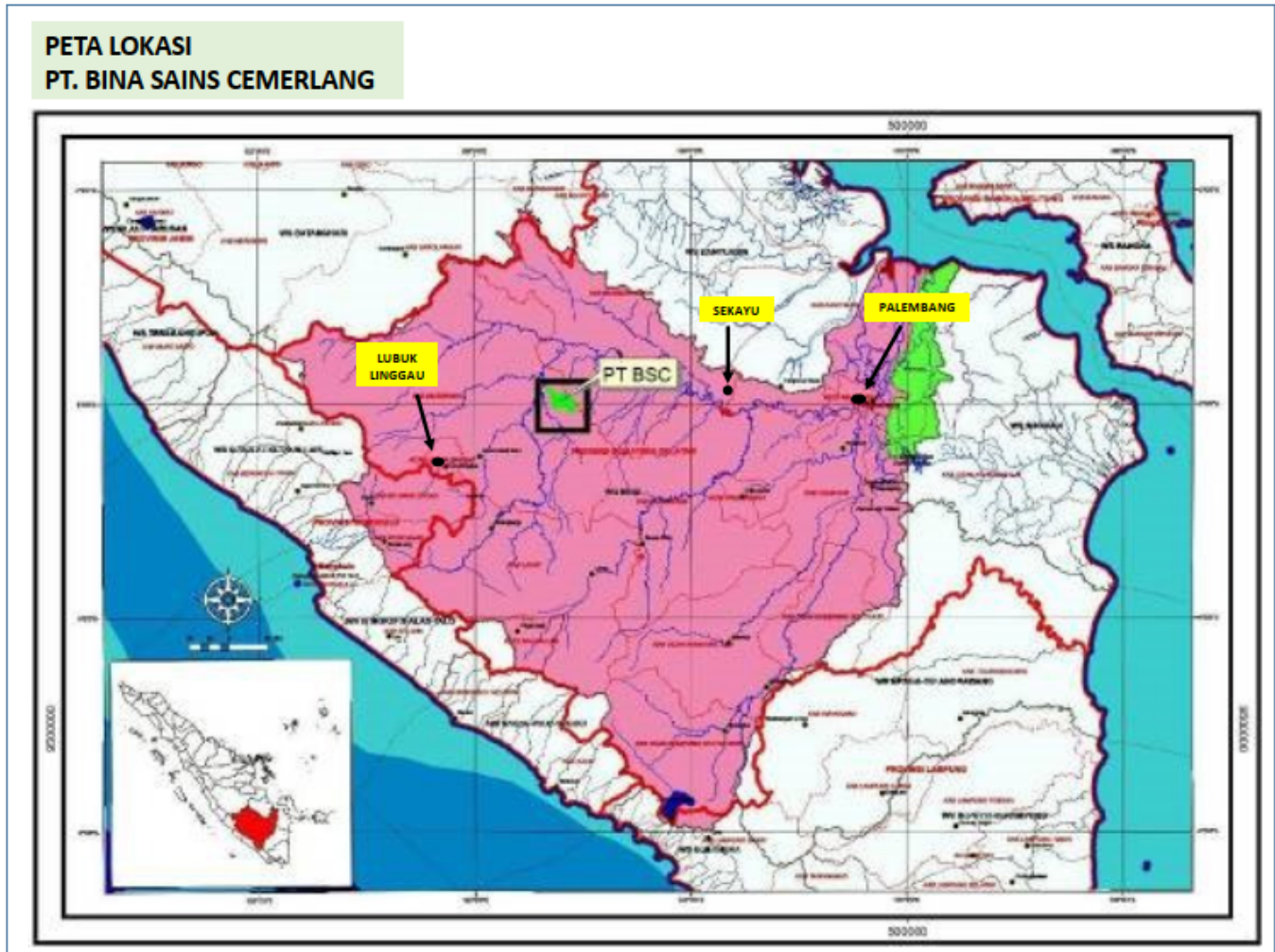
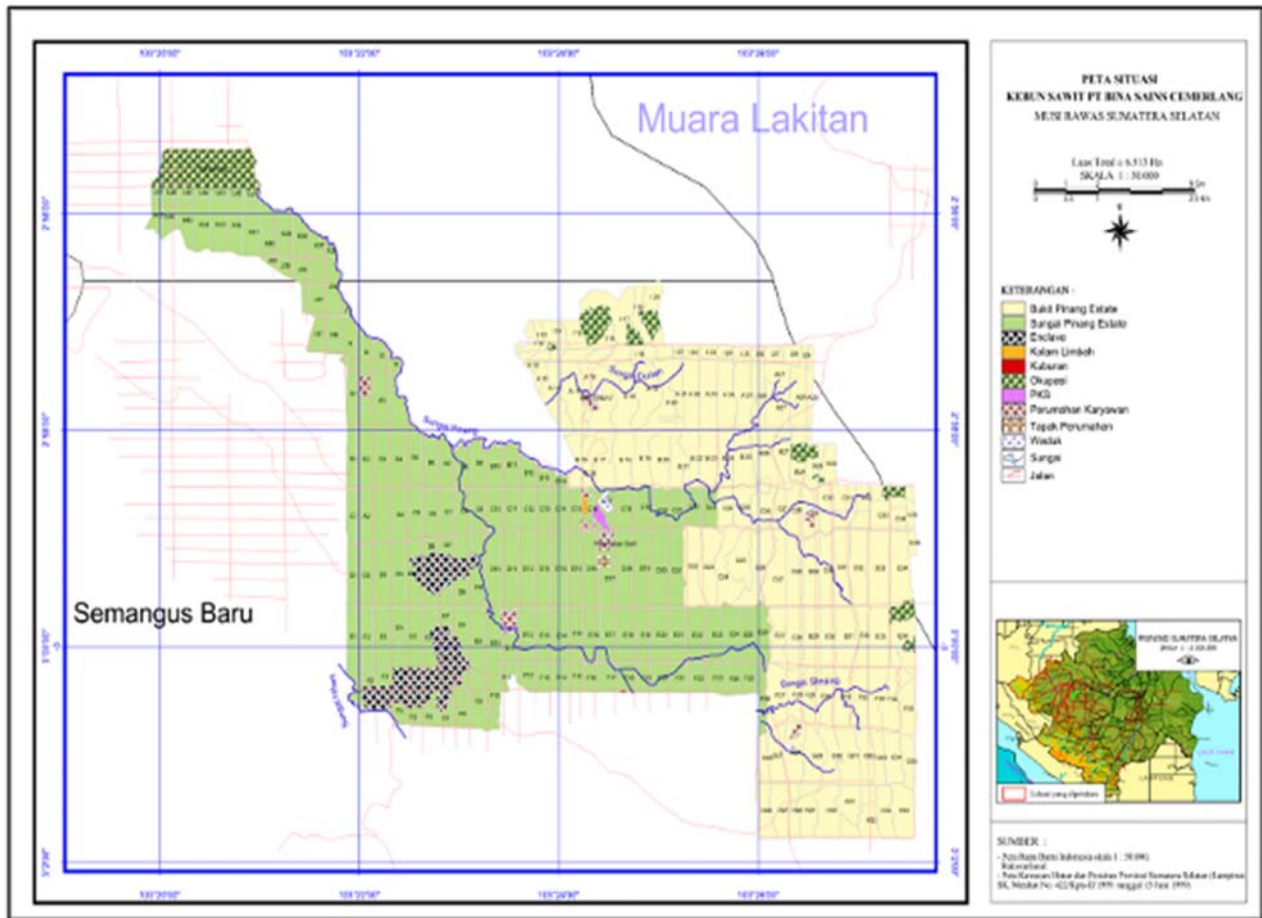


Figure 2. Location Map of PT Bina Sains Cemerlang.



Abbreviations Used

ASA	:	Annual Surveillance Audit
BMP	:	Best Management Practices
BMS	:	Block Manuring System
BSS	:	Block Spraying System
BPE	:	Bukit Pinang Estate
BSC	:	Bina Sains Cemerlang
CEO	:	Chief Executive Officer
CLA	:	Collective Labour Agreement
CPO	:	Crude Palm Oil
CSPK	:	Certified Sustainable Palm Kernel
CSPO	:	Certified Sustainable Palm Oil
ESH	:	Environment, Safety, and Health
FFB	:	Fresh Fruit Bunch
GCAD	:	Group Corporate Assurance Department
HCS	:	High Carbon Stock
HCV	:	High Conservation Value
HCVA	:	High Conservation Value Area
HGU	:	<i>Hak Guna Usaha</i> (Land Use Rights)
IP	:	Identity Preserved
ISO	:	International Organization for Standardization
ISPO	:	Indonesian Sustainable Palm Oil
IUP	:	<i>Izin Usaha Perkebunan</i> (Plantation Permit)
K3/OHS	:	Keselamatan dan Kesehatan Kerja (Occupational Health & Safety)
LPUP	:	<i>Laporan Perkembangan Usaha Perkebunan</i>
LTA	:	Loose Time Accident
MB	:	Mass Balance
MRS	:	Minamas Research Center
NGO	:	Non-Government Organization
OHSAS	:	Occupational Health & Safety
PK	:	Palm Kernel
POM	:	Palm Oil Mill
POME	:	Palm Oil Mill Effluents
PSD	:	Plantation Services Department
RSPO	:	Roundtable on Sustainable Palm Oil
RKL/RPL	:	<i>Rencana Kelola Lingkungan/ Rencana Pemantauan Lingkungan</i> (Environmental Management Plan/ Environment Monitoring Plan)
RKS/RPS	:	<i>Rencana Kelola Sosial/ Rencana Pemantauan Sosial</i> (Social Management Plan/ Social Monitoring Plan)
SCCS	:	Supply Chain Certification Standard
SIA	:	Social Impact Assessment
SOP	:	Standard Operational Procedure
SPE	:	Sungai Pinang Estate
SPF	:	Sungai Pinang Factory
PSQM	:	Plantation Sustainability and Quality Management
SOP	:	Standard Operating Procedure
TBP	:	Time Bound Plan

1.0	SCOPE OF THE CERTIFICATION ASSESSMENT		
1.1	Assessment Standard Used		
	<ul style="list-style-type: none"> • RSP0 Certifications Systems for Principles & Criteria and RSP0 Independent Smallholders Standard (Endorsed by RSP0 Board of Governors on 12 November 2020). • Indonesia National Interpretation RSP0 Principles and Criteria for the Production of Sustainable Palm Oil 2018 Endorsed by the RSP0 Board of Governors on 20th April 2020. 		
1.2	Organisation Information		
1.2.1	Organization name listed in the certificate	Sungai Pinang POM, PT Bina Sains Cemerlang subsidiary of Sime Darby Plantation Berhad	
1.2.2	Contact person	Alagendran Maniam	
1.2.3	Organization address and site address	RSP0 registered company: No 2, Plantation Tower, PJU 1A/7Street, Petaling Jaya, Malaysia 47301 Liaison Office: The Plaza Office Tower, 36 Floor, JL. MH Thamrin Kav. 28-30, Jakarta 10350, Indonesia	
1.2.4	Telephone	+6221 - 29926000	
1.2.5	Fax	+6221 – 29922686	
1.2.6	E-mail	alagendran.maniam@simedarbyplantation.com	
1.2.7	Web page address	www.simedarby.com	
1.2.8	Management Representative who completed the application for certification	Alagendran Maniam (Head Sustainability & Quality Management)	
1.2.9	Registered as RSP0 member	1-0008-04-000-00, 7 September 2004	
1.3	Type of Assessment		
1.3.1	Scope of Assessment and Number of Management Unit	Palm Oil Mill and supply base: Sungai Pinang POM, Sungai Pinang Estate and Bukit Pinang Estate.	
1.3.2	Type of certificate	Single	
1.4	Locations of Mill and Plantation		
1.4.1	Location of Mill		
	Name of Mill	Location	Coordinate
			Latitude Longitude
	Sungai Pinang	Sungai Pinang Village, Muara Lakitan Sub District, Musi Rawas District, Sumatera Selatan Province, Indonesia	S 02° 59' 08" E 103° 24' 22"
1.4.2	Location of Certification Scope of Supply Base		
	Name of Supply Base	Location	Coordinate
			Latitude Longitude
	Sungai Pinang Estate	Sungai Pinang, Anyar, Semangus Lama, Semangus Baru and Muara Lengas	S 02° 59' 14" E 103° 24' 20"

	Village, Muara Lakitan Sub District, Musi Rawas District, Sumatera Selatan Province, Indonesia			
Bukit Pinang Estate	Sungai Pinang, Anyar, Semangus Lama, Semangus Baru and Muara Lemas Village, Muara Lakitan Sub District, Musi Rawas District, Sumatera Selatan Province, Indonesia	S 02° 59' 12"	E 103° 24' 25"	
1.5	Description of Area Statement			
1.5.1	Tenure			
	• State	6,513.00	Ha	
	• Community	-	Ha	
1.5.2	Area Statement			
	Description	Total (Ha)		
	Total area	6,513.00		
	Mature area	5,105.12		
	Immature area	1,080.52		
	Mill	14.78		
	Building / Housing	82.58		
	Infrastructure	160.99		
	Nursery	18.45		
	HCV	44.07		
	Occupation	6.20		
	Others area	0.29		
1.6	Planting Year and Cycles			
1.6.1	Age profile of planting year			
	Planting Year	Hectarage (Ha)		
		Bukit Pinang Estate	Sungai Pinang Estate	Total
	1992	-	126.41	126.41
	1993	-	57.28	57.28
	1996	223.13	146.45	369.58
	1997	122.04	102.43	224.47
	1998	471.50	380.76	852.26
	2000	177.46	-	177.46
	2005	-	190.61	190.61
	2009	-	14.00	14.00
	2010	-	51.72	51.72
	2013	130.24	206.04	336.28
	2014	228.84	279.61	508.45
	2015	505.81	393.82	899.63

	2016	324.54	496.02	820.56			
	2017	212.69	198.33	411.02			
	2018	25.19	40.21	65.40			
	Mature Area	2,421.44	2,683.68	5,105.12			
	2018	117.71	178.46	296.17			
	2019	150.50	160.08	310.58			
	2020	166.72	-	166.72			
	2021	149.52	157.53	307.05			
	Immature Area	584.45	496.07	1,080.52			
	TOTAL	3,005.89	3,179.75	6,185.64			
1.6.2	New Planting area after January 2010		- Ha				
1.6.3	Planting Cycle		1st and 2nd 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 (%)
	Sungai Pinang	30	136,316.44	29,311.98	21.50	6,057.86	4.44
	<i>*Production data source from 24 months before assessment (January 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)	%
	Sungai Pinang	3,138.58	2,421.44	62,357.33	12.88	62,357.33	100
	Bukit Pinang	3,374.42	2,683.68	73,937.08	13.78	73,937.08	100
	TOTAL	6,513.00	5,105.12	136,294.41	13.35	136,294.41	100
	<i>*Production data source from 24 months before assessment (January 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)		
	-	-	-	-	-	-	-
	TOTAL						-
	<i>*Production data source from 24 months before assessment (January 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		Previous Certificate Claim (tonnes/year)		Actual certified product for last year		

								(tonnes/year)	
		FFB Processed		138,000		136,316.44			
		CPO Production		31,000		30,070.88			
		Palm Kernel (PK) Production		6,500		6,227.03			
1.8.2 Product selling									
		Type of selling product			Actual selling product for last year (January 2020 to December 2021) (MT)				
		CSPO sold as RSPO certified product			0				
		CSPK sold as RSPO certified product			0				
		CSPO sold under another scheme			0				
		CSPK sold under another scheme			0				
		CSPO sold as conventional			29,907.02				
		CSPK sold as conventional			5,868.68				
1.8.3 Estimate of Certified FFB Claim									
		Name of Estates	Total Area (Ha)	Production Area (Ha)	FFB (tonnes/year)		Yield (tonnes/ha/year)		
		Sungai Pinang	3,138.58	2,421.44	32,000		13.22		
		Bukit Pinang	3,374.42	2,683.68	38,000		14.16		
		TOTAL	6,513.00	5,105.12	70,000		13.71		
<i>*Projected FFB production for 12 months of certificate</i>									
1.8.4 Estimate of Certified Palm Product Claim									
	Name of Mill	Capacity (tonnes/ hour)	FFB Processed (tonnes/year)	CPO		Palm Kernel		Supply Chain Module	
				Out put (tonnes)	Extraction (%)	Out put (tonnes)	Extraction (%)		
	Sungai Pinang	30	70,000	16,000	22.86	3,200	4.57	IP	
<i>*Projected CSPO and CSPK production for 12 months of certificate</i>									
1.9 Other Certifications									
	ISO 9001:2008			-					
	ISO 14001: 2004			-					
	OHSAS 18001:2007			-					
	ISCC			-					
	ISPO			Certificate No: MUTU-ISPO/090 (Valid thru 3 August 2022)					
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							
INDONESIA									
1	Sekunyir. PT. Indotruba Tengah	2010	Sekunyir	2010	Seruyan and Kotawaringin Barat District, Kalimantan Tengah Province		Certified		
			Seruyan	2010			Certified		

2	Manggala. PT. Tunggal Mitra Plantations	2010	Manggala 1	2010	Rokan Hilir District, Riau Province	Certified
			Manggala 2	2010		Certified
			Manggala 3	2010		Certified
3	Bukit Ajong PT. Sime Indo Agro	2010	West	2010	Sanggau District, Kalimantan Barat Province	Certified
			West (HGU on process)	2023		-
			East	2010		Certified
			East (HGU on process)	2023		-
			East Plasma	2010		Certified
			West Plasma	2010		Certified
			Sei Mawang	2023		-
4	Teluk Siak. PT Aneka Inti Persada	2011	Teluk Siak	2011	Siak District, Riau Province	Certified
			Pinang Sebatang	2011		Certified
			Aneka Persada	2011		Certified
5	Sungai Pinang. PT. Bina Sains Cemerlang	2012	Sungai Pinang	2012	Musi Rawas District, Sumatera Selatan Province	Certified
			Sungai Pinang (HGU on process)	2023		-
			Bukit Pinang	2012		Certified
			Bukit Pinang (HGU on process)	2023		-
6	Pematang. PT. Teguh Sempurna	2011	Pematang	2011	Seruyan and Kotawaringin Timur District, Kalimantan Tengah Province	Certified
			Kawan Batu	2011		Certified
			Hatan Tiring	2011		Certified
			Batang Garing	2011		Certified
7	Alur Dumai. PT Lahan Tani Sakti	2011	Alur Dumai	2011	Rokan Hilir District, Riau Province	Certified
8	Teluk Bakau. PT. Bhumireksa Nusa Sejati	2011	Teluk Bakau	2011	Indragiri Hilir District, Riau Province	Certified
			Nusa Perkasa	2011		Certified
			Nusa Lestari	2011		Certified
9	Mandah PT. Bhumireksa Nusa Sejati	2014	Mandah	2011	Indragiri Hilir District, Riau Province	Certified
			Rotan Semelur	2011		Certified
10	Angsana. PT Ladangrumpun Suburabadi	2011	Angsana	2011	Tanah Bumbu District, Kalimantan Selatan Province	Certified
			Gunung Sari	2011		Certified
			Pantai Bonati	2011		Certified
			KKPA-1 PT.SHE	2013		Certified
			KKPA-4 PT.SHE	2013		Certified
11	Mustika. PT Sajang Heulang	2013	Mustika	2013	Tanah Bumbu District, Kalimantan Selatan Province	Certified
			KKPA-2 PT.SHE	2013		Certified
			KKPA-3 PT.SHE	2013		Certified
			KKPA-5 PT.SHE	2013		Certified

			SAP 1	2023		-
12	Gunung Aru. PT Bersama Sejahtera Sakti	2011	Gunung Aru	2011	Kotabaru District, Kalimantan Selatan Province	Certified
			Gunung Kemasam	2011		Certified
			Laut Timur	2011		Certified
			Pantai Timur	2011		Certified
			KKPA BSS	2023		-
13	Bebunga. PT. Langgeng Muaramakmur	2011	Bebunga	2011	Kotabaru District, Kalimantan Selatan Province	Certified
			Bakau	2011		Certified
			Sungai Cengal	2011		Certified
14	Sukamandang PT Kridatama Lancar	2011	Sukamandang	2011	Seruyan and Kotawaringin Timur District, Kalimantan Tengah Province	Certified
			Sapiri	2011		Certified
			Barasdanum	2011		Certified
			Kuala Kuayan	2011		Certified
15	Pondok Labu. PT Paripurna Swakarsa	2012	Binturung	2012	Kotabaru District, Kalimantan Selatan Province	Certified
			Pondok Labu	2012		Certified
			Rampa	2012		Certified
			Sesulung	2012		Certified
16	Rantau. PT Laguna Mandiri	2012	Rantau	2012	Kotabaru District, Kalimantan Selatan Province	Certified
			Matalok	2012		Certified
			KKPA Sungai Cengal (1,382 SH)	2014		Certified
			Selabak (PT SAA)	2012		Certified
			Randi (PT SAA)	2012		Certified
			Sangkoh (PT SAA)	2012		Certified
			Lanting (PT LMR)	2012		Certified
17	Betung. PT Laguna Mandiri	2014	Betung	2012	Kotabaru District, Kalimantan Selatan Province	Certified
			Sekayu	2012		Certified
18	Ungkaya. PT Tamaco Graha Krida	2012	Ungkaya	2012	Morowali District, Sulawesi Tengah Province	Certified
19	Ladang Panjang. PT Bahari Gembira Ria	2012	Ladang Panjang	2012	Muaro Jambi District, Jambi Province	Certified
			Ladang Panjang (HGU on process)	2023		-
20	Rantau Panjang. PT Guthrie Pecconina Indonesia	2012	Rantau Panjang	2012	Musi Banyuasin District, Sumatera Selatan Province	Certified
			Rantau Panjang (HGU on process)	2023		-
			Bumi Ayu	2012		Certified
			Karang Ringin	2012		Certified
			Napal	2012		Certified
			Napal (HGU on process)	2023		-

			Mangun Jaya	2012		Certified
			Mangun Jaya (HGU on process)	2023		-
			Sungai Jernih	2023		-
			GPI KKPA	2023		-
21	Blang Simpo. PT Perkasa Subur Sakti	2013	Tamiang (PT PPP)	2013	Aceh Tamiang and Aceh Timur District, Province Aceh	Certified
			Batang Ara (PT PSK)	2013		Certified
			Blang Simpo-01	2013		Certified
			Blang Simpo-02	2013		Certified
22	Lembiru. PT Sandika Nata Palma	2014	Lembiru	2014	Ketapang District, Kalimantan Barat Province	Certified
			Awatan	2014		Certified
			Karya Palma	2023		-
			KKPA SNP	2023		-
			Pelanjau (PT BAL)	2019		Certified
			Sungai Putih (PT BAL)	2023		-
			Beturus (PT BAL)	2023		-
			KKPA BAL	2023		-
MALAYSIA						
1	Sg Dingin SOU 1	2010	Bukit Hijau	2010	Kerangan, Kedah	Certified
			Padang Buluh	2010		Certified
			Bukit Selangor	2010		Certified
			Sg Dingin	2010		Certified
			Jentayu	2010		Certified
			Anak Kuli	2010		Certified
			Somme	2010		Certified
2	Chersonese SOU 2	2011	Chersonese	2011	Kuala Kurau, Perak	Certified
			Holyrood	2011		Certified
			Kalumpang	2011		Certified
			Tali Ayer	2011		Certified
3	Elphil SOU 3	2011	Kinta Kellas	2011	Sg Siput, Perak	Certified
			Elphil	2011		Certified
			Kamuning	2011		Certified
4	Flemington SOU 4	2011	Flemington	2011	Teluk Intan, Perak	Certified
			Bagan Datoh	2011		Certified
			Sabak Bernam	2011		Certified
			Sg Samak	2011		Certified
5	Seri Intan SOU 5	2011	Seri Intan (Main Division)	2011	Teluk Intan, Perak	Certified
			Sabrang	2011		Certified

			Sg Wangi	2011		Certified
			Sogomana (Main Division)	2011		Certified
6	Selaba SOU 5	2011	Seri Intan (Selaba Division)	2011	Teluk Intan, Perak	Certified
			Sogomana (Cashwood & Sg Beruas Division)	2011		Certified
			Bikam	2011		Certified
			Clumy	2011		Certified
7	Tennamaram SOU 6	2011	Tennamaram	2011	Bestari Jaya, Selangor	Certified
			Sungei Buloh	2011		Certified
			Bkt Talang	2011		Certified
8	Bkt Kerayong SOU 7	2011	Bkt Kerayong	2011	Kapar, Selangor	Certified
			Bkt Cherakah	2011		Certified
			Bkt Rajah	2011		Certified
			Bkt Lagong	2011		Certified
			Elmina	2011		Certified
9	East SOU 8	2010	East	2010	Carey Island, Selangor	Certified
			Dusun Durian	2010		Certified
			Sepang	2010		Certified
10	West - SOU 9	2010	West	2010	Carey Island, Selangor	Certified
11	Bukit Putri - SOU 10	2011	Bukit Putri	2011	Raub, Pahang	Certified
12	Kerdau SOU 11	2011	Kerdau	2011	Temerloh, Pahang	Certified
			Jentar	2011		Certified
			Mentakab	2011		Certified
			Sg Mai	2011		Certified
			Chenor	2011		Certified
13	Jabor - SOU 12	2011	Jabor	2011	Kemaman, Trengganu	Certified
14	Labu SOU 13	2011	Labu	2011	Nilai, Negeri Sembilan	Certified
			New Labu	2011		Certified
			Bradwall	2011		Certified
15	Tanah Merah SOU 14	2010	Tanah Merah	2010	Port Dickson, Negeri Sembilan	Certified
			Sua Betong	2010		Certified
			Bukit Pelandok	2010		Certified
16	Sua Betong SOU 15	2014	Salak	2014	Port Dickson, Negeri Sembilan	Certified
			Sengkang	2014		Certified
			Siliau	2014		Certified
			PD Lukut	2014		Certified
			Sungai Baru	2014		Certified
			Tampin Linggi	2014		Certified

17	Kok Foh SOU 16	2011	Bukit Pilah	2011	Bahau, Negeri Sembilan	Certified
			Kok Foh	2011		Certified
			Muar River	2011		Certified
			St. Helier	2011		Certified
			Pertang	2011		Certified
			Sg Gemas	2011		Certified
			Sg Sebalang	2011		Certified
			Sg Senarut	2011		Certified
18	Kempas SOU 17	2010	Kempas	2010	Jasin, Melaka	Certified
			Kemuning	2010		Certified
			Tangkah	2010		Certified
19	Diamond Jubilee SOU 18	2011	Bukit Asahan	2011	Jasin, Melaka	Certified
			Diamond Jubilee	2011		Certified
			Serkam	2011		Certified
20	Pagoh SOU 19	2014	Pagoh	2014	Muar, Johor	Certified
			Lanadron	2014		Certified
			Pengkalan Bukit	2014		Certified
			Welch	2014		Certified
21	Chaah SOU 20	2010	North Labis	2010	Chaah, Johor	Certified
			Cha'ah	2010		Certified
			Sg Simpang Kiri	2010		Certified
22	Gunung Mas SOU 21	2010	Gunung Mas	2010	Kluang, Johor	Certified
			Kempas Klebang	2010		Certified
			Bukit Paloh	2010		Certified
			Yong Peng	2010		Certified
23	Bukit Benut SOU 22	2011	Bukit Benut	2011	Kluang, Johor	Certified
			CEP Niyor	2011		Certified
			Lambak / Elaeis	2011		Certified
24	Ulu Remis SOU 23	2011	Pekan	2011	Layang-layang, Johor	Certified
			Sembrong	2011		Certified
			Tun Dr. Ismail	2011		Certified
			Ulu Remis	2011		Certified
			Bukit Badak	2011		Certified
			Cenas	2011		Certified
25	Hadapan SOU 24	2011	CEP Rengam	2011	Layang-layang, Johor	Certified
			Kulai	2011		Certified
			Layang	2011		Certified
			Seri Pulai	2011		Certified

26	Sandakan Bay SOU 26	2008	Tun Tan Siew Sin	2008	Sandakan, Sabah	Certified
			Tunku	2008		Certified
			Tigowis	2008		Certified
			Sentosa	2008		Certified
			Saguliud	2008		Certified
27	Melalap SOU 27	2011	Melalap	2011	Tenom, Sabah	Certified
			Sapong	2011		Certified
28	Binuang SOU 28	2009	Tingkayu	2009	Kunak, Sabah	Certified
			Sungang	2009		Certified
			Jelata Bumi	2009		Certified
			Binuang	2009		Certified
29	Giram SOU 29	2009	Mostyn	2009	Kunak, Sabah	Certified
			Giram	2009		Certified
30	Merotai SOU 30	2009	Imam	2009	Tawau, Sabah	Certified
			Merotai	2009		Certified
			Table	2009		Certified
			Tiger	2009		Certified
31	Lavang SOU 31	2011	Belian	2011	Bintulu, Serawak	Certified
			Kelida	2011		Certified
			Lavang	2011		Certified
			Lavang (SE)	2011		Certified
			Rasan	2011		Certified
			Chartquest	2011		Certified
			Dulang	2011		Certified
			Peroh	2011		Certified
			Pekaka	2011		Certified
			Ruai	2011		Certified
32	Rajawali SOU 32	2011	Rajawali	2011	Bintulu, Serawak	Certified
			Samudera	2011		Certified
			Semarak	2011		Certified
			Bayu	2011		Certified
33	Derawan SOU 33	2011	Takau	2011	Bintulu, Serawak	Certified
			Damai	2011		Certified
			Derawan	2011		Certified
			Sahua	2011		Certified
P & G (New Britain Palm Oil)						
1	Poliamba	2012	Kara	2012	Keviang, New Ireland Province, P&G	Certified
			West Coast	2012		Certified

			Nalik	2012		Certified
			Noatsi	2012		Certified
			Madak	2012		Certified
			North (Smallholders)	2012		Certified
			South (Smallholders)	2012		Certified
			West (Smallholders)	2012		Certified
2	Tetere	2011	Tetere	2011	Gudaicanal, Solomon Island	Certified
			Ngalimbiu	2011		Certified
			Mbalisuna	2011		Certified
			West Zone (Smallholders)	2011		Certified
			Central Zone (Smallholders)	2011		Certified
			MBA East (Smallholders)	2011		Certified
			MBA West (Smallholders)	2011		Certified
3	Sangara, Sambiripa & Mamba	2013	Sangara	2013	Higaturu, Popondetta, Oro, P&G	Certified
			Sumberipa	2013		Certified
			Ambogo	2013		Certified
			Embi	2013		Certified
			Mamba	2013		Certified
			Sorovi (smallholders)	2013		Certified
			Igora (smallholders)	2013		Certified
			Saiho (smallholders)	2013		Certified
			Aeka (smallholders)	2013		Certified
			Ilimo (smallholders)	2013		Certified
4	Gusap	2010	Dumpu	2010	Madang, P&G	Certified
			Surinam	2010		Certified
			Jephcott	2010		Certified
			Gusap	2010		Certified
			Paddox	2010		Certified
			Ngaru	2010		Certified
			Madang VOP (smallholders)	2010		Certified
			Morobe VOP (smallholders)	2010		Certified
5	Hagita	2013	Giligili	2013	Milne Bay, P&G	Certified
			Hagita	2013		Certified
			Waigani	2013		Certified
			Sagarai	2013		Certified
			Padipadi	2013		Certified

			Mariawatte	2013		Certified
			East Gurney	2013		Certified
			West Gurney	2013		Certified
			East Sagarai	2013		Certified
			West Sagarai	2013		Certified
6	Mosa Kumbango Kapiura Namumdo Waraston	2008	Bebere	2008	West New Britain	Certified
			Kumbango	2008		Certified
			Togulo	2008		Certified
			Dami	2008		Certified
			Waisisi	2008		Certified
			Kautu	2008		Certified
			Karausu	2008		Certified
			Moroa	2008		Certified
			Bilomi	2008		Certified
			Loata	2008		Certified
			Haella	2008		Certified
			Garu	2008		Certified
			Daliavu	2008		Certified
			Sapuri	2008		Certified
			Malilimi	2008		Certified
			Rigula	2008		Certified
			Nomundo	2008		Certified
			Navarai / Karato ME	2008		Certified
			Volupai. Lotomgam / Natupi / Goruru	2008		Certified
			Lolokoru	2008		Certified
			Silovoti	2008		Certified
			LSS Hoskin (1,877 Smallholders)	2008		Certified
			VOP East (1,815 Smallholders)	2008		Certified
			VOP Central (1,958 Smallholders)	2008		Certified
			VOP West (1,277 Smallholders) Kaulong / Akamie / Pusiki / Repamira / Sakapei / KDC ME (21 large smallholders)	2008		Certified
			LSS Kapiura (847 Smallholders)	2008		Certified
			VOP Kapiura (551 Smallholders)	2008		Certified

	<p><i>TBP on January 2022.</i></p> <p>Sime Darby has achieved 34 management units in Malaysia, 25 management units in Indonesia, 10 management units in P&G that RSPO certified. Total management unit in Sime Darby Plantation Berhad are 34 in Malaysia, 25 in Indonesia and 10 in P&G. There is change of time bound plan, with detail:</p> <ol style="list-style-type: none"> 1. Uncertified area in PT Sime Indo Agro: postpone become 2023 due to HGU process 2. Uncertified area in PT Bina Sains Cemerlang: postpone become 2023 due to HGU process 3. Uncertified area in PT Bahari Gembira Ria: postpone become 2023 due to HGU process 4. Uncertified area in PT Budidaya Agro Lestari: postpone become 2023 due to HGU process 5. For Liberia operations: As at 16 Jan 2020, Sime Darby Plantation under its unit Sime Darby Plantation Investment (Liberia) Pte Ltd has completed its disposal of its entire interest in Sime Darby Plantation (Liberia) Inc (SDP Liberia) to Mano Palm Oil Industries Ltd (MPOI). https://www.simedarbyplantation.com/media/pressreleases/sime-darby-plantation-completesdivestment-of-its-liberia-operation
1.10.2	<p>Progress of Associated Smallholders and Outgrowers for Certifiable Standard</p>
	<p>There are no scheme smallholders in PT Bina Sains Cemerlang.</p>

2.0	ASSESSMENT PROCESS
2.1	Assessment Team
ASA-1.3 (Remote)	<ol style="list-style-type: none"> Rizliani Aprianita Hasibuan (Lead Auditor). Indonesian citizens. Bachelor of Agribusiness and Master of Agribusiness, Faculty of Agriculture. The trainings that have been attended include the Lead Auditor training ISO 9001; 2008, ISO 14001; 2004, OHSAS 18001, SA8000 Training, ISPO Auditor training, RSPO Lead Auditor training, RSPO SCCS, Social Audit by RSPO (verite) and participating in several IHT in the legal field, environment, employment, BMP, and so on. Has participated in several audits related to the sustainable palm oil certification system since 2015 with social aspects, K3, worker welfare and waste management aspects. In this audit activity acts to assess the Social, Worker Welfare, OHS aspects, TBP and Partial Certification. Asystasya Aishah Slalahi (Auditor). Indonesia citizen, Bachelor of Economy, Major of Agribusiness, Faculty of Economic and Management. She has one year experience in consultancy. She has followed training such as ISPO Auditor Training, Lead Auditor ISO 9001:2015, OHS General Expert, and several in house training related to environmental, BMP, etc. Has been involved in several audit activities since 2016 related to sustainable palm oil certification covering waste management aspect, Social Aspect, Health and Safety Aspect, and Worker Welfare. In this audit activity acts to assess Legal, Land Dispute, and BMP and SCCS aspects. Bayu Yogatama (Auditor) Bachelor of Forestry, Department of Forest Resources Conservation and Ecotourism, Bogor Agricultural University. Has attended the ISO 9001: 2015 Quality Auditor / Lead Auditor Course Quality Management System (QMS) course and ISO 19011: 2011 Guidelines for Auditing Management System, ISPO Lead Training, SA 8000, RSPO Lead Training, IHT RSPO NPP, IHT RSPO RaCP, IHT ISO 17021, and IHT ISO 17065. Having experience working in plywood field as Inspector in foreign private company. Currently working for an independent certification body. During this assessment has verified environment, conservation and GHG aspect. During this assessment has verified environment and conservation management aspect. Sentot Adi Subandono (Observer), Indonesia citizen, Bachelor of Agriculture, Department of Agricultural Cultivation. He has five years of experience working since 2005 as Plantation Operational Staff and nine years as Internal Auditor in private oil palm plantations in Indonesia. The training that has been attended includes the Basic Management Development Program of Palm Oil Plantation, Use of Limited Pesticides, Best Practices in Internal Auditing, Fraud Auditing: Prevention, Detection, and Investigation, Operational Risk Approach in Internal Auditing, General Occupational Health and Safety Expert, ISPO, ISO 9001: 2015.
ASA-1.3 & ASA-1.4 (Onsite)	<ol style="list-style-type: none"> Hasiholan Sihombing (Lead Auditor). Indonesian citizen. Bachelor of Agriculture Majoring in Agronomy, Agriculture Faculty. He has working experienced for 7 (seven) years since 2009 as an Operational Staff in an Oil Palm Plantation Company in Indonesia. The training he has followed namely: Lead Auditor ISPO, RSPO P&C Lead Auditor Course, RSPO Supply Chain Certification Lead Auditor Course, SA 8000 Awareness, Quality Management Systems (ISO 9001:2015), Environmental Management Systems (ISO 14001:2015), OHS General Expert, OHSAS 18001:2007, ISO 19011:2018, ISO 17021:2011 and ISO 17065:2012. In this assessment, an assessment of aspects of land legality, land dispute, SCCS, TBP and Partial Certification. Rindu Galih Rezza Rachmansyah (Auditor) Indonesian citizen, Bachelor of Agriculture with major in Plant Pest and Disease. Has one year experience as Field Expert in Pesticide Company and 3 years' experience in Industrial Forest Management, Forest Rehabilitation and Reclamation on Indonesia Stated Owned Company as Assistant. Training which had attended including Lead Auditor ISO 9001, ISO 14001, ISO 17021, ISO 19011, SA 8000, Lead Auditor ISPO, Lead Auditor RSPO, RaCP & NPP Awareness and OHSAS 18001:2007. Has involved in several audit activities related to sustainable palm oil since 2017 in the aspects of Best Management Practices (BMP), social, worker welfare and OHS. During assessment, he assigned to verification towards worker welfare, information disclosure, transparency and social aspect. Septian Maulana (Auditor). Indonesian Citizen, Bachelor of Economic, Pamulang University. Have experience as sustainability staff on oil palm plantation. Training have been followed including Occupational Health and Safety Expert Candidate certification by Ministry of Manpower and Transmigration of Indonesia; Awareness Integrated Management Systems (ISO 9001:2015, ISO 14001:2015, ISO 45001:2018); Basic Fire Fighting; Basic First Aid; Understanding the regulations and technical aspects of environmental management; Training of Immobilization after a venomous snake bite; Awareness ISO 19011:2011; Awareness ISO 17065:2012; Awareness ISO 17021:2015; ISO 14001:2015; and ISO 45001:2018; ISO 9001:2015 Lead Auditor, ISPO Lead Auditor, and RSPO Lead Auditor, Has conduct audit in aspect BMP, OHS, Worker Welfare, and Transparency since 2020. In this audit activity was verified OHS and Best Management Practices Aspect.

	<p>4. Ayu Lestari (Auditor Trainee). Indonesian citizens. Associate of environmental engineering and management, IPB University. The trainings he has attended include General AK3 training, Basic Fire, Fire Fighting, ISO 9001; 2008, ISO 14001; 2004, ISO 17021; 2015, ISO 17065, ISO 19011. During this assessment has verified environment and conservation management aspect, under supervised by Lead Auditor.</p> <p>Curriculum vitae (CV) of the members and the assessment team is available at the PT Mutuagung Lestari office.</p>
<p>2.2</p>	<p>Assessment Methodology, Assessment Process and Locations of Assessment</p>
<p>2.2.1</p>	<p>Figure of person days to implement assessment</p>
<p>ASA-1.3 (Remote)</p>	<p>Number of auditors : 3 auditors and 1 auditor Observer Number of days for Remote ASA 1.3: 3 days Number of working days for Remote ASA 1.3: 9 Working days.</p>
<p>ASA-1.3 & ASA-1.4 (Onsite)</p>	<p>Number of auditors: 3 auditors and 1 auditor trainee Number of days for Onsite ASA 1.3 & 1.4: 4 days Number of working days for Onsite ASA 1.3 & 1.4: 12 Working days</p>
<p>2.2.2</p>	<p>Assessment Process</p>
<p>ASA-1.3 (Remote)</p>	<p>The assessment was conducted by measuring the sufficiency of implementation with the consistency done by the PT Bina Sains Cemerlang to the requirements of Principles and Criteria for the Production of Sustainable Palm Oil 2018, endorsed by the RSPO Board of Governors and adopted at the 15th Annual General Assembly by RSPO Member on 15 November 2018, The Indonesia National Interpretation, Endorsed by the RSPO Board of Governors on 20 April 2020 and RSPO Certification System for Principles and Criteria, 14 June 2017.</p> <p>For this section (ASA 1.3) The assessment was conducted in One method: document review, aiming to observe the sufficiency of types or substances from required documents. Improvement of findings from ASA-1.3 findings were observed by auditors at this assessment. All information obtained was recorded in Check List of PT Mutuagung Lestari (MUTU) and part of ASA 1.3. Remote Audit report.</p> <p>The opening meeting was held on 3 November 2020 at 08.00 am through a teleconference (zoom). As for the participants who attended the opening meeting included the Estate Manager, Mill Manager, Support Team from sustainability department and other relevant staff. while the closing meeting will take place on 5 November 2020 at 17 pm. attended by the same participants as the opening meeting. Commonly, the audit activities went smoothly with good support from the unit management. The presentation of documents is presented quite well using email or cloud drive.</p> <p>Improvement of findings from surveillance findings were observed by auditors at this ASA-1.3 assessment. All information obtained was recorded in Check List of PT Mutuagung Lestari (MUTU) and part of ASA-1.3.</p> <p>The assessment program please find Appendix 2</p>
<p>ASA-1.3 & ASA-1.4 (Onsite)</p>	<p>The assessment was conducted by measuring the implementation of certification system and standard conducted by PT Bina Sains Cemerlang – Sungai Pinang Factory Unit Certification based on:</p> <ul style="list-style-type: none"> • RSPO Principles and Criteria for Sustainable Palm Oil Production 2018, The Indonesian National Interpretation, Endorsed by the RSPO Board of Governors on 20th April 2020 • RSPO Certification Systems for Principles & Criteria and RSPO Independent Smallholder Standard, Endorsed by the RSPO Board of Governors on 12 November 2020 <p>Additional Documents:</p> <ul style="list-style-type: none"> • RSPO Notice to CB on RSPO P&C On-site & Remote Audits, on 24th March 2020 • Contingency RSPO Audit Procedure (This procedure is applicable when force majeure (such as pandemics, natural disasters, civil unrest, etc.) preventing the audit team from conducting field verifications) 25 August 2020 • Contingency RSPO Audit Procedure for RSPO Principles & Criteria and Independent Smallholder Standard (Version 2) Approved by Assurance Standing Committee on 22 October 2021

The scope of certification of PT Bina Sains Cemerlang consist of one mill (Sungai Pinang Factory) and two estates (Sungai Pinang Estate and Bukit Pinang Estate).

The audit program is included as Appendix 2. The approach to the audit was to treat the mill and its supply base as an RSPO Certification Unit. Mill was audited together with the sample estates. A range of environmental and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HCVs, declared conservation areas and local communities.

The assessment was conducted in three methods: (1) document review, aiming to observe the sufficiency of types or substances from required documents; (2) interview, aiming to obtain more detailed information and cross check the information; and (3) field observation, aiming to observe directly the sufficiency of implementation on site. Some opportunities for improvement of the results ASA-1.3 & ASA 1.4 by the MUTU auditor to the management unit and the results are the subject will be verified at the next assessment phase Recertification. Improvement of findings from ASA-1.3 findings were observed by auditors at this ASA-1.3 & ASA 1.4 assessment. All information obtained was recorded in Check List of PT Mutuagung Lestari (MUTU) and part of ASA-1.3 & ASA 1.4

The opening meeting was held on 18 January 2022. As for the participants who attended the opening meeting included the General Manager, Estate and Mill Managers, Support Team from Jakarta and other staff. Closing meeting was held on 21 January 2022 attended by the same participants as the opening meeting. Management PT Bina Sains Cemerlang accept all the onsite ASA-1.3 & ASA-1.4 audit results.

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

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

Company officials were not present at any of the internal or external stakeholder interviews. A list of Stakeholders contacted is included as Appendix 1.

Commonly, the audit activities went smoothly with good cooperation from the unit management. The presentation of documents is presented quite well by involving related personnel.

All information obtained was recorded in Check List of PT Mutuagung Lestari (MUTU).

The assessment program please find Appendix 2.

2.2.3	Locations of Assessment
ASA-1.3 (Remote)	Will be completed during the onsite audit.
ASA-1.3 & ASA-1.4 (Onsite)	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:

Sungai Pinang POM

- **Tank Fuel.** Field observations related chemical management, OHS, and environmental aspect
- **Spare Part Warehouse.** Field observations related chemical management, OHS, and environmental aspect
- **Oil Storage.** Field observations related OHS, and environmental aspect.
- **Chemical Warehouse** Field observations related chemical management, OHS, and environmental aspect
- **Hazardous Waste Temporary Store.** Observations related hazardous waste management, OHS and environmental aspect.
- **Workshop.** Field observations related chemical management, OHS, and environmental aspect.
- **WWTP.** Field observations and interview related ban entry to WWTP, run-off, and testing of effluent. Officers equipped with PPE and Recording of effluent debit effluent.
- **WTP.** Observations related to water management, recording of water used, OHS, and waste management.
- **Reservoir,** Field observation related water sources
- **Security.** Observation and interview related worker welfare aspect.
- **Grading.** Observation related BMP, OHS and worker welfare aspects.
- **St. Sterilizer.** Observation related BMP, OHS and worker welfare aspects.
- **St. Boiler.** Observation related BMP, OHS and worker welfare aspects.
- **St. Kernel.** Observation related BMP, OHS and worker welfare aspects.
- **St. Engine room.** Observation related BMP, OHS and worker welfare aspects.
- **Hydrant Simulation.** Observations related to the function of the hydrant.

Sungai Pinang Estate

- **Block A001 Division 3: HGU Pole No. 1.** Observation the conditions and position of legal boundary.
- **Block A003 Division 3: HGU Pole No. 2.** Observation the conditions and position of legal boundary.
- **Block C005 Division 3: HGU Pole No. 6 and 7.** Observation the conditions and position of legal boundary.
- **Block B005 Division 3: HGU Pole No. 8, 9 dan 10.** Observation the conditions and position of legal boundary.
- **Block E010 Division 2: Sungai Pinang River (HCV Area).** Observation of HCV management.
- **Central Warehouse.** Field observations and interview related spare part management, OHS, and environmental aspect.
- **Fertilizer storage** Observation towards health, safety and environment aspect.
- **Rice warehouse.** Field observations related to facilities and infrastructure
- **Tank Fuel.** Field observations related chemical management, OHS, and environmental aspect
- **Workshop.** Field observations related chemical management, OHS, and environmental aspect.
- **Clinic.** Field observations related chemical management, OHS, Facility, and environmental aspect.
- **BMS & BSS.** Field observations related chemical management, OHS, and environmental aspect.
- **Generator House.** Field observations related chemical management, OHS, and environmental aspect.
- **Division 3 Block E07 Landfill.** Field observations related chemical management, OHS, and environmental aspect.
- **Division 1-2 Emplacement Facilities.** Observation to emplacement facilities such as assembling points, fire extinguisher, in-organic waste store, sanitation system, housing quality, playground, and masjid
- **CHC (Central Housing Complex).** Observation to emplacement facilities such as assembling points, fire extinguisher, in-organic waste store, sanitation system, housing quality, playground, and masjid
- **Elementary/junior high school/kindergarten.** Field observations related to facilities and infrastructure
- **Daycare Division 2.** Observation and interview with worker related labor aspect and OHS.
- **Replanting Area Block F011 Division 1.** Observations and interviews related to aspects of BMP, worker welfare, OHS and the environment.
- **Spraying Activity Block G015 Division 1.** Observations and interviews related to aspects of BMP, worker welfare, OHS and the environment.
- **Harvesting Activity Block E08 Division 3.** Observations and interviews related to aspects of BMP, worker welfare, OHS and the environment.
- **Nursery Area Block H011 Division 2.** Observations and interviews related to aspects of BMP, worker welfare,

OHS and the environment.

- **Manuring Activity Block F008/009 Division 2.** Observations and interviews related to aspects of BMP, worker welfare, OHS and the environment.
- **Planting Year 2021 Area Block H015 Division 2.** Observations and interviews related to aspects of BMP, and the environment.

Bukit Pinang Estate:

- **Block K002 Division 3: HGU Pole No. 14.** Observation the conditions and position of legal boundary.
- **Block K018 Division 3: HGU Pole No. 15.** Observation the conditions and position of legal boundary.
- **Block C011 Division 1: HGU Pole No. 4.** Observation the conditions and position of legal boundary.
- **Block F017 Division 2: Sungai Pinang River (HCV Area).** Observation of HCV management.
- **Fertilizer storage** Observation towards health, safety and environment aspect.
- **Workshop.** Field observations related OHS and environmental aspect.
- **Fire House.** Field observations related OHS and environmental aspect.
- **Spare Part Warehouse.** Field observations related chemical management, OHS, and environmental aspect
- **Agrochemical Warehouse.** Observation towards health, safety and environment aspect
- **Oil Storage.** Field observations related OHS and environmental aspect.
- **BSS.** Observation towards health, safety and environment aspect.
- **Generator House.** Field observations related chemical management, OHS, and environmental aspect.
- **Daycare.** Observation and interview with worker related labor aspect and OHS.
- **CHC (Central Housing Complex).** Observation to emplacement facilities such as assembling points, fire extinguisher, in-organic waste store, sanitation system, housing quality, playground, and masjid
- **Harvesting Activity Block E16 Division 1.** Observations and interviews related to aspects of BMP, worker welfare, OHS and the environment.
- **Spraying Activity Block G18 Division 2.** Observations and interviews related to aspects of BMP, worker welfare, OHS and the environment.
- **Manual Weeding Block J19 Division 3.** Observations and interviews related to aspects of BMP, worker welfare, OHS and the environment.
- **EFB Transfer Activity Block J19 Division 3.** Observations and interviews related to aspects of BMP, worker welfare, OHS and the environment.
- **Harvesting Activity Block K18 Division 3.** Observations and interviews related to aspects of BMP, worker welfare, OHS and the environment.

2.3	Stakeholder Consultation and Stakeholders Contacted
2.3.1	Summary of stakeholder consultation process.
ASA-1.3 (Remote)	Will be completed during the onsite audit.
ASA-1.3 & ASA 1.4 (Onsite)	<p>Summary of stakeholder consultation process for PT Bina Sains Cemerlang was held by:</p> <ul style="list-style-type: none"> • Public Notification was made on MUTU Website • Public consultation meeting with government institution on 18 January 2022. • Public consultation meeting with communities on 18 January 2022. • Public consultation meeting with internal stakeholders and contractor 18 January 2022. • Public consultation with NGOs (by email) such as WWF, WALHI, AMAN, and Sawit Watch on 11 January 2022. <p>Numbers of input from stakeholders were clarified by PT Bina Sains Cemerlang.</p>
2.3.2	Stakeholder contacted
	Please find appendix 1

2.4	Determining Next Assessment
	The next visit (Recertification) will be conducted eight (9) months to twelve (12) months after the license issued

3.0 ASSESSMENT FINDINGS

3.1 Summary of Assessment Report of the RSPO Certification

MUTUAGUNG LESTARI has conducted an assessment of Sungai Pinang POM – PT Bina Sains Cemerlang subsidiary of Sime Darby Plantation Berhad operation consisting of one (1) mill and two (2) oil palm estates.

During the assessment, there were two (2) Non-conformities were assigned against Major Compliance Indicators; two (2) non-conformities were assigned against Minor Compliance Indicators; and One (1) opportunities for improvement were identified.

Further explanation of the non-conformities raised and corrective actions taken by the company are provided in section 3.5. The company has already prepared and implemented the corrective actions that had been reviewed and accepted by Auditors in form of documentation evidences e.g. (*document record/photographic/etc*). Those corrective actions taken that consist of two (2) Major non-conformities and two (2) Minor non-conformities had been closed out shall be verified during next assessment.

MUTUAGUNG LESTARI found that Sungai Pinang POM – PT Bina Sains Cemerlang subsidiary of Sime Darby Plantation Berhad complied with the requirements of RSPO Certification Systems for Principles & Criteria and RSPO Independent Smallholder Standard, endorsed by the RSPO Board of Governors on 12 November 2020 and Indonesia National Interpretation of Principles and Criteria for Sustainable Palm Oil Production 2018, endorsed on 20th April 2020.

Therefore, MUTUAGUNG LESTARI Recommends RSPO Certification of compliance is continued.

Ref Std.	VERIFICATION RESULT of MUTU-Certification	
PRINCIPLE #1 BEHAVE ETHICALLY AND TRANSPARENTLY		
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	Certification unit showed SOP of information requests (SOP Rev-02) validated on 01 February 2016 which explains the types of documents which are publicly accessible such as human rights policy, list of employees, continuous improvement, HCV, IUP, etc. These documents can be accessed by sending a request to the management. Other than that, the SOP explains the types of information that may be accessed in public or provided in general and information that is confidential and requires approval from company management. The SOP also explains the person responsible for providing information both internally and externally, namely the Human Resources Officer or External Affairs Officer.	
1.1.2	The company has also reported several mandatory reports on environmental, manpower, legality and other aspects, for example: <ul style="list-style-type: none"> Plantation report of PT Bina Sains Cemerlang period of Semester II of 2021 has been sent to Plantation Agency of Musi Rawas District on 11 January 2022. HGU utilization report of PT Bina Sains Cemerlang for the period 2021 has been sent to Land Agency of Musi Rawas District on 11 January 2022. Evidence of reporting RKL-RPL Semester 1 2021 to the Ministry of Environment through the environmental electronic reporting system (SIMPEL) with ID number 1642148595-2002 on October 11, 2021 Evidence of reporting on the management of Hazardous and Toxic waste in Quarter IV to the Ministry of Environment through the electronic environmental reporting system (SIMPEL) with ID number 1642149164-2002 on January 14, 2022 Evidence of reporting on the management and utilization of waste in Quarter IV to the Environmental Service of Musi Rawas District on January 10, 2022. Evidence of sending the OHS Committee report of SPE, BPE and SPF for the fourth quarter of 2021 to the Manpower and 	

Transmigration Office of Sumatera Selatan Province on January 10, 2022.

- Reporting of Employment Report for PT Bina Sains Cemerlang (Sungai Pinang Estate) in 07 June 2021 to Manpower and Transmigration Agency of Sumatera Selatan Province.
- Reporting of Employment Report for PT Bina Sains Cemerlang (Sungai Pinang Factory) in 11 January 2021 to Manpower and Transmigration Agency of Sumatera Selatan Province.
- Reporting of Employment Report for PT Bina Sains Cemerlang (Sungai Pinang Estate) in 04 November 2021 to Manpower and Transmigration Agency of Sumatera Selatan Province.

Based on the description above, it can be concluded that the company has routinely reported mandatory reports which are the provision of information to stakeholders on a regular basis in accordance with the timeframe. This is also reinforced by the results of interviews with representatives from Agencies in Musi Rawas District who stated that the company routinely reports all required information according to the time frame.

1.1.3

The Company has shown a record of requests for information and responses given that are listed in the Log Book of external communications and information giving. The document provides information regarding the date and number of the letter, sender, destination, subject of the letter, responses, date of response, and information. In the 2021 period (January-December) there were no requests for information from relevant stakeholders, but there were several letters of request for assistance and the company responded to them according to the time frame contained in the procedure.

Based on an interview with the Surrounding Village Representative, it was found that the company had conducted socialization to the Village regarding the mechanism for requesting information from the company and the representative has been understood related to mechanism. If there is a request for information, the village will send a letter or tell the request orally to the company and the company will respond to it. In addition, the representative also said that in the past year there had never been a letter of request for information to the company.

1.1.4

Certification unit also showed the record of the socialization regarding the SOP mentioned in 1.1.1 on 20 September 2021 attended by every stakeholders such as: Factory Manager, Assistant, Contractor, and Safety Officer and Communities. In addition, based on the interviews with the villagers, labor union and gender committee, it is known that they had a good understanding of communication and consultation procedures.

1.1.5

The certification unit has shown the PT Bina Sains Cemerlang Stakeholder Register document, updated December 2021. Based on this document, there are stakeholders related to certification unit which include government stakeholders (province, regency, sub-district and village), the public facilities, partner cooperatives, village organizations, corporations, internal stakeholders, contractors, FFB suppliers, etc. The stakeholder register explains the name, agency/position, location, category and contact person number.

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 the ethical codes in all operational activities and transactions. This policy is stated in the Sime Darby Plantation Group Code of Conduct updated in December 2021. This policy generally explained that their ethical code is here as follows:

- Collaborating, respecting each other, equal opportunity, non-discrimination, and protecting human rights.
- Avoid conflicts of interest.
- Avoid bribery and corruption.
- Ensuring the confidentiality of the information and preventing the abuse of obtained information through the company's operational activities.

Furthermore, it's specifically stated in article number 7 that the group prohibits their workers from any bribery, illegal, and unethical business practice.

The scope of this policy is: shareholders, board of commissioners, directors, employees, customers, contractor partners, business partners, creditors, banks, auditors, local communities / partners and the environment, government, competitors, mass media, NGOs, CBOs, unions. Workers, Strategic Business Partners, Plasma Farmers, and similar industry associations.

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. Based on the interview with workers and contractor workers, it's known that they had a good understanding towards the code of ethics policy.

1.2.2

In procedure No. 440 / HRM-COC / 07 chapter 6 regulates the enforcement of the code of conduct which contains monitoring and implementation; reporting of violations; and imposing sanctions for violations. Compliance with the code of conduct is the responsibility of management, assisted by the Minamas Disciplinary Committee. Unit Heads are responsible for their respective work environments. Each individual is obliged to report every violation to the Disciplinary Committee, then the Disciplinary Committee reports to Management with sufficient and accountable evidence. Management is obliged to provide protection for the reporter. Individuals who commit violations have the right to provide an explanation to their direct supervisor, prior to the decision to impose sanctions.

Other than that, certification unit have a system to monitor compliance and implementation of policies and overall ethical business practices on several SOPs, here as follows:

- SOP of ethical code implementation monitoring No. 01/SOP/MIK-PSQM/II/2020 validated on 2 January 2020 which stated the UoC's procedure in implementing their ethical codes.
- SOP of recruitment validated on 4 January 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 grievance of workers (No. SOP SHE Rev-01) validated on 1 February 2016 which stated the procedure in handling workers' grievance.
- SOP of handling grievance of communities (No. 005/LSI-PKM/14) validated on 1 January 2014 which stated the procedure in handling communities' grievance.
- SOP of handling information (No. SOP Rev-02) validated on 01 February 2016 which informed the UoC's accessible documents and the procedure in delivering requested information.

Based on the management review and internal audit document, there were no violation against the UoC's ethical codes.

Status: Comply

PRINCIPLE #2 OPERATE LEGALLY AND RESPECT RIGHTS

2.1

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

2.1.1

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

Land legality

The company shown evidences over its compliance toward the applicable regulation related to the aspects of land legality (HGU and IUP). As for the land cultivation permit, Certification Unit has owned the Plantation Business Permit (IUP) and Land Title (HGU), namely:

- HGU Certificate No. 07/99 dated June 12, 1999 issued by the Head of the Land Office of Musi Rawas District dated on 12 June 1999, with an area of 6,513 hectares. The date of expiry of the rights is 11 June 2034.
- Plantation business license in the form of Plantation Business Registration Letter No. 105 / Mentanhut-VII / 2000 from the Ministry of Forestry and Plantation of the Republic of Indonesia issued on 9 October 2000 with an area of 6,513 hectares and mill capacity 30 MT FFB/Hour.

Social and Environmental Regulations:

- The company shows an Environmental Impact Analysis (AMDAL) document for Oil Palm Plantations and Palm Oil Mills with a reserved area of 24,000 Ha and an installed production capacity of 30 tons of FFB/hour (can be increased to 45 tons of FFB/hour).

The Agribusiness Agency has approved this document, Ministry of Agriculture No. 005/ANDAL/RKL-RPL/BA/X/94, dated October 18, 1994.

- The Revised Environmental Management Plan (RKL) and Environmental Monitoring Plan (RPL) for Palm Oil Plantations and Processing Mills were approved by the Musi Rawas District Head 128B/KPTS/IV/2007 on October 30, 2007. The plantation area is 6513 ha with a reserved area of 24,000 ha, a capacity of 30 to 60 tons FFB/hour. In addition, this document was prepared by the Center for Environmental Research Research Institute, Sriwijaya University. Amdal drafting team Ir. H.M Idris Naning (Team Leader, AMDAL 1 & B).
- Social and Environmental Impact Assessment for PT Bina Sains Cemerlang's replanting activities for the 2015-2018 period covering an area of 1,774.23 ha consisting of 865.90 ha (Bukit Pinang Estate) and 908.33 ha (Sungai Pinang Estate)
- Decree of the Head of the Musi Rawas District Investment and One-Stop Service Office Number 503/05/LB3/DPM-PTSP/IV/2019 dated May 31, 2019, regarding the Extension of the B3 Waste Management Permit for the Temporary Storage of B3 Waste at PT Bina Sains Cemerlang. The validity period is five years from the date of this decision.
- Decree of the Regent of Musi Rawas District Number: 436/KPTS/LDH/2017 dated June 7, 2017, concerning the permit for liquid waste for land application activities which is valid for five years from the date of stipulation. Based on this permit, it is known that the land application area is 83.64 ha (Sungai Pinang Estate), located in blocks F11 and E12.
- Decree of the Minister of Public Works and Public Housing Number. 782/KTSP/M/2021 dated June 16, 2021, regarding granting a water resource exploitation permit to PT Bina Sains Cemerlang for palm oil and domestic processing in Sungai Pinang, valid for five years from the date of stipulation.
- The company has identified the HCV area within its operational area. An independent consultant of CV POLLITO conducted the identification. The HCV areas present in PT BSC are HCV 1.1, HCV 4.1, and HCV 5 in the riparian regions of Pinang River, Durian River, Selinsing River, and Air Hitam River for 492 ha included in the plantation area (potential HCV Area). The river border area settled into the HCV area of 44.07 ha and is not in the planting area statement.

BMP Aspect

- The company has cleared land for replanting without burning.
- The company does not use invasive species in biological pest control
- The company has stored chemicals in accordance with applicable regulations

OHS Aspect

- The company has provided PPE to every worker.
- The company already has licensed and valid personnel.

Compliance with Manpower Regulation

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

- Reporting of Employment Report for PT Bina Sains Cemerlang (Sungai Pinang Estate) in 07 June 2021 to Manpower and Transmigration Agency of Sumatera Selatan Province.
- Reporting of Employment Report for PT Bina Sains Cemerlang (Sungai Pinang Factory) in 11 January 2021 to Manpower and Transmigration Agency of Sumatera Selatan Province.
- Reporting of Employment Report for PT Bina Sains Cemerlang (Sungai Pinang Estate) in 04 November 2021 to Manpower and Transmigration Agency of Sumatera Selatan Province.
- The implementation of the minimum wage in 2021 and 2022 is in accordance with regulation.
- Payment of overtime wages to workers in accordance with Decree of the Minister of Manpower No. 102 of 2004.
- Implementation of the structure and scale of wages for all levels of workers in accordance with Minister of Manpower Regulation No. 01 of 2017.
- Implementation related to the protection and prohibition of employing minors (less than 18 years) in accordance with Law no. 13 of 2003, Law no. 20 of 1999 and Law no. 35 of 2014.

2.1.2

Procedure of legal requirement which presented in document No: No 001, dated 01 July 2019 mentioned that Plantation Services Department and Head of Administration has responsibility to arranged and monitored legal related laws and/or regulation. The procedure mentioned that in order to monitor and update of laws and/or regulations, the Plantation Services Department and Head of Administration required to actively check and make coordination with Government Agencies or Institutions. Internal audit of

regulations compliance is conducted annually as example on 13-17 December 2021 in PT BSC. Regarding the evidence of evaluation of legal compliance from contractors collaborating with the company, there has been a non-conformity in indicator 2.2.2

2.1.3

The company has a HGU Pole Maintenance procedure which is stated in document M-025/HPUI/IX/2018 dated 27 September 2018. In the procedure it is explained that the maintenance of HGU boundary marks is carried out periodically at least every six months by monitoring and checking the physical condition of the HGU poles by officers who have been appointed by the management of the plantation.

The company shows the document for monitoring the HGU markers which is carried out every 2 months. The last HGU marker monitoring was carried out in November 2021. The report on the inspection and maintenance of the boundary markers has provided complete information regarding the number of markers, condition of markers, location of markers, coordinates of markers and corrective actions as well as the target time for repairs if there are damaged or missing marker. In the monitoring report, it is known that all HGU marker are available.

Field observations to several HGU boundary markers in Sungai Pinang Estate (No. 01, 02, 06, 07, 08, 09 and 10) and Bukit Pinang Estate (No. 04, 14 and 15) show that the poles sampled during the audit were available in the field and in well-maintained conditions. Verification using GPS indicates that the pole coordinate is in accordance with the provisions of the land title.

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 use of contractors for plantation and mill activities, the certification unit has well documented the list of contractors, contact persons, work agreements, etc. The results of the document review show that certification unit has a list of 12 third parties (contractors and transporters) who cooperate with the company during the 2021-2022 period. The company also shows examples of 3 cooperation agreements with third parties, namely cooperation with PT Mitra Karya Jaya Perdana (Replanting), CV Semangus Indah Express (CPO-PK Transport) and Mr. Indrajaya (FFB Transport). Where in the agreement has stated the obligations of third parties to comply with applicable laws and regulations such as the implementation of OHS, registration of workers in the BPJS program, the obligation to pay taxes, and other provisions.

2.2.2

In each work agreement between the certification unit and the third parties (contractors and transporters), there are several separate clauses related to fulfilling legal obligations in force in Indonesia as one of the obligations that must be fulfilled by the contractor. Some of these obligations are related to the registration of BPJS (Government Insurance Scheme), the provision of minimum wages, the obligation to use PPE, other permits such as tax payment (NPWP), vehicle licenses (STNK), driver license (SIM) and others.

Non-Conformity No. 2022.01 with minor category

- The results of the document review show that the company has a list of 12 third parties (contractors and transporters) who cooperate with the company during the 2021-2022 period. The company also shows examples of 3 cooperation agreements with third parties, namely cooperation with PT Mitra Karya Jaya Perdana (Replanting), CV Semangus Indah Express (CPO-PK Transport) and Mr. Indrajaya (FFB Transport). Where in the agreement has stated the obligations of third parties to comply with applicable laws and regulations such as the implementation of OHS, registration of workers in the BPJS program, the obligation to pay taxes, and other provisions.
- The results of interviews with third parties (PT Mitra Karya Jaya Perdana and CV Semangus Indah Express) obtained information that these third parties have provided PPE to their workers and provided minimum wages to their workers, but have not registered their workers in the BPJS program. This has not been proven by the company related to the registration of workers in the BPJS program, the provision of PPE and the application of the minimum wage to its workers.
- The results of observations and interviews with contractor workers at SPE for replanting activities, it is known that there is 1 worker who does not use PPE at work (has been given but is not used) and 1 worker who has not received PPE from the contractor.
- The company can show third party compliance for Mr. Indrajaya which will be carried out in 2021 where the fulfillment of relevant laws and regulations such as the application of OHS (having used appropriate PPE such as helmets, safety shoes, etc.), BPJS

health ownership (because of individuals) and ownership of a driving license for Dump Trucks. However, for other third parties (PT Mitra Karya Jaya Perdana and CV Semangus Indah Express) the results of monitoring compliance with the obligation to comply with laws and regulations have not been shown.

The company has not been able to show that all third parties who are cooperating in operational activities have fulfilled the relevant legal obligations and can be proven by the third party concerned.

2.2.3

In each work agreement between the certification unit and the third parties (transporter/contractor), there are Contract/Agreement or Integrity Principles related to statement fulfilling legal obligations in Indonesia as one of the obligations that must be fulfilled by the third parties. Some of these obligations are related to compliance with laws and regulations in Indonesia, disallowing child, forced and trafficked labor to be employed by the third party, and where young workers are employed, the sustainability policy has included a clause for their protection. To ensure compliance with these clauses, the certification unit always requests the requirements for the completeness before the contractor does / starts work.

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

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

2.2.2	Status: Non-Conformity No. 2022.01 with minor category	
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2.3
All FFB supplies from outside of the unit of certification are from legal sources.

2.3.1, 2.3.2

The management unit does not receive FFB from other sources, the source of FFB is only from PT BSC's own plantations, namely Sungai Pinang Estate and Bukit Pinang Estate.

	Status: Comply	
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PRINCIPLE #3 OPTIMISE PRODUCTIVITY, EFFICIENCY, POSITIVE IMPACTS AND RESILIENCE

3.1
There is an implemented management plan for the unit of certification that aims to achieve long-term economic and financial viability.

3.1.1

The company shows PT Bina Sains Cemerlang's Business Plan document for the period 2022 – 2026 which is signed by the Head of Sustainability & Quality Management, the document has explained related to Production projections, Projected Costs including the replanting program, in addition to the source of FFB entirely from the Estate.

3.1.2

The company shows the replanting plan documents, including the following:

Year	2022	2023	2024	2025	2026
Ha	451.77	504.89	526.60	-	355.74

The implementation of replanting activities is evaluated periodically, for example the company shows work completion minutes replanting activities in Divisions I and III of BPE on Agreement No. 003/Replanting/BSC/VI/2018 for the seventh payment on December 31, 2021, in summary, the replanting activities include the progress of: Falling, stumping and chopping trees; digging, closing the hole of the former hump; Construction of roads in areas with a slope of >6°; Felt making.

3.1.3

The company has carried out periodic management review activities, for example the company showed a recording of the

management review meeting held on December 30, 2021, the activity was attended by 13 participants who discussed improvements to the ISPO and RSPO internal audit results.

Status: Comply

3.2

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

3.2.1

The certification unit already has a system to improve existing practices with the latest information and techniques and a socialization mechanism for all workers following current technological developments. The certification unit also develops guidelines for farmers by providing systematic training for continuous improvement. Some of the evidence that has been applied for continuous improvement include:

- 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 energy is by reducing the use of fossil fuels.
- The 2021 HCV Management Plan improved 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.
- Air quality management and monitoring through several actions like road maintenance, air quality testing, routine maintenance of vehicles and machines, and vehicle upgrades.
- Management and monitoring of surface and groundwater through testing the quality standard.
- Green House Gas Management and using land clearing with mechanical and zero-burning policy.
- The company show the record evidence regarding internal audit of RSPO that conducted on 13-17 December 2021.

3.2.2

Certification Unit already has an annual report document using the RSPO metric template format that has been provided to the auditor team at the time of the assessment. The summary in the report, for example, is as follows:

Name of RSPO Member	: Sime Darby Plantation Berhad
RSPO Membership Number	: 1-0008-04-000-00
Name of Certified Unit	: Sungai Pinang Palm Oil Mill
Name of Certification Body	: PT MUTUAGUNG LESTARI
RSPO PalmTrace ID Number	: RSPO_PO1000000316
Number of Mills	: 1
Number of Estates	: 2
Production Area (ha) - Estate	: 5105
Certified Area (ha) - Estate	: 6513
High Conservation Value (HCV) Area (ha)	: 44
Peatlands - Planted (ha)	: 0
Peatlands – Unplanted (ha)	: 0
Average LTIFR	: 0
Total Workers	: 84
% of Non-Local Workers of Total Workers	: 0%
% of Contract Workers of Total Workers	: 8.3 %
% of Female Workers of Total Workers	: 3.6 %
% of Young Workers	: 0%

Status: Comply

3.3

Operating procedures are appropriately documented, consistently implemented and monitored.

3.3.1

The company has a plantation procedure in the form of a Reference SOP for the Agronomic Planting Manual for Palm Oil No. Policy; 110 / EST-ARM / 13 consisting of 18 chapters / sections on technical culture of oil palm cultivation was released based on Upstream

Indonesia's plantation head memorandum on September 1, 2013. Besides that, the company has procedure of Palm Oil Processing System in the Palm Oil Mill Technical Guidelines consisting of the basics of oil palm processing, oil and palm kernel stockpiling, control of factory wastewater, water treatment and laboratory analysis and others.

3.3.2

As a mechanism to check the implementation of procedures consistently, the company conducts internal audit activities. In addition, to examine the implementation of procedures for work carried out by contractors/third parties, the company evaluates contractors and conducts inspections when submitting minutes of work completion at each stage of payment.

3.3.3

The company already has a record of the monitoring and follow-up that has been carried out, for example:

- PT Bina Sains Cemerlang ISPO internal audit report conducted on 13 – 17 December 2021.
- PT Bina Sains Cemerlang RSPO internal audit report conducted on 13 – 17 December 2021.
- Performance Management Unit of Sungai Pinang Estate Report 2021.

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 already has several documents related to social and environmental impact studies carried out independently or participative by involving affected stakeholders in collaboration with accredited independent experts. Some of the records held by the unit of certification are as follows:

Environmental Impact Assessment (EIA)

The company has EIA document (AMDAL) covering 24,000 ha with mill capacity of 30 ton/hour. The document is legalized by Agribusiness Division of Agriculture Department no. No. 005/ANDAL/RKL-RPL/BA/X/94 dated 18 October 1994. The study includes impact analysis on air quality reduction, soil fertility, erosion and sedimentation, water quality, change in vegetation cover and wildlife disturbance, community recklessness, job opportunity and the development of local business and income.

The Revised Environmental Management Plan (RKL) and Environmental Monitoring Plan (RPL) of Plantation and Palm Oil Processing Plant have been approved by the Regent of Musi Rawas 128B / KPTS / IV / 2007 dated 30 October 2007. The estate area is 6,513 ha with 24,000 ha of reserve area, Capacity 30 to 60 Ton FFB/Hour. In addition, this document was created by the Centre for Environmental Research Institute, Sriwijaya University. The team of Amdal Ir. H.M Idris Naning (Team Leader, AMDAL 1 & B). Social and Environmental Impact Assessment for replanting activities of PT Bina Sains Cemerlang for 2015-2018 covering 1,774.23 ha consists of 865.90 ha (Bukit Pinang Estate) and 908.33 ha (Sungai Pinang Estate).

In the document above, information related to environmental aspects and parameters must be monitored and managed, along with information on targets and implementation times contained in the RKL-RPL matrix. The document has also covered all aspects of plantation and mill activities and their changes throughout the operational activities. The sampling methodology used is participatory, involving external stakeholder groups to identify impacts. Based on the verification of these documents, it can be concluded that all environmental impacts from plantation activities have been identified, and their management recommended relevant regulations and laws.

Social Impact Assessment (SIA)

PT BSC has conducted a social impact assessment of oil palm plantation management in July 2011 conducted by CV POLLITO. The report about the involvement of which contain the public to ask for input related to environmental and social aspects of society. Communities involved include (documented in the public hearing event attendance list): Forest Agency, Environment Agency, Plantation Agency, Social Agency, local NGOs, Community Leaders, Customary Leaders, Youth Groups, etc. The form of stakeholder involvement is carried out through discussions, interviews, field checking and telephone contacts.

The form of stakeholder involvement is through discussions and interviews. There is recorded evidence in the form of the attendance list of activities public hearing on January 6th, 2010. The event was attended among others by: Community leaders, customary leaders, youth groups, Forest Agency, Environmental Agency, Agriculture Agency, Social Agency, local NGOs, and other.

The types of data collected are primary data and secondary data. Primary data collection for monitoring the management of social impacts is obtained from relevant stakeholders, affected parties, and local village officials who represent the community and as verifiers. Secondary or indirect data collection is carried out through literature studies through various references such as environmental assessment documents, HCV study results in documents, local government literature, CSR implementation records, company internal data, correspondence between companies and affected parties, local news, and information. National and so on. These data sources are used as consideration for social impact management recommendations. Based on the verification of these documents, it can be concluded that all social impacts of plantation activities have been identified, and their management recommended relevant regulations and laws.

High Conservation Value Assessment (HCVA)

The company has identified HCV area within its operational area. The identification was conducted by independent consultant of CV POLLITO in January 2010. The HCV area present in PT BSC are HCV 1.1; HCV 4.1 and HCV 5 in form of riparian area of Pinang River, Durian River, Selinsing River and Air Hitam River for 492 ha that is included in the plantation area (potential HCV Area). The river border area that has been settled into the HCV area of 44.07 ha and is not in the planting area statement.

3.4.2

The certification unit has managed and monitored social and environmental impacts that are carried out independently by involving affected stakeholders. Some evidence of documentation of activities that have been carried out are as follows:

Environmental Impact Assessment (EIA)

Based on the verification results of the RKL-RPL document for Semester 1 of 2021, it can be concluded that all the management and monitoring parameters requested in the environmental document matrix have been implemented. The certification unit has also evaluated every parameter of effective impact monitoring carried out as required in KepmenLH 45 of 2005, including evaluation of trends, evaluation of critical levels, and compliance. Based on the evaluation results, it is known that all parameters are still by the related Quality Standards, and there is no indication of environmental pollution in the area around the company. The effectiveness of environmental management and monitoring from the analysis results and compatibility between management and monitoring plans with their implementation in the field. Several things can be concluded from the results of the review of the RKL-RPL document for Semester 1 of 2021, including:

- Preventing soil, water, and air pollution by reducing the use of chemicals, managing waste properly, and complying with proper waste disposal in each area.
- Carry out efforts to save the environment by protecting areas important for environmental sustainability, such as river borders.
- Manage and monitor the impact of potential land and garden fires.
- Manage and monitor the quality of soil, air, water, and other disturbances.
- Utilizing solid waste from palm oil mills as a substitute for fertilizers and fossil fuels.

This can also be proven from field visits to the WWTP area, the Land Application area, and 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 its operational activities. The company has also carried out ecological management following the RKL-RPL by installing signboards for conservation areas, markings in stakes, and red paint for spray boundary areas and other chemical applications. Based on the results of interviews with sprayer and fertilization officers, they also stated that they were aware of the prohibition on the use of chemicals in the buffer zone marked in red. In addition, they do not use chemicals when they are close to water bodies such as canals, reservoirs, or artificial ponds connected to rivers.

The certification unit has also made an RKL-RPL report every semester, which refers to the environmental management and monitoring matrix. Environmental management reports are carried out every six months and submitted to the relevant agencies, for example, the RKL-RPL Report for Semester 1 of 2021, which to the Environmental Agency of Musi Rawas District with proof of receipt dated October 18, 2021. Based on the results of interviews with the Environmental Service regarding reporting on the implementation of RKL-RPL, the certification unit routinely does this. Until the audit was conducted, there were no complaints or conflicts related to the environment from NGOs or local communities around the company.

Social Impact Assessment (SIA)

The social monitoring and management plan included The Social impact assessment conducted in 2011. Based on document verification, the management plan and monitors the social impact that the company has implemented based on participatory results with affected parties. The program has included an issues management schedule and PIC. During the audit, the company has shown a document of social impact management and monitoring plan activities for the period 2021-2022.

Social and environmental management and monitoring plan has been developed with the participation of affected stakeholders. The form of stakeholder involvement is through discussions and interviews. There is recorded evidence in the form of the attendance list of activities public hearing on January 6th, 2010. The event was attended, among others, by Community leaders, customary leaders, youth groups, Forest agencies, Environmental agencies, Agriculture agencies, Social agencies, local NGOs, and others. Based on the interviews with the surrounding community, relevant agencies, and internal stakeholders, the company has identified and managed environmental and social impacts such as social assistance, infrastructure improvements, surface water management, land ownership licensing processes, etc.

Based on the results of consultations with workers' representatives, there is no form of discrimination against workers, no underage workers were found, the company has also fulfilled the rights of its employees, and the company has provided several critical facilities for employees. Such as housing, water, electricity, places of worship, public facilities, Educational infrastructure (schools), and other facilities. The company also allocates resources for the maintenance of the entire facility. The resource persons also stated that they could voice their views through their representative institution or a spokesperson they choose in the evaluation activities to review and develop mitigation plans and monitor the success of the implemented projects.

Based on the results of field visits and external stakeholder interviews related to the management of social impacts carried out by the company for 2021, it can also be concluded that there are no issues related to the social effects that the company has not identified. All potential social impacts have been managed and included in the management plan, which is still being collected. For example, the land ownership permit process is still under management by the community.

3.4.3

The certification unit has made efforts to implement the management and monitoring of social and environmental impacts as described in indicator 3.4.2. In addition, the certification unit also periodically updates the administration in a participatory manner. Some documentary evidence of the actions that have been made are as follows:

Environmental Impact Assessment (EIA)

The company involves the Environment Service and the Ministry of Environment and Forestry to monitor the results of environmental management by presenting RKL-RPL reports and other environmental management documents that are sent every certain period, which can be proven in indicator 1.1.2. The company also does not block access to all environmental agencies if they carry out field verification in their management areas. It aims to obtain advice and advice in carrying out environmental management by the vision, mission, and government programs so that they can run synergistically. Monitoring and updating related to environmental impact management are also carried out in conjunction with an evaluation of HCV management described in more detail in indicator 7.12.4. However, in general, all recommendations from the assessment of HCV management carried out in a participatory manner will be carried out in line with the management and monitoring of environmental impacts.

Social Impact Assessment (SIA)

The company has shown evidence of implementing the social impact management plan, reviewed and updated in a participatory manner. Based on the results of the Socialization/Consultation document regarding the action plan and monitoring of social and environmental impacts in 2022, which was carried out on December 12, 2021, to the environment around the community such as Semangus Baru Village, Desa Anyar, Sungai Pinang Village, Muara Rengas Village, Sindanglaya Village, and Sukamaju Village. Based on this document, the implementation of monitoring and management of social and environmental impacts have been reviewed, such as updating the management of existing land permits according to their validity period and the fulfillment of permits related to land ownership by applicable regulatory mechanisms, Environmental Management such as factory effluent management, Hazardous waste management, pollution river water bodies around the garden due to domestic liquid waste, pollution of surrounding river water bodies such as chemical spraying and replanting as well as plasma land clearing management according to regulations, economic improvement and empowerment.

Based on the explanation above, it can be concluded that the company has made efforts to update the social and environmental

management program periodically with transparent and accountable evidence.

Status: Comply

3.5

A system for managing human resources is in place.

3.5.1

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

- Recruitment of workers is based on needs and adjusted to the ability of the company.
- The age of the prospective worker is a minimum of 18 years at the time of recruitment of workers.
- Recruitment of workers is based on the ability, expertise and assessment of prospective workers.
- The company is authorized to carry out the placement, transfer and promotion of workers in accordance with applicable regulations.
- Termination of employment can occur when a worker retires, dies, resigns, and terminates an employment agreement due to a serious violation and others.

In addition to being publicly listed in Collective Labor Agreement, the certification unit has other procedures in the form of Policies, SOPs, Internal Memorandums and others related to recruitment, transfer, promotion, retirement, termination of employment and others. For example, some procedures that are owned by the certification unit.

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

Based on the explanation and description above, it can be concluded that the certification unit has documented procedures for recruitment, selection, acceptance, promotion, retirement and termination of employment and is available to workers and their representatives in accordance with applicable laws such as Law No. 13 of 2003, Law no. 11 of 2020 and other regulations related to employment.

3.5.2

The company always documented all labor procedures that have been carried out properly such as recruitment, promotion, performance assessment, pension and others. The following are some sample labor procedures that have been implemented and are well documented by 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 KWT (initial) who sent the job application letter on 16 January 2021 and started working on 01 February 2021.
- Promotion documents such as management decree for worker's promotion. For example, a worker on behalf of ARS (initial) who had a promotion based on worker's appraisal, from contract worker to permanent worker (SKU-H)
- Pension document such as the management decree of employment's termination and certification unit also showed other supporting documents such as the decree, there are also other supporting documents such as calculation of pension payments, labor documents of workers since they first worked, etc. All procedures and documents shown are in accordance with existing procedures and in accordance with applicable laws.

The results of interviews with workers (harvesting, spraying and mill operators) in note that the certification unit has carried out labor procedures starting from recruitment, selection, acceptance, promotion and retirement procedures in accordance with existing regulations, as well as all the application is assessed in accordance with the abilities and competencies of the employees. For example, workers who initially entered were selected before being accepted, workers who received promotion / class promotion had received an assessment from their superiors and workers who retired received all their rights as retirees. During 2021 employment system which is carried out still refers to the Collective Labour Agreement which is based on the existing government regulations in

Indonesia, this was strengthened by the results of consultations with the labor union in every unit, the Manpower and Transmigration Agency of Musi Rawas District which stated that the application of existing labor procedures is in accordance with the regulations.

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

Status: Comply

3.6

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

3.6.1

The company shows the HIRAC document for each Estate and Mill unit which is available in Indonesian, the document informs the type of work, potential hazards, effects, risks, risk control, risk after control, and PIC.

The HIRAC document has been socialized to all workers, for example, based on the results of interviews with Sorting workers at the Mill and Harvest workers, it is known that workers can explain the potential hazards in their work area and how to control them such as safe working procedures and the use of appropriate PPE.

3.6.2

Based on the results of the document review, it is known that the company has monitored the effectiveness of the OHS plan including:

- Monitoring of the completeness of licensed personnel and equipment and machinery permit certificates.
- Monitoring of fire control facilities and infrastructure, fire extinguishers, hydrants and first aid kits and bags
- Monitoring the condition and completeness of the use of PPE.
- Regarding the implementation of the MCU, based on the results of interviews with management, it is known that in 2020 – 2021 there will be no health checks due to the covid-19 pandemic and in order to prevent transmission, the company shows letters including:
 - Circular Letter of the Minister of Manpower of the Republic of Indonesia No. M/7/AS.02.02/V/2020 dated May 20, 2020 which one of the points explained: To temporarily postpone the health checks of the workforce until the aspects of occupational safety and health are met or until the covid-19 pandemic ends.
 - Inter-Office Mail from Regional CEO dated April 14, 2020 regarding Precautionary Measures in Facing the Spread of Covid-19 at Work Locations.
- The results of interviews with BSS SPE workers explained that the company has conducted health checks twice a year, but during the covid-19 pandemic, health checks have not been carried out.
- The company shows the PT BSC MCU screening schedule for high-risk employees in 2022 made by the Company's Doctor which is planned to be carried out in April and October 2022.

Companies are encouraged to carry out regular health checks for all workers and special health checks for high-risk workers by observing and implementing Health protocols. (OFI)

Status: Comply

3.7

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

3.7.1 & 3.7.2

Certification unit has training identification and program for workers for period of 2021 for operational training, OHS training, and policy socialization. In the program and identification training in 2021 have activities in mill and estate for workers and stakeholders (contractors, local communities, and others), some of training program, namely:

Internal Workers

- Training for manuring, harvesting and spraying activity
- Socialization of company's policy
- First aid training.
- Training for Environment and hazardous waste handling.
- Simulation of emergency responses and firefighting management

Stakeholders

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

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

- Training of spraying procedure and calibration in 02 February 2021.
- Socialization of HIRAC for workers and contractor workers in 12 June 2021.
- Socialization of Company Policy for workers and contractor workers in 20 December 2021.

Based on field observations and interviews with workers (harvesters, sprayers and mill operators), it is known that workers have understood their work in accordance with the procedures set by the company and their understanding of the duties and responsibilities for each job has been carried out quite well, because the certification unit has routinely conducted training every year according to the type of work each. Meanwhile, the results of interviews with representatives of third parties (transporter and contractor) and their workers in field and the surrounding community revealed that they had received routine socialization related to company policies, code of conduct, PPE, communication procedures and complaints were routinely provided by the certification unit which causes stakeholders to understand the procedures and work methods that already exist in the company's operational area.

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

3.7.3

The unit of certification showed socialization about the supply chain to employees which was last conduct on 15 December 2021. The minutes explained the procedures for managing certified and non-certified products including the responsibilities for each of the personnel who handle products.

Based on the interviews with weighbridge officers and security, the two personnel have been able to explain well about the management of certified and uncertified products, especially regarding the origin of the FFB source.

Status: Comply

3.8

Supply Chain Requirements for Mills

3.8.1 and 3.8.2

SCSS module used in Sungai Pinang POM is Identity Preserved (IP), because only received FFB from the estate which has been certified with RSPO i.e Sungai Pinang Estate and Bukit Pinang Estate.

3.8.3

Estimated certified product recorded in the last assessment report (ASA-1.2). The estimates of certified production for the next license period describe at ASA-1.3 & ASA-1.4 report (basic info 1.8.3), in reasonable amount taking into account the last year's production. The data are shown in the following table:

Products	Last Year Projected + Ext Time (11 Nov 2019 – 10 Dec 2021)	Actual* (January 2020 to December 2021)
FFB Certified (MT)	138,000	136,316.44
CSPO (MT)	31,000	30,070.88
CSPK (MT)	6,500	6,227.03

3.8.4

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

- Member Name: Sime Darby Plantation - Sungai Pinang POM, PT BSC
- License ID: CB93660
- Core Product: Palm Oil
- Member ID: RSPO_PO1000000316

- RSPO Membership Number: 1-0008-04-000-00 (Sime Darby Plantation Berhad)
- Type of Business: Oil Mill
- Supply chain model: Identity Preserved

3.8.5

The Mill has had procedures of Minamas Plantation Manual RSPO SCCS (No. SCCS-Std/RSPO/PSQM/02 Rev. 03 dated 1 December 2020). The procedure has covered all aspects in latest RSPO supply chain standard (P&C 2018), such as receiving and recording that identify the traceability of RSPO certified and uncertified source and products, FFB processing, the announcement in RSPO Palmtrace not later than 3 months after dispatch, key persons such as security, weighbridge clerk, dispatch/kernel officer, production clerk, Administration Head, as well as the training.

Based on the interviews with weighbridge officers and security, the two personnel have been able to explain well about the management of certified and uncertified products, especially regarding the origin of the FFB source.

3.8.6

The procedure for internal audit mentioned in the **Procedure of Internal Audit (No. SCCS-IA/RSPO/PSQM/04 dated 1 March 2018)**. Based on that procedure internal audit carry out minimum one times a year. Based on document review, the company show the record evidence regarding internal audit of RSPO SCCS that conducted on 13-17 December 2021. Based on result of internal audit, there is no non-conformity in SCCS indicator and complied with RSPO Supply Chain requirements for mills and the RSPO Rules on Market Communications and Claims.

Management Review of RSPO SCCS implementation conducted on 30 December 2021. The management review discussion has covered the input from internal audit result, correction and corrective action, process performa and product compliance, follow up of previous management review, and recommendation for improvement.

3.8.7

The mill has verified and documented the volumes of certified and non-certified FFBs received. Certified and non-certified FFB received period of 24 months before audit which is January 2020 – December 2021:

Month	FFB (ton)		Total
	Certified	Non-Certified	
Jan 2020 – Dec 2021	136,316.44	-	136,316.44

Estimated certified product recorded in the last assessment report (ASA-1.2). Actual certified produced has been verified during this assessment. The data are shown in the following table:

Products	Last Year Projected + Ext Time (11 Nov 2019 – 10 Dec 2021)	Actual* (January 2020 to December 2021)
FFB Certified (MT)	138,000	136,316.44
CSPO (MT)	31,000	30,070.88
CSPK (MT)	6,500	6,227.03

According to the data during the certification period, there is overproduction in FFB certified but there is not overproduction in CSPO and CSPK.

Related for handling non-conforming oil palm products, has been set in the Minamas Plantation Manual RSPO SCCS (No. SCCS-Std/RSPO/PSQM/02 Rev. 02 dated 06 April 2020). The complaint from stakeholder should be delivered in written, and shall be responded by MR in 14 working days. During the audit, there is no written complaint from stakeholders related to nonconforming products.

3.8.8

There are no sales of CSPO and CSPK during 24 months previous the audit. However, the management shown the template of dispatch documentation such as contract agreement, delivery order, delivery ticket, report of loading, weighing minutes, weighing card, and delivery note. That documentation cover information of delivery date, description of product and supply chain model, product quantity, identification number, certificate number, sender's name and address of the seller.

3.8.9

Until this assessment conducted, there is no sales of certified product. The unit of certification has legal ownership of CPO and PK and did not outsource its milling activities. Only transportation of CPO and PK are outsourced to the third parties, as shows through Work Agreement such as Agreement with CPO and PK Transporter of CV Semangus Indah Ekspres No. 010/Pengangkutan CPO-PK/BSC-SIE/VI/2020 dated 11 June 2020, valid thru 31 May 2022.

To ensure the contractors complies with the RSPO Supply Chain, in the agreement, there were clauses that set obligations of the contractor to comply with the supply chain rules. For instance, the responsibility to deliver products only from Sungai Pinang POM, as well as the willingness to observed by Certification Body and the company internal audit in order to verify the compliance.

3.8.10 and 3.8.11

Until this assessment conducted, there is no sales of certified product as well as contractual agreement such as for products transportation. For the further sales, there is no certainty whether the transportation will be conducted by contractor or the buyer.

3.8.12

The company has had the up-to-date record and report that are kept in mill office, complete, accurate and up-to-date. All the record can be accessed by the auditor, such as record of certified product shipping, sales contract, delivery order/invoice, production report and product sales. Based on document verification on supply chain procedure, retention time for all records and report regarding to supply chain are kept for 2 years.

For instance, record of all certified palm oil/palm kernel oil volumes purchased (input) and claimed (output) for period of 24 months before audit (January 2020 – December 2021):

Month	CPO (ton)		Total
	Certified	Non-Certified	
Opening stock	758.91	-	758.91
Jan 2020 - Dec 2021	29,311.98	-	29,311.98
Total	30,070.88	-	30,070.88

Month	CSPO Despatch (ton)			Total
	RSPO	Other Scheme	Non-Certified	
Jan 2020 - Dec 2021			29,907.02	29,907.02
Total			29,907.02	29,907.02

Month	PK (ton)		Total
	Certified	Non-Certified	
Opening stock	169.17	-	169.17
Jan 2020 - Dec 2021	6,057.86	-	6,057.86
Total	6,227.03	-	6,227.03

Month	CSPK Despatch (ton)			Total
	RSPO	Other Scheme	Non-Certified	
Jan 2020 - Dec 2021			5,868.68	5,868.68
Total			5,868.68	5,868.68

3.8.13 and 3.8.14

The conversion rate of production of CPO (OER) and PK (KER) were based on actual daily, monthly and yearly production. The extraction rate follows the actual data for a 24-month period for January 2020 until December 2021 i.e OER 21.50% and KER 4.44%. Periodically update of extraction is actual extraction.

3.8.15

SCSS module used in Sungai Pinang POM is Identity Preserved (IP), because only received FFB from the estate which has been certified with RSPO i.e Sungai Pinang Estate and Bukit Pinang Estate.

The Mill has SOP for the implementation of supply chain in the identification procedure and Traceability. Result of verification to the SOP and document review shown there was no uncertified FFB process by Mill, as well as separated during transportation.

3.8.16

Until this assessment conducted, there is no sales of certified product. For the CSPO and CSPK that sold as conventional, the company has removed the stock of CSPO and CSPK from the palm trace, as example removing stock of CSPO dated 20 January 2022 (transaction ID: ST-TR-8e93d122-b154) and removing stock of CSPK dated 20 January 2022 (transaction ID: ST-TR-29bb7dca-780a).

3.8.17

Based on announcement and transaction report documents review, it concluded that all RSPO certified products submitted are in compliance with the RSPO Rules on Market Communications and Claims.

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 & 4.1.2

The company shows the document of the human rights policy updated in July 2017. This policy explained committed to respect and protect human rights in order to create security for all workers including the living rights, reproductive rights, self-developing rights, justice rights, welfare rights, security rights, women's rights, and children's rights. Furthermore, on those policy also described about prohibiting retaliation against Human Rights Defenders (HRDs) as well as prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.

The commitment of the certification unit in respecting human rights has been quite well implemented in the absence of issues and incidents of human rights violations that occurred in the operational area of plantations and factories. This is evidenced by document study on complaints and grievance documents (internal and external) that so far there have been no incidents or issues of human rights violations occurring in the operational area of the certification unit.

During the audit carried out, the team auditor has been trying to ensure this policy has been communicated and implemented through stakeholder consultation. Based on interviews with workers, the surrounding community (village head, community leaders, smallholder's representative), and contractors known that the company has socialized company policies regularly including policies on human rights. Socialization is done by sticking to the policy in offices, socializing in the housing, and socializing with workers during the morning briefing before the activities started.

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

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

Status: Comply

4.2

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

4.2.1, 4.2.2 & 4.2.3

Mechanism for consultation and complaints is listed in some procedure, such as:

- SOP for Handling Public Complaints (SPO/6.3/PKM) with document number SOP/005/BSC/2016 No. revision 01/Rev/RSPO/P&C/PPK dated November 1, 2016. This procedure explains that public complaints can be submitted by telephone at the contact number provided in each unit.
- SOP for Handling Employee Complaints (SPO/6.5/PKK) with document number SOP/006BSC/2012 No. revision 01/Rev/RSPO/6.5/PKK dated November 1, 2012. The procedure explains that public complaints can be submitted by telephone at the contact number provided by the assistant at each emplacement location.
- SOP for Handling Stakeholder Complaints No. 001 revision 0 dated 31 October 2020. The procedure aims to ensure that the stakeholder complaint handling system (internal and external) can be understood by stakeholders including those who are illiterate. In the procedure it is explained that the company provides illustrated information regarding the submission of complaints.

The procedure above has explained about the person in charge of receiving and resolving complaints (external and internal officers including HRD), response timeframe, confidentiality of the reporter and whistleblower, until further handling of complaints is possible to a tripartite level. (Mediation and settlement by government). Procedure is available in Bahasa Indonesia and if there is any complaints/grievances that the resolution that has not found mutually, the complainants can brought that compliance to RSPO Complaints System.

Based on interview with Agencies in Musi Rawas District, it is known that they understand how to communicate and consult with company. However, the results of interviews with representatives of surrounding communities, the community has known about the communication procedures and to people who served as communicators between the company and community so that people who cannot read / write can be informed by the related communicators.

Based on the review of complaints documents from the surrounding community, it was not found that there were complaints from external stakeholder. For complaints from internal parties, there are several well-documented complaints along with their responses. The complaints that were submitted and recorded were complaints related to the housing conditions of workers who were damaged, but these have been properly resolved so that there are no additional complaints on the same object. All of the complaints mentioned above have been completely resolved by the company by showing proof of resolution in the form of documentation and direct responses related to complaints received from external and internal parties. This is supported by the results of interviews with workers who stated that the company always records all complaints submitted by workers and within a reasonable period of time these complaints have been properly resolved.

4.2.4

The conflict resolution mechanism is listed in the SOP for Conflict Resolution No. 056/BSC-PK/C12 dated 1 May 2012. The SOP describes the conflict resolution mechanism and the person responsible for conflict resolution. In addition, the SOP also states that if there is a conflict that cannot be accepted by the parties, then to get justice, the problem will be forwarded to the competent authorities (Police and Courts).

The results of interviews with management obtained information that if there is a conflict, the reporter can request legal assistance from an independent party or appoint a mediator to mediate. Other than that, interviews with the government agencies, surrounding communities, and workers, it's known that they have understood the person responsible and the grievance mechanism in which the complainant's identity is protected and can have a legl assistance from an independent party or appoint a mediator to mediate.

Status: Comply

4.3

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

4.3.1

Contributions to sustainable development at the local level made by the company are based on the results of consultations with local communities that can provide long-term economic, social, and environmental benefits. Talks are based on transparency, openness, and participation and encourage communities to identify their priorities and needs, including the different needs of men, women, and minority/vulnerable groups. The company analyzes community needs and gathers information to prepare the SIA Action Plan to contribute to sustainable development at the local level. Other examples of contributions to sustainable development at the local level based on the 2021 CSR Monthly Report Period include:

- Access to health and well-being;
- Access to quality education;
- Access to clean water and sanitation;

- Support/improvement/guarantee of food and water security. If there are several prospective workers of equal quality, those selected for employment should always be those from members of the local community.

The results of interviews with local village heads also stated that the need for assistance and CSR could be submitted if needed by submitting a proposal to the company. The informant said that based on experience, all the requirements requested by the community were always responded to positively. The results of interviews with company management also stated that the needs submitted by the district could be in the form of proposals or official letters if they needed assistance from the company's CSR department, and they would respond immediately.

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 scope of certification covering an area of 6,513 Ha. The area has had land title of HGU and plantation permit of IUP as follows:

- HGU Certificate No. 07/99 dated June 12, 1999 issued by the Head of the Land Office of Musi Rawas District dated on 12 June 1999, with an area of 6,513 hectares. The date of expiry of the rights is 11 June 2034.
- Plantation business license in the form of Plantation Business Registration Letter No. 105 / Mentanhut-VII / 2000 from the Ministry of Forestry and Plantation of the Republic of Indonesia issued on 9 October 2000 with an area of 6,513 hectares and mill capacity 30 MT FFB/Hour.

4.4.2

The acquisition of land rights begins with the acquisition of a location permit for ± 24,000 hectares, then a Land Use Right is issued for an area of 6,513 hectares. On the location permit area, there is arable land and local community ownership. The company has provided compensation for the community's land through a deliberation process. The recording is part of the document that is documented in the Compensation Document Report. In the report, several documents for the compensation process are attached.

The company shows a recapitulation of compensation in the Sungai Pinang area for the period 1990 to 1999. For example, the compensation dated October 15, 1999 covering an area of 203.5 ha and has been paid for a total compensation of Rp161,350,000,- and signed by the Head of Sungai Pinang Village, Head of Anyar Village, PT Bina Sains Cemerlang and the Head of Muara Lakitan Sub-district. A map of the area and the names of the land owners located in Sungai Pinang are available.

Based on interview with Community Leader in Sungai Pinang Village who was also one of the previous land owners, it is known that the process of land compensation agreements that are negotiated through the FPIC process in consultation with affected parties and the process was carried out in an open and fair manner without any coercion according to the agreement of both parties.

4.4.3

The company can show a map showing legal rights in the form of a HGU map with a scale of 1:25,000 contained in the HGU certificate issued by the Land Office that developed through participatory mapping. Based on public consultation with village representatives from Semangus Baru Village and Sungai Pinang Village, it is recognized that they know the legal boundaries owned by PT Bina Sains Cemerlang.

Field observations to several HGU boundary markers in Sungai Pinang Estate (No. 01, 02, 06, 07, 08, 09 and 10) and Bukit Pinang Estate (No. 04, 14 and 15) show that the poles sampled during the audit were available in the field and in well-maintained conditions. Verification using GPS indicates that the pole coordinate is in accordance with the provisions of the land title.

4.4.4

As explained in 4.4.2, it is known that the negotiation process for land release has been carried out in a fair, open, and transparent manner and is based on the agreement of both parties without any coercion from either party. The community represents itself in the process. All relevant information regarding land acquisition is available in appropriate forms and languages.

4.4.5

As explained in 4.4.2, it is known that the negotiation process for land release has been carried out in a fair, open, and transparent manner and is based on the agreement of both parties without any coercion from either party. The community represents itself in the

process.	
4.4.6	
Based on the results of interviews with stakeholders (Semangus Baru Village and Sungai Pinang Village), it was informed that the company has had a positive impact such as employee recruitment, and CSR assistance. The company regularly holds meetings with community representatives and absorbs community aspirations which are applied in company policies such as CSR or other assistance. Communication with the community is no problem, every request for information is always responded to by the company. Beside that the implementation of FPIC demonstrated in social impact assessment and HCV assessment.	
Status: Comply	
4.5	
No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.	
4.5.1; 4.5.2; 4.5.3, 4.5.4; 4.5.5, 4.5.6; 4.5.7; 4.5.8	
There is no land expansion activity during this audit. Based on document Identification of HCV and stakeholder consultation, there was not found customary/indigenous rights in operational area. There were the records of the process of collecting information on the preparation of the High Conservation Values Identification Report and the Social Impact Assessment Report. The recording evidence comprising of participants' list and photographs.	
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	
The company has procedure of Land Acquisition and Compensation, document No. 343/PSD-OKUP/11, approved by Head Plantation dated 23 February 2012 related to identifying legal, customary or user rights, and for identifying people entitled to compensation. Based on public consultation with village representatives from Semangus Baru Village and Sungai Pinang Village known that they know about the procedure through the socialization given and they agree with the procedure.	
4.6.2	
The company has procedure of Land Acquisition and Compensation, document No. 343/PSD-OKUP/11, approved by Head Plantation dated 23 February 2012. The procedure is described how to calculate and distribute fair and gender-equal compensation in all activities related to the compensation process for land over the land right cultivated by the Company, the purpose is to ensure the area of plantation free from others right. Based on public consultation with village representatives from Semangus Baru Village and Sungai Pinang Village known that they know about the procedure through the socialization given and they agree with the procedure and compensation process was done directed to the land owner and landowners are given the freedom to release their land without coercion.	
4.6.3	
PT BSC does not yet have a plasma or smallholder scheme for local communities.	
4.6.4	
Based on interview with Community Leader in Sungai Pinang Village who was also one of the previous land owners, information is obtained that he has received compensation for the land he has claimed and all the files for the settlement process are also kept by the person concerned. All land claim settlement processes, from identification, negotiation to compensation, are carried out through the agreement of the parties without any coercion or pressure from other parties.	
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 a procedure in place to identify people and/or community groups entitled to compensation presented in document No. 343/PSD-OKUP/11, approved by Head Plantation dated 23 February 2012. The procedure is described how to identify people and/or	

community groups entitled to compensation. Based on public consultation with village representatives from Semangus Baru Village and Sungai Pinang Village known that they know about the procedure through the socialization given and they agree with the procedure and compensation process was done directed to the land owner and landowners are given the freedom to release their land without coercion.

4.7.2

The company has procedure of Land Acquisition and Compensation, document No. 343/PSD-OKUP/11, approved by Head Plantation dated 23 February 2012. The procedure is described how to calculate and distribute fair and gender-equal compensation in all activities related to the compensation process for land over the land right cultivated by the Company, the purpose is to ensure the area of plantation free from others right. Based on public consultation with village representatives from Semangus Baru Village and Sungai Pinang Village known that they know about the procedure through the socialization given and they agree with the procedure and they can access the procedure through management representative of the company if they need it.

4.7.3

The company can show recapitulation of previous landowners who have been compensated. Compensation is only made for the area within HGU areas owned by the company and was completed. The certificate holder has no expansion area for new planting area.

Based on public consultation with village representatives from Semangus Baru Village and Sungai Pinang Village, the communities that have lost access and rights to land also provided opportunities to benefit from plantation development such as benefit in the form of CSR program, become employee and become a contractor in the company.

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

The company has freed the area inside the HGU from community rights without dispute. The company shows a recapitulation of compensation in the Sungai Pinang area for the period 1990 to 1999. For example, the compensation dated October 15, 1999 covering an area of 203.5 ha and has been paid for a total compensation of Rp161,350,000,- and signed by the Head of Sungai Pinang Village, Head of Anyar Village, PT Bina Sains Cemerlang and the Head of Muara Lakitan Sub-district. A map of the area and the names of the land owners located in Sungai Pinang are available.

Based on interview with Community Leader in Sungai Pinang Village who was also one of the previous land owners, it is known that the process of land compensation agreements that are negotiated through the FPIC process in consultation with affected parties and the process was carried out in an open and fair manner without any coercion according to the agreement of both parties.

4.8.2 and 4.8.4

Based on information from PT BSC management and the identification of PT BSC land problems, it is known that there were several cases of conflict with the community in 2020 and 2021 and have been handled according to company procedures. This is in line with the information obtained by the auditors through several online media sites, which are as follows:

1. <https://mubakab.go.id/berita/218-pemkab-muba-mediasi-sangketa-lahan-masyarakat-muba-dengan-pt-bsc>. In the online news dated August 12, 2020, it was stated that the Musi Banyuasin Regency Government facilitated the Suka Maju Village community, Plakat Tinggi District regarding efforts to resolve conflicts / Plantation Land Claims PT Bina Sains Cemerlang (BSC) in Sungai Pinang Village, Muara Lakitan Sub District, Musi Rawas District by Residents Suka Maju Village, Plakat Tinggi District. In the mediation, representatives of the people of Suka Maju Village, Plakat Tinggi District, said that the company could complete the compensation process for the 300 landowners. In addition, the community expects the Musi Banyuasin Regency Government together with BPN to ensure that the land in question is in the territory of the Musi Banyuasin Regency or over the Musi Rawas District area.
It was also informed that the Musi Banyuasin Regency Government is ready to go down for a field check with the BPN to check the coordinates of the land referred to by the community and also ask the community to be able to clearly show legality, letters and land documents in question.
2. <https://silamparipers.com/2021/07/24/masyarakat-suka-maju-menuntut-penyelesaian-lahan-di-pt-bsc/>. In the online news on August 17, 2021, it was reported that hundreds of people from Sukamaju Village, Plakat Tinggi District, Musi Banyuasin Regency, Sumatera Selatan and residents of Sungai Pinang Village, Muara Lakitan Sub District, Musi Rawas District, visited PT Bina Sains

Cemerlang's oil palm plantation to ensure that the disputed land between the community and the PT BSC is not used by the company because until now there is still no legal certainty about the status of their land which is suspected to have been controlled by PT BSC illegally.

- <https://onlinekoe.com/dipicu-sengketa-lahan-ratusan-warga-desa-sungai-pinang-lakukan-aksi-panen-masal/>. In the online news on August 17, 2021, it was stated that on August 16, 2021 hundreds of residents of Sungai Pinang Village held a mass harvesting action because the land area of 1,538 hectares which is now claimed by the PT BSC company belongs to the residents of Sungai Pinang Village so that residents are busy doing the action.

Related to online media news link No. 1 and 2, the company said that it is news that is interconnected. Based on the verification to the management of PT BSC, information was obtained that the HGU of PT BSC is entirely within the area of Sungai Pinang Village, Muara Lakitan Sub District, Musi Rawas District as stated in the HGU Decree and HGU Certificate issued by BPN and in accordance with Minister of Home Affairs Regulation No. 13 of 2014. The entire area in the PT BSC HGU has been compensated as written in the Certificate from the Sungai Pinang Village Head known to the Muara Lakitan Sub-district Head and the Musi Rawas District BPN.

This was also evidenced by the dispatch of a team from the Musi Rawas District Government and followed up with a letter from the Musi Banyuasin Regency Government No. 130/336/II/2020 dated July 20, 2020 regarding the facilitation of settlement of plantation land problems which essentially:

- Whereas the area claimed by the residents of Suka Maju Village is within the administrative area of Musi Rawas District according to the Regulation of the Minister of Home Affairs No. 13 year 2014
- Whereas the claimed area has been compensated to the land owners and has become an oil palm plantation planted by PT BSC.
- Whereas the area that has been claimed already has legality, namely the HGU SK and the HGU Certificate issued by the BPN of Musi Rawas District.
- Furthermore, the Musi Banyuasin Regency Government will coordinate with the Musi Rawas District Government to facilitate the resolution and request that the company temporarily not exploit the area to avoid social conflicts.

Regarding the news on August 17, 2021, the management of PT BSC said that this was due to a provocation by the attorney and the Suka Maju village head to take action to the claim location, even though the problem is being handled by the Musi Banyuasin Regency Government and the Musi Regency Government. The current condition and condition of the area is that PT BSC has not managed it while waiting for a decision from the two regional governments. Therefore, regarding the provocation, the company has reported the attorney to the Sumatera Selatan Police for causing social unrest in the community, which has actually received a temporary decision from the two regional governments and is currently under police investigation.

At the time of the audit, the results of the auditor's verification to the location of the claim that it is true that the area is currently still not being reclaimed because it is waiting for the results of the decision from the Musi Banyuasin Regency Government and the Musi Rawas District Government.

Based on the verification to the management of PT BSC on online media news link number 3, information was obtained that the area claimed by the community was within the HGU of PT BSC which had been obtained by the company in accordance with legally correct procedures. The community's claim is speculative because it does not show legality rights or legal footing rights, but only based on the recognition that the area has not been compensated. This area was also sued by the parents of the residents, namely in 1992 but could not be proven at the Lubuk Linggau District Court so their claim was rejected. This was actually known by the villagers, but was provoked by Mr. Hasrin Rahim's attorney to take action in the field.

Therefore, regarding the provocation, the company has reported the attorney to the Sumatera Selatan Police for causing social unrest in the community, which in fact already knew that the area was legally owned by PT BSC and was currently under police investigation. Conditions when the audit took place, the atmosphere was conducive again and there was no more mass harvesting.

4.8.3

No evidences show that there is any acquisition process through dispossession or forced abandonment. Based on public consultation with related government agencies of Musi Rawas District and village representatives from Semangus Baru Village and Sungai Pinang Village and interviews with 1 previous land owners, known that all land acquisition between local people and company representatives conducted as mutual agreement and the compensation process are done directed to the land owner and not diminish the legal/customary right, landowners are given the freedom to release their land without coercion.

	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.	
<p>5.1.1, 5.1.2, 5.1.3, 5.1.4, 5.1.5, 5.1.6, 5.1.8 Based on document review, field observations, and interviews with staff and management, it is known that the company does not buy FFB from third parties/FFB suppliers, either independent smallholders, collectors, or plasma. The company only receives FFB from its plantations and plantations from the same Group as described in indicator 2.3.1. Based on this explanation, this indicator does not apply to the audit period of ASA 1.3 and 1.4.</p> <p>5.1.7 The company has tested the electronic weighbridge carried out on December 02, 2021, for Sungai Pinang Factory by the Department of Trade and Industry of Lubuklinggau District, valid until November 2022 with evidence:</p> <ul style="list-style-type: none"> • Test Result Certificate number 398/DISDAGIND/IV/2021 with a maximum capacity of 40,000 Kg • Test Result Certificate number 399/DISDAGIND/IV/2021 with a maximum capacity of 50,000 Kg <p>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.</p> <p>5.1.9 The company has had an SOP related to the complaining mechanism in SOP / 006 / BSC / 2012 dated November 1, 2012, regarding handling employee complaints where employees submit complaints to the assistant through their respective supervision. Complaints are recorded in the register book, and if it is still within the authority of the assistant, the assistant immediately responds to the criticism. The purpose of the SOP is to resolve any internal and external complaints quickly and correctly and create a safe and prosperous atmosphere within the company and the surrounding community. The SOP describes the objectives, responsibilities, procedures, documentation, and exceptions. The complaint resolution period is two weeks for each section. Based on the complaint book document review, there were no complaints from contractors or vendors.</p>	
	Status: Comply
5.2 The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.	
<p>5.2.1, 5.2.2, 5.2.3, 5.2.4, 5.2.5 Based on document review, field observations, and interviews with staff and management, it is known that the company does not buy FFB from third parties/FFB suppliers, either independent smallholders, collectors, or plasma. The company only receives FFB from its plantations and plantations from the same Group as described in indicator 2.3.1. Based on this explanation, this indicator does not apply to the audit period of ASA 1.3 and 1.4.</p>	
	Status: Comply
PRINCIPLE #6 RESPECT WORKERS' RIGHTS AND CONDITIONS	
6.1 Any form of discrimination is prohibited.	
<p>6.1.1, 6.1.2 & 6.1.3 PT Bina Sains Cemerlang already has a policy regarding equal opportunities and treatment in employment opportunities, which is listed in the Guidelines for Sustainable Plantation Management, sub-Social Policy at point 1 (No.Policy 724/TQEM-SPMS/09 dated 27/08/2010). At this point it is explained that all staff/employees must be treated fairly and fairly in matters relating to recruitment, advancement, working conditions and descriptions, without depending on race, degree, ethnicity, gender, skin color, imperfections (disability), sexual orientation, Company membership, political views, religion and age.</p> <p>The results of interviews with workers (harvester, sprayer, and mill operator) during field visits in each unit, interviews with bipartite representative and representatives of the gender committee also obtained information that there was no indication of acts of discrimination based on religion, ethnicity, gender and regional origin in the process of accepting work.</p>	

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

- The composition of workers consisting of various ethnic groups, religions, gender and workers' origins. The existing workers do not only come from one area but come from several areas spread throughout Indonesia such as Java, Sumatra, Kalimantan and others.
- During the audit, the company doesn't have any AKAD workers (*Angkatan Kerja Antar Daerah / Inter-Regional Work Force*).
- Recruitment of workers based on the results of selection, performance appraisal, ability, medical eligibility and expertise of workers.
- For now, most of the workers are migran and local people that have become the majority of workers in the operational scope of the certification unit.
- Worker placement and training are carried out in accordance with their expertise / type of work, such as prospective sprayer workers are placed as sprayer workers and receive regular pesticide handling and management training.
- Women workers are given equal rights, wages and opportunities to get promotions with male workers of the same type of work, for example there are several upkeep foremen who are female workers.

Based on the results of interviews with workers (harvester, sprayer, and mill operator) it is known that workers have never felt that the certification unit has discriminated against them since last year until now. This is because all activities from recruitment, performance appraisal, promotion, and union, each worker is given the same opportunity regardless of ethnicity, caste, nationality, religion, disability, gender, sexual orientation, gender identity, membership in labor unions, affiliations, politics, or age. There is no difference between the communication between superior and workers because of the things mentioned above, so that the workers do not feel isolated or discriminated against by the superiors. This has resulted in the absence of discrimination issues from last year to the present.

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

6.1.4

The unit of certification does not carry out pregnancy testing as a discriminatory measure in recruitment activities. With the existence of a non-discrimination policy that is approved by the company's leadership, every recruitment activity carried out is only in the form of ordinary health checks to ensure workers are in good health. For an explanation of pregnancy testing, it is explained below.

A pregnancy test for workers is carried out not every month, because the certification unit conducts pregnancy checks if the worker has experienced delays in the regular schedule of menstruation in the current month. Most of the female workers who work are already using contraception and if there are workers who experience delays, this must be checked for pregnancy at the nearest clinic or done independently. This case do for to ensure that pregnant workers are not allowed to do work with chemicals, not as a basis for discriminating against these workers. If declared pregnant, the worker will be transferred to a safer job but still equal in terms of wages and other benefits, so that there is no discriminatory action.

The statement above is made clear by the results of interviews with committee gender and female workers in PT Bina Sains Cemerlang stating that female workers are required to have monthly pregnancy testing at the clinic to ensure that no female workers working with chemicals are pregnant / breastfeeding and testing the pregnancy is not a discriminatory measure given by the certification unit.

6.1.5

Gender committees have been formed and are still active until today in the certification unit which is chaired by the committee chairperson along with coordinators in several sections and there are representatives in each unit. The structure of the gender committee not only consists of female workers but also includes male workers. The main objective of forming a gender committee is to provide a forum that can accommodate the aspirations / complaints of workers (especially women), as company partners in carrying out the activities of socialization related to gender and other policies related to workers' reproductive rights. In carrying out its activities this gender committee always collaborates with the bipartite representative so that the socialization of matters related to women's rights can be conveyed properly and there is no discrimination in terms of gender.

The workers also knew of the existence of the gender committee because it had been routinely socialized by its management, the last socialization related to the gender committee (gender bias and equality) and for example the activity was carried out which was attended by workers (male and female) and housing residents. The results of this socialization can be seen with the absence of differences in company operational activities such as promotional activities, the same status of workers without gender bias because overall are given equal opportunities for all genders (male or female) in work.

The results of interviews with upkeep workers (male and female workers) and representatives of the gender committee revealed that until now there were no reports / issues / complaints related to gender reported by the workers and at the moment the activities carried out were gender meetings, women recitation weekly and others. Currently the certification unit is more focused on gender bias and equality for women because the most vulnerable parties in plantation operational activities are women, but this does not mean that the company does not focus on other genders. This is evidenced by the absence of any issues or incidents related to this from last year until now.

6.1.6

Equal payment of wages has been made by certification unit properly, taking into account the ability, performance, expertise, length of work and other factors as a basis for remuneration. So that the payment of wages provided is in accordance with the burden / duties / types of work respectively. For example, ISH (harvester), HPN (Sprayer) and ANT (processing) who get wages in December 2021 whose value is above the minimum wage, but with different amounts based on years of service, ability, attendance and job performance (structure and scale wage). This is in accordance with statements from workers who were interviewed with types of work as harvesters and sprayers who have the same type of work but have different wage scales based on their performance, length of work in the company, productivity and other factors.

In addition, based on the results of review of structure and scale wage, it was found that the certification unit already has a wage scale structure for each worker based on position, class, work performance, and not based on gender differences or origins. For example, the lowest wage scale is for permanent worker with that below 1 year work and the highest wage is permanent worker with class A8.

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

Status: Comply

6.2

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

6.2.1

The company has procedures related to recruitment, selection, employment, promotion, retirement and termination of employment which are generally described in the Collective Labor Agreement written in Bahasa. This Collective Labor Agreement explains the working conditions and rights / obligations of workers such as, recruitment, selection, transfer, promotion, performance appraisal, remuneration, discipline, overtime, and other provisions. These procedures have been documented and socialized to all workers and their representatives.

The company still have workers with contract status for upkeep worker (PKWT). For the other employee status is Regular Workers and Staff (assistant and above). All the rights for each employment status have been distinguished. For workers with contract status (PKWT), certification unit also registered the worker with to Manpower and Transmigration Agency of Musi Rawas District.

The results of interviews with workers (harvesters, sprayers, fertilizers and mill operators) and labor union know that workers have a sufficient understanding of their rights (wages, overtime, incentives, fines, etc.) listed in the Collective Labor Agreement and in accordance with routine socialization provided by the certification unit. Workers' wages in December 2021 have been above the minimum wage set by the government, wage based on years of service, ability, attendance and job performance (structure and scale wage) and there are no late payments every month.

A review of the December 2021 wage document for harvest workers, pesticides, sprayers and mill operators proves that the wages

received are above the minimum wage and in accordance with the wage scale structure determined by the certification unit for 2021. For example, workers wages ISH (harvester), HPN (Sprayer) and ANT (processing) have a different based on wage scale structure 2021.

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

6.2.2 & 6.2.3

The company has Collective Labor Agreement are made in a Bahasa that explains the working conditions and rights / obligations of workers such as recruitment, selection, transfer, promotion, performance appraisal, working hours, remuneration, discipline, deduction, overtime, sick leaves, holiday entitlement, maternity leave and other provisions. Explanations related to the contents of the Collective Labor Agreement include:

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

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

- Inter Office Mail No. 011/HRM-i6.1/I/2021 dated January 8, 2021 regarding the Minimum Wage and Wage Scale Structure in 2021 for PT Bina Sains Cemerlang. Where the minimum wage has been set at IDR 3,299,758,-/month, while the smallest wage scale structure is in the class G1 and the highest wage is in the class A8.
- Inter Office Mail No. 045/HRM-i6.1/XII/2021 dated December 30, 2021 concerning Minimum Wage and Wage Scale Structure in 2022 for PT Bina Sains Cemerlang. Where the minimum wage has been set at IDR 3,299,758,-/month, while the smallest wage scale structure is in the class G1 and the highest wage is in the class A8.
- Decree of the Governor of Sumatera Selatan No. 712/KPTS/DISNAKERTRANS/2020 dated December 10, 2020 regarding the Minimum Wage for Musi Rawas District in 2021 with an amount of IDR 3,299,758,-/month.
- Decree of the Governor of Sumatera Selatan No. 685/KPTS/DISNAKERTRANS/2021 dated December 28, 2021 regarding the Minimum Wage for Musi Rawas District in 2022 with the amount of IDR 3,299,758,-/month.
- December 2021 salary slips and overtime payment have a different based on wage scale structure 2021, has been accordance with applicable laws and all wages above the minimum wage.
- List of women workers that has been given maternity leave and pregnant workers in 2021 (January until December).
- Unit certification has provisions related to deduction / penalty which have been stated in the Company Regulation and further explanation is set out in an internal memo.
- In the payroll document, there is information that states the results of the worker's wages in one month according to the work performance of each worker. Payroll has also been accurate for each worker, for example the number of days worked in a month, premium payments, fines, deductions from workers' wages and other information that is in accordance with facts in the field.
- Etc.

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

The results of interviews with workers (harvesters, sprayers, and mill operators) and labor union know that workers have a sufficient understanding of their rights (wages, overtime, incentives, deductive, fines, etc.) listed in the Collective Labor Agreement and in accordance with routine socialization provided by the certification unit. Workers' wages in December 2021 have been above the

minimum wage set by the government and there are no late payments every month, working hours is seven (7) hour a day with 6 days in a week and for the overtime has been paid in accordance with applicable regulations.

A review of the December 2021 wage document for harvest workers, pesticides, sprayers and mill operators proves that the wages received are above the minimum wage and in accordance with the wage scale structure determined by the certification unit for 2021. For example, workers' wages ISH (harvester), HPN (Sprayer) and ANT (processing) have a different based on wage scale structure 2021 and all wages above the minimum wage.

6.2.4

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

6.2.5

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

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

6.2.6

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

The certification unit has the determination of assessment prevailing wage and all kind of benefits for DLW simulation in 2022 has been included in the calculation of main wage, worker status, housing facility, education, electricity, water sources, healthcare and others. The results of these calculations are known that the standard of DLW currently given / simulated by the certification unit is above the stipulation of the minimum wage with scale of minimum.

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

6.2.7

Non-Conformity No. 2022.02 with minor category

- The results of the review of the workforce list document as of December 2021 revealed that PT Bina Sains Cemerlang still has 151 workers with PKWT status (BPE 72 people, SPE 73 people and SPF 7 people). From the total number of existing PKWT, there are 51 PKWT workers who work as harvesters in SPE and 33 people in BPE.
- Harvesting work is a permanent job, this is because the criteria for harvesting work are included in the description of permanent work in Law no. 13 of 2003 (explanation of article 59 paragraph 2) where it reads "work that is continuous, uninterrupted, not limited by time and is part of a production process in one company or work that is not seasonal."

- There is an Inter-Office Memo No. 192/SPE-AGR/XII/2021 dated December 27, 2021, which explains the need for workers in SPE, where the need for harvest workers which is determined based on the ratio of worker needs still includes PKWT workers in it.
- There is an Inter-Office Memo No. 001/BSC/AGR-BPE/XI/2021 dated November 1, 2021, which explains the need for workers at BPE, where the need for harvest workers determined based on the ratio of worker needs still includes PKWT workers in it.
- There is an Inter-Office Memo No. 017/CEO-RSS/VI/2021 dated June 19, 2021 regarding Procedures and Procedures for Recruiting PKWT Employees, which does not explain the types of work that can be employed by workers with PKWT status.
- There is an Inter-Office Memo No. 017/HRM-i5/II/2019 dated January 25, 2019 regarding the Use of Temporary or Contract Employees in the Minamas Plantation Business Unit, which explains that the use of contracted/non-permanent employees is only intended for temporary work (project based) and completed within a period of time. such as replanting and harvesting at peak times.
- In Government Regulation No. 35 of 2021 on the PKWT section explains that PKWT cannot be held for work that is permanent and PKWT can be held based on a period of time (work that is not completed for too long, seasonal work, work related to new products) or the completion of a particular job (work that once completed and temporary work).

The company has not been able to prove that the application of the use of PKWT on work that is not permanent is in accordance with the applicable laws and regulations.

6.2.7	Status: Non-Conformity No. 2022.02 with minor category	
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6.3
The unit of certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.

6.3.1
The company has demonstrated a commitment to support for forming a labor union as stipulated in the Guidelines for Sustainable Plantation Management-Social Policy in point 5 (No.Policy 724/TQEM-SPMS/09 dated 27/08/2010). At this point, it is explained that the Company is expected to respect the rights of all employees to form and join a labor union community of their choice and to negotiate together.

As a form of implementation of the freedom of association policy, the SPSI workers' union has been formed at PT Bina Sains Cemerlang as evidenced by the proof of registration No. 560/18/Nakertrans/SP/2012 dated January 12, 2012. This proof of registration is valid forever. The results of interviews with representatives of labor unions, obtained information that the company gives freedom to workers to associate. In addition, there was no intervention from the company to the labor union in the formation or selection of the management structure within the organization.

6.3.2
Certification unit has well-documented the records of meetings between labor unions and management representatives as well as with internal union meetings. The following are examples of records of meetings conducted by labour unions in 2021 to 2022, here as follows:

- The bipartite meeting on October 28, 2021, which was attended by 13 participants, discussed the Manisan Fund (Workers' Entertainment) which is planned to be used for the procurement of basic necessities, uniforms and sports facilities.
- The bipartite meeting on October 25, 2021, which was attended by 13 participants, discussed the Allocation of Sweets Funds (Workers' Entertainment) in 2021 to be used for the welfare of workers.

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 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 was 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).

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. Based on the interview with workers, it's known that there were no mandatory to be the member of labor union. The membership of labor union is voluntary.

Status: Comply

6.4

Children are not employed or exploited.

6.4.1, 6.4.2, 6.4.3 & 6.4.4

The company has policy regarding the age requirements of workers is contained in Collective Labor Agreement states that the requirement for accepting workers is at least 18 years old. The unit of certification has a Human Rights Protection policy issued by the General Manager on April 8, 2016. One of the policy points includes the prohibition of employing minors. There has not been an explicit written policy on child protection. The results of the verification of documents revealed that there were no workers under the age of 18. In addition to having a policy governing the minimum age for workers for workers, the certification unit also includes clauses on child protection and prohibitions on hiring workers under the age of 18 in any agreement with the contractor. The policy was socialized to all workers and to the contractor when signing the work agreement.

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

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

Status: Comply

6.5

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

6.5.1

Certification unit showed the policy concerning on sexual harassment, violence, abuse, and reproductive rights stated in the Sime Darby Plantation Group Code of Conduct updated in December 2021. This policy explained that the company committed to provide a conducive work place by prevention any forms of violence and harassment. In terms of that, this sexual harassment policy encourages the workers to report of all sexual harassment experienced by any individual, despite gender or age.

Certification unit also showed the record of the company's socialization for all workers and external stakeholders. This record explained the mechanism of all grievances including violence and sexual harassment. However, illiterate people can submit their complaints through the village head or another representative from the stakeholder (gender committee and labor union).

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, the socialization held by showing the audio-visual related to the mechanism in reporting any forms of sexual harassment and violence to all workers twice a month.

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.

6.5.2

Certification unit showed the policy concerning on sexual harassment, violence, abuse, and reproductive rights stated in the Sime Darby Plantation Group Code of Conduct updated in December 2021. This policy explained that the protection of women workers from crime and sexual harassment and protecting rights related to women's reproduction.

The company also has a Memorandum from the Chairman of SOU 22 regarding the treatment of pregnant and breastfeeding employees which is circulated to all operating management units. This memo contains about:

- Female employees who are pregnant or breastfeeding are prohibited from having direct contact with chemicals (spray and fertilizer).
- It is prohibited to employ pregnant women workers who, according to the doctor's statement, are dangerous for the health and safety of their wombs and themselves if they work from 23.00 to 07.00 (Law No. 13 article 76 paragraph 2).
- Workers whose children are still breastfeeding must be given the opportunity to breastfeed their children if this is to be done while working (Law No. 13 article 83).

Based on the interviews with the female workers, gender committee and daycare officer, for workers who are pregnant and breastfeeding are not allowed to work on jobs related to chemicals and these workers will be transferred to lighter/other jobs.

6.5.3

Based on the interviews with gender committee representatives and field observation virtually, it is known that the company 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. Uoc also showed the result of new mother's needs identification which was conducted on July 2021 attended by the gender committee and the management representatives. This document informed the needs of new mother that has been approved by the company are daycare, breastfeeding room, special time to breastfeed, pregnancy test every month, and guarantee the security of female workers against the sexual harassment and forced labor.

6.5.4

The company showed the procedure to accommodate complaints and grievances from employees specifically in sexual harassment and violence showed in socialization to all workers and stakeholders. 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 and contractor workers, it's known that the workers already have sufficient understanding of the grievance mechanism. Related complaints of sexual harassment can be submitted to the gender committee.

Status: Comply

6.6

No forms of forced or trafficked labour are used.

6.6.1 & 6.6.2

There are no migrant workers who work in the company's operational area. All workers come from within one country (although from various regions). In addition, each worker has been provided with a clear work contract. The rights and obligations of workers are also clearly stated in company regulations, collective labor agreements, and in work agreements. Based on employee list and observation in field known that there is no migrant workers, forced labor. Every worker has a work agreement that describe specific job description, there is no substitution of contract without prior consultation and agreement from the worker, for example:

- There is no retention for identity, because all labor documents for individuals are in the form of photocopies and not original items such as ID cards, diplomas, family cards and others.
- There is no contract substitution, because all existing contract workers currently work in accordance with existing contracts such as contract workers for maintenance activities only doing maintenance activities and do not employ workers other than those stated in the contract.
- The freedom of workers in resigning, because if the worker wants to resign there is no understanding or prohibition from the company to the worker concerned. This is evidenced by the presence of workers who resigned to move to work and the company gave all their rights as fully resigned workers without any shortcomings.
- There is no coercion in doing overtime work, workers who do overtime at the company can refuse if ordered to do overtime activities because overtime is not the worker's obligation and the company also does not prohibit this.

Based on employee data and interview with workers, most of the workers came from local communities. They have the recruitment process in the company and is in accordance with applicable employee acceptance procedures. Based on the results of interviews with workers in plantation and mill, it is known that currently there are no migrant workers, retention of identity, payment recruitment

fees, contract substitution, involuntary overtime, lack of freedom of workers to resign, penalty for termination, debt bondage, and withholding. bondage. This is because the certification unit has carried out its operations in accordance with applicable regulations.

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

Status: Comply

6.7

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

6.7.1

OHS Committee Structure

- BPE : The company shows the Decree of the Head of the Manpower and Transmigration Office of Sumatera Selatan Province Number: 01/KPTS/NAKERTRANS/2022 concerning changes in the approval of the management of the occupational safety and health PT Bina Sains Cemerlang Bukit Pinang Estate on January 17, 2022. OHS Committee Secretary for Bukit Pinang Estate is Marimim. OHS Committee Secretary has obtained General OHS Expert Appointment Letter No. 5/227/AS.02.04/I/2020 dated January 20, 2020 and General OHS Expert Authority Card valid until January 20, 2023.
- SPF : The company shows proof of sending a letter of request for a change in the structure of the occupational safety and health committee of PT Bina Sains Cemerlang Sungai Pinang Mill on January 10, 2022 to the Manpower and Transmigration Office of Sumatera Selatan Province. The OHS Committee Secretary for Sungai Pinang Mill is Arpan. OHS Committee Secretary has obtained General OHS Expert Appointment Letter No. 5/221/AS.02.04/I/2020 dated January 20, 2020 and General OHS Expert Authority Card valid until January 20, 2023.
- SPE : The company shows the Decree of the Head of the Manpower and Transmigration Office of Sumatera Selatan Province Number: 08/KPTS/NAKERTRANS/2021 concerning the Ratification of Changes in the Management of OHS Committee PT Bina Sains Cemerlang Sungai Pinang Estate dated 17 September 2021. The OHS Committee secretary for the Sungai Pinang Estate unit is Arpan. OHS Committee Secretary has obtained General OHS Expert Appointment Letter No. 5/221/AS.02.04/I/2020 dated January 20, 2020 and General OHS Expert Authority Card valid until January 20, 2023.

Based on the results of interviews and document studies, it is known that every OHS Committee organization has routinely held monthly meetings, for example the recording of the BPE OHS Committee meeting in December 2021 which discussed accidents related to harvest team work and the cleanliness of employee housing.

6.7.2

Based on the results of interviews with management, it is known that there have been no changes to the emergency response procedures and work accidents. The documents for emergency preparedness and response procedures are available in Indonesian, including:

- Accident First Aid Procedure, AMF/SOP.ESH/07, April 9, 2010
- Emergency Response Standby Procedure, AMF/SOP.ESH/14, April 8, 2010
- Fire management No. 727/TQEM-ESH/10 dated 01 April 2010,
- Identification and evaluation of potential emergency 724/TQEM-ESH/10 dated 01 April 2010,
- Earthquake 746/TQEM-ESH/10 April 01, 2010,
- Evacuation 726/TQEM-ESH/10 April 01, 2010,
- Countermeasures for the 728/TQEM-ESH/10 explosion on 01 April 2010,
- Emergency drill 733/TQEM-ESH/10 April 01, 2010
- Emergency preparedness and response and recovery 725/TQEM-ESH/10 dated 01 April 2010.

Based on the results of the field visit, it was found that the company had provided a first aid kit in the building based on the identification of potential hazards and risks, besides that the company also appointed a foreman as the officer responsible for carrying the first aid kit. Based on the results of interviews with the foreman, it was found that the personnel concerned could briefly explain the function of the contents of the first aid bag that was brought.

Based on the results of field visits at the Estate and Mill, it is known that the company has provided warnings of evacuation routes and assembly points which are placed in places that are easily seen and known by workers.

6.7.3

Based on the results of field visits and interviews at the Estate and Mill, it is known that every worker has been provided with PPE in accordance with the identified hazards and potential risks. The PPE provided will be replaced periodically or after it is damaged with a mechanism that is known to the workers.

In addition, the company has also provided sanitation facilities that can be used by workers to clean themselves as well as change and store clothes as well as clean and store controllers.

6.7.4

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

Based on the interview with PT Bina Sains Cemerlang workers, concluded that all employees were aware of the medical service procedures in the event of an accident or illness. All employees interviewed also claimed to have a health BPJS card, if they went to a company clinic there was no fee at all.

6.7.5

The company shows the recording of work accidents using Lost Time Accident, for example in 2021 as follows:

Unit	Case	Lost Time Incident	Working Hour	Frequency Rate	Severity Rate
SPE	3	19	914,088	3.28	20.79
BPE	1	19	875,596	1.14	21.70
SPF	0	0	181,403	0.00	0.00

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

Procedures related to pest monitoring and control are contained in the Agricultural Reference Manual (ARM) document No. Policy 110/EST-ARM/13 Section 15 on crop protection. These procedures include explaining:

- *Oryctes* on oil palm tree
- Control of bag worms and needle worms
- Use of beneficial plants for natural leaf pest control
- Rat control in oil palm plantations
- Utilization of owls for rat pest control
- Control of root rot and stem end rot caused by Ganoderma.
- Best practice certification to minimize Ganoderma Inoculum in oil palm replanting.
- The use of *Arvuscular mychorrhizal* fungus for controlling root rot disease.

The document also regulates the stages of identification, monitoring and control of pests and diseases. In principle, the pest and disease census are an early warning measure for diseases and pests. If the census results show that the attack exceeds the threshold, then control is carried out, such as:

- Horn beetle: Observation frequency once a month, control threshold 5% / ha
- Oil Palm Leaf Feeding Caterpillar: Observation period is once a month, control threshold for example needle worm *Setora nitens* 5 larvae / midrib
- Rats: Period of observation every 3 months, control threshold 5%

IPM Implementation

- Based on the results of field visits and document studies, it is known that the company has applied owl cages as biological control of rat pests. In addition, the company has also applied a beneficial plant which is planted on the side of the road and is in a well-maintained condition.
- Based on the results of the document review, it was found that there were no pest attacks that exceeded the economic threshold, this was in accordance with the results of field observations where there were no signs of massive pest attacks.

7.1.2

Based on the results of document studies and field visits, it is known that the company does not have any invasive species which refers to the Regulation of the Minister of Environment and Forestry No. 94/MENLHK/SEKJEN/KUM.1/12/2016 concerning Invasive Types used by companies for pest control.

7.1.3

Based on the results of field visits, it was found that there was no use of fire for pest control purposes.

Status: Comply

7.2

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

7.2.1

Based on the results of document review and visits to the pesticide storage warehouse, it was found that the company had used selective pesticides to treat the targeted pests or weeds. The pesticides used include:

Merk	Target
Prima Up 480 AS	broad leaf weed and narrow leaf weed
Metaprima 20 WDG	broad leaf weed
Centalon 480 EC	broad leaf weed
Becano 500 SC	broad leaf weed
Lifeline 280 SL	broad leaf weed
Capture	Oryctes

7.2.2

The company shows records of pesticide use, for example the US Prima Up 480 pesticide in 2021 as follows:

- Active Ingredients: Glyphosate 48%
- LD50: 5,000 mg/kg
- Application Area: 3,063 Ha
- Active Ingredients per Ha: 2,37 kg/Ha
- Number of Application: 3,88 times

7.2.3

The company shows the following pesticide application records:

Merk	2020	2021	Reduction (-)/ Increase
Prima Up 480 AS	7,905	6,269	-1,636
Metaprima 20 WDG	360	321	-39

Centalon 480 EC	1,617	1,833	216
Becano 500 SC	84	58	-26
Lifeline 280 SL	1,346	1,782	436
Capture	1,302	1,436	134
Sidametrin	554	0	-554
Manthene	217	0	-217

Based on the pesticide use data above, it is known that in general the use of pesticides in 2021 has decreased compared to 2020, especially the use of pesticides for controlling animal pests (*Sidamethrin and Manthene*).

7.2.4

Based on the results of document review and interviews, it is known that the company does not use pesticides preventively without prioritizing the census.

7.2.5

Based on the results of the study of the list of pesticide use documents and field visits at the pesticide storage warehouse, it is known that there are no use of pesticides listed in the World Health Organization (WHO) Class 1A or 1B or included in the Stockholm or Rotterdam Conventions, as well as paraquat.

7.2.6

Based on the results of interviews with the PT BSC spray team, it is known that all workers have received training related to handling pesticides on a regular basis, besides that workers can briefly explain the procedures for spraying and handling pesticides and spray equipment after work.

7.2.7

Based on the results of the field visit at the pesticide storage warehouse, it was found that the storage area was in accordance with Government Regulation No. 74 of 2001 concerning the Management of Hazardous and Toxic Materials, including the pesticide storage warehouse equipped with the OHS hazard symbol, emergency response facilities in the form of fire extinguishers, first aid kits, ventilation and adequate lighting.

7.2.8

The company has and shows an SOP for handling pesticide waste which is listed in the SOP document for Storage of Pesticide Packaging, document number RA 012 revision number 00 dated April 1, 2017, which includes, among others, the safety and health of personnel working with hazardous waste and the control of temporary storage of packaging waste. Pesticides until the deadline for submission to the competent authorities. Procedures related to the storage of pesticide waste include packaging requirements, storage procedures, storage building requirements, and requirements for submitting hazardous waste to third parties. The company only manages pesticide packaging waste by storing the waste temporarily before being given to licensed collectors.

Based on field observations at Sungai Pinang estate and Bukit Pinang estate, it was found that all used pesticide containers were washed/rinsed in the available washing places, then recorded by warehouse staff, and then sent to the temporary hazardous waste warehouse in each estate. Used pesticide packaging is stored and collected at the temporary hazardous waste warehouse that is licensed, documented (log book). The company shows last hazardous waste was transported on January 6, 2022, through report no. 11/BSC/B3/I/2022, which PT Gema Putra Buana did as a licensed hazardous waste transporter.

However, based on the results of the field visit, it was found that there was a used pesticide jerry can at the Final Waste Disposal Site in block E07 Division 3 at Sungai Pinang Estate, and there was one jerry can of used pesticides and waste burning at the CHC (Central Housing Complex) in Bukit Pinang Estate. There has been nonconformance in the 7.3.1 indicator.

7.2.9

Based on the results of field visits and interviews, it is known that there is no air spraying activity.

7.2.10

- Regarding the implementation of the MCU, based on the results of interviews with management, it is known that in 2020 – 2021 there will be no health checks due to the covid-19 pandemic and in order to prevent transmission, the company shows letters including:
 - Circular Letter of the Minister of Manpower of the Republic of Indonesia No. M/7/AS.02.02/VI/2020 dated May 20, 2020 which one of the points explained: To temporarily postpone the health checks of the workforce until the aspects of occupational safety and health are met or until the covid-19 pandemic ends.
 - Inter-Office Mail from Regional CEO dated April 14, 2020 regarding Precautionary Measures in Facing the Spread of Covid-19 at Work Locations.
- The results of interviews with BSS SPE workers explained that the company has conducted health checks twice a year, but during the covid-19 pandemic, health checks have not been carried out.
- The company shows the PT BSC MCU screening schedule for high-risk employees in 2022 made by the Company's Doctor which is planned to be carried out in April and October 2022.

Based on the explanation above, companies are encouraged to implement special Health Examinations for workers who are at high risk by observing and implementing Health protocols. (OFI)

7.2.11

Based on documents review, it informed that all pesticide application workers in SPE and BPE were in reasonable age limit for work (no underage workers) and no pregnant workers. UoC had well-monitored the women workers through monthly pregnancy test. If founded pregnant, they will transfer to non-agrochemical works (away from chemical contacts). The company has a policy prohibiting pregnant or breastfeeding women from working as spraying worker. The policy has been written down and installed in the form of warning as seen in the housing of CHC BPE and CHC SPE.

Status: Comply

7.3

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

7.3.1

All waste products and sources of pollution have been identified and documented in the waste management and identification document period of 2021. Based on document verification, company has done waste source identification and management plan for examples are:

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

The company already has a temporary hazardous waste storage area permit through the Decree of the Head of the Musi Rawas District One-Stop Service and Investment Office Number 503/05/LB3/DPM-PTSP/VI/2019 dated 31 May 2019, regarding the extension of the hazardous Waste Management Permit for PT Bina Sains Cemerlang's Temporary Hazardous Waste Storage Activities. Validity period: 5 years from the date of this decision. Document review shows that the company has sent hazardous waste to PT Gema Putra Buana (licensed collector by the national environmental minister). Manifests are available and checked by auditors. Observation during audits at temporary hazardous waste storage shows that all hazardous waste is compliant with the periods in the permit. Submission of the last hazardous waste was carried out on 6 January 2022.

- The results of field visits to several locations in the company's management areas, it was found that there was Waste that was not appropriately managed, such as:

Field Visit to SPF

- Domestic Waste is scattered in the company area (old iron and Waste used for food and beverage packaging)

- There are traces of burning Waste (EFB and Domestic Waste) in the Water Treatment Station Area
- Former hazardous waste (motorcycle brake oil) packaging found around mill area

Field Visit to SPE

- DIVISION 1-2 semi-permanent housing and CHC (Central Housing Complex) permanent housing found used hazardous waste packaging (used oil drums) and traces of domestic waste burning activities.
- There is former hazardous waste (used oil packaging) in the chemical warehouse trash bin
- There are 12 used drums (BBM and Oil) in the fertilizer warehouse
- There is a used pesticide jerry can at the Final Disposal Site in block E07 Division 3
- There are 212 pcs used pesticide packages in front of the chemical warehouse which has not been submitted to hazardous waste storage area.

Field Visit to BPE

- There is one used drum (Oli), one jerry can of used pesticide, and Waste burning at CHC (Central Housing Complex)
- Around the fertilizer warehouse, there is one used drum (Oli)
- The workshop area has an oil trap that is connected to drainage that flows into a body of water.
- The company has a hazardous waste management SOP No. 5.3/BSC-PLB3/V16 dated May 15, 2016, which explains that all hazardous waste must be managed appropriately and stored in hazardous waste storage area. In addition, this procedure does not explain the existence of a temporary storage period for hazardous waste before it is sent to a licensed hazardous waste storage area.
- The company also has an SOP for Handling Non-hazardous waste No. SOP/027/BSC/2019 No. The revision of the RSPO/P&C/PLNB-3 dated November 1, 2019, clarifies that any Non-hazardous waste must be managed and stored in a warehouse. However, an explanation regarding domestic Waste has not been included in the procedure.

Based on this evidence, the company has not fully implemented the management of hazardous waste and Non-hazardous waste following the SOPs that it has, **non-conformity No. 2022.03 with major category**

7.3.2

The company routinely socializes waste management directly and indirectly; for example, the direct socialization of B3 waste management was carried out on November 7, 2021, to all staff and employees at SPE and BPE. In addition, based on interviews related to management and disposal of waste, managers in estates and mills have known about the proper disposal of waste, including domestic waste management disposal to landfill, hazardous waste management In Hazardous Waste Storage, and POME in WWTP.

However, based on the results of field visits to SPF, SPE, and BPE, it was found that domestic waste was scattered in the company area and used hazardous packaging that was not in the temporary hazardous waste storage area. There has been nonconformance in the 7.3.1 indicator.

7.3.3

The company has provided a landfill as a final waste disposal site. Organic waste from housing and inorganic waste is disposed of in the bins that have been provided, then transported every two times a week and disposed of in landfills, and then buried when it is complete. Observations also found these landfills are located far away (> 1 km) from housing and situated in flood-free areas. The results of field observations in employee housing areas also show many warnings to prohibit waste burning activities and the dangers of burning actions.

However, based on field visits at SPF, SPE, and BPE, there are traces of burning domestic waste and used hazardous waste packaging outside the Temporary hazardous waste storage area. These have been nonconformance in the 7.3.1 indicator.

7.3.1	Status: Non-Conformity No. 2022.03 with Major Category
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7.4

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

7.4.1

The company already has a procedure related to fertilization activities contained in the Agricultural Reference Manual (ARM) document (No. Doc. 110 / EST-ARM / 13) Section 8 concerning the Fertilization of Oil Palm Crops which includes technical fertilization, empty fruit bunch application and compost application on Immature plants and mature plants, fertilizer placement and fertilizer application of 'focal feeding' on marginal soils. The implementation of the SOP is monitored periodically with an operational audit or

Plantation Advisory. In addition, the implementation of fertilization supervised by the foreman, assistant and re-evaluation by the manager.

7.4.2

The company shows the recording of SPE and BPE Leaf Analysis on October 15, 2021 which was carried out by the Minamas Research Center. The parameters analyzed included: ASH, P, K, Mg, Ca, N, and B.

Meanwhile, the results of the soil analysis are listed in the document of the Soil Fertility Survey and Land Suitability for Oil Palm Plants 2021 PT BSC compiled by the Minamas Research Center which informs the nutrient status including: pH, C-Organic, Total N, P, K, Mg, Ca, Na, etc.

7.4.3

Based on the results of the field visit, it is known that the company has implemented a nutrient recycling strategy including the application of empty bunch and pruned midribs in the racking area. The company shows a empty bunch application record, for example the year 2021 as follows:

- BPE: 4,270,850 Kg
- SPE: 3,132,278 Kg

7.4.4

Based on the results of the document review, it is known that PT BSC's FFB production is 39,644 Tons (SPE) and 33,009 Tons (BPE). Based on the results of the document review, it is known that the fertilizers used by the company include AC, ZA, MOP, HGFB, RP, and Kieserite with a total application of:

- SPE: 3,484,069 Kg
- BPE: 2,579,902 Kg

Based on the explanation above, it is known that the use of fertilizers per ton of FFB are: 87.88 Kg/Ton (SPE) and 65.07 Kg/Ton (BPE).

Status: Comply

7.5 Practices minimize and control erosion and degradation of soils.

7.5.1

Based on the results of the study of the Soil Fertility Survey and Land Suitability Survey document for Oil Palm Plants at PT Bina Sains Cemerlang for the period 2021 – 2026, it is known that there is no marginal soil, while all soil types are of the order Ultisol. The land slope class is between 0° – 25°, the dominance is hilly with an area of 898.81 Ha (14.01%), besides that there is a steep slope land with an area of 129.59 Ha (2.02%).

7.5.2

Based on the results of field visits in the replanting area for the 2021 planting year, for example block H15 Afdeling II, SPE Estate, it is known that there are no extensive replanting activities on land with steep slopes.

7.5.3

Based on the results of the study of the area statement documents and field visits, it was found that the company did not carry out new plantings but only carried out replanting activities.

Status: Comply

7.6 Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.

7.6.1

Based on the results of the study of the Soil Fertility Survey and Land Suitability Survey document for Oil Palm Plants at PT Bina Sains Cemerlang for the period 2021 – 2026, it is known that there is no marginal soil, while all soil types are of the order Ultisol. The land slope class is between 0° – 25°, the dominance is hilly with an area of 898.81 Ha (14.01%), besides that there is a steep slope land with an area of 129.59 Ha (2.02%).

<p>7.6.2, 7.6.2 Based on the results of the document review and field visits, it is known that the company does not carry out any new land development activities.</p>	<p>Status: Comply</p>
<p>7.7 No new planting on peat, regardless of depth after November 15th, 2018 and all peatlands are managed responsibly.</p>	
<p>7.7.1, 7.7.2, 7.7.3, 7.7.4, 7.7.5, 7.7.6, 7.7.7 Based on the results of the study of the Soil Fertility Survey and Land Suitability Survey document for Oil Palm Plants at PT Bina Sains Cemerlang for the period 2021 – 2026, it is known that there are no types of peat soils, while all soil types are of the order Ultisol.</p>	
<p>Status: Comply</p>	
<p>7.8 Practices maintain the quality and availability of surface and ground water</p>	
<p>7.8.1 The company identifies water flows within its operational areas in the HCV document. There is also a water management plan included in the HCV management plan, environmental management, and monitoring plan (AMDAL) record. Based on the document, it is also known that the water source management plan is to test the quality of surface water (River Pinang and Sungai Durian) every six months and drill/resident wells every one year. All tests were carried out by a KAN accredited laboratory (LP-1148-IDN). Related to this, the company shows the results of testing surface water quality for semester 2 of 2021, which was carried out on November 5, 2021. The company carried out surface water tests with 27 indicators at 4 sample points. The test results analysis for all these locations shows that all the parameters of the test results are still by the applicable quality standards. The quality standard is Government Regulation Number 22 of 2021 class 1.</p> <p>The certification unit also does not limit access to clean water, and all workers also have access to adequate clean water. Based on the results of field observations in the permanent housing area of CHC (Central Housing Complex) Sungai Pinang Estate and 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 factory workers. Who live in factory housing, the water source comes from a reservoir that has been treated in the WTP. The company also conducts water testing to see the quality of water taken from drilled wells by a KAN accredited laboratory (LP-1148-IDN) on July 7, 2021. The water quality test results also show that all parameters of the test results are still following the quality standards set—the Regulation of the Minister of Health Number 32 of 2017. Meanwhile, the monitoring well test results will be explained in indicator 7.8.3.</p> <p>The company also has a river boundary management plan - a riparian belt, explained in the SOP for Watershed Protection (No.PM 0300, Rev 00 dated October 30, 2014). The SOP includes procedures that require watershed areas or buffer zones to be marked. No chemical application is allowed. (spraying & fertilizing), maintenance of oil palm plantations in the watershed is carried out manually; during tree rejuvenation which is approximately 50 meters left and right of the river, flow is allowed to grow naturally, and it is forbidden to take sand for residents. Based on the results of document verification and field observations of several sampling locations indicate that the company has carried out activities to improve water quality, including:</p> <ul style="list-style-type: none"> • Conduct socialization to all employees and the surrounding community not to use water for consumption activities. • Maintain the cleanliness of the environment around water sources so that sources of pollution can be minimized. • Create a program to improve water quality in stages with the provisions of the applicable laws and regulations. • Report the examination results by the provisions of the applicable laws and regulations. • Testing the quality of river water and drilled wells listed in the RKL/RPL report • Management of erosion and surface water runoff, lowland water management, 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. • Wastewater management using WWTP and its utilization in licensed application areas as well as monitoring the quality of wastewater and monitoring wells • Monitoring water use for palm oil processing and evaluating its usefulness. • Flow meter logging in WTP • Checking for leaks of water faucets at the factory and calibrating flowmeters • Distribution control and maintenance of water distribution pipes to housing 	

- Production of water-saving posters and water-saving campaigns
- Socialization of water use savings in factories and housing.
- Planting of plant species on riverbanks such as Bamboo, Trembesi, etc.

7.8.2

The company has an SOP for Watershed Protection (No.PM 0300, Rev 00 dated October 30, 2014). The SOPs stipulate that watershed areas or buffer zones must be marked, no chemical application (spraying & fertilization), and maintenance of oil palm plantations are allowed. The watershed is done manually; when rejuvenating, trees, approximately 50 meters left and right of the river flow, are allowed to grow naturally, and it is forbidden to take sand for residents.

In addition, the company also explained the efforts to manage river borders and other water sources. Such as: periodically monitoring the condition of river borders from disturbances and, pollution and fires every month testing surface water quality standards to ensure river water quality is still within normal limits. In addition, the company also conducted socialization with employees and the surrounding community in conservation efforts, which can be proven based on the minutes of socialization to workers on October 11, 2021, and to the community on December 7, 2021. The interviews with spraying and fertilizing workers also stated that they had known rules related to chemical application limits, prohibition of washing goods contaminated with chemicals in rivers, and other activities that harm water sources.

The company has also planted woody plants on riverbanks. In 2021, it was known that 200 plants had been planted consisting of bamboo and vetiver grass. Based on the results of field visits to the HCV location, which is the Sungai Pinang River border area division 02 block E010 Sungai Pinang Estate and Sungai Pinang River border area division 02 block F017 Bukit Pinang Estate, it shows that the company has carried out several activities as a form of protection for the river border area, such as:

- Placing warnings on no hunting, HCV areas, and 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
- 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

All palm oil mill effluent produced by the SPF Palm Oil Mill is processed at the wastewater treatment plant before being distributed to plantations as land applications. Monitoring is carried out every month regularly and reported to the Environment Agency every three months. The company can show evidence regarding the results of the POME quality measurement in a document of the effects of tests carried out by a laboratory accredited by KAN (LP-1148-IDN). The analysis of the test results for the period January - December 2021 shows that all parameters are by the applicable quality standards. This indicates that the liquid waste generated from FFB management activities can be applied to Land applications. The company can also show the testing results on monitoring wells for semester 2 of 2021 carried out by a KAN accredited laboratory (LP-1148-IDN) on November 5, 2021. Minister of Health Regulation No. 32 of 2017. The certification unit already has a Land Application Permit based on the Regent of Musi Rawas no 436/KPTS/DLH/2017 regarding the extension of the permit for the use of palm oil industrial wastewater on the oil palm plantation land of PT Bina Sains Cemerlang. The application area of 83.64 ha is located in blocks F11 and F12, issued on June 7, 2017, valid for five years.

7.8.4

The company already has a water use/utilization permit based on the Decree of the Minister of Public Works and Public Housing Number 782/KPTS/M/2021 dated June 16, 2021, concerning the Water Resources Concession Permit. This permit decision comes into effect from June 8, 2021, until five years from the date of stipulation. It is explained that the company must collect water with a quota that can be utilized of 12,000 m3/month.

The procedure of water use monitoring in the mill is available under the document Procedure of Water Treatment Plant. Water consumption is monitored by using flowmeters installed in the piping system of WTP. According to water use data in the last period, January to December 2021 average water used for processing is still below the budget (0.56 m3/ton FFB while the budget is 1.5 m3/ton). The widespread use of water under the budget of the company.

Status: Comply

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

The company uses shells and fiber as boiler fuel to generate turbine power, reducing the use of fossil fuels. There are the documentation of shells and fiber usage on document of “Efisiensi Pemakaian Bahan Bakar Fosil menggunakan Fibre & Cangkang” period January-December 2021. For example, the use of shells and fiber period January-December 2021 usage is 9,073 tons and 3,992 tons respectively, while electricity generated from diesel fuel 192,727 kWh.

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

The Certification Unit has carried out an inventory of GHGs in the Greenhouse Gas Mitigation Report document for 2021. Based on document analysis, it can be concluded that the company has identified the source of GHG produced by the SPF unit and its suppliers. Identification of significant sources of GHG emissions is placed, and the company has developed mitigation plans covering mills and plantations. Significant GHG emissions include:

- Land-use change.
- POME processing.
- Fertilizers and pesticides.
- Use of fossil fuels for operations and transportation.

The mitigation plans include, among other things, the correct dosage and application of fertilizers as recommended, reducing reuse and recycling, limiting the use of electricity, transportation, and machine maintenance, as well as periodic air quality tests. The company has reported the results of the GHG calculation, which was submitted to the RSPO GHG website.

Fossil fuel reduction in SPF has been carried out using fibers and shells for fuel substitution. The company also uses POME with test results from the monitoring period from January – to December 2021, which show 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 has been entered into the RSPO GHG Calculator version 4.0. The summary of GHG emissions for the period January – December 2021 is as follows:

Summary Emissions

Description	Value	Unit	Description	Value	Unit
CPO	1.75	tCO ₂ e/tProduct	Oil palm planted on mineral soil	6185.64	Ha
PK	1.75	tCO ₂ e/tProduct	Oil palm planted area on peat	0.00	Ha
PKO	0	tCO ₂ e/tProduct	Total oil palm planted area	6185.64	Ha
PKE	0	tCO ₂ e/tProduct	Conservation area (Forested)	44.07	Ha
OER	22.54	%	Conservation area (non-Forested)	0.00	Ha
KER	4.68	%	FFB Production per hectare	11.29	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	tCO ₂ e/t FFB	Emission Source	tCO ₂ e
POME	13689.43	0.20	PK from own mill	0.00
Fuel Consumption	983.72	0.01	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	0.00	0.00		
Sale of EFB	0.00	0.00		
Total	14673.15	0.21		

Estate / Plantation Field Emissions and Sinks

Description	Emission (tCO ₂ e)			TOTAL
	Own	Group	3rd Party	
Emission Source				
Land Conversion	59931.58	0.00	0.00	59931.58
CO ₂ Emissions from Fertilizer	5283.56	0.00	0.00	5283.56
N ₂ O Emissions from Peat	0.00	0.00	0.00	0.00
N ₂ O Emissions from Fertilizer	4773.55	0.00	0.00	4773.55
Fuel Consumption	1688.47	0.00	0.00	1688.47
Peat Oxidation	0.00	0.00	0.00	0.00
Sinks				
Crop Sequestration	-52728.77	0.00	0.00	-52728.77
Sequestration in Conservation Area	-404.12	0.00	0.00	-404.12
Total	18544.27	0.00	0.00	18544.27

FFB Supplier

Supplier Name	FFB Production by Estate/Plantation (t)	FFB Supplied by Estate/Plantation (t)	Percentage of FFB supplied by Estate/Plantation (%)
Sungai Pinang Estate	37539.20	37539.20	100
Bukit Pinang Estate	32298.79	32298.79	100

Palm Oli Mill Effluent Treatment

Description	Unit	Value
Diverted to Compost	%	0
Diverted to anaerobic digestion	%	100
POME to anaerobic pond	%	100
POME to methane capture (flaring)	%	0
POME to methane capture (electricity generation)	%	0

7.10.2

Based on document verification, there are no additional new areas in the scope of certification; it is still the same as the previous audit activities. The company has identified pollution and emissions activities, including GHG. Pollution/emissions come from land clearing, fertilization and use of chemicals (spray activities), use of solar in transportation, lighting, and processing of FFB, and management of POME.

7.10.3

Based on document verification, there are no additional new areas in the scope of certification, and it is still the same as the previous audit activities. The company has identified pollution and emissions activities, including GHG. Pollution/emissions come from land clearing, fertilization and use of chemicals (spray activities), use of solar in transportation, lighting, and processing of FFB, and management of POME. The company has also implemented GHG emission management, including establishing a policy of zero burning in land clearing, fertilizer, and chemical use by recommendations, EFB and POME applications on land, routine emission testing, use of fibers and shells as boiler fuel, planting trees in the area riparian.

Status: Comply

7.11

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

7.11.1

The company is committed to clearing land without burning (zero burning) either during land clearing or replanting, as stated in the environmental protection policy dated April 30, 2013. The company also has an SOP procedure. Policy; 110/EST-ARM/13 Memorandum of Head of Plantation Upstream Indonesia dated September 01, 2013, chapter Replanting. The procedure explains that land clearing or replanting also shows no zero-burning method. In addition, the company has a Fire Prevention and Handling Manual with No. M-077 / HPU / VIII / 2014 from Head Plantation Upstream Indonesia dated August 07, 2017, which contained that

the company implemented Zero Burning Policy in all Minamas plantation activities. Based on the results of field observations of Block D13 Division 1 Sungai Pinang Estate, it was found that there was no indication of replanting activities using the burn method; the company carried out replanting actions manually (chipping).

7.11.2

Efforts to prevent and control fires in the managed area have been described in the 2021 Fire Monitoring and Prevention Report, whose period is between January -and December 2021. Based on document verification, there were no land fires in the company's operational areas from January to December 2021, and observations in each plantation and mill; there is no evidence of fire in the company's functional areas. Based on interviews with management, they cleared the land using heavy equipment (manual).

7.11.3

The company has involved stakeholders at the border locations of the operational area to prevent and control fires through simulations and socialization of firefighters, which were attended by the surrounding community and several agencies around the company. The company has demonstrated evidence of stakeholder involvement in fire prevention and control, as shown below:

- Minutes of Fire Extinguisher Simulation on March 11, 2021, held at Sungai Pinang Estate and attended by representatives of Villages around PT BSC, the fire fighting team at PT BSC, etc.
- Minutes of socialization on October 7, 2021, held in Anyar Village and attended by 15 participants.

Status: Comply

7.12

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

7.12.1

Based on the results of document verification, it shows that PT BSC has cleared land after November 2005 without prior identification of HCV, namely the period November 2005 – November 2007 covering an area of 12 Ha and land clearing for the period Dec 2007 – Dec 2009 covering an area of 58 Ha. Meanwhile, the HCV Identification activity was carried out in 2010, shown based on the HCVA Identification Report document, PT Bina Sains Cemerlang, carried out by an independent consulting agency (CV. POLLITO) in January 2010.

Sime Darby Plantation Berhad, the parent of PT BSC, has made a disclaimer of liability according to a letter from the Head of PSQM Department on July 15y, 2015, and has reported the results of Land Use Change Analysis (LUCA) in August 2015. The company has also shown the RSPO Remediation and Compensation document. Liabilities for land clearance without prior HCV Assessment, which explains LUCA in the PT BSC area.

The LUCA Report Review Status Revision Priority document shows that on February 27, 2019, PT BSC received a LUCA report on the results of a review from the RSPO. On December 8r, 2020, PT BSC received a Conditional Approval for one year due to the Pending Review Report.

The company can also show the stages of communication between PT BSC and the RSPO, indicating that there have been several revisions to the LUCA document that has been prepared and returned to PT BSC. On December 22, 2021, the RSPO again sent the document review results, and on January 33, 2022, PT BSC again sent a response to the review. Until the Surveillance 1.4 audit was carried out, PT BSC's LUCA document was still under review by the RSPO in the data clarification stage by the LUCA reviewer.

Based on the explanation above, the company has not been able to show that the LUCA Report document has been accepted and has PASS status. This is a non-conformity in indicator 7.12.8.

7.12.2

The company has identified HCV area within its operational area. The identification was conducted by independent consultant of CV POLLITO. The HCV area present in PT BSC are HCV 1.1; HCV 4.1 and HCV 5 in form of riparian area of Pinang River, Durian River, Selinsing River and Air Hitam River for 492 ha that is included in the plantation area (potential HCV Area). The river border area that has been settled into the HCV area of 44.07 ha and is not in the planting area statement.

The identified RTE of wildlife species are *Felidae*, *Hylobatidae*, *Ursidae*, *Manidae*, *Hytridae*, *Cercopithecidae*, *Viverridae*, *Bufo*, *Macaca nemestrina*, *Alcedo atthis*, *Anthreptes malacensis*, *Chloropsis sonnerati*, *Ictinaetus malayanensis*, *Varanus nebulosus*, and *Naja sp* and RTE species of vegetation species are *Ficus fistulosa*, *Picus*, *Rhodamnia cinerea* and seedling of *Aglaia tomentosa*.

7.12.3

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

7.12.4

The company has developed a matrix for HCV management plan in 2020/2021 consisting of rare, threatened, or endangered species, rivers buffer zone, reservoirs buffer zone, and local identities. The company also has issued control of any illegal or inappropriate hunting, fishing, or collecting activities.

The company established an HCV management plan to maintain the HCV areas in operation are listed on the Management plan HCV 2021 documents. The HCV management and monitoring implemented that taken by the management unit such as maintaining HCV attributes (HCV boundary, signboard), HCV socialization (community and worker), keeping HCV area, regular patrols for maintaining HCV security, species monitoring, enrichment in riparian.

The company also conducts a review of management and monitoring activities in 2021, as evidenced in the 2021 HCV Management Plan Review Report, which contains evaluation and management and monitoring recommendations to improve HCV management activities in 2022.

7.12.5

The company has identified HCV area within its operational area. The identification was conducted by independent consultant of CV POLLITO. The HCV area present in PT BSC are HCV 1.1; HCV 4.1 and HCV 5 in form of riparian area of Pinang River, Durian River, Selinsing River and Air Hitam River for 492 ha that is included in the plantation area (potential HCV Area). The river border area that has been settled into the HCV area of 44.07 ha and is not in the planting area statement. The company currently has a mutual agreement with the surrounding community; for example, for monitoring and patrol activities, the company has agreed with the community active in the company not to hunt and trade wild animals.

7.12.6

The Certification Unit has a policy set out in procedures related to protecting endangered species with document number SPO/006/BSC/202 revision 01 concerning SOPs for Handling and Protecting Flora and Fauna, effective on November 1, 2012. The document generally describes preventive and repressive measures. Protect protected wild animals and plants, such as the principle of sustainability. All employees are advised not to hunt, catch, kill and sell protected animals and plants threatened with extinction and report any such activities. Maintain and not disturb the area designated as the HCV area and report any illegal acts. Employees who do not comply will be subject to sanctions by the applicable laws and regulations. The company also put no hunting boards with photos of the species and sanctions for violating government regulations in all HCV areas.

Information also applies sanctions for employees in the form of disciplinary action following the provisions of national law, which are also listed on the HCV signboard, which explains that "anyone who violates will be reported to the authorities with criminal threats and fines following Law Number 41 of 1999". The company imposes the sanction by giving a first warning letter to employees who violate work rules, among others, such as: carrying out activities unrelated to work for personal gain within the company, such as hunting, trading animals, and logging forests. Based on interviews with company employees regarding animal protection, the company has committed to protecting animals within the scope of corporate governance, such as implementing a ban on hunting, killing, and keeping wild animals in the company environment. The procedure for animal protection also regulates the existence of sanctions or sanctions for those who violate these provisions.

In addition, the company has also carried out socialization about the existence of endangered plants and animals to all employees and the surrounding community, which is shown in the minutes of socialization documents, for example, carried out to employees on October 11, 2021, and carried out to the community and contractors on December 7, 2021. All activities can be proven by photos and the document's attached attendance list. Indirect socialization is also carried out by installing information boards and brochures with warning signs related to conservation areas and the presence of protected rare plants and animals in easily visible places, such as; area entrances, regional roads that are often crossed by the community, and other sites other strategic areas such as offices and

other public facilities. The results of field visits to several conservation areas indicate that the company has managed protected areas. Such as; replanting local species, not logging, using no chemicals, installing HCV signboards, and prohibiting hunting and burning to avoid and prevent illegal hunting and encroachment of the area. HCV. Several warning signs have been posted regarding the prohibition of hunting and encroachment. Some personnel appointed by the company carry out routine monitoring of HCV areas. The results of field observations also show signs prohibiting hunting for protected animals, burning, and marking the boundaries of conservation areas.

7.12.7

Monitoring of protected areas in 2021 is carried out regularly every week to ensure the site's security. Monitoring activities were carried out in several locations on the river border and heath forest. This monitoring is carried out to see the progress of the results of HCV management from the initial stage to the current condition. The company also monitors the diversity of flora and fauna, which is routinely carried out every year by showing the results of HCV monitoring carried out in 2021. The results of observing fauna in the plantation area still found several protected species of animals included in the protection status according to IUCN, CITES, and PermenLHK No. 106 of 2018. HCV management and monitoring activities are contained in the HCV management and monitoring report. For example, the results of patrols in 2021 for conservation areas such as flora and fauna found were Meninting King Prawns, Cobras, Monitor Lizards, and Long Tailed Monkeys.

Based on the management and monitoring evaluation results in 2021, it is known that there are protected animals in the PT BSC area. Monitoring results were also reported to the Sumatera Selatan Nature Conservation Center (BKSDA) on January 5, 2022. Based on the 2021 HCV monitoring report, it is known that several protected species are still found in the company's management area. The results of the 2021 evaluation for the 2022 management plan will be carried out by involving the surrounding community in December 2021. Based on this evaluation, the company determines the management unit's management and monitoring, such as maintaining HCV attributes, socializing HCV, maintaining HCV areas, and routine patrols to maintain security. HCV, and species monitoring. In addition, based on interviews with employees and the surrounding community, it was found that they were aware of the presence of RTE species and HCV areas in the company's operational areas.

7.12.8

Based on the document review, several facts are known as follows:

- There was land clearing carried out after November 2005 at PT BSC without prior identification of HCV in the PT BSC management area, Sime Darby Plantation Berhad as the parent of PT BSC, has disclosed liability according to the letter from the Head of PSQM Department dated July 15, 2015, which explains that in PT BSC there was land clearing for the period Nov 2005 – Nov 2007 covering an area of 12 Ha and land clearing for the period Dec 2007 – Dec 2009 covering an area of 58 Ha.
- Then, when the previous ASA-1.3 audit was carried out remotely, this indicator became a Non-compliance because PT BSC's LUCA had not yet received approval from the RSPO. The non-compliance received the status of "OPEN until the next surveillance audit" based on an email from Aminah Ang (Aminah.ang@rspo.org) on September 7, 2020, to alagendran.maniam@simeдарbyplantation.com stating, "Dear Alagendran, following your email dated December 1, 2020, and after reviewing the current LUCA progress, we agreed to allow the NC to remain open until the next Surveillance audits. We hope that the process can be completed by then."
- On April 6, 2021, there was an email from the RSPO (aryo.gustomo@rspo.org) regarding the RSPO Compliance Advisory Sime Darby Plantation Berhad, which is valid for six months from the issuance of the Advisory Note (until October 2021) permitting units that are LUCA the review has not been completed to continue the certification.
- Then, when the ASA-1.3 & ASA-1.4 onsite audit was carried out, the company showed a history of communication between the RSPO and the Company from March 2, 2021, until the latest on January 3, 2022. through dani.ikhshan@simeдарbyplantation.com provided the data requested by the RSPO. The last reply was received by the RSPO on January 5, 2022, via email indrawan.suryadi@rspo.org stating, "We acknowledge receipt of the clarification data, thank you. It has been forwarded to the reviewer". Based on the last email, it was concluded that there was still no LUCA approval given to PT BSC.

Based on the explanation above, the certification unit has not yet been able to show approval of the Land Use Change Analysis (LUCA) from the RSPO. This is a **Non-Conformity No. 2022.04 with Major Category**

7.12.8	Status: Non-Conformity No. 2022.04 with Major Category
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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-1-3 & ASA-1.4	The company did not use RSPO Trademark and CB Logo, However, the parent company Sime Darby Plantation Berhad has had a trademark license No. 1106024.	✓
	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-1-3 & ASA-1.4	The company did not use RSPO Trademark and CB Logo, However, the parent company Sime Darby Plantation Berhad has had a trademark license No. 1106024.	✓
	Status: Comply	
3.	Implementation of Certificate and Trademark is not used on product	X or √
ASA-1-3 & ASA-1.4	The company did not use RSPO Trademark and CB Logo, However, the parent company Sime Darby Plantation Berhad has had a trademark license No. 1106024.	✓
	Status: Comply	
4.	Controlling of Certificate and Trademark, including withdrawing inappropriate trademark.	X or √
ASA-1-3 & ASA-1.4	The company did not use RSPO Trademark and CB Logo, However, the parent company Sime Darby Plantation Berhad has had a trademark license No. 1106024.	✓
	Status: Comply	

3.3 Summary of RSPO Partial Certification.

Compliance of the uncertified management units of Sime Darby Plantation Berhad 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.

Sime Darby Plantation Berhad Time Bound Plan is explained in table section 1.10. Sime Darby has achieved 34 management units in Malaysia and 24 Management Units in Indonesia that RSPO certified. Total management unit in Sime Darby Plantation Berhad are 34 in Malaysia, 25 in Indonesia and 1 in Liberia. Sime Darby Plantation Berhad has informed the Time Bound Plan progress through representative’s office in Indonesia. MUTU has considered that Sime Darby Plantation Berhad is comply with the RSPO requirement for Time Bound Plan. The Time Bound Plan was revised and declared by the Sime Darby Plantation Berhad Indonesian representative on January 2022 by the Head of Sustainability & Quality Management.

MUTU has verified partial certification for un-certified unit’s subsidiary of Sime Darby Plantation Berhad based on their Time Bound Plan. MUTU Auditor verified positive assurance against the company internal audit and supporting evidence as well as any information from others sources.

MUTU Auditor has verified company partial certification and concludes that:

- PT Budidaya Agro Lestari waiting for land title process to some of its operational area.
- PT Guthrie Pecconina Indonesia – Sungai Jernih Estate currently is in HGU process
- The company has followed RSPO requirement related to New Planting Procedure and Remediation and Compensation Procedure.
- There is 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.

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><i>Company Group/Holding Statement:</i> The sustainability unit has conducted the internal audit for 9 units and updated in the compliance status of uncertified management unit. There is no replacement of primary forest or HCV area and no new planting after January 1st 2010. Other than that, land conflicts and land disputes also being audited and approved by Head of Sustainability-Indonesia.</p> <p><i>Auditor Verification:</i> Internal Audit report available for uncertified management unit.</p>
2.1.2	No replacement after dates defined in NIs Criterion 7.3 of: <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><i>Company Group/Holding Statement:</i> No replacement of primary forest or HCV or no new planting after Jan 1st 2010 for all uncertified units except for PT Sime Indo Agro, Bukit Ajong Mill East* Estate /Sei Mawang Estate which is currently under RaCP. LUCA submitted and currently under review process by appointed reviewer by RSPO.</p> <p><i>Auditor Verification:</i> Sime Darby Plantation Berhad sent disclosure of liability including LUCA analysis to RSPO Secretariat on 2 December 2014 and 2nd revision on 24 June 2016. Current</p>

		status of LUCA report of SDP Bhd is having been sent the 19 report of LUCA to RSPO on Aug 2018, responded by RSPO with need clarification. The companies ensuring reporting of disclosure of liability progress to RSPO and according to the CB's correspondence with RSPO Remediation and Compensation.
2.1.3	Any new plantings since January 1 st 2010 must comply with the RSPO New Plantings Procedure.	<p>Company Group/Holding Statement: No new plantings. As at 16 Jan 2020, Sime Darby Plantation under its unit Sime Darby Plantation Investment (Liberia) Pte Ltd has completed its disposal of its entire interest in Sime Darby Plantation (Liberia) Inc (SDP Liberia) to Mano Palm Oil Industries Ltd (MPOI).</p> <p>Auditor Verification: Karya Palma Estate (PT Sandika Natapalma) and Beturus Estate (PT Budidaya Agro Lestari) any new planting after January 1st 2010 and due to not conduct NPP it will be object of sanction.</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>Company Group/Holding Statement: The group has land conflict procedure in place. No Land conflict registered with RSPO Complaints System. No outstanding complaints with the RSPO.</p> <p>Auditor Verification: Auditor has verified the supporting evidence of above the company statement and there is no conflict in uncertified area.</p>
2.1.5	Any Labour disputes are being resolved through a mutually agreed process, in accordance with RSPO criterion 6.3.	<p>Company Group/Holding Statement: No stakeholder comments or complaints received.</p> <p>Auditor Verification: Auditor has verified the supporting evidence of above the company statement. There are no labour dispute in company unit.</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>Company Group/Holding Statement: None noted. No stakeholder comments or complaints received.</p> <p>Auditor Verification: Auditor has verified the supporting evidence of above the company statement. There is any legal non-compliance for company under SDP waiting for land title process, i.e.:</p> <ul style="list-style-type: none"> • PT Sime Indo Agro 5,815 Ha • PT Bina Sains Cemerlang 308.25 Ha • PT Bahari Gembira Ria 1,639 Ha • PT Guthrie Pecconina Indonesia 890 Ha

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

3.4.1. Identification of Findings, Corrective Actions and Observations at Remote ASA-1.3 (Remote Audit)

NCR No.	: 2020.1	Issued by	: Rizliani Aprianita Hsb
Date Issued	: 5 November 2020	Time Limit	: 10 December 2020
NC Grade	: Major	Date of Closing	: 21 November 2020
Standard Ref. & Requirement	6.2.2 Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed, including work done by family members.		
Evidence observed : The company showed documents including: <ul style="list-style-type: none"> • The list of SPE employees for September 2020, and there is worker with initial TW with an entry date of 4 January 2016 • Procedure of Control records No. 011 / PC-BSC / VIII / 10 dated 10 August 2010 which explains the validity period and the destruction of records for audit / assessment examination is 5 years. • The results of interviews with management informed that the worker was still working at the company. 			
Non-Conformance Description : The company has not been able to show a work agreement letter on behalf of the worker.			
Root Cause Analysis (filled by organization audited): Contract agreement on behalf of the employee is available but not well documented due to the change of new Head of Administration. The PIC who coordinates the agreement is the Head of Administration.			
Correction (filled by organization audited): Submit worker's agreement with initial TW with details: <ol style="list-style-type: none"> 1. Agreement no: 002 / PKWT-PK / SPE / IV / 2016 made on April 1, 2016 with a validity period of 3 (three) months starting April 1, 2016 and ending on June 30, 2016. 2. Agreement no: 010 / BSC / PKWT / VII / 2017 made on July 1, 2017 with a validity period of 6 (six) months starting July 1, 2017 and ending on December 31, 2017. 3. Agreement no: 009 / BSC / PKWT-PK / I / 2018 made on January 1, 2018 with a validity period for a period of 6 (six) months starting January 1, 2018 and ending on June 30, 2018 4. Agreement no: 007 / BSC / PKWT-PRT / X / 2018 made on August 1, 2018 with a validity period for a period of 6 (six) months starting August 1, 2018 and ending on December 31, 2018 Agreement no: 003 / BSC / PKWT-PK / BSC / SPE / I / 2020 made on January 1, 2020 with a validity period for 1 (one) January 2020 and ends on December 31, 2020			
Corrective Action (filled by organization audited): Update employee data on the payroll system and ensure employee data records are well documented. The PIC specifically for contract agreement documentation was the Head of Administration			
Assessor Evaluation and Conclusion (filled by auditor): Verification on November 15, 2020			

The company showed evidence of improvement in the form of:

- Worker's agreement with initial TW for the period 2016 – 2020
- List of employees SPE update for October 2020
- Records of monitoring of Worker's agreement in SPE, BPE and SPF informing the name of the worker, No. agreement, agreement extension, off period, time status and others.

Verification on November 21, 2020

The company showed evidence of improvement in the form of memorandum No. 002 / BSC / XI / 2020 dated 19 November 2020 regarding PIC for agreement contract . The memo explained that the Kasie was responsible for managing agreement contract documentation.

Based on the explanation above, it is concluded that the discrepancies have been met.

Verified by : Rizliani A Hsb

NCR No.	: 2020.2	Issued by	: Rizliani Aprianita Hsb
Date Issued	: 5 November 2020	Time Limit	: ASA 1.4
NC Grade	: Minor	Date of Closing	: 15 November 2020
Standard Ref. & Requirement	: 6.7.5 Occupational injuries are recorded using Lost Time Accident (LTA) metrics.		

Evidence observed :

The company showed documents including:

- SPE Work Accident Report for the period Jan - Sep 2020 with details of 5 people and 51 lost work days.
- BPE Work Accident Report for the period Jan - Sep 2020 with a statement of Zero (no work accidents)
- OHS report of SPE for the 1st - 3rd quarter 2020 period which informs that there are 2 work accidents
- OHS report of BPE for the period of the 1st - 3rd quarter 2020 with a statement of Zero (no work accidents)
- LTA calculation report for SOU 22 for the period Jan - Sep 2020 with details
 - SPE: there were 6 cases with 53 lost working days
 - BPE: there were 11 cases with 54 lost working days

Non-Conformance Description :

Based on the explanation above, there is an inconsistency in work accident recording data for the period January - September 2020.

Root Cause Analysis (filled by organization audited):

The accident reporting mechanism originates from the Central Clinic at PT BSC and is submitted to the mill / plantation unit. Furthermore, the mill / plantation unit reports to the SQM Regional Staff (RSQM) to be verified and finalized (such as accident classes etc.) to be used as a final Minamas Plantation report. There was missed communication, where the results of verification and finalization were not carried out by the unit in the unit's work accident report and included in the OHS report in the January - September 2020 period SPE and BPE

Correction (filled by organization audited):

1. Adjust the unit work accident report with the verified and finalized work accident report
2. Make adjustments and revisions to OHS reports and submit them back to the Manpower Agency for the period January - September 2020 SPE and BPE (evidence of handover of revised reports to Manpower Agency is attached)

Corrective Action (filled by organization audited):

RSQM re-ensures that the work accident reports and OHS reports are in accordance before being submitted to related parties by RSQM staff.

Assessor Evaluation and Conclusion (filled by auditor):

Verification on November 15, 2020

The company showed evidence of improvement in the form of:

- Revised PHS Report which informs the recording of work accidents at BPE for the 1st, 2nd and 3rd quarter of 2020
- Revised OHS Report which informs the recording of work accidents at SPE for the 1st, 2nd and 3rd quarter of 2020
- Evidence of handover of revised OHS Report at BPE semester 1, 2 and 3 of 2020 to the Manpower and Transmigration Agency of the OHS Supervisory Unit on November 11, 2020.
- Evidence of handover of the OHS Report revision at SPE semester 1, 2 and 3 of 2020 to the Manpower and Transmigration Office of the OHS Supervisory Unit on November 12, 2020.
- Memorandum from the Manager of PT BSC No. 001 / BSC / XI / 2020 dated 11 November 2020. The memo explained that:
 - The person in charge of preparing quarterly OHS reports is the Head of Administration
 - OHS Quarterly Report is completed no later than the second week after the quarter, according to the report.
 - OHS quarterly reporting before distribution for inspection by RSQM staff
 - OHS reports that are reported to the relevant agencies so that they are accompanied by a receipt from the agency.

Based on the explanation above, the non-conformity is declared Fulfilled.

Verified by : **Rizliani A Hsb**

NCR No.	: 2020.3	<i>Issued by</i>	: Rizliani Aprianita Hsb
Date Issued	: 05 Nopember 2020	<i>Time Limit</i>	: 10 December 2020
NC Grade	: Major	<i>Date of Closing</i>	: 15 November 2020
Standard Ref. & Requirement	: 7.1.1 IPM plans are implemented and monitored to ensure effective pest control.		

Evidence observed (filled by auditor):

- Based on the study of the document, the appointment has shown the records of observation and control of pests and diseases by showing the control of the Census Recapitulation and Oryctes Control in September 2020 and the control of caterpillars.
Fact:
 - Document recapitulation of the census and control oryctes SPE, the application of preventive Capture 50 EC without census for several blocks of the 2016, 2017 and 2019 planting year
 - September 2020 Census and Census Control Recap document, applications for attacks below the threshold
 - Census recap documents and SPE rat control September 2020, attacks above 5% there is no chemical control
- SOP for Oil Palm Planting section 15 on Plant Protection:
 - Section 1.3.2 describes spraying cipermethrin for rhinoceros beetles if an attack is detected
 - Point 3.3.3 under normal conditions, the Census of the Fire Caterpillar is once a month, if a census occurs, it is carried out once a week until the pest population is controlled
 - Points 5.3.4 rat control, control is carried out if the attack is above 5%

Non-Conformance Description (filled by auditor):

However, the company has not been able to show chemical control activities according to its procedures (there are capture applications for several blocks for the 2016, 2017 and 2019 planting year without preceded by a census)

Root Cause Analysis (filled by organization audited):

1. Census data for the 2016, 2017 and 2019 planting years was late in submitting to the auditors during the audit activity (data was not well documented).

2. Data on census recapitulation and control in September 2020 submitted to the Auditor is the data for the January - September 2020 date.
3. The attack of mice on TM above 5% is not carried out chemically, but biologically (owls).

Correction (filled by organization audited):

1. Census data for the 2016, 2017 planting year (data attached) and for the 2019 planting year, control / prevention of oryctes attacks without census (attached memo) is carried out.
2. In September 2020 the results of the caterpillar census showed below the threshold, while the data of the fire caterpillar control recap submitted was carried out in April 2020 based on the results of the early April 2020 census showing above the economic threshold (data attached)
3. Rat pest control is carried out biologically (owls) with the attached nestbox monitoring data.

Corrective Action (filled by organization audited):

Pest control is carried out in accordance with management policies and procedures and ensures pest control data is well documented.

Assessor Evaluation and Conclusion (filled by auditor):

The company shows evidence of improvement in the form of:

- Inter-Office Mail Head Minamas Research Center on July 14 2018 Regarding the Prevention of Oryctes Beetle Attack on TBM @ (24 months) by using Cypermethrin 50 EC and 5 GR Carbosulfan Insecticides
- Recapitulation of the Census and Control of the SPE Oryctes September 2020
- Oryctes Attack Census Document SPE Blok G015 (2017) and F013 (2016)
- Recapitulation of the Census of Caterpillars and Control for the period January - September 2020
- Recapitulation of caterpillar census and control of J18 and H18 blocks
- Documentation of control for April 13 and April 24, 2020
- BPE Block H18 caterpillar census form (SN and SA types):
- BPE Blok J18 census form (types of SN and SA):
- Inter office mail Head Minamas Research Center dated December 21, 2017 regarding Recommendations for Pest, Disease and Weed Control in 2018 and 2019
- Map of the SPE Owl House
- Monitoring the status of the Nest Box in the SPE field June 2020
- Monitoring the status of the Nest Box in the SPE field September 2020

Verification is carried out by looking at the adequacy of clarification of the root of the problem, corrective action (correction) and preventive action (corrective action) sent.

Auditor verification (17 November 2020)

- a. Please be able to respond to the auditor's response in the root cause column and corrective action (preventive action) above (highlight blue)
- b. Please include the census recapitulation and Oryctes control document with information on the control date and further census documents after control.
- c. Based on the caterpillar census recapitulation document and control of September 2020 (excel document), it is known that there were census and control activities on the same date, as in the block:
 - G015: 25 August 2020
 - H018: 09 April 2020
 - I018: 14 August 2020
 - I019: 12 August 2020
- d. Evidence of the implementation of chemical control in G017
- e. According to the procedures and information from management during the audit activity, it is known that the threshold for Setora Niten / Setora Asigna caterpillars is 5 per midrib, please justify the implementation of chemical control on blocks with census results below 5%, such as Block F017, F018, G015, G016, G017, G018, I018, G015, I019. For example on the block:
 - F018: Census 08 July 2020, average 0.05 heads / midrib chemically controlled 09 July 2020
 - I018: Census 14 August 2020, average 0.04 head / midrib, chemically controlled 14 August 2020

Based on the explanation above, it is concluded that the discrepancies have not been fulfilled.

Verification date November 26, 2020:

- The company shows evidence of improvement in the form of:
- Letter of Appointment of PT BSC HPT Document Management Coordinator PIC with number Ist / SPE-Agr / XI / 2020 from EM SPE, 19 November 2020
- The document for the Census Recapitulation and Control of the Bukit Pinang Plantation Division 1,2 and 3 for the period January - September 2020 describes the census date before control (date of implementation and number of tails / midrib), control according to census results (date of implementation, tools used, and materials), and the census after control
- The document for Census Recapitulation and Oryctes Control of Sungai Pinang Plantation Division 1 for the period August - September 2020 describes the census date before control (implementation date and attack level), control according to census results (implementation date and materials), and census after control
- Oryctes Attack Census Form after controlling Block F013, G013, G015, H012, H014, F012, G012
- Inter Office Mail from the Crop Protection Manager Minamas Research Center to the SQM (Sustainability Quality Management) Manager dated 19 November 2020, with the number MRC / Mgr.CPR / Mgr.SQM / 09 / XI / 2020, regarding Recommendations for Pest, Disease Control, and Weeds 2020.
- Letter from the Head Minamas research Center to the Upstream Productivity Manager dated 18 July 2020 with the number MRC / Head / Mgr.UPD / 0141 / VII / 2020 regarding the Recommendation for Pest, Disease and Weed Control in the 2021 Budget.

Based on the explanation above, it is concluded that the discrepancies have been met.

Verified by : Rizliani Aprianita Hsb

NCR No.	: 2020.4	Issued by	: Bayu Yogatama
Date Issued	: 5 November 2020	Time Limit	: ASA 1.4
NC Grade	: Minor	Date of Closing	: 30 November 2020
Standard Ref. & Requirement	7.3.1 A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.		
Evidence observed (filled by auditor): Based on the review of the PT BSC LB3 Logbook document, it is known that the type of toxic waste Derijen has been stored since November 2, 2019 (more than 365 days). Referring to the applicable regulations and the temporary LB3 storage permit owned by the company, it is stated that the maximum hazardous waste storage limit is 365 days. (over the shelf life)			
Non-Conformance Description (filled by auditor): The Certification Unit has not been able to show evidence that the waste management plan has been documented and implemented in accordance with the applicable laws and regulations.			
Root Cause Analysis (filled by organization audited): Hazardous waste transportation plan by PT. Gema Putra Buana is scheduled for mid-September 2020 and on September 17, 2020 the transportation of medical Hazardous waste will be carried out, after the transportation of medical LB3 is completed, other LB3 transportation will be carried out (besides medical Hazardous waste), but due to the Covid-19 outbreak, it hinders the operation of the carrier and results in delay in transporting Hazardous waste to a third party (proof of communication and certificate from the carrier)			
Correction (filled by organization audited): Transport carried out by PT. Gema Putra Buana is planned for the 2nd week of November 2020 (evidence attached)			
Corrective Action (filled by organization audited): The transportation of LB3 is carried out before the hazardous waste shelf life exceeds by ensuring intense communication to third parties is carried out long before the LB3 shelf life limit.			
Assessor Evaluation and Conclusion (filled by auditor): Verification 10 November 2020 The management unit shows that it has carried out root cause analysis, corrections and corrective actions. However, the management unit has not been able to show evidence of improvement according to the corrections presented. In addition, please make corrections			

to the root cause analysis and answer the auditor's questions in the root cause analysis column. Based on the explanation above, the 2020.03 non-conformity has not been fulfilled.

Verification 16 November 2020

The management unit shows some evidence of improvement, such as:

- Proof of conversation (communication) with the LB3 carrier regarding the LB3 transportation plan until 5 November 2020.
- Response letter from PT Fema Putra Buana No: 176 / GPB-P / XI / 2020 dated November 6, 2020 regarding the unrealized LB3 transportation plan which is planned to be transported on the 2nd week of November 2020.
- Tripartite Cooperation Agreement Letter between PT Bina Sains Cemerlang (producer), PT Gema Putra Buana (carrier), PT Hidup Makmur Jaya Abadi (manager) No. 05 / LGL / TPT / BSC-BPB-MJA / VII / 2020 dated July 13 2020 which is valid for 1 year.
- Permit for Hazardous Waste Utilization owned by PT Hidup Makmur Jaya Abadi in accordance with Statement of Compliance Commitment Number: S.547 / Menlhk / Setjen / PLB.3 / 2019 August 9, 2019.
- LB3 manifest which was transported on 9 November 2020 by PT Gema Putra Buana as an example of manifest Number: KLHK-1605120445 for used batteries / batteries totaling 0.07 tons.

Verification date November 25, 2020

The company shows evidence of improvement, in the form of:

- Agreement for the Management / Utilization of Hazardous Waste No. 01 / BSC-KNBP-GPB / MOU / II / 2020 between PT Karya Nusa Bumi Persada with PT BSC and PT Gema Putra Buana dated March 30, 2020 and is valid for a period of 1 year.
- Hazardous waste Management Permit for hazardous waste utilization activities on behalf of PT Karya Nusa Bumi Persada No. SK.218 / Menlhk / Setjen / PSLB.3 / 3/2016 dated 15 March 2016 (used lubricating oil, used rags) and is valid for a period of 5 years.
- Agreement for the transportation and management of hazardous waste no. 03 / SPKS / BSC-GPB-PLIB // I / 2020 between PT BSC and PT Gema Putra Buana and PT Processing Limbah Industri Bekasi dated March 30, 2020 and is valid for a period of 1 year (for non-metallic B3 packaging type waste and electronic waste with waste codes B104d and B107d)
- Letter No. S.31 / menlhk / Setjen / PLB.3 / 1/2019 dated January 21, 2019 regarding the Statement of Compliance of the Commitment of PT Processing Limbah Industri Bekasi. Also attached are provisions for the implementation of LB3 management for hazardous waste utilization activities
- SPK for B3 Waste Utilization No. 02 / SPK / III / 2020 between PT BSC and PT Muhtomas (used batteries and used filters) and PT Gema Putra Buana dated March 30, 2020 and is valid for a period of 1 year.
- Hazardous waste Management Permit for utilization activities of PT Muhtomas No. SK.115 / Menlhk / Setjen / PLB.3 / 2/2018 dated February 28, 2018. This decree comes into force on December 4, 2017 for a period of 5 years.
- Monitoring the management and schedule of hazardous waste transportation in 2021 made by the Kasie.

Verification dated November 30, 2020

The management unit shows evidence of improvement in the form of inter-office mail related to the official report on the transportation of PT Bina Sains Cemerlang's hazardous waste which details 0.1730 tons of used filters and 0.0171 tons of electronic waste transported by PT Gema Putra Buana to PT Processing Limbah Industri in accordance with the follow-up SPK No. 03 / SPKS / BSC-GPB-PLIB / II / 2020.

Based on the evidences of improvement shown, root cause analysis and preventive action taken, non-conformities are declared as having been fulfilled.

Verified by : **Bayu Yogatama**

NCR No.	: 2020.5	Issued by	: Bayu Yogatama
Date Issued	: 5 November 2020	Time Limit	: ASA 1.4
NC Grade	: Major	Date of Closing	: -

Standard Requirement	Ref. & : 7.12.8 Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018, the Remediation and Compensation Procedure (RaCP) applies.
Evidence observed (filled by auditor): Based on the document review, several facts are known as follows: <ul style="list-style-type: none"> • There was land clearing that was carried out after November 2005 at PT BSC without any HCV identification in the PT. Sime Darby Plantation Sdn Bhd as the parent company of PT BSC has conducted a disclosure of liability according to a letter from the Head of PSQM Department dated 15 July 2015 which explains that PT BSC has cleared 12 hectares of land for the period November 2005 - November 2007 and land clearing for the period of Dec 2007 - Dec 2009 covering an area of 58 hectares • Based on a review of the LUCA Report Review Document Status Revision Priority v3 Sime Darby Plantation Sdn Bhd. It is known that the last update for LUCA PT BSC is a review from the RSPO that was received on February 27, 2019, but has not been answered by the management unit to date. 	
Non-Conformance Description (filled by auditor): Based on the description above, the management unit has not been able to demonstrate approval of the Land Use Change Analysis (LUCA) from the RSPO or resolution related to RaCP.	
Root Cause Analysis (filled by organization audited): PT BSC's LUCA report is still in the process of being reviewed by ERE Consulting	
Correction (filled by organization audited): Requesting RSPO to assign NC LUCA PT BSC to open status until the next Surveillance Audit (Evidence of communication attached)	
Corrective Action (filled by organization audited): Request for open NC LUCA PT BSC status will be submitted by SDP through SDP's routine meeting with RSPO.	
Assessor Evaluation and Conclusion (filled by auditor): Verification 7 December 2020 The management unit shows proof of conversation via email from SDP to the RSPO with details: 1 December 2020 (From SDP to RSPO) <i>Dear Puan Aminah,</i> <i>Hope this email finds you well.</i> <i>As you are well aware, we are closely working with Ibu Suli on the monitoring and progress of LUCA for SDP.</i> <i>The updates as per our today meeting with Ibu Suli are as follows: -</i> <ul style="list-style-type: none"> • <i>LUCA for 3 PTs; PT BSC, PT AIP & PT TMP are still under review by consultant. We would like to request your kind advice on the status of NC raised by our CB for the following PTs: -</i> • <i>PT Bina Sains Cemertlang,, NC closing due date is 10 Dec 2020.</i> • <i>PT Aneka Inti Persada, NC closing due date is 10-Jan-21.</i> • <i>PT Tunggal Mitra Plantation, NC closing due date is 24-Feb-21.</i> <i>Your kind consideration is highly appreciated.</i> <i>Thank you.</i> <i>Regards,</i> 7 December 2020 (From: RSPO to SDP) Dear Alagendran, Following your email dated 01 December 2020 and after reviewing the current LUCA progress, we agreed to allow the NC to remain open until the next Surveillance audit. We hope that the process can be completed by then Based on evidence of improvement shown by NCR 2020.05 Open until the next surveillance audit.	
Verified by	: Bayu Yogatama

3.4.3. Identification of Findings, Corrective Actions and Observations at ASA-1.3 & ASA-1.4 Onsite Audit

NCR No.	: 2022.1.	Issued by	: Rindu Galih Rezza Rachmansyah
Date Issued	: 21 January 2022	Time Limit	: Recertification
NC Grade	: Minor	Date of Closing	: 8 March 2022
Standard Ref. & Requirement	2.2.2 All contract, including those for FFB supply, contain specific clause on meeting relevant legal requirements and this can be demonstrated by the third party.		
Evidence observed (filled by auditor): <ul style="list-style-type: none"> The document review results show that the company has a list of 12 third parties (contractors and transporters) who cooperate with the company during the 2021-2022 period. The company also shows examples of 3 cooperation agreements with third parties, namely cooperation with PT Mitra Karya Jaya Perdana (Replanting), CV Semangus Indah Express (CPO-PK Transport), and Saudara Indrajaya (FFB Transport). The agreement has stated the obligations of third parties to comply with applicable laws and regulations such as the implementation of OHS, registration of workers in the Insurance and Social Security (BPJS) program, the obligation to pay taxes, and other provisions. The results of interviews with third parties (PT Mitra Karya Jaya Perdana and CV Semangus Indah Express) obtained information that the third palak had provided PPE to their workers and provided minimum wages to their workers but had not registered their workers in the Insurance and Social Security (BPJS) program. The company has not proven this related to the registration of workers in the Insurance and Social Security (BPJS) program, the provision of PPE, and the application of the minimum wage to its workers. The results of observations and interviews with contractor workers at SPE for replanting activities show that one worker does not use PPE at work (has been given but is not used), and one worker has not received PPE from the contractor. The company can show third party compliance for Indrajaya, which will be carried out in 2021 was the fulfillment of relevant laws and regulations such as the application of OHS (having used appropriate PPE such as helmets, safety shoes, etc.), Social Security and Healthcare ownership (because of individuals) and ownership of a driving license Dump Trucks. However, for other third parties (PT Mitra Karya Jaya Perdana and CV Semangus Indah Express), the results of monitoring compliance with the obligation to comply with laws and regulations have not been shown. 			
Non-Conformance Description (filled by auditor): The company has not shown that all third parties who cooperate in operational activities have fulfilled the relevant legal obligations and can be proven by the third party concerned.			
Root Cause Analysis (filled by organization audited): <ul style="list-style-type: none"> There are no relevant legal requirements procedures for third parties working with the company 			
Correction (filled by organization audited): <ul style="list-style-type: none"> Making procedures for legal requirements for third parties (SOP Attached) Identify all legal requirements relevant to third party activities by SQM Dept (List of regulatory identification on third parties attached) Make a list of third parties that cooperate with the Operational Unit by Head of section (List of third parties attached & list of employees) Disseminate the list of regulations for compliance with relevant legal requirements to third parties by the Head of Section (evidence of Socialization of relevant legal requirements to third parties is attached) 			
Corrective Action (filled by organization audited): <ul style="list-style-type: none"> Monitoring legal compliance with third parties according to their activities by the SQM Dept (Monitoring & monitoring schedule attached) Evaluating compliance with legal requirements of third parties in collaboration with the company by the Management unit (evaluation report attached) 			

Assessor Evaluation and Conclusion (filled by auditor):**Verify January 29, 2022**

The company has determined the root of the problem, corrective and corrective actions for non-conformities that arose during the audit activity, but still no evidence of improvement that supports this and some additional information needed, including:

- The determination of corrective action does not include the procedures used in carrying out monitoring and evaluation of legal compliance, where the procedure at least explains the PIC, timeline, things that need to be evaluated and so on.
- Document identification of legal requirements relevant to third parties.
- Document list of third parties in cooperation with operational units.
- Documentation of socialization of the list of regulations related to the fulfillment of third party legal requirements.
- Document monitoring and evaluation procedures for third party compliance with legal requirements.
- Document monitoring and evaluation of third party compliance with legal requirements.

Based on the explanation above, the nonconformity in this indicator is stated to have not been fulfilled.

Verify March 08, 2022

The company has improved the determination of the root of the problem's corrective and corrective actions for non-conformities that arose during the audit activity. In addition, some evidence of additional improvements is also shown as follows:

- Identification document of relevant legal requirements for third parties in 2022, ratified on January 23, 2022. It has identified as many seven relevant laws and regulations to be used as the basis for compliance with regulations by third parties when collaborating with the company.
- An updated list of third parties collaborating with the company as of January 25, 2022, as many as ten third parties cooperating with the company for FFB transport, replanting, EFB applications, and others. During the audit activity, a third-party list of 12 stakeholders was provided. Still, after being updated as of January 25, 2022, only ten stakeholders remained because the other two stakeholders had expired, and no extension was made.
- SOP for Legal Compliance with Third Parties (document No. 001/BSC-PPHK//22 dated January 22, 2022) describes the parties responsible for ensuring third-party compliance, compliance monitoring procedures, and evaluation of such monitoring.
- List of third parties at Bukit Pinang Estate updated as of January 25, 2022, along with their employees who collaborate with the company, where there are four third parties (FFB transporters) who cooperate with the company in 2022, and there are four workers (each third party has one employee). Of the four workers, an evaluation has been carried out. It can be shown that the age of workers who are not under the age of 18 years, the wages of workers in the previous month are by the minimum wage, have BPJS, have been given PPE, and have a driver's license as a condition for driving a vehicle.
- List of third parties at Bukit Pinang Estate updated as of March 01, 2022, along with their employees who cooperate with the company, where there are five third parties (FFB transporters, replanting, and maintenance) collaborating with the company in 2022 and there are 17 workers. Of all these workers, an evaluation has been carried out. It can be shown that the age of workers who are not under the age of 18 years, the wages of workers in the previous month are by the minimum wage, have BPJS, have been given PPE, have a driver's license as a condition for driving a vehicle and fulfilling other requirements.
- List of third parties at Sungai Pinang Factory updated as of March 01, 2022, along with their workers who cooperate with the company, where there is one-third party (CPO/PK transporter) collaborating with the company in 2022, and there are three workers. Of the three workers, an evaluation has been carried out. It can be shown that the age of workers who are not under the age of 18 years, the wages of workers in the previous month are by the minimum wage, have BPJS, have been given PPE, and have a driver's license as a condition for driving a vehicle.
- Document monitoring and evaluation of third party compliance with statutory requirements for Bukit Pinang Estate dated March 01, 2022, where from 4 third parties in collaboration with the company monitoring legal compliance related to BPJS ownership, completeness of PPE, provision of first aid, license owner (SIM/ SIO depending on needs), remuneration and others. From the monitoring results, it is known that all these third parties have complied with the applicable laws and regulations.
- Document monitoring and evaluation of third party compliance with statutory requirements for Sungai Pinang Estate dated March 1, 2022, where from 5 third parties in collaboration with the company monitoring legal compliance related to BPJS ownership, completeness of PPE, provision of first aid, license owner (SIM/ SIO depending on needs), remuneration and others. From the monitoring results, it is known that all these third parties have complied with the applicable laws and regulations.
- Document monitoring and evaluation of third party compliance with statutory requirements for Sungai Pinang Factory dated March 1, 2022, where from 5 third parties in collaboration with the company monitoring legal compliance related to BPJS

ownership, completeness of PPE, provision of first aid, license owners (SIM/ SIO depending on needs), remuneration and others. From the monitoring results, it is known that all these third parties have complied with the applicable laws and regulations.

- Socialization to third parties related to compliance with laws and regulations that must be adhered to while working with the company on January 27, 2022, at Bukit Pinang Estate, which 12 participants attended.
- Socialization to third parties related to compliance with laws and regulations that must be adhered to while working with the company on February 5, 2022, at Sungai Pinang Estate, which 11 participants attended.
- Socialization to third parties related to compliance with laws and regulations that must be adhered to while working with the company on January 31, 2022, at Sungai Pinang Factory, which 7 participants attended.

Based on the explanation above, the nonconformity in this indicator is declared to have been fulfilled.

Verified by : Rindu Galih Rezza Rachmansyah

NCR No. :	2022.2.	Issued by :	Rindu Galih Rezza Rachmansyah
Date Issued :	21 Januari 2022	Time Limit :	Recertification
NC Grade :	Minor	Date of Closing :	8 March 2022
Standard Ref. & Requirement :	6.2.7 Permanent fulltime employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal.		

Evidence observed (filled by auditor):

- The results of the review of the workforce list document as of December 2021 revealed that PT Bina Sains Cemerlang still has 151 workers with PKWT status (BPE 72 people, SPE 73 people, and SPF 7 people). Of the total number of existing Fixed Time Employment Agreement, 51 PKWT workers work as harvesters in SPE and 33 people in BPE.
- Harvest work is a permanent job; this is because the criteria for harvesting work are included in the description of ongoing work in Law no. 13 of 2003 (explanation of article 59 paragraph 2), where it reads "*pekerjaan yang sifatnya terus menerus, tidak terputus-putus, tidak dibatasi waktu dan merupakan bagian dari suatu proses produksi dalam satu perusahaan atau pekerjaan yang bukan musiman*"
- There is an Inter-Office Memo No. 192/SPE-AGR/XII/2021 dated December 27, 2021, which explains the need for workers in SPE, where the need for harvest workers, which is determined based on the ratio of worker needs, still includes PKWT workers in it.
- There is an Inter-Office Memo No. 001/BSC/AGR-BPE/XI/2021 dated November 1, 2021, which explains the need for workers at BPE, where the need for harvest workers determined based on the ratio of worker needs still includes Fixed Time Employment Agreement workers in it.
- There is an Inter-Office Memo No. 017/CEO-RSS/VI/2021 dated June 19, 2021, regarding Procedures and Procedures for Recruiting PKWT Employees, which does not explain the types of work that workers can employ with Fixed Time Employment Agreement status.
- There is an Inter-Office Memo No. 017/HRM-i5/II/2019 dated January 25, 2019, regarding the Use of Temporary or Contract Employees in the Minamas Plantation Business Unit, which explains that the use of contracted/non-permanent employees is only intended for temporary work (project-based) and completed within a period. Such as replanting and harvesting at peak times.
- In Government Regulation No. 35 of 2021, the PKWT section explains that Fixed Time Employment Agreement (PKWT) cannot be held for permanent work. Fixed Time Employment Agreement can be controlled based on a period (work that is not completed for too long, seasonal work, work related to new products) or the completion of a particular job (once completed and temporary work).

Non-Conformance Description (filled by auditor):

The company has not been able to prove that the implementation of the Fixed Time Employment Agreement (PKWTT) on non-

permanent work is by the applicable laws and regulations.

Root Cause Analysis (filled by organization audited):

- There are no specific provisions from management related to the work that may be employed by the Fixed Time Employment Agreement (PKWT) and the work that may not be
- Lack of harvest workers Indefinite Time Employment Agreement available at operational unit BPE and SPE.

Correction (filled by organization audited):

- Created a Memo related to the list of jobs that can be done by the Fixed Time Employment Agreement and those that cannot (attached memo)
- Collecting data on the needs of harvest workers and work at the factory according to the needs of the BPE, SPE operational units, and the requirements of TK at SPF (The data is contained in the proposal letter for the appointment of SKU employees for each team (Document attached)
- Selected Fixed Time Employment Agreement workers harvesting (BPE and SPE) and at the factory to be processed into Indefinite Time Employment Agreement (PKWTT) in operational units, all by Fixed Time Employment Agreement (PKWT) harvesting (SPE and BPE) are proposed to SKUs and shortages were recruited from the community around the company, then the Fixed Time Employment Agreement at SPF was not extended by one person on the grounds of lack of discipline in the workforce, especially the level of attendance and six people were proposed to SKU to fulfill the shortage of TK in SPF (Documents submitted by TK for SKU and approval The management of each unit is attached in the proposal letter for the appointment of SKU employees).

Corrective Action (filled by organization audited):

- Monitoring of the implementation of jobs that are not allowed to use the Fixed Time Employment Agreement in the field by the SQM Dept. on a memorandum of work that can be carried out by the Fixed Time Employment Agreement (PKWT) and which cannot (Monitoring schedule and monitoring results are attached).

Assessor Evaluation and Conclusion (filled by auditor):

Verify January 29, 2022

The company has determined the root of the problem corrective and corrective actions for non-conformities that arose during the audit activity, but still, no evidence of improvement that supports this; some additional information is needed, including:

- Determination of the root of the problem that has not been comprehensive; please also pay attention to corrective actions that can be the root of the main issue, namely related to the identification of types of permanent/non-permanent work and monitoring the implementation/use of the Fixed Time Employment Agreement by regulations/procedures.
- Determination of corrective actions that have not been explained related to the status of Fixed Time Employment Agreement workers on harvest work that does not pass the selection, for example, being transferred or dismissed. Explanation, please.
- Determination of corrective actions that are still lacking about the status of other Fixed Time Employment Agreement workers who work in permanent jobs other than harvesting jobs.
- Documents for collecting data on the needs of harvest workers by the needs of operational units at SPE and BPE.
- Fixed Time Employment Agreement (PKWT) worker selection document for harvest along with the selection results.
- Follow-up documents for Fixed Time Employment Agreement (PKWT) workers who have passed the selection as Indefinite Time Employment Agreement (PKWTT) and who have not passed the selection.
- Memorandum documents related to the types of work that are permanent or non-permanent that can be done by Fixed Time Employment Agreement (PKWT) workers.
- Monitoring plan document by SQM Department to ensure Fixed Time Employment Agreement workers are only used for non-permanent work by related regulations and stipulated memorandums.
- Other supporting documents after being corrected/added to determine the root of the problem and corrective and corrective actions by the company.

Based on the explanation above, the nonconformity in this indicator is stated to have not been fulfilled.

Verify March 08, 2022

The company has improved the determination of the root of the problem's corrective and corrective actions for non-conformities that arose during the audit activity. In addition, some evidence of additional improvements is also shown as follows:

- Memorandum No. 01/PT BSC-AC/II/2022 dated January 31, 2022, from the Jambi Area Controller regarding the List of Permanent / Non-Permanent Jobs. The memorandum states that jobs classified as permanent are harvesting and product processing. In contrast, non-permanent jobs are scout harvesting, ablation, basal pruning, fertilization, chemist, compound mill, and vehicle operators/drivers.
- Inter-Office Mail No. 002/BSC-BPE/II/2022 dated February 2, 2022, from the Manager of Bukit Pinang to the CEO of Upstream Indonesia regarding the Application for Appointment of Daily SKU Employees. The letter explains that Bukit Pinang Estate proposes appointing all harvest workers (permanent workers according to the previous Memorandum and Government Regulation No. 35 of 2021) and all Fixed Time Employment Agreement (PKWT) workers who have worked for more than two years. -3 years with the last year rating Fairly Good. In the attachment to the letter, there are several critical supporting documents, namely:
 - Performance appraisal documents for as many as 78 Fixed Time Employment Agreement (PKWT) workers at Bukit Pinang Estate who have received performance appraisals over the past year with the results of "Enough," and these workers work as harvesters, maintenance, loaders, and others. For all Fixed Time Employment Agreement (PKWT) workers who work in harvest work, it has been proposed to be appointed permanent workers.
 - Supporting manpower analysis documents to ensure that all workers whose planned needs in 2022 have been fully met so that there is no longer a shortage of workforce so that the company no longer employs Fixed Time Employment Agreement (PKWT) workers on permanent jobs and will only hire them for non-permanent work.
- Inter-Office Mail No. 003/AGR-SPE/II/2022 dated February 1, 2022, from Sungai Pinang Manager to CEO Upstream Indonesia regarding Application for Daily SKU Employee Appointment. The letter explains that Sungai Pinang Estate proposes appointing all harvest workers (permanent workers according to the previous Memorandum and Government Regulation No. 35 of 2021) and all Fixed Time Employment Agreement (PKWT) workers who have worked for more than two years. -3 years with the last year rating Fairly Good. In the attachment to the letter, there are several important supporting documents, namely:
 - Performance appraisal documents for as many as 68 Fixed Time Employment Agreement (PKWT) workers at Sungai Pinang Estate who have received performance appraisals over the past year with the results of "Enough," and these workers work as harvesters, maintenance, loaders, and others. For all Fixed Time Employment Agreement (PKWT) workers who work in harvest work, it has been proposed to be appointed as permanent workers.
 - Supporting manpower analysis documents to ensure that all workers whose planned needs in 2022 have been fully met so that there is no longer a workforce shortage so that the company no longer employs PKWT workers on permanent jobs and will only hire them for non-permanent work.
- Inter-Office Mail No. 017/BSC-SPF/II/2022 dated January 22, 2022, from Sungai Pinang Factory Manager to CEO Upstream Indonesia regarding Application for Daily SKU Employee Appointment. The letter explains that Sungai Pinang Factory proposes to appoint all processing/processing workers (permanent workers according to the previous Memorandum and Government Regulation No. 35 of 2021) and also all Fixed Time Employment Agreement (PKWT) workers who have worked more than 2-3 years with a rating of the last year Fairly Good. In the attachment to the letter, there are several important supporting documents, namely:
 - Performance appraisal documents for as many as 6 Fixed Time Employment Agreement (PKWT) workers at Sungai Pinang Factory who have received performance appraisals over the past year with the results of "Enough," and these workers work as harvesters, maintenance, loaders, and others. For all Fixed Time Employment Agreement (PKWT) workers who work in harvest work, it has been proposed to be appointed permanent workers.
 - Supporting workforce analysis documents to ensure that all workers whose planned needs in 2022 have been fully met so that there is no longer a shortage of workforce so that the company no longer employs Fixed Time Employment Agreement workers.
- Monitoring schedule document for checking the use of Fixed Time Employment Agreement (PKWT) workers by the laws and regulations approved by the SQM Manager on January 25, 2022, where the monitoring schedule is planned to be carried out every three months, namely in February, May, August and November 2022 Supervision will be carried out by the RSQM PT Bina Sains Cemerlang.
- Monitoring document on the use of Fixed Time Employment Agreement (PKWT) workers in the company by the laws and regulations in February 2022, the result of which is that all PKWTs included in permanent work have been submitted for appointment by the company so that in the future there will be no more Fixed Time workers Employment Agreement (PKWT) which violates the laws and regulations.

Based on the explanation above, the nonconformity in this indicator is declared to have been fulfilled. It will be re-observed about the realization of the appointment of Fixed Time Employment Agreement (PKWT) workers and its monitoring.

Verified by : **Rindu Galih Rezza Rachmansyah**

NCR No.	: 2022.3.	Issued by	: Hasiholan Sihombing
Date Issued	: 21 Januari 2022	Time Limit	: 21 April 2022
NC Grade	: Minor raised to Major	Date of Closing	: 19 April 2022
Standard Ref. & Requirement	: 7.3.1 A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented in accordance with applicable laws and regulations.		

Evidence observed (filled by auditor):

- The results of field visits to several locations in the company's management areas, it was found that there was Waste that was not appropriately managed, such as:
 - Field Visit to SPF**
 - Domestic Waste is scattered in the company area (old iron and Waste used for food and beverage packaging)
 - There are traces of burning Waste (EFB and Domestic Waste) in the Water Treatment Station Area
 - Former hazardous waste (motorcycle brake oil) packaging found around mill area
 - Field Visit to SPE**
 - DIVISION 1-2 semi-permanent housing and CHC (Central Housing Complex) permanent housing found used hazardous waste packaging (used oil drums) and traces of domestic waste burning activities.
 - There is former hazardous waste (used oil packaging) in the chemical warehouse trash bin
 - There are 12 used drums (BBM and Oil) in the fertilizer warehouse
 - There is a used pesticide jerry can at the Final Disposal Site in block E07 Division 3
 - There are 212 pcs used pesticide packages in front of the chemical warehouse which has not been submitted to hazardous waste storage area.
 - Field Visit to BPE**
 - There is one used drum (Oli), one jerry can of used pesticide, and Waste burning at CHC (Central Housing Complex)
 - Around the fertilizer warehouse, there is one used drum (Oli)
 - The workshop area has an oil trap that is connected to drainage that flows into a body of water.
- The company has a hazardous waste management SOP No. 5.3/BSC-PLB3/V16 dated May 15, 2016, which explains that all hazardous waste must be managed appropriately and stored in hazardous waste storage area. In addition, this procedure does not explain the existence of a temporary storage period for hazardous waste before it is sent to a licensed hazardous waste storage area.
- The company also has an SOP for Handling Non-hazardous waste No. SOP/027/BSC/2019 No. The revision of the RSPO/P&C/PLNB-3 dated November 1, 2019, clarifies that any Non-hazardous waste must be managed and stored in a warehouse. However, an explanation regarding domestic Waste has not been included in the procedure.

Non-Conformance Description (filled by auditor):

Based on this evidence, the company has not fully implemented Hazardous waste management and Non-hazardous waste by its SOP.

Root Cause Analysis (filled by organization audited):

- Lack of awareness of employees in the management of domestic waste, Hazardous Waste, and Non-Hazardous Waste, so that there are still burning of EFB, domestic waste both in the factory area and in residential locations as well as Hazardous

waste management that has not been by regulations

2. Hazardous waste management procedures and non-Hazardous waste management procedures do not contain complete methods for managing Hazardous waste and non-Hazardous waste generated and domestic waste management.

Correction (filled by organization audited):

1. Providing factory and residential areas, burning domestic waste in residential areas, quoting Hazardous waste from household products both in the factory area, employee housing, and landfill to be stored in licensed Temporary storage of hazardous waste (Follow-up on improvements to findings in each attached unit).
2. Revise Hazardous waste management and non-Hazardous waste management (Revised SOP for Hazardous waste and Non-Hazardous waste management is attached).

Corrective Action (filled by organization audited):

1. socialization to employees about the management of domestic waste and Hazardous waste generated from household activities (Document for the socialization of domestic waste management, prohibition of throwing garbage, and management of Hazardous waste is attached)
2. increased supervision by the Assistant Division of each unit in waste management, Hazardous waste, and the implementation of a zero-burning policy.
3. Provide sanctions to educate employees to improve compliance in domestic waste management, Hazardous waste and the implementation of a zero burning policy (memo attached)

Assessor Evaluation and Conclusion (filled by auditor):

Verify March 29, 2022

The company has completed root cause analysis and corrective actions but has not yet submitted proof of improvement for the non-conformities. In addition, there are still auditor questions in the root cause analysis column and disciplinary actions explained by the company. Please respond and send supporting evidence regarding the repairs made.

Based on this, this nonconformity has not yet been fulfilled.

Verify April 19, 2022

The company has sent proofs of repairs in the form of:

- SOP for Hazardous Waste Handling No.5.3/BSC-PLB3/V16 Revision 01 dated May 15, 2016
- SOP for Handling Non-Hazardous waste Waste No. SOP/027/BSC/2019 No. Revision 01/RSPO/P&C/PLNB-3 dated November 1, 2019
- Documentation of Domestic Waste Management Activities, Hazardous Waste, and Socialization:
 - For example, Monitoring of Domestic Waste Transportation in PT BSC Housing in January 2022
 - Documentation of collection and disposal of waste to landfill at SPE
 - Minutes of the meeting of domestic waste management and Hazardous waste on January 21, 2022, was held in the Sungai Pinang Factory area and was attended by 12 participants
 - Minutes of the meeting of domestic waste management and Hazardous waste on January 21, 2022, was held in the Sungai Pinang Estate area and was attended by 24 participants
 - Minutes of the meeting of domestic waste management and Hazardous waste on January 21, 2022, was held in the Bukit Pinang Estate area and was attended by 36 participants
 - Minutes of housing domestic waste disposal on January 21, 2022, was carried out at the Bukit Pinang Estate housing
 - Recap of monitoring waste transportation in 2021 at Sungai Pinang Estate, Bukit Pinang and Sungai Pinang Factory
 - Recap of monitoring waste transportation in 2022 at Sungai Pinang Estate, Bukit Pinang and Sungai Pinang Factory
 - Documentation of Garbage Collection and Disposal to landfill at Sungai Pinang Factory
 - Documentation of Follow-up for Domestic Waste and Hazardous Waste Management at PT BSC
- Domestic Waste and Hazardous Waste Management Memorandum No. 012/ACJ-SKP/II/2021, dated January 20, 2021, Regarding the Affirmation of Domestic Waste and Hazardous Waste Management, the memorandum contains the management of domestic waste, Hazardous waste, and the implementation of the Zero Burning policy which the Jambi PIC area controller has approved.

The company has provided proof of improvement sent in the form of root cause analysis, the latest corrective and corrective actions, and has completed additional information and evidence related to management that has been carried out. Based on the verification of documents and information submitted, it can be concluded that the findings in the field have been managed and followed up to

prevent the results from being repeated in the future by increasing supervision and providing sanctions if violations occur. Based on this, the nonconformity has been fulfilled.

Verified by : Hasiholan Sihombing

NCR No.	: 2022.4.	Issued by	: Hasiholan Sihombing
Date Issued	: 21 Januari 2022	Time Limit	: Open until next audit (Recertification)
NC Grade	: Major	Date of Closing	:
Standard Ref. & Requirement	7.12.8 C) Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018, the Remediation and Compensation Procedures (RaCP) applies.		
Evidence observed (filled by auditor):			
<p>Berdasarkan kajian dokumen diketahui beberapa fakta sebagai berikut:</p> <ul style="list-style-type: none"> • Terdapat pembukaan lahan yang dilakukan setelah November 2005 di PT BSC tanpa didahului oleh identifikasi HCV di area kelola PT BSC, Sime Darby Plantation Sdn Bhd sebagai induk dari PT BSC telah melakukan <i>disclosure of liability</i> sesuai surat dari Head PSQM Departemen tanggal 15 July 2015 yang menjelaskan bahwa di PT BSC terdapat pembukaan lahan periode Nov 2005 – Nov 2007 seluas 12 Ha dan pembukaan lahan periode Dec 2007 – Dec 2009 seluas 58 Ha. • Lalu pada saat audit ASA-1.3 sebelumnya yang dilakukan secara remote, indikator ini menjadi Ketidaksesuaian dikarenakan LUCA PT BSC belum mendapatkan persetujuan dari RSPO dan ketidaksesuaian tersebut mendapatkan status "OPEN sampai dengan audit surveillance selanjutnya" berdasarkan email dari Aminang Ang (aminah.ang@rspo.org) pada tanggal 7 September 2020 kepada alagendran.maniam@simedarbyplantation.com yang menyatakan "Dear Alagendran, Following your email dated 01 December 2020 and after reviewing the current LUCA progress, we agreed to allow the NC to remain open until the next Surveillance audit. We hope that the process can be completed by then" • Pada tanggal 6 April 2021, terdapat email dari RSPO (aryo.gustomo@rspo.org) mengenai RSPO Compliance Advisory Sime Darby Plantation Berhad yang berlaku selama 6 bulan sejak dikeluarkan Advisory Note tersebut (hingga Oktober 2021) yang mengizinkan unit-unit yang LUCA nya belum selesai direview untuk melanjutkan sertifikasi. • Kemudian pada saat audit onsite ASA-1.3 + ASA-1.4 dilaksanakan, perusahaan menunjukkan history komunikasi antara RSPO dan Perusahaan sejak tanggal 2 Maret 2021 hingga terakhir tanggal 3 Januari 2022 dimana dani.ikhshan@simedarbyplantation.com memberikan data-data yang diminta oleh RSPO dan terakhir dibalas oleh RSPO pada tanggal 5 Januari 2022 melalui email indrawan.suryadi@rspo.org yang menyatakan "We acknowledge receipt of the clarification data, thank you. It has been forwarded to the reviewer". Berdasarkan email terakhir tersebut, disimpulkan masih belum terdapat persetujuan LUCA yang diberikan kepada PT BSC. 			
Non-Conformance Description (filled by auditor):			
Based on the explanation above, the certification unit has not yet been able to show the Land Use Change Analysis (LUCA) approval from the RSPO.			
Root Cause Analysis (filled by organization audited):			
<ol style="list-style-type: none"> SDP has completed LUCA for all affected operating units (19 PTs) that are subject to RaCP. Submission of nineteen (19) LUCA reports to RSPO completed in end Dec 2017 with full shapefile submission in Aug 2018. SDP's Land Use Change Analysis (LUCA) review process is ongoing – LUCA report for seven (7) of nineteen (19) PTs have been approved and completed in 2021, three (3) in 2020, and one (1) in 2017. The rest eight (8) are in the clarification stage. <ul style="list-style-type: none"> • SDP's concern of slow progress of LUCA review and recommendation to expedite the progress was highlighted to the CEO of RSPO. A letter was sent on 3rd November 2020. • Since all the clarifications on LUCA is submitted on time to RSPO, RSPO issued an Advisory Note for SDP on 6 Apr 2021 for approval of Critical non-conformity raised under RaCP in the RSPO audits for 10 PTs with pending LUCA review, will be allowed to be open until the next surveillance/re-certification audits. 			

- iv. SDP's first submission of LUCA resulted in a total final conservation liability of 1,640 Ha i.e. estimated compensation plan costing USD 4 million. SDP's Compensation Concept Note (Batang Ara Project) has been approved in December 2016.
- v. As reported in the Concept Note, SDP has no environmental remediation liability.
 - In SDP operation, areas , where clearing vegetation and planting of oil palm is prohibited by the RSPO Principle & Criteria (e.g. riparian zones, steep areas, fragile soils, and peat areas), are set-aside and maintained as per Company's policies.
 - Confirmation on zero environmental remediation for each PT is done during LUCA review process through verification of respective PT's audit reports and HCV reports.

vi. Process & Status of SDP LUCA Report Review:

No	PT	Status	Remarks
1	PT Guthrie Pecconina Indonesia		Received response from RSPO on 04 Jan 2022. 3rd clarification.
2	PT Paripurna Swakarsa		Clarification submitted on 30 Jun 2020-awaiting results from RSPO
3	PT Mitra Austral Sejahtera		Clarification submitted on 25 Oct 2020-awaiting results from RSPO
4	PT Budidaya Agro Lestari		Clarification submitted on 25 Oct 2020-awaiting results from RSPO
5	PT Teguh Sempurna		Clarification submitted on 30 Dec 2020-awaiting results from RSPO
6	PT Bersama Sejahtera Sakti		Clarification submitted on 31 Jan 2021-awaiting results from RSPO
7	PT Bhumireksa Nusa Sejati		Received response from RSPO on 19 Nov 2021. 3rd clarification.
8	PT Bina Sains Cemerlang		Clarification submitted on 03 Jan 2022 (4th Clarification) -awaiting results from RSPO
9	PT Sajang Heulang		Approved (21 December 2021)
10	PT Lahan Tani Sakti		Approved (14 August 2017)
11	PT Langgeng Muaramakmur		Approved (10 June 2020)
12	PT Swadaya Andika		Approved (22 June 2020)
13	PT Kridatama Lancar		Approved (10 Dec 2020)
14	PT Bahari Gembira Ria		Approved (18 Jan 2021)
15	PT Sime Indo Agro		Approved (23 Jan 2021)
16	PT Aneka Inti Persada		Approved (04 May 2021)
17	PT Ladangrumpun Suburabadi		Approved (04 May 2021)
18	PT Laguna Mandiri		Approved (04 May 2021)
19	PT Tunggal Mitra Plantation		Approved (14 July 2021)

Correction (filled by organization audited):

To obtain a time extension from RSPO on the NCR closure. This is to ensure that the LUCA for PT BSC is able to be completed. A request has been sent to RSPO and now awaiting an official advisory note from RSPO.

Corrective Action (filled by organization audited):

To complete the LUCA for PT BSC. Fortnightly meeting is currently conducted to ensure no any further delay in response. Meeting has been conducted with RSPO by Indonesia Grower Committee (IGC) to discuss RaCP issue. RSPO will assign additional manpower to resolve the delay in RaCP.

Assessor Evaluation and Conclusion (filled by auditor):

Verifikasi Auditor tanggal 19 Februari 2022

Perusahaan mengirimkan bukti perbaikan berupa email terupdate dari RSPO kepada Minamas Plantation melalui email Aryo Gustomo <aryo.gustomo@rspo.org> kepada Alagendran Maniam <alagendran.maniam@sime-darbyplantation.com> pada tanggal 18 Februari 2022 dimana email tersebut berisi informasi sebagai berikut:

"We take consideration to provide a Conditional Approval as referring to the previous Advisory Note that we had provided to you before. This considering that the Advisory Note was given for the first case that came to us, and when the continuation of the previous approval for the similar case, we only give you through the conditional approval.

Now, this Conditional Approval would only be given for those Management Units that have been certified before to allow the Company to complete the RaCP process and continue the Annual Surveillance Assessment (ASA) and/or Recertification. And this will only be valid until the next 6 months from the date of this email. From time to time, we will review all the progress and status of the Certification and RaCP process for the particular certified management units, and we may revoke this conditional approval if any issues happen that may heavily threaten the integrity of RSPO standard requirements".

Also attached to the email are the names of the certification units whose RaCP status is ongoing (LUCA) status, one of which is PT

Bina Sains Cemerlang, the certification unit for this audit activity. On the Ongoing status, RSPO gave remarks, "Proceed with the continuation of audits; however, the NC will remain open until the next ASA and management unit must provide the update to the pending action/clarification to RSPO Secretariat within the next three months."

With the "conditional approval" given by the RSPO, any nonconformity in indicator 7.12.8 is declared OPEN until the following surveillance and will be re-verified regarding the RSPO approval of the RACP in the following surveillance audit.

Verified by	:	Hasiholan Sihombing
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3.4.4. Opportunity for Improvement

No	Ref. Std.	Description
1	3.6.2 & 7.2.10	<p>The effectiveness of the H&S plan to address health and safety risks to people is monitored.</p> <p>Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated</p> <ul style="list-style-type: none"> The results of interviews with management representatives, it is known that in 2020 – 2021 there will be no health checks due to the covid-19 pandemic. To prevent transmission, the company shows letters including: <ul style="list-style-type: none"> Circular Letter of the Minister of Manpower of the Republic of Indonesia No. M/7/AS.02.02/V/2020 dated May 20, 2020, one point explains: temporarily postpone labor inspections until the occupational safety and health aspects are met or until the covid-19 pandemic ends. Inter-Office Mail from Regional CEO dated April 14, 2020, regarding Precautionary Measures in Facing the Spread of Covid-19 at Work Locations. The results of interviews with SPE spray workers explained that the company has carried out health checks twice a year, but during the covid-19 pandemic, health checks have not been carried out. The company shows the PT BSC MCU screening schedule for 2022 high-risk employees made by the Company Doctor, which is planned to be carried out in April and October 2022. <p>All companies carry out periodic health checks for workers and special health checks for workers who are at high risk by observing and implementing Health protocols and following up if workers are found to have health problems.</p>

3.4.5. Noteworthy Positive Components

No	Description
1	Commitment to implementing the principles of sustainable oil palm plantation management.
2	The company has talented human resources in their respective fields.
3	The company no longer uses pesticides with the active ingredient paraquat
4	Presentation of documents is quite good

3.5 Summary of Arising Issues from Public and Auditor Verification







Public Issues (Institution/ NGO/Community)	Auditor Verification
<p>Environmental Agency of Musi Rawas District</p> <ul style="list-style-type: none"> • The company already has a valid environmental permit, liquid waste utilization permit, and hazardous waste storage permit. • The company has regularly submitted mandatory reports such as RKL-RPL reports, Hazardous waste management reports, and liquid waste management reports to Environmental Agency • The Environment Agency routinely conducts supervision at PT BSC. The control results have no negative issues or reports related to the environment from the community, and up to the time of the audit, there were no negative complaints/issues from the surrounding community. • Communication between the company and the Environment Agency of Sarolangun Regency went smoothly. 	<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>
<p>FFB Transport (Local contractor)</p> <ul style="list-style-type: none"> • The contractor has a cooperation agreement with the company. • Workers have received wages by the applicable UMP. • PPE for contractor workers is provided individually by the contractor. • There are no complaints related to contractor payments. 	<p>There are no negative issues from the FFB transport (local contractor).</p>
<p>Semangus Baru Village Interviewee: Head of Village</p> <ul style="list-style-type: none"> - The company absorbs workers from the village. - There are no issues regarding environmental pollution for the last 2 years. - The company has socialized about protected animals and conservation areas and put up signs prohibiting hunting of certain animals around the plantation area. - Socialization on the prohibition of burning has been carried out for land clearing activities. - The company routinely provides assistance to villages in the form of CSR and direct assistance - There is no problem with the communication between the village and the company and the company always responds to requests from the village. - There are no problems and conflicts over land ownership between the company and the surrounding community. 	<p>There is no negative issue from representative of Semangus Baru Village</p>
<p>Sungai Pinang Village Interviewee: Public Figure / Community Leader (one of previous land owner)</p> <ul style="list-style-type: none"> - The company absorbs workers from the village. 	<p>There is no negative issue from representative of Sungai Pinang</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<ul style="list-style-type: none"> - There are no issues regarding environmental pollution for the last 2 years. - The company has socialized about protected animals and conservation areas and put up signs prohibiting hunting of certain animals around the plantation area. - The company routinely provides assistance to villages in the form of CSR and direct assistance - There is no problem with the communication between the village and the company and the company always responds to requests from the village. - There are no problems and conflicts over land ownership between the company and the surrounding community. - The implementation of land compensation in the past was carried out voluntarily and without any coercion from other parties. Evidence of compensation and supporting documents have been provided to each party. 	<p>Village</p>
<p>Issues from online media:</p> <p>https://linggaupos.sumeks.co/masyarakat-tiga-desa-tutup-jalan-pt-bsc/</p> <p>In the online news on August 16, 2021, it was stated that the people of three villages in the Muara Lakitan sub-district held a peaceful protest to close the PT Bina Sains Cemerlang access road. This action was carried out because the community demanded plasma land designated for the community.</p> <p>https://icnews-online.com/masyarakan-layangkan-surat-ke-pt-bsc-akan-tutup-akses-jalan/#.Yd7dzv7P3IU</p> <p>In the online news on August 26, 2021, it was stated that the Musi Rawas District Government held a meeting with community representatives from 3 villages (Anyar Village, Semangus Baru Village and Muara Rengas Village) to discuss the road closure action by the village community towards PT Bina Sains Cemerlang. The Musi Rawas District Government listened to the reason for closing the road because the residents were demanding PT BSC's promise in terms of plasma development which had not been realized until 2021.</p>	<p>Based on the verification to the management of PT BSC, information was obtained that related to the road closure action on August 16, 2021 related to the demands for the plasma plantation, the management of PT BSC sent a letter to the Regent of Musi Rawas through letter number 190/BSC/UM/PSD/VIII/2021 dated August 18 2021 regarding the threat of closing the Anyar Village access road so as to prevent the entry and exit of transportation for CPO, Kernel and PT BSC vehicles and requesting the Regent that the road closures by residents of 3 villages can be stopped by explaining the following:</p> <ul style="list-style-type: none"> - Whereas the statement letter dated September 10, 2012 is not a letter of agreement, but a joint statement that in the context of developing plasma covering an area of 2,247 hectares, the company and 3 villages agreed to be willing to cooperate with mining companies in plasma locations if it turns out that the mining permits overlap. Not a promise to give PT BSC plasma covering an area of 2,247 hectares to 3 villages. - PT BSC plasma plantation is still under construction. - Whereas the access road is a Regency road so that PT BSC has the right to use the road, moreover PT BSC has contributed to the improvement of the road through the CSR program. <p>Then as a follow-up to the letter from PT BSC, the Musi Rawas District Government held a meeting on August 26, 2021 with representatives from 3 villages without including PT BSC representatives with a resume of the meeting:</p> <ul style="list-style-type: none"> - The Musi Rawas District Government said that the Anyar / Muara Rengas Village access road is a Regency road so that road closures must be stopped. Meanwhile, the plasma plantation of PT BSC is in the progress of development. - The 3 village parties have not been able to accept the status

Public Issues (Institution/ NGO/Community)	Auditor Verification
	<p>of the road as a district road because they still think that the road is a village road because there is no compensation process for the residents who own the land by the government.</p> <p>Based on the results of the meeting, the management of PT BSC sent an application letter for an audience with the Regent to resolve the issue through letter number 221/BSC/UM/PSD/IX/2021 dated September 10, 2021.</p> <p>Until this audit took place, PT BSC had not received another invitation from the Musi Rawas District Government. However, the condition of the access road is already passable and there is no road closure action.</p>
<p>Issues from online media:</p> <p>https://onlinekoe.com/dipicu-sengketa-lahan-ratusan-warga-desa-sungai-pinang-lakukan-aksi-panen-masal/</p> <p>In the online news on August 17, 2021, it was stated that on August 16, 2021 hundreds of residents of Sungai Pinang Village held a mass harvesting action because the land area of 1,538 hectares which is now claimed by the PT BSC company belongs to the residents of Sungai Pinang Village so that residents are busy doing the action.</p>	<p>Based on verification to the management of PT BSC, information was obtained that the area claimed by the community was within the HGU of PT BSC which had been obtained by the company in accordance with legally correct procedures. The community's claim is speculative because it does not show legality rights or legal footing rights, but only based on the recognition that the area has not been compensated. This area was also sued by the parents of the residents, namely in 1992 but could not be proven at the Lubuk Linggau District Court so their claim was rejected. This was actually known by the villagers, but was provoked by Mr. Hasrin Rahim's attorney to take action in the field.</p> <p>Therefore, regarding the provocation, the company has reported the attorney to the Sumatera Selatan Police for causing social unrest in the community, which in fact already knew that the area was legally owned by PT BSC and was currently under police investigation.</p> <p>Conditions when the audit took place, the atmosphere was conducive again and there was no more mass harvesting.</p>
<p>Issues from online media:</p> <p>https://mubakab.go.id/berita/218-pemkab-muba-mediasi-sangketa-lahan-masyarakat-muba-dengan-pt-bsc</p> <p>In the online news dated August 12, 2020, it was stated that the Musi Banyuasin Regency Government facilitated the Suka Maju Village community, Plakat Tinggi District regarding efforts to resolve conflicts / Plantation Land Claims PT Bina Sains Cemerlang (BSC) in Sungai Pinang Village, Muara Lakitan Sub District, Musi Rawas District by Residents Suka Maju Village, Plakat Tinggi District. In the mediation, representatives of the people of Suka Maju Village, Plakat Tinggi District, said that the company could complete the compensation process for the 300 landowners. In addition, the community expects the Musi Banyuasin Regency Government together with BPN to ensure</p>	<p>Regarding the 2 online media news links, the company said that they were related news. Based on the verification to the management of PT BSC, information was obtained that the HGU of PT BSC is entirely within the area of Sungai Pinang Village, Muara Lakitan Sub District, Musi Rawas District as stated in the HGU Decree and HGU Certificate issued by BPN and in accordance with Minister of Home Affairs Regulation No. 13 of 2014. The entire area in the PT BSC HGU has been compensated as written in the reference letter from the Sungai Pinang Village Head known to the Muara Lakitan Sub-district Head and the Musi Rawas District BPN.</p> <p>This was also evidenced by the dispatch of a team from the Musi</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<p>that the land in question is in the territory of the Musi Banyuasin Regency or over the Musi Rawas District area.</p> <p>It was also informed that the Musi Banyuasin Regency Government is ready to go down for a field check with the BPN to check the coordinates of the land referred to by the community and also ask the community to be able to clearly show legality, letters and land documents in question.</p> <p>https://silamparipers.com/2021/07/24/masyarakat-suka-maju-menuntut-penyelesaian-lahan-di-pt-bsc/</p> <p>In the online news on August 17, 2021, it was reported that hundreds of people from Sukamaju Village, Plakat Tinggi District, Musi Banyuasin Regency, Sumatera Selatan and residents of Sungai Pinang Village, Muara Lakitan Sub District, Musi Rawas, visited PT Bina Sains Cemerlang's oil palm plantation to ensure that the disputed land between the community and the PT BSC is not used by the company because until now there is still no legal certainty about the status of their land which is suspected to have been controlled by PT BSC illegally.</p>	<p>Rawas District Government and followed up with a letter from the Musi Banyuasin Regency Government No. 130/336/I/2020 dated July 20, 2020 regarding the facilitation of settlement of plantation land problems which essentially:</p> <ul style="list-style-type: none"> - Whereas the area claimed by the residents of Suka Maju Village is within the administrative area of Musi Rawas District according to the Regulation of the Minister of Home Affairs No. 13 year 2014 - Whereas the claimed area has been compensated to the land owners and has become an oil palm plantation planted by PT BSC. - Whereas the area that has been claimed already has legality, namely the HGU SK and the HGU Certificate issued by the BPN of Musi Rawas District. - Furthermore, the Musi Banyuasin Regency Government will coordinate with the Musi Rawas District Government to facilitate the resolution and request that the company temporarily not exploit the area to avoid social conflicts. <p>Regarding the news on August 17, 2021, the management of PT BSC said that this was due to a provocation by the attorney and the Suka Maju village head to take action to the claim location, even though the problem is being handled by the Musi Banyuasin Regency Government and the Musi Regency Government. The current condition and condition of the area is that PT BSC has not managed it while waiting for a decision from the two regional governments. Therefore, regarding the provocation, the company has reported the attorney to the Sumatera Selatan Police for causing social unrest in the community, which has actually received a temporary decision from the two regional governments and is currently under police investigation.</p> <p>At the time of the audit, the results of the auditor's verification to the location of the claim that it is true that the area is currently still not being reclaimed because it is waiting for the results of the decision from the Musi Banyuasin Regency Government and the Musi Rawas District Government.</p>
<p>Labour Inspector from Manpower and Transmigration Agency of Sumatera Selatan Province.</p> <p>The communication relationship between the company and the agency has been going well for the past few years. The company has routinely carried out routine employment reports (employee list) to the agencies. The implementation of labor regulations has been quite well implemented by the company such as minimum wages, BPJS, overtime, provision of PPE, provision of health facilities and proper housing. This was conveyed based on the results of the official visit in March 2021 to the company to conduct routine work visits.</p>	<p>Based on the document review, it is known that currently the company has implemented an employment system that refers to the laws and regulations in Indonesia such as minimum wages, BPJS, overtime, provision of PPE, provision of health facilities and proper housing. This has been proven by the provision of wages above the minimum wage, registration of all workers in the BPJS program, appropriate overtime payments and so on.</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<p>Plantation Agency of Musi Rawas District</p> <ul style="list-style-type: none"> • PT BSC has sent regular reports to the Plantation Office such as the Plantation Business Progress Report every semester. • The response from PT BSC was good enough to respond to requests for information. • So far, the PT BSC area has no history of fire incidents, other than that the infrastructure for fire prevention and control is considered adequate. 	<p>There are no negative issues from the Plantation Agency of Musi Rawas District</p>
<p>Labour Union (SPSI) of PT Bina Sains Cemerlang.</p> <p>The communication relationship between the company and the union has been going well for the past few years. The union holds meetings to discuss issues/events and complaints that occur in the company's operational areas. Where the best solution will be sought together from the point of view of workers and employers. Since January 2021 until now (January 2022) the company has properly implemented government regulations related to employment and OHS such as providing minimum wages, calculating overtime, providing PPE, BPJS and other things that are the rights of workers and obligations that must be given. by the company has been implemented. There has never been any activity of harassment, violence, child labor, or human trafficking that has occurred since 2020 until the audit activity was carried out.</p>	<p>The company already in accordance related to minimum wages, overtime calculations, provision of PPE, BPJS and other things have been implemented so that there are no issues related to wages since 2021 until now.</p> <p>There were also no issues/incidents related to harassment, violence, child labor, or human trafficking that occurred since 2021 until audit activities were carried out within the company.</p>
<p>Gender Committee of PT Bina Sains Cemerlang.</p> <p>The gender committee has been formed with management from among workers and staff, where the management/members consist of male and female workers. Since 2021 there have been no issues related to gender, harassment, violence or serious violations of reproductive rights in the company's environment.</p>	<p>There are no issues related to gender, harassment, violence or serious violations of reproductive rights in the company's environment.</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>Signed on behalf of:</p> <table border="0" data-bbox="292 798 1299 1134"><tr><td data-bbox="292 798 812 882">PT Bina Sains Cemerlang Head of Sustainability & Quality Management</td><td data-bbox="1055 798 1299 882">MUTU International Lead Auditor</td></tr><tr><td data-bbox="454 903 665 1071"></td><td data-bbox="1088 882 1266 1029"></td></tr><tr><td data-bbox="438 1050 665 1113"><u>Alagendran Maniam</u> Tuesday, 19 April 2022</td><td data-bbox="1039 1050 1299 1113"><u>Hasiholan Sihombing</u> Tuesday, 19 April 2022</td></tr></table>	PT Bina Sains Cemerlang Head of Sustainability & Quality Management	MUTU International Lead Auditor			<u>Alagendran Maniam</u> Tuesday, 19 April 2022	<u>Hasiholan Sihombing</u> Tuesday, 19 April 2022
PT Bina Sains Cemerlang Head of Sustainability & Quality Management	MUTU International Lead Auditor						
							
<u>Alagendran Maniam</u> Tuesday, 19 April 2022	<u>Hasiholan Sihombing</u> Tuesday, 19 April 2022						

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

No	Institution/ NGO/ Community	Address	Phone/ Email	Form of Communi- cation	Date of Contact	Response	
						Yes	No
1	Land Agency	Musi Rawas District	-	Via phone	18 January 2022	✓	
2	Plantation Agency	Musi Rawas District	-	Via Phone	18 January 2022	✓	
3	Environmental Agency	Musi Rawas District	-	Via Phone	18 January 2022	✓	
4	Manpower Agency	Musi Rawas District	-	Via Phone	18 January 2022	✓	
5	Semangus Baru Village	Musi Rawas District	-	Via Phone	18 January 2022	✓	
6	Sungai Pinang Village	Musi Rawas District	-	Via Phone	18 January 2022	✓	
7	Local Contractor for FFB transport	Musi Rawas District	-	Direct Interview	18 January 2022	✓	
8	Sungai Pinang POM • 1 WTP operator • 1 WWTP operator • 1 warehouse operator	PT BSC, Musi Rawas District	-	Direct Interview	18 January 2022	✓	
9	Sungai Pinang Estate • 1 housing resident • 1 BSS house operator • 1 warehouse operator • 1 doctor	PT BSC, Musi Rawas District	-	Direct Interview	19 January 2022	✓	
10	Bukit Pinang Estate: • 1 BSS house operator • 1 warehouse operator • 1 housing resident	PT BSC, Musi Rawas District	-	Direct Interview	20 January 2022	✓	
11	World Wide Fund	Indonesia	wwf- indonesia@wwf. or.id	Via email	11 January 2022		✓
12	Wahana Lingkungan Hidup Indonesia	Indonesia	informasi@walhi .or.id	Via email	11 January 2022		✓
13	Sawit Watch	Indonesia	info@sawitwatc h.or.id	Via email	11 January 2022		✓
14	AMAN	Indonesia	rumahaman@a man.or.id	Via email	11 January 2022		✓

Appendix 2. Assessment Program

Remote Audit

DATE	03 to 05 November 2020	
PLANNED TIME	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
Tuesday, 3 November 2020		
08.00 – 09.00	Opening meeting by zoom application <ul style="list-style-type: none"> Auditee Speech (Introduction of PIC, Profile of Certified Management Unit). Auditor Team Speech (Introduction, Audit Objective, Audit Scope, Audit Plan Discussion, Determine of Audit Sample, Transparency and Confidentiality Clarification). 	All Auditor
09.00 – 12.00	Public Consultation by phone <ul style="list-style-type: none"> Public consultation to Government Agencies of Langkat by phone Stakeholder consultation to affected communities surrounding the plantations and previous land owner. Public consultation with Local Contractor & Supplier Interview with internal stakeholders (ex. Bipartite or Labour Union, Gender Committee and Cooperative committee members) Document review and completing audit checklist.	All Auditor
12.00 – 14.00	Break	All Auditor
14.0 – 17.00	<ul style="list-style-type: none"> Observation of Sungai Pinang POM live video (if possible) Verification of stakeholder consultation result Document review and completing audit checklist. 	All Auditor
Wednesday, 4 November 2020		
08.00 – 12.00	<ul style="list-style-type: none"> Observation of Sungai Pinang Estate live video (if possible) Document review and completing audit checklist. 	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. 	All Auditor
Thursday, 5 November 2020		
08.00 – 12.00	<ul style="list-style-type: none"> Observation of Bukit Pinang Estate live video (if possible) 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

Onsite Audit

DATE	17 to 22 January	
PLANNED TIME	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
Monday, 17 January 2022		
13.50 – 15.00	JAKARTA → PALEMBANG (GA 108)	All Auditor
15.00 – 21.00	From the airport to the audit location in Musi Rawas District	All Auditor
Tuesday, 18 January 2022		
08.00 – 09.00	OPENING MEETING <ul style="list-style-type: none"> Auditee Speech (Introduction of PIC, Profile of Certified Management Unit) Auditor Team Speech (Introduction, Audit Objective, Audit Scope, Audit Plan Discussion, Determine of Audit Sample, Transparency and Confidentiality Clarification) 	Management of Unit Certification All Auditor
09.00 – 12.00	<ul style="list-style-type: none"> Stakeholders consultation by phone to related agencies Stakeholder consultation to affected communities surrounding the plantations, and previous land owners by phone indigenous peoples, local communities Interview by phone with Gender Committee, Worker’s Union, Worker’s Cooperative, (if any), Local Contractor (for Mill and Estate), Smallholders, Third Party Supplier (if any), local NGO (if any) Document Verification 	All Auditor All Auditor
12.00 – 14.00	Break	
14.00 – 16.30	Field observation to Sungai Pinang POM <ul style="list-style-type: none"> Supply Chain verification (FFB Receiving, Weighbridge) Implementation of Occupational Health & Safety Aspect, Implementation of Employment Procedure and Mechanism Aspect, security post, FFB Sorting, Processing Activity, Despatch CPO) Implementation of Environmental aspect, Inspection to Chemical Storage, Hazardous Waste Storage. Fire Control Simulation. POME Pond & land application 	HHS SML RGR & AYU
16.30 – 17.00	Submission of audit progress	
Wednesday, 19 January 2022		
08.00 – 12.00	Field Observation to Sungai Pinang Estate	
	Aspect to be verified : <ul style="list-style-type: none"> Implementation of Legal Aspect (Land Ownership, Legal Boundaries), HCV; Implementation of Agronomy Aspect (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application), Implementation of Occupational Health & Safety Aspect, Implementation of Employment Procedure and Mechanism Aspect Implementation of Environmental, and Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management), Observation of Workers Facilities (Housing, School, Worship Place). 	HHS SML RGR & AYU

DATE	17 to 22 January	
PLANNED TIME	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
12.00 – 14.00	Break	
14.00 – 17.00	<ul style="list-style-type: none"> Continuing stakeholder consultation (if anything was not done the previous day) Document Verification 	All Auditor
16.30 – 17.00	submission of audit progress	All Auditor
Thursday, 20 January 2022		
08.00 – 12.00	Field Observation to Bukit Pinang Estate Aspect to be verified : <ul style="list-style-type: none"> Implementation of Legal Aspect (Land Ownership, Legal Boundaries), HCV; Implementation of Agronomy Aspect (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application), Implementation of Occupational Health & Safety Aspect, Implementation of Employment Procedure and Mechanism Aspect Implementation of Environmental, and Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management), Observation of Workers Facilities (Housing, School, Worship Place). 	HHS SML RGR & AYU
12.00 – 14.00	Break	
14.00 – 17.00	<ul style="list-style-type: none"> Continuing stakeholder consultation (if anything was not done the previous day) Document Verification 	All Auditor
16.30 – 17.00	submission of audit progress	All Auditor
Friday, 21 January 2022		
08.00 – 10.00	Continue Document Verification	All Auditor
10.00 – 12.00	Interim Meeting (closing meeting preparation)	All Auditor
12.00 – 14.00	Break	All Auditor
15.00 – 16.00	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 and Management of Unit Certification
16.00 – 22.00	Travel from audit location to hotel in Palembang	All Auditor
Saturday, 22 January 2022		
08.00 – 09.00	Auditor doing Antigen/PCR swab test in Palembang	All Auditor
10.00 – 11.00	Travel from hotel to airport	All Auditor
12.05 – 13.15	PALEMBANG → JAKARTA (GA 107)	All Auditor