

*Roundtable on Sustainable Palm Oil Certification
RSPO*

[✓] ASA-1.4 & Recertification-2

Name of Management Organisation : Pematang Palm Oil Mill, PT Teguh Sempurna subsidiary of Sime Darby Plantation Berhad
 Plantation Name : PT Teguh Sempurna - Pematang Estate, Hatantiring Estate, Kawan Batu Estate and Batang Garing Estate
 Location : Village of Sahabu, Sub District of Batu Ampar, District of Seruyan, Province of Kalimantan Tengah, Indonesia
 Certificate Code : **MUTU-RSPO/004**
 Date of Initial Registration : 05 July 2011
 Date of Certificate Issue : 05 April 2022
 Date of Certificate Expiry : 04 April 2027

Date of License Issue : 05 May 2022

Date of License Expiry : 04 April 2023

*License expired in 04 July 2020, however due to pandemic Covid-19 situation the license extended until 04 April 2022

Assessment	Assessment Date	PT. Mutuagung Lestari Auditor	Reviewed by	Approved by
ASA-1.4 Remote Audit	11 to 12 July 2020	Moh Arif Yusni (Lead Auditor), Haikal Ramadhan K, Yohannes H, Yohannes Pandiangan	Harso Yuli Antena	Ardiansyah
ASA-1.4 & RC-2 Onsite Audit	21 to 26 March 2022	Mohamad Arif Yusni (Lead Auditor), Afiffuddin, Radityo Puspanjana, Alfiany Sukmawati		

Assessment	Approved by MUTUAGUNG LESTARI on:
ASA-1.4 & RC-2	05 April 2022

TABLE OF CONTENT

FIGURE

Figure 1. Location Map of PT Teguh Sempurna	1
Figure 2. Operational Map of PT Teguh Sempurna	2

Abbreviations Used	3
--------------------	---

1.0 SCOPE of the CERTIFICATION ASSESSMENT

1.1 Assessment Standard Used	5
1.2 Organisation Information	5
1.3 Type of Assessment	5
1.4 Location of Mill and Plantations	5
1.5 Description of Area Statement	6
1.6 Planting Year and Cycle	6
1.7 Description of Mill and Supply Base	7
1.8 Estimate Tonnage of Certified Product	8
1.9 Other Certifications	8
1.10 Time-Bound Plan	8

2.0 ASSESSMENT PROCESS

2.1 Assessment Team	18
2.2 Assessment Methodology, Assessment Process and Locations of Assessment	19
2.3 Stakeholder Consultation and Stakeholders Contacted	23
2.4 Determining Next Assessment	23

3.0 ASSESSMENT FINDINGS

3.1 Summary of Assessment Report of the RSPO Certification	24
3.2 Conformity Checklist of Certificate and Logo Use	75
3.3 Summary of RSPO Partial Certification	76
3.4 Identification of Findings, Corrective Actions, Observations, Opportunity for Improvement and Noteworthy Positive Components	78
3.5 Summary of Arising Issues from Public and Auditor Verification	92

4.0 CERTIFIED ORGANISATION'S ACKNOWLEDGEMENT OF INTERNAL RESPONSIBILITY

4.1 Formal Signing of Assessment Findings	95
---	----

APPENDICES

1. List of Stakeholders Contacted in the RSPO Certification Process	96
2. Assessment Program	98

Figure 1. Location Map of PT Teguh Sempurna

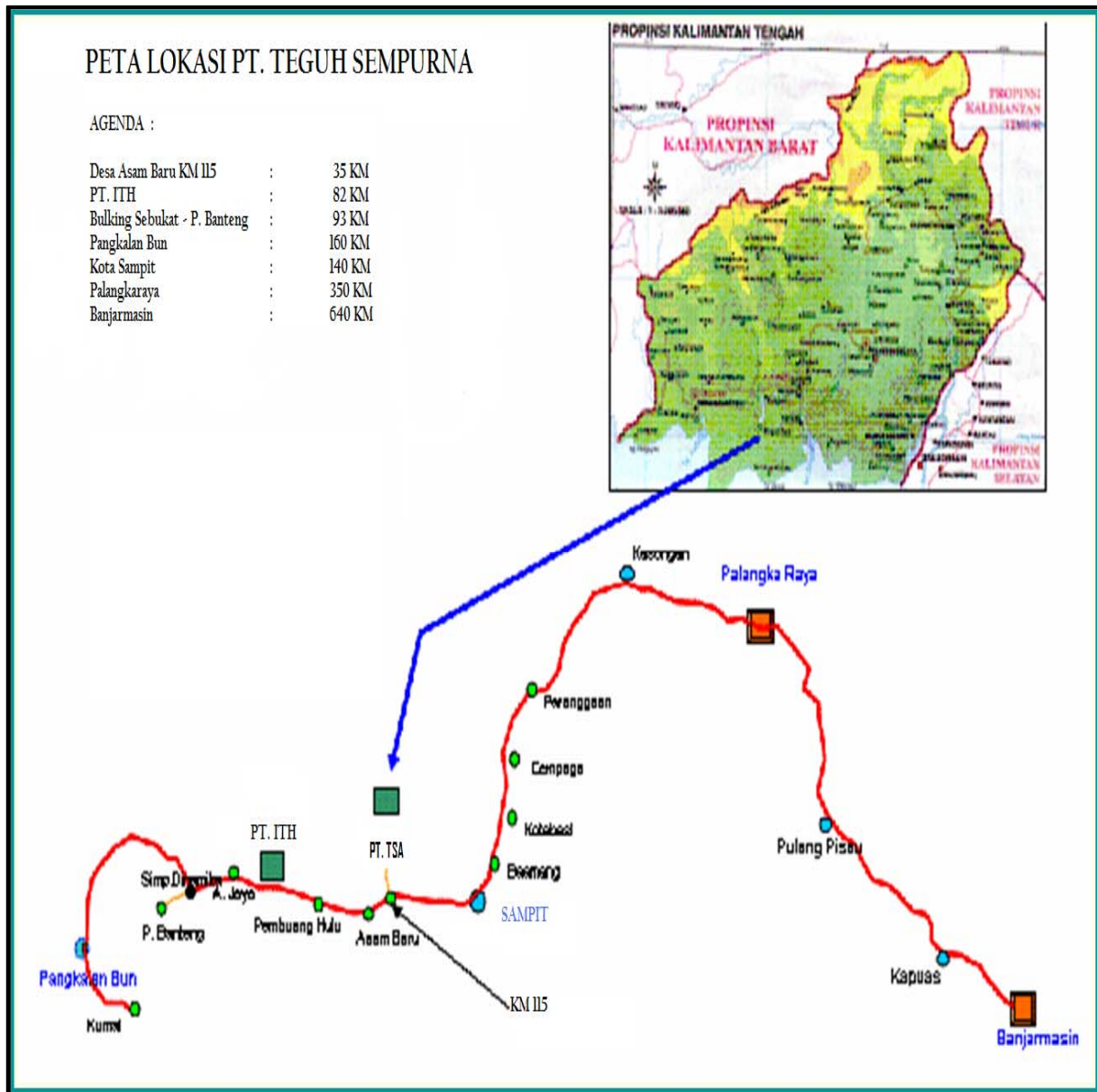
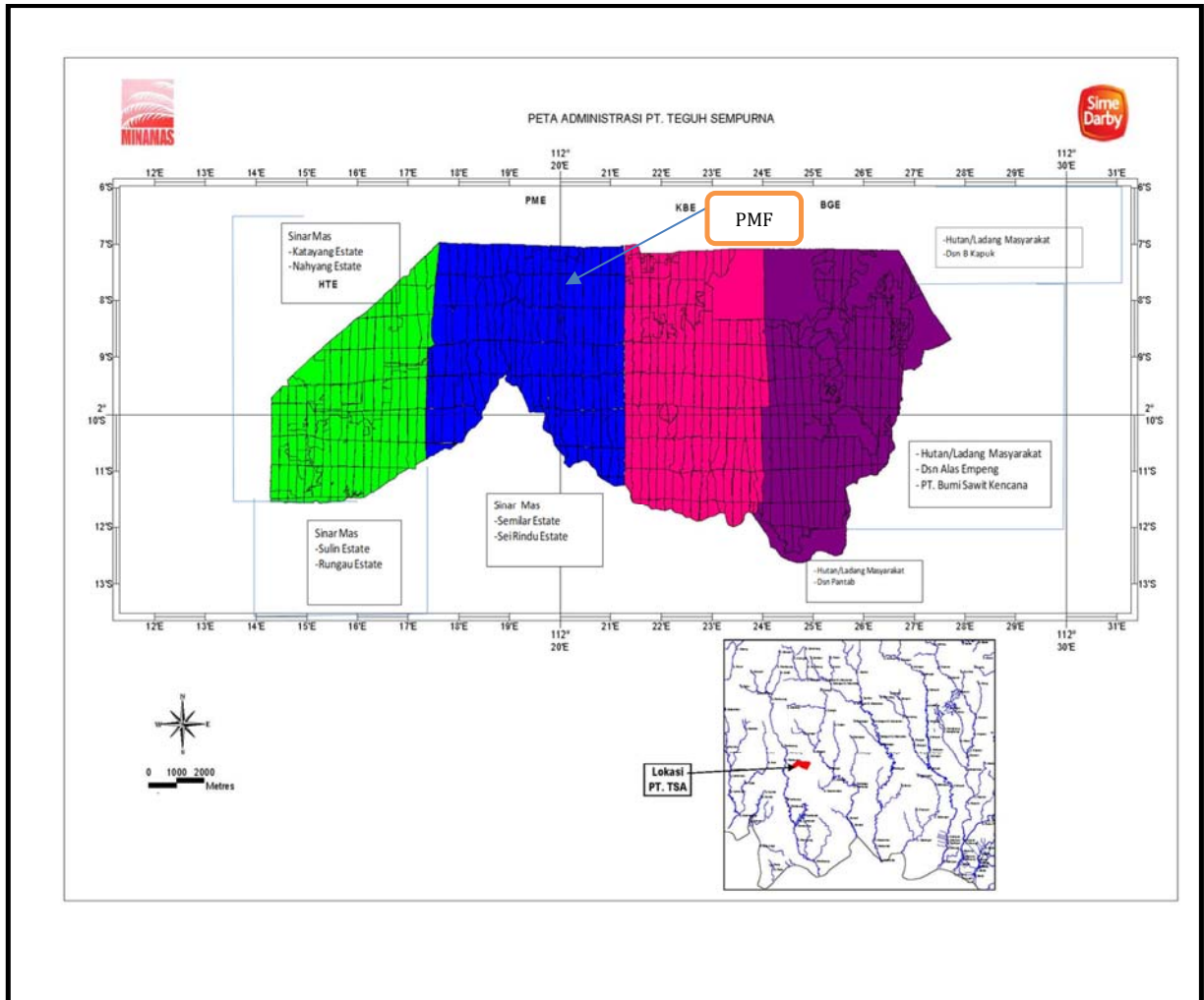


Figure 2. Operational Map of PT Teguh Sempurna



Abbreviations Used

AMDAL (SEIA)	:	<i>Analisis Mengenai Dampak Lingkungan</i> (Social and Environmental Impact Assessment)
APD (PPE)	:	<i>Alat Pelindung Diri</i> (Personal Protective Equipment)
ARM	:	Area Manager (Abbreviation for number code of Manual Policy or Letter)
BOB	:	Barn Owl Box
BOD	:	Biological Oxygen Demand
BGE	:	Batang Garing Estate
BPC	:	Business Planning and Consolidation
BPN	:	<i>Badan Pertanahan Nasional</i> (Land Agency)
BPJS	:	<i>Badan Penyelenggara Jaminan Sosial</i>
BSS	:	Block Spraying System
CCM	:	Chemical Company Malaysia
CH	:	Certification Holder
CoC	:	Code of Conduct
CPO	:	Crude Palm Oil
CSR	:	Corporate Social Responsibility
EFB	:	Empty Fruit Bunch
EIA	:	Environment Impact Assessment
ESH	:	Environment Safety and Health
FFB	:	Fresh Fruit Bunch
FPIC	:	Free, Prior and Informed Consent
GHG	:	Green House Gases
HCV	:	High Conservation Value
HGU	:	<i>Hak Guna Usaha</i> . (Land Use Title)
HIRARC	:	Hazard Identification Risk Assessment and Risk Control
HTE	:	Hatantiring Estate
ISCC	:	International Sustainable Carbon Certificate
ISPO	:	Indonesian Sustainable Palm Oil
IPM	:	Integrated Pest Management
IUP	:	<i>Izin Usaha Perkebunan</i> . (Plantation Business Permit)
WWTP	:	Wastewater Treatment Plant
KBE	:	Kawan Batu Estate
KER	:	Kernel Extraction Rate
K3 (OHS)	:	<i>Keselamatan dan Kesehatan Kerja</i> (Occupational Health and safety)
LA	:	Land Application
LCC	:	Legume(s) Cover Crop
LB3	:	Hazardous Waste
LKS	:	<i>Lembaga Kerjasama</i> (Cooperation Agency)
LTIFR	:	Lost Time Accident Frequency Rate
MC	:	Medical Certificate
MRC	:	Minamas Research Center
MCM	:	Management Committee Meeting
NGO	:	Non-Government Organization
OER	:	Oil Extraction Rate
OHS	:	Occupational Health and Safety
PME	:	Pematang Estate
PMF	:	Pematang Factory
P&D	:	Pest & Disease

PK	:	Palm Kernel
PKWT	:	<i>Perjanjian Kerja Waktu Tertentu</i>
POM	:	Palm Oil Mill
POME	:	Palm Oil Mill Effluent
PPE	:	Personal Protective Equipment
PSD	:	Plantation Services Department
PSQM	:	Plantation Sustainability and Quality Management
PT	:	<i>Perseroan Terbatas</i>
P2K3	:	<i>Panitia Pembina Keselamatan dan Kesehatan Kerja</i>
RSPO	:	Roundtable on Sustainable Palm Oil
RTD	:	Recruitment Training Department
SAP	:	System Application Product and Processing
SCCS	:	Supply Chain Certification System
SEIA	:	Social Environment Impact Assessment
SIA	:	Social Impact Assessment
SGM	:	Senior General Manager
SKU-H	:	<i>Sistem Kerja Umum- Harian</i>
SOP	:	Standard Operating Procedure
SOU	:	Strategic Operating Unit
UKL/UPL	:	<i>Upaya Kelola Lingkungan/Upaya Pemantauan Lingkungan (Environmental Management Efforts / Environmental Monitoring Efforts)</i>
UMK	:	<i>Upah Minimum Kabupaten (District Minimum Salary)</i>
TSA	:	Teguh Sempurna
WALHI	:	Wahana Lingkungan Hidup Indonesia
WHO	:	World Health Organization
WTP	:	Water Treatment Plant
WWTP	:	Waste Water Treatment Plant
VP	:	Vice President

1.0	SCOPE of the CERTIFICATION ASSESSMENT		
1.1	Assessment Standard Used	<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 	
1.2	Organisation Information		
1.2.1	Organisation name listed in the certificate	PT Teguh Sempurna subsidiary of Sime Darby Plantation Berhad	
1.2.2	Contact person	Alagendran Maniam	
1.2.3	Organisation address and site address	RSPO 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	+62-21-29926000	
1.2.5	Fax	+62-21-29922686	
1.2.6	E-mail	alagendran.maniam@simedarbyplantation.com	
1.2.7	Web page address	www.simedarbyplantation.com	
1.2.8	Management Representative who completed the application for certification	Alagendran Maniam (Head of Sustainability & Quality Management)	
1.2.9	Registered as RSPO member	1-0008-04-000-00 07 September 2004.	
1.3	Type of Assessment		
1.3.1	Scope of Assessment and Number of Management Unit	Pemantang POM, Pemantang Estate, Hatantiring Estate, Kawan Batu Estate and Batang Garing 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
	Pemantang	Sahabu Vilage, Batu Ampar Sub District, Seruyan District, Kalimantan Tengah	S 02° 08' 54" E 112° 17' 34"

		Province, Indonesia				
1.4.2	Location of Certification Scope of Supply Base					
	Name of Supply Base	Location	Coordinate			
			Latitude	Longitude		
	Pemantang Estate	Pemantang Viilage, Mentaya Hulu Sub District, Kotawaringin Timur District, Kalimantan Tengah Province, Indonesia	S 02° 09' 29"	E 112° 17' 26"		
	Hatantiring Estate	Sahabu Viilage, Batu Ampar Sub District, Seruyan District, Kalimantan Tengah Province, Indonesia	S 02° 06' 58"	E 112° 17' 36"		
	Kawan Batu Estate	Kawan Batu Viilage, Mentaya Hulu Sub District, Kotawaringin Timur District, Kalimantan Tengah Province, Indonesia	S 02° 09' 40"	E 112° 23' 07"		
	Batang Garing Estate	Karang Biring Kapuk Viilage, Mentaya Hulu Sub District, Kotawaringin Timur District, Kalimantan Tengah Province, Indonesia	S 02° 09' 28"	E 112° 25' 15"		
1.5	Description of Area Statement					
1.5.1	Tenure					
	• State		16,601.66	Ha		
	• Community		-	Ha		
1.5.2	Area Statement					
	• Total area		16,601.66	Ha		
	• Mature area		13,697.43	Ha		
	• Immature area		365.54	Ha		
	• Nursery		15.00	Ha		
	• Emplacement (Housing, Buildings)		256.50	Ha		
	• Palm Oil Mill		61.00	Ha		
	• Roads and Bridges		501.33	Ha		
	• Swamps, Ravines, Valleys, Hilly		115.00	Ha		
	• Conservation Area (HCV)		991.68	Ha		
	• Enclave (Permanent Occupied)		597.18	Ha		
	• Cemetery		0.25	Ha		
	• Water Catchment Area		0.75	Ha		
1.6	Planting Year and Cycles					
1.6.1	Age profile of planting year					
	Planting Year	Hectarage (Ha)				
		Pemantang Estate	Hatantiring Estate	Kawan Batu Estate	Batang Garing Estate	Total
	1996	590.18				590.18
	1997	1,518.87	94.00	855.00		2467.87
	1998		780.00	377.00		1157.00

1999		301.00	136.00		437.00		
2000		164.00	497.00		661.00		
2004		202.00	59.00		261.00		
2005		723.00	560.00		1283.00		
2006		644.00	325.00	692.47	1661.47		
2007		492.00	131.00	911.31	1534.31		
2008				468.00	468.00		
2009				762.00	762.00		
2010				295.00	295.00		
2011				192.00	192.00		
2014		7.00			7.00		
2015	563.75				563.75		
2016	376.67		349.00		725.67		
2017	258.18		373.00		631.18		
Mature Area	3,307.65	3,407.00	3,662.00	3,320.78	13,697.43		
2019	277.54	-	-		277.54		
2020	-	-	88.00		88.00		
Immature Area	277.54	-	88.00		365.54		
Total	3,585.19	3,407.00	3,750.00	3,320.78	14,062.97		
1.6.2	New Planting area after January 2010		Ha				
1.6.3	Planting Cycle		2 nd Cycle				
1.7	Description of Mill and Supply Base						
1.7.1	Description of Mill						
	Name of Mill	Capacity (tonnes/ hour)	FFB Processed (tonnes/year)	CPO		Palm Kernel	
Out put (tonnes)				Extraction (%)	Out put (tonnes)	Extraction (%)	
	Pemantang	60	733,138.30	157,613.34	21.50	32,316.32	4.41
	<i>*Production data source from July 2019 to February 2022</i>						
1.7.2	Description of Certification Scope of Supply Base						
	Name of Estate	Total Area (Ha)	Production Area (Ha)	FFB (tonnes/year)	Yield (tonnes/ ha/year)	Supplied to Mill	
FFB (tonnes/year)						%	
	Pemantang	3,857.91	3,307.65	121,989.26	13.83	121,989.26	100
	Hatantiring	3,811.00	3,407.00	215,445.42	23.71	215,445.42	100
	Kawan Batu	4,400.00	3,662.00	204,954.94	20.99	204,954.94	100
	Batang Garing	4,532.75	3,320.78	187,024.66	21.12	187,024.66	100
	TOTAL	16,601.66	13,697.43	729,414.28	19.97	729,414.28	100
	<i>*Production data source from July 2019 to February 2022</i>						

<p><i>**FFB production represent data for 32 months, so the yield calculations is based on formula: FFB production / Production Area / 32 X 12</i></p>							
1.7.3	FFB description from other source						
	Name of sources/Organisation (RSPO certified)	Type of Organisation	number of smallholders	Production Area (Ha)	Supplied to Mill FFB (tonnes/year)		
	Sukamandang Estate	PT Kridatama Lancar Subsidiary of Sime Darby Plantation Berhad	-	2,867.12	859.49		
	Sapiri Estate		-	3,151.76	989.07		
	Kuala Kuayan Estate		-	2,568.02	811.65		
	Baras Danum Estate		-	2,995.20	1,063.81		
	TOTAL				3,724.02		
<p><i>* all FFB from other source are from RSPO certified area</i> <i>**Production data source from July 2019 to February 2022</i></p>							
1.7.4	Product categories			FFB, CPO, PK			
1.8	Tonnage of Product						
1.8.1	Past Annual Claim Certified Product		Last Year Projected Certified Volume (MT)		Last Year Actual Certified Volume (July 2019 to February 2022) (MT)		
	FFB Processed		561,900		733,138.30		
	CPO Production		160,406		157,613.34		
	Palm Kernel (PK) Production		33,428		32,316.32		
1.8.2	Product selling						
	Type of selling product		Actual selling product for last year (July 2019 to February 2022) (MT)				
	CSPO sold as RSPO certified product		32,011.20				
	CSPK sold as RSPO certified product		30,374.36				
	CSPO sold under other scheme		0				
	CSPK sold under other scheme		0				
	CSPO sold as conventional		119,749.30				
	CSPK sold as conventional		1,338.17				
1.8.3	Estimate of Certified FFB Claim						
	Name of Estate	Total Area (Ha)	Production Area (Ha)	FFB (tonnes/year)	Yield (tonnes/ha/year)		
	Pematang	3,857.91	3,307.65	47,000	14.21		
	Hatantiring	3,811.00	3,407.00	81,000	23.77		
	Kawan Batu	4,400.00	3,662.00	81,000	22.12		
	Batang Garing	4,532.75	3,320.78	71,000	21.38		
	TOTAL	16,601.66	13,697.43	280,000	20.44		
<p><i>*Projected FFB production for 12 months of certificate</i></p>							
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)	

	Pematang	60	280,000	61,600	22.00	12,600	4.50	IP
*Projected FFB production for 12 months of certificate								
1.9	Other Certifications							
	Environment award (Environment ministry award) 2018			Predicate blue				
	Others							
1.10	Time Bound Plan							
	Time Bound Plan for Other Management Units							
	Management Unit		Estate (Supply Base)	Time Bound Plan	Location	Status		
	Mill	Time bound						
INDONESIA								
1	Sekunzir. PT. Indotruba Tengah	2010	Sekunzir	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 Kemas	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
			Kalumpong	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	2011	Kerdau	2011	Temerloh, Pahang	Certified

	SOU 11		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	Tingkeyu	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	Kevieng, 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, Slomon 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
			Karaus	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>TBP on January 2022.</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	Progress of Associated Smallholders and Out growers for Certifiable Standard			
	PT Teguh Sempurna does not have a cooperation scheme with smallholders and outgrower			

2.0	ASSESSMENT PROCESS
2.1	Assessment Team
ASA-1.4 (Remote)	<ol style="list-style-type: none"> Moh Arif Yusni (Lead Auditor). Indonesian citizen. Bachelor of Agriculture, majoring in Plant Protection. Has experience as an operational staff at a private oil palm plantation company in Indonesia on 2010 to 2012. Has attended several trainings, i.e.: ISO 19011, ISO 9001; ISO 14001, SA 8000, RSPO lead auditor, ISPO lead auditor, OHS expert, OHS auditor based on National Government No. 50/2012, SCCS, etc. Has conducting ISPO, RSPO and MSPO audit as an auditor and lead auditor with expertise on best management practices for estate and mill, legality, worker welfare, safety, social, environment, conservation, transparency, long term economic management plan and supply chain for palm oil mill aspects. During the audit, he verified Legality, Social, TBP and Partial Certification. Haikal Ramadhan Kharismansyah (Auditor). Indonesian citizen, Bachelor of Agriculture department of plant and pest disease (Agrotechnology). He has 3 years experiences as an Agronomy Staff in private oil palm plantation in Indonesia. Training which had attended including Basic Management Development Program Agronomy, Integrated Urban Pest Management, Integrated Pest Management, ISO 9001: 2015, Lead Auditor ISPO, Lead Auditor RSPO, ISO 22000, SA 8000, ISO 14000 and SCCS. Has conducting ISPO and RSPO audit with expertise on best management practices, OHS, Worker Welfare, and SCCS. During this audit he verify Best Management Practices, SCCS, OHS and Worker Welfare Yohanes Hardian (Auditor). Indonesian Citizen. Diploma of Forest Resource Conservation, Faculty of Forestry, Bogor Agricultural University, specialist in the environment aspect and wildlife. Has Worked as Staff Rehabilitation project at WWF Central Kalimantan region. Had attended training HCV, has been involved in several activity of HCV Identification of Oil Palm Plantation. Has worked as an environmental staff on Oil Palm Plantation. Have been trained as ISPO auditors and have attended training Auditor ISO 9001 and ISO 19011, Legal documents in-house training with the ISPO commission. Training SIA Remark Asia 2016, Training Lead Auditor RSPO by Proforest-Daemeter 2016. Experience audit RPO And ISPO Since 2014. During this audit, he assigned to verify, social aspect, and HCV Johannes Kapri Pandiangan (Trainee Auditor). Bachelor of Agriculture, Department of Agricultural Social-Economics, Faculty of Agriculture. Has 7 years of experience working as operational staff in one of the leading private oil palm plantation companies in Indonesia. The training that has been attended includes: Forest and land fire emergency response training by BKSDA Riau Province, IHT ISPO P&C Certification System, IHT Awareness ISO 17021 and 17065, IHT Awareness RSPO, ISO 14001: 2015 Lead Auditor Training, and ISO 9001:2015 Lead Auditor Training During this audit he verify Best Management Practices under supervised by Lead Auditor.
ASA-1.4 & RC-2 (Onsite)	<ol style="list-style-type: none"> Moh Arif Yusni (Lead Auditor). Indonesian citizen. Bachelor of Agriculture, majoring in Plant Protection. Has experience as an operational staff at a private oil palm plantation company in Indonesia on 2010 to 2012. Has attended several trainings, i.e.: ISO 19011, ISO 9001; ISO 14001, SA 8000, RSPO lead auditor, ISPO lead auditor, OHS expert, OHS auditor based on National Government No. 50/2012, SCCS, etc. Has conducting ISPO, RSPO and MSPO audit as an auditor and lead auditor with expertise on best management practices for estate and mill, legality, worker welfare, safety, social, environment, conservation, transparency, long term economic management plan and supply chain for palm oil mill aspects. During the audit, he verified Legality, Social, TBP and Partial certification. Afiffuddin (Auditor). Indonesian citizen, Diploma III majoring Palm Oil Plantation, Bogor Agricultural University. Five years working experience since 2010 at Oil Palm Plantation Company in Indonesia as agronomy operational staff and followed several trainings namely: Basic Plantation Management Program, Auditor Training Indonesian Sustainable Palm Oil (ISPO), Training of RSPO lead auditor, RSPO SCCS, OHS General Expert, OHS System Management based on PP 50 2012 and Management System Certification (ISO 9001-2015/SNI 19011-9001:2015) ISO 17021, ISO 17065, SA 8000 training. He has been involved in several audit activities related to sustainable palm oil certification since 2016 covering Best Management Practices aspect, health and safety aspect and worker welfare aspect. During this audit, He conducted an assessment on SCCS, BMP Agronomy and long-term budget. Radytio Puspanjana (Auditor). Indonesian Citizen. Bachelor of agriculture, majoring in Soil Science. Agriculture Faculty. He was working as honorarium Officer at the Riau Province Plantation Agency in the division of huge estate for 1 year. The participated trainings are Survey and Mapping (GIS) Training which was held by National GMIT, ISPO auditor training, ISO 9001/2008 auditor training, ISO 14001/2004 auditor training, IHT Geospatial Information System, IHT High Conservation Value, IHT Environmental Impact Assessment, IHT Green House Gas

	<p>and RSPO Lead Auditor Course by Checkmark Training. Since 2015 has been following many audit as auditor base on Best Management Practice and Environment. During the audit, he verified environment aspect, waste management, GHG and conservation aspect.</p> <p>4. Alfiany Sukmawati (Auditor Trainee). Indonesian Citizen. Bachelor of Public Health, major in Environmental Health, University of Indonesia. Has attended training in AMDAL A & B, ISO 14001 auditor training, OSHAS, ISO 9001 auditor training, Awareness ISO 17021, Awareness ISO 17065, Awareness ISO 9001, Awareness ISO 45001, and Awareness ISO 19011. Has participated in several simulations of audit activities related to the certification system for sustainable palm oil plantations with environmental aspects. During the audit, she verified environment aspect, waste management, and safety 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>
2.2	Assessment Methodology, Assessment Process and Locations of Assessment
2.2.1	Figure of person days to implement assessment
ASA-1.4 (Remote)	<p>Number of auditors: 3 auditor and 1 auditor trainee</p> <p>Number of days for Remote audit ASA-1.4: 2 days</p> <p>Number of working days for Remote audit ASA-1.4 document review : 6 Working days</p>
ASA-1.4 & RC-2 (Onsite)	<p>Number of auditors: 3 auditor and 1 auditor trainee</p> <p>Number of days for Onsite Audit ASA-1.4 & RC-2 at site: 5.5 days</p> <p>Number of working days for Onsite Audit ASA-1.4 & RC-2 at site : 17.5 Working days</p>
2.2.2	Assessment Process
ASA-1.4 (Remote)	<p>The assessment was conducted by measuring the sufficiency of implementation with the consistency done by the PT Teguh Sempurna Subsidiary of Sime Darby Plantation Berhad 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 and RSPO Certification System for Principles and Criteria, 14 June 2017.</p> <p>For this section (ASA 1.4) 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 1.4 Remote Audit report.</p> <p>The opening meeting was held on 11 July 2020 at 08.30 am through a teleconference (zoom). As for the participants who attended the opening meeting included the Estate Manager, Mill Manager, Support Team from sustainability department and other relevant staff. while the closing meeting will take place on 12 July 2020 at 15.30 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 one drive</p> <p>The assessment program please find Appendix 2 assessment program please find Appendix 2</p>
ASA-1.4 & RC-2 (Onsite)	<p>The assessment was conducted by measuring the sufficiency of implementation with the consistency done by the PT Teguh Sempurna to the requirements of:</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 Teguh Sempurna consist of one mill (Pemantang Factory) and four (4) estate, namely Pemantang Estate, Hatantiring Estate, Batang Garing Estate and Kawan Batu Estate. Currently the process of certification in PT Teguh Sempurna ride into in 3rd cycles, with the first registration of certificate starting on 05 July 2011

During pandemic covid -19 situation PT Teguh Sempurna applying Scenario 4 in accordance with Contingency RSPO Audit Procedure 25 August 2020. Remote audit ASA 1.4 has been carried out on 11 – 20 July 2020 and until next following year (12 Months since remote audit), there is no field visit due to group safety policy, travel restriction, extended lockdown, restrictive quarantine procedures. Since palm trace license expired on 04 July 2020 there is no new license for Pemantang Factory and the license extended every three months with the maximum of extension until 04 April 2022 (33 Months) in accordance with Updated Audit Scenario 4 (Contingency RSPO Audit Procedure) on 9 September 2021

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.

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 RSPO and Mutu Website. There is no written negative feedback receive. Stakeholder consultation involved internal and external stakeholders. Meetings were 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 meeting, the interviewer explained the purpose of the audit followed by an evaluation of the relationship between the stakeholder and the company before discussions proceeded. The interviewer recorded comments made by stakeholders and these have been incorporated into the assessment findings. The comments made by external stakeholders were also taken into account in the assessment

Structured worker interviews with male and female workers and staff were held in private at the workplace in the mill and the estates. Fieldworkers were interviewed informally in small groups in the field. In addition, the wife's of workers and staff were interviewed in informal meetings at their housing. Company officials were not present at any of the internal or external stakeholder interviews. A list of Stakeholders contacted is included as Appendix I.

Some opportunities for improvement of the results ASA-1.4 & RC-2 delivered by the MUTU auditor to the management unit and the results are the subject will be verified at the next assessment phase (ASA-2.1). All information obtained was recorded in Check List of PT Mutuagung Lestari (MUTU) and part of this assessment

The assessment program please find Appendix 2

2.2.3	Locations of Assessment
ASA-1.4 (Remote)	will be completed during the onsite audit

**ASA-1.4
& RC-2
(Onsite)**

The sampling location consider the issue arise 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:

Pematang Factory

- **Mill Drainage.** Observations mill effluent lines, sanitation mill and flow of leaching mill.
- **WWTP.** Observation on WWTP, indication of waste overflow, OHS implementation, and interview with worker about worker welfare, OHS, and company's policies.
- **Solid Waste.** Observation of the management of Solid waste consist of EFB, fiber and shell from the production process of mill.
- **Methane capture/ Biogas Plan.** Observations and interviews related to POME management, employment, health checks, OHS, PPE and biogas utilization management. The installation can process 1.000 of megawatt power / month.
- **Chemical Warehouse.** Field observations and interview related chemical management, OHS, and environmental aspect.
- **Sparepart Warehouse.** Field observations and interview related sparepart management, OHS, and environmental aspect.
- **Hazardous Waste Temporary Warehouse.** Field observations and interview related hazardous waste management, OHS and environmental aspect.
- **Diesel Tank.** Observation of OHS, environment aspect, emergency response and fire facilities.
- **Workshop.** Field observations and interview related workshop activity, OHS, environmental and worker welfare aspect.
- **Hydrant simulation no. 4 Boiler Area.** Observation related emergency preparedness
- **Sterilizer Station.** Observations related to occupational safety and health as well as established work procedures
- **Boiler Station.** Observations related to occupational safety and health as well as established work procedures
- **Engine Room Station.** Observations related to occupational safety and health as well as established work procedures
- **Press Station.** Observations related to occupational safety and health as well as established work procedures
- **WTP.** Observations related to water management, recording of water used, OHS, and waste management.

Hatantiring Estate

- **HGU stakes and land demarcation No. 71 No. 72 and No. 73.** Observation of aspect of land demarcation and maintenance of HGU pole, and land dispute potency.
- **HCV Sahabu River Riparian Area, Block R19 & R22.** Observation the implementation of management in HCV of riparian area.
- **HCV Forest Area, Block R7.** Observation the implementation of management in HCV of forest area.
- **Occupation area Block R7.** Field observation regarding the condition of the occupation area.
- **Land application, Block T18.** Observation for POME management and nutrient cycle strategy
- **FFB Harvesting, Block T11** Observation and interview related FFB quality, harvesting round, OHS, and employment.
- **Manuring, Block T08.** Observation and interview related application dose, best practices as well as chemical handling, first aid kit, and employment.
- **Empty Bunch Application Area, Block B20.** Observation related to empty bunch area, and empty bunch waste management by applying mulch to empty bunches on the land
- **Peat Subsidence and Surface Ground Water Monitoring, Block V002.** Observation related peat management.
- **Block Spraying System House.** Observation related agrochemical waste management, MSDS, emergency response, and type of pesticide used.
- **Housing Area.** Observation and interview related environment aspect, safety, and labor aspect
- **Daycare.** Observation and interview with worker related labor aspect and safety.
- **Fuel Tank.** Observation related safety, emergency facility, secondary trap, and prohibited conditions.
- **Fertilizer Storage.** Observation related agrochemical management, MSDS, emergency response, safety sign and type of pesticide used
- **Agrochemical and Oil Storage.** Observation towards agrochemical management, MSDS, safety sign, emergency

- response, and type of pesticide used
- **Generator (Genset).** Observation and interview related employee facility, electricity, domestic waste, socialization of company policies and complaint mechanisms.
- **Sparepart and PPE Warehouse.** Observation and interview with warehouse operator related PPE stock management.
- **Workshop.** Observation and interview with hazardous waste operator, emergency procedure, licence, and PPE.
- **Pesticide Mixing Area and PPE Storage.** Observations related to pesticide mixing activities, safety sign, and personal protective equipment storage
- **Land Application, Block T18.** Observation and interview with worker related POME.

Pematang Estate

- **HGU stakes and land demarcation No. 68 No. 69 and No. 70.** Observation of aspect of land demarcation and maintenance of HGU pole, and land dispute potency.
- **HCV Sahabu River Riparian Area, Block Q23.** Observation the implementation of management in HCV of riparian area.
- **HCV Forest Area, Block Q24 and R7.** Observation the implementation of management in HCV of forest area.
- **Herbicide Application, Block R25-R26.** Interviews of spraying mechanism, work tools, chemicals used, doses used, medical examinations, extra fooding, PPE, labor aspect and environment.
- **Leguminose Cover Crop Planting Block Q34 (replanting area 2022).** Observation related work procedures, health and safety as well as worker welfare
- **Replanting Area Block Q29 (replanting area 2022).** Observation related replanting activity, slope managements and work procedure and interview with contractor worker.
- **Workshop.** Observation and interview with hazardous waste operator, emergency procedure, license, and PPE.
- **Agrochemical Storage.** Observation towards agrochemical management, MSDS, emergency response, safety sign, and type of pesticide used
- **Fuel Tank.** Observation towards oil storage management, MSDS, emergency response, and type of pesticide used
- **Hazardous Waste Temporary Storage** Field observations and interview related hazardous waste management, OHS and environmental aspect.
- **Fertilizer Storage.** Observation towards agrochemical management, MSDS, emergency response, safety sign, and type of pesticide used

Kawan Batu Estate

- **HGU stakes and land demarcation No. 57 No. 58, No. 59, No. 61, No. 62 and No. 60.** Observation of aspect of land demarcation and maintenance of HGU pole, and land dispute potency.
- **HCV Rungau River Riparian Area, water spring, Forest Area Block W47.** Observation the implementation of management in HCV.
- **FFB Harvesting, Block Q018.** Observation and interview with workers related FFB quality, harvesting round, safety aspect, first aid kit, and labour aspect
- **Spraying, Block R043.** Observation and interview related herbicide spraying activities, labour aspect, first aid kit, safety and environment aspect
- **Block Spraying System Storage.** Observation related agrochemical waste management, MSDS, emergency response, and type of pesticide used.
- **Fire Fighting Facility.** Observation and simulation emergency procedure.
- **Housing Area.** Observation and interveiw related domestic waste, sport facilities, praying facilities, sanitary and hygiene, clean water access, educational facilities, assembly point, emergency respond, weekly market, electricity access, and building adequency,
- **Daycare.** Observation and interview with worker related labor aspect and safety.
- **Fuel Tank.** Observation related safety, emergency facility, secondary trap, and prohibited conditions.
- **Fertilizer Storage.** Observation related agrochemical management, MSDS, emergency response, and type of pesticide used.
- **Agrochemical and Oil Storage.** Observation towards agrochemical management, MSDS, emergency response, and type of pesticide used.

- **Sparepart and PPE Warehouse.** Observation and interview with warehouse operator related PPE stock management.
- **Workshop.** Observation and interview with hazardous waste operator, emergency procedure, license, and PPE.
- **Domestic Waste Final Disposal, Block S59,** observations related domestic waste management,
- **Bayau Village/Tabion.** Observation related uncompensated area.
- **Landfill Area.** Observation related domestic waste management.

Batang Gading Estate

- **HGU stakes and land demarcation No.56, No.55, dan No.47.** Observation of aspect of land demarcation and maintenance of HGU pole, and land dispute potency.
- **HCV Silar River Riparian Area, Block R67.** Observation the implementation of management in HCV of riparian area.
- **Occupation area Block W60.** Field observation regarding the condition of the occupation area.
- **Manuring Activity, Block O16.** Observation and interview related application dose, best practices as well as chemical handling and employment, first aid kit.
- **Spraying, Block U22.** Observation and interview related herbicide spraying activities, labour aspect, first aid kit, safety and environment aspect.
- **Workshop.** Observation and interview with hazardous waste operator, emergency procedure, license, and PPE.
- **Agrochemical Storage.** Observation towards agrochemical management, MSDS, emergency response, safety sign, and type of pesticide used
- **Fuel Tank.** Observation towards oil storage management, MSDS, emergency response, and type of pesticide used
- **Hazardous Waste Temporary Storage** Field observations and interview related hazardous waste management, OHS and environmental aspect.
- **Fertilizer Storage.** Observation towards agrochemical management, MSDS, emergency response, safety sign, and type of pesticide used
- **Clinic.** Observation and interview related medical waste, medical surveillance and medical facilities.

2.3	Stakeholder Consultation and Stakeholders Contacted
2.3.1	Summary of stakeholder consultation process.
ASA-1.4 (Remote)	will be completed during the onsite audit
ASA-1.4 & RC-2 (Onsite)	<p>Summary of stakeholder consultation process</p> <p>Consultation of stakeholders for PT Teguh Sempurna was held by:</p> <ol style="list-style-type: none"> 1. Public Notification on website PT Mutuagung Lestari and RSPO 2. Public consultation with NGOs (by email) such as WALHI, WWF, and Sawit Watch 3. Public consultation by phone with government institution 4. Public consultation meeting with communities including previous land owner 5. Public consultation meeting with internal stakeholders and contractor <p>Numbers of input from stakeholders were clarified by PT Teguh Sempurna</p>
2.3.2	Stakeholder contacted
ASA-1.4 (Remote)	will be completed during the onsite audit
ASA-1.4 & RC-2 (Onsite)	Please find appendix 1
2.4	Determining Next Assessment
	The next visit (ASA 2.1) will be conducted nine (9) months until twelve (12) months after date of annual license.

3.0 ASSESSMENT FINDINGS

3.1 Summary of Assessment Report of the RSPO Certification

MUTUAGUNG LESTARI has conducted an assessment of PT Teguh Sempurna subsidiary of Sime Darby Plantation Berhad operation consisting of one (1) mill and four (4) oil palm estates.

During the assessment, there were one (1) Nonconformity were assigned against Major Compliance Indicators and three (3) Nonconformities were assigned against Minor Compliance Indicators and six (6) for improvement were identified.

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

MUTUAGUNG LESTARI found that Pemantang POM - PT Teguh Sempurna Subsidiary of Sime Darby Plantation Berhad complied with the requirements of Principles and Criteria for Sustainable Palm Oil Production 2018, The Indonesia National Interpretation, Endorsed by the RSPO Board of Governors on 20 April 2020 and RSPO Certification Systems for Principles & Criteria and RSPO Independent Smallholder Standard, Endorsed by the RSPO Board of Governors on 12 November 2020

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

Ref Std.	VERIFICATION RESULT of MUTU-Certification	
PRINCIPLE #1 BEHAVE ETHICALLY AND TRANSPARENTLY		
1.1	The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.	
1.1.1	<p>List of publicly accessible document describes in SOP of request of information and response issued on June 27, 2016 consist of 12 documents which has been covering the documents listed in indicator 1.2's requirement.</p> <p>According to the company's SOP, information can be accessed through verbal (by phone), direct visit and writing (email and letter). Adm Head in the respective unit is responsible to verify the request and forward to the intended person (EM/DEPT/DIV). The requests of information that requiring head of department approval will be responded to a maximum of 1 month, otherwise approval will be required for a maximum of 15 days. Confirmed during public consultation to communities, local contractor and relevant institution, the SOP and mechanism has been understood well.</p> <p>The entire request of information (verbal and written) is recorded and kept in the logbook which is available in all units both of estates and mill, there was no request for information, but recorded several incoming letters which were entirely the proposals of aid that has been responded by the company. In addition, sighted the evidence of report delivery to relevant agencies, among others : report of environmental management and monitoring, report of employment, waste management and plantation report.</p>	
1.1.2	Based on the results of the document review and interviews with the agency, such as the Manpower Supervisor, the Environment Agency, and others, it is known that the information presented by the certification unit has been presented in an appropriate language and can be accessed by the agency.	

The unit of certification has provided evidence that the information has been received in an appropriate form and language for the relevant stakeholders, such as proof of handover of the Land Use and Use of HGU Report to the Land Office of Kotawaringin Timur District, January 24, 2022.

The company showed other requests for information, including based on the 2021 Incoming and Outgoing Letter Monitoring document at the Pemantang Factory unit. For example, a letter was issued to the Head of BPJS Kesehatan Sampit Branch dated January 6, 2021.

1.1.3

The logbook of incoming and outgoing mail. The examples are as follows:

1. Letter from the Regency of Kotawaringin Timur regarding Program Protection, BPJS Employment for Vulnerable Workers, number 500/167 /EK/II/2022, dated 23 February 2022
2. Entrance Letter for Pemantang Estate: Application for transportation units for distribution of Zakat Fitrah by the Chairman of the PHBI (Islamic Holiday Committee) on 11 May 2020 and has been responded to by the company and has been realized.
3. Entrance Letter for Batang Garing Estate: Application for basic necessities and anticipation of Covid -19 by the Head of Kapuk Village, April 8, 2020, has been responded to by estate management and the request for assistance has been forwarded to the AC, OC and CEO's office for the request for the stone.

Company has maintains records of requests for information and responses.

1.1.4

Consultation and communication procedures are documented, including in the Communication Procedure document, document number SOP/TSA/056, which among others describes a list of publicly accessible documents, scope, internal communication, external communication, feedback, general information, the person in charge, procedures and so on. The company has shown evidence of socialization of the procedure to stakeholders, including that which was carried out on September 13, 2021 and the Socialization document for the RSPO, ISPO, Human Right Policy, Communication SOP, Code of Conduct, Environment, HCV, and Land Fires which was held on July 29, 2020, and attended by 81 Participants.

Based on interview with stakeholders, it's known that all relevant stakeholders such as cooperative, manpower agency, plantation agency, village official, are understand communication procedure.

1.1.5

The company shows the PT TSA Stakeholder List of Names and Addresses for 2022, which explains the names of stakeholders by type, namely Service and Agencies, Village Heads, Community Leaders, Gender Committee, and Contractors. In addition, there is also contact information for the person, address, contact number, and position.

Based on the document there are:

1. District government offices and agencies: 10 stakeholders
2. Sub District and village: 7 stakeholders
3. Gender committee: 1 stakeholder
4. Contractors: 21 stakeholders

Based on random checked with stakeholder list, for example *Dinas Ketahanan Pangan dan Pertanian* and *Dinas Lingkungan Hidup* Province of Kalimantan Tengah still relevant with contact person stated.

Status: Comply	
-----------------------	--

1.2

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

1.2.1

Code of conduct describes in document No: 440/HRM-COC/07 written in Bahasa, including integrity code and ethical code in all operations and transactions including business ethics, work ethics, and firm commitment in particular matters (conflict of interests, political activities, gifts/souvenirs, commissions, and bribery prohibitions.)

The company has shown documents related to the socialization of business ethics policies, including those conducted on 13 September 2021 to contractors and 14 October – 1 November 2021 to all employees.

Based on the results of interviews with employee representatives and third party contractor, it was stated that the person concerned had received socialization regarding ethical policies.

1.2.2

The mechanism for implementing the code of conduct policy, such as due diligence in the selection of third party contractors/suppliers, which states in the agreement that the parties must comply with applicable regulations such as the absence of coercion and child labour. In addition, by involving stakeholder monitoring in this implementation, the company established a complaint/complaint procedure in the SOP for Handling Public Complaints on April 11, 2013 and the SOP for Handling Employee Complaints on April 30, 2013. There is a system in place to monitor compliance and the implementation of policies and ethical business practices, such as those found in the factory area, that there are surveillance cameras (CCTV) that monitor workers from fraudulent practices.

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 CH shown evidences over its compliance toward the applicable regulation related to the aspects as follows:

Legal Aspect

Formerly, the area of PT TSA was forest concession company (Natural Forest Management Permit / HPH) namely Sarmiento Parakanca Timber, Prakanca Djaya Raya and Inhutani III. Based on Forest Map Governance Agreement (*Peta TGHK*) province of Kalimantan Tengah in 1990 the location of PT TSA is Conversion Production Forest (*Hutan Produksi Konversi*). For the area in 8 October 1996 Ministry of Forestry has released the area from a conversion production forest area (SK 640.KPTS-II/1996) for plantation development PT TSA. Based overlay between operational map of PT TSA with Provincial-level Spatial Plan (*RTRWP*) map Province of Kalimantan Tengah 2015 the area of PT TSA in other uses land (APL). However, based on the Decree of the Minister of Environment and Forestry Number: SK.01/MENLHK/SETJEN/KUM.1/1/2022 concerning Revocation of Forest Area Concession Business Permit (attached). PT TSA is included in the Appendix II List of the List of Forestry Concession Permits/Companies that are subject to revocation.

In this regard, the company has submitted a clarification to the government through a letter from the Director No. 037/TSA/UM/PSD/II/2022 dated January 24, 2022 regarding the Letter of Request for Clarification on SK.01/MENLHK/SETJEN/KUM.1/1/ 2022 concerning Revocation of PT TSA's Forest Area Concession which is addressed to the Director General of Forestry Planning and Environmental and Forestry Planning (KLHK) related to clarification of the Letter of the Director General of Forestry Planning and Environmental Management Number S.110/PKTL/KUH/PLA.2/II/2022 dated January 11, 2022 Regarding the notification of the Decree of the Minister of Environment and Forestry concerning the Revocation of the Forest Area Concession Permit of PT Teguh Sempurna in accordance with Attachment II to the Decree of the Minister of Environment and Forestry Number SK.01/MENLHK/SETJEN/KUM.1/1/2022 dated January 5, 2022, in The letter explained that:

1. PT TSA has obtained the Decree for the Release of Forest Areas No. 640.KPTS-II/1996, October 8, 1996 it was explained that the area included in the forest area was 16,300 Ha. This is in accordance with the survey results contained in the Minutes of Boundary Arrangements dated July 15, 1994.
2. From the Decree on the release of Forest covering an area of 16,300 Ha, currently HGU has an area of 6,601,657 ha based on the Decree of the State Minister of Agrarian Affairs 63/HGU/BPN/99. HGU Certificate Number 10 on 16,601,657 Ha land is valid until August 9, 2034 (for 35 years).

The letter also explained that PT TSA would like to request an explanation from the Director General of Planology, KLHK regarding the background of the license revocation as referred to in SK LHK No 01/2022 and the implications for the status of forest areas that have been issued HGUs and have been managed in accordance with the applicable laws and

regulations. The letter was also copied to the Minister of Environment and Forestry and the Secretary General of the Ministry of Environment and Forestry.

BMP

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

Manpower Aspect

- Payment of the minimum wage is in accordance with the Decree of the Governor of Kalimantan Tengah 2022, which is described in Criterion 6.2.
- Enrolling employees in the BPJS Employment and BPJS Health programs, which are described in Criterion 6.7.
- Paying overtime pay to workers who work more than normal working hours, which is described in Criterion 6.6.
- The company shows the Mandatory Employment Report document at the Company, report number 743562022032,0001, reporting date 22 March 2022 and reporting obligation on 22 March 2023.
- The company shows the Mandatory Employment Report at the Company (PT TSA – Pematang Factory), report number 74281.20210410.0001, reporting date 10 April 2021 and reporting obligation back on 10 April 2022.
- The company shows documents for Recording a Specific Time Work Agreement, including a receipt for the Recording of a Specific Work Agreement in Pematang Factory to the Seruyan District Manpower and Transmigration Office for 5 workers, dated March 23, 2022. This is in accordance with *Keputusan Menteri Tenaga Kerja dan Transmigrasi 100/2004*.

Environmental Aspect

Management has complied with environmental regulations relevant to Water Pollution Management Reports, Air Pollution Management Reports, and Hazardous Waste Management Reports. That can be proven through an electronic receipt from the Ministry of Environment and Forestry on 16 March, 2022 (reported regularly every semester). From the report it is known that all monitoring results are not above the quality standard and unit certification has made an effort to manage the risks.

The Certification unit already has an Environmental Permit in the form of an Environmental Impact Analysis Document (ANDAL) which has been approved based on the Decree of the Minister of Agriculture c.q. Head of the Agribusiness Agency No. 35/ANDAL/RKL-RPL/BA/X/1998 dated October 9, 1998 regarding the approval of ANDAL and RKL-RPL of PT Kridatama Lancar and PT Teguh Sempurna, located in Kotawaringin Timur District, Kalimantan Tengah Province.

ANDAL Addendum :

Currently the company is in the process of ANDAL addendum where there are additional activities, such as replanting activities and the implementation of permits in the environmental sector. Where the final process is in the stage of preparing the revised ANDAL addendum draft document as evidenced by the Minutes of the requirements and obligations of PT TSA's environmental permit on April 7, 2021 from Environment Agency Kalimantan Tengah Province. The next process is due to the COVID incident in internal agency. Thus, the company agreed to continue to encourage the AMDAL document revision process **OFI**

2.1.2

To ensure compliance to regulations, company has Policy 701/TQEM-ESH/10. This document explaining personnel who have responsibility to update the regulation and law, identification and inventory, evaluation and monitoring Information of regulation from national, provincial and district regulatory bodies, and renewal of any changes to prevailing laws and regulations and monitoring of expired regulations/licenses.

A list of regulatory identifications ranging from Laws, Government Regulations, Presidential Decrees, Ministerial Regulations, Ministerial Decrees, Regional Regulations, and the ratification of the ILO. Internal audits have been conducted continuously and are documented and reviewed in the management review activities conducted on February

2022. To ensure compliance with the certification unit and third-party laws in the certification unit, routine monitoring is carried out once a year by means of compliance audit / internal audit. The last internal audit for RSPO and SCCS was conducted on 25 – 30 August 2021.

2.1.3

SOP of boundary pole maintenance explained on procedure of Boundary Stone Maintenance (Doc. LGL/TSA/009), Revise 02, 4 June 2016). The company shows the HGU Pole Inspection Monitoring conducted every 6 months. Based on last monitoring in June 2021 there were 28 poles with good conditions. Based on the boundary field visit on HTE, BGE and KBE, it is known that the boundary stakes are still in a good condition.

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

The company shows the document for the List of Names and Addresses of PT TSA's Stakeholders in 2022 consist of 21 contractor, which among other things describes the type of contractor stakeholders. For examples;

No.	Contractor Name	Bussiness Activity
1.	CV Gelora Seruyan	Transportation Services
2.	CV Ayawan Jaya	Transportation Services
3.	CV Simin Jaya	Application EFB
4.	CV Central Pratama Properti	Replanting Work

2.2.2

The company shows contract documents that have separate clauses regarding the fulfillment of relevant legal obligations, including but not limited to the application of minimum wages, provision of PPE, and involving workers in the BPJS Health and Employment program, which are listed in:

- Transportation Service Agreement Letter, number 004/Jasa Transport/TSA/IV/2021, dated April 10, 2021, with CV Gelora Seruyan, article 5 related to the implementation of special regulations regarding health, security, environment, and employment.
- Transport Service Agreement Letter number 003/Jasa Pengangkutan/TSA/IV/2021, dated April 10, 2021, with CV Ayawan Jaya, article 5 related to the implementation of special regulations regarding health, security, environment, and employment.

Based on the results of interviews with representatives of contractors, including the contractor PT Central Pratama Property, it is known that the work agreement has its own clause regarding the fulfillment of relevant legal obligations and this has been known by the contractors.

However, regarding the fulfillment of the relevant legal obligations, it has not been proven either by the third party concerned or by the company.

Based on the explanation above, it is known that the company has not been able to show proof that the fulfillment of the relevant legal obligations by third parties/ contractors has been fulfilled in accordance with the agreement. Based on that's explanation raised **Non-conformity No.2022.01 with Minor Category**

2.2.3

The company shows contract documents that have separate clauses that prohibit practices involving child labor, forced labor, and workers from human trafficking, which are stated in the Transportation Services Agreement dated April 10, 2021, with CV Gelora Seruyan and CV Ayawan Jaya, article 5 related to restrictions on hiring underage and/or illegal workers. The company has the opportunity to add the date of birth information to the contractor's workforce list. **OFI.**

2.2.2

Status: Non-conformity No.2022.01 with Minor Category

2.3

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

2.3.1

All entire FFB accepted in Pematang Factory originally from its own estate under the scope of certifications and other estates under the subsidiary of Sime Darby Plantation Berhad and have been obtained RSPO Certificate. Based on document review and interview with management it was known there was no FFB from out-growers or smallholders. Other sources of Pematang Factory are from :

- Sukamandang Estate - PT Kridatama Lancar Subsidiary of Sime Darby Plantation Berhad
- Sapiri Estate - PT Kridatama Lancar Subsidiary of Sime Darby Plantation Berhad
- Kuala Kuayan Estate - PT Kridatama Lancar Subsidiary of Sime Darby Plantation Berhad
- Baras Danum Estate - PT Kridatama Lancar Subsidiary of Sime Darby Plantation Berhad

2.3.2

As mentioned in Indicator 2.3.1, it was known Pematang Factory do not accepted FFB from out growers, agent or middlemen. All FFB process originally from its own estate under the scope of certifications and other estates under the subsidiary of Sime Darby Plantation Berhad and have been obtained RSPO Certificate

Status: Comply

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

3.1

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

3.1.1

The company has shown documents related to the 2022-2026 long-term plan. The things described in the document are FFB production projections, OER and KER projections, CPO and PKO production, estimated CPO and PKO prices, production costs and plans for replanting. An annual evaluation is carried out to see the achievement of the long-term plans that the company has.

The company has also demonstrated monitoring of business feasibility, which is described in the results of the public accountant's audit report which states "In Our opinion, the accompanying financial statements are present fairly, in all material respects, the financial position of PT Teguh Sempurna as at 31 December 2020, and its financial performance and cash flow for the year then ended, in accordance with Indonesian Financial Accounting Standards. The public accountant audit was carried out by the public accounting firm Tanudiredja, Wibisana, Rintis & Partners.

3.1.2

The company has shown documents related to replanting contained in the company's long-term plan for 2020-2024. The document describes the plan for replanting oil palm as follows:

- 2020 : 131 Ha
- 2021 : 234 Ha
- 2022 : 64 Ha
- 2023 : 684 Ha
- 2024 : 1,211 Ha

Annual replanting planning also evaluated at the end of year and compared with realization. Its annual planning can be adjusted based on field condition, financial condition, or another reason. Based data replanting report January to December 2022, update 28 February 2022 has been conducted replanting on Pematang Estate is 131.03 Ha.

3.1.3

Management reviews are carried out in several reviews, consisting of Weekly and Monthly Management Reviews at the Estate level, and quarterly management reviews at the company level and company internal audits conducted 6 times, the last internal audit for RSPO and SCCS was conducted on 25 – 30 August 2021. The company showed Plantation Advisor Department (PA) in 23 December 2021. The management review discusses the achievement of production, maintenance, fertilization, and cost. There is audit PMU (Plantation Management Unit) assessment rating report date 31 October 2021 explained replanting progress, nursery activities, manuring activities and building facility budgeting.

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

Documents verifications the company can demonstrable continuous improvement in key operations as follows:

BMP

- Harvest inspection activities to maintain harvest quality, namely for indicators of loose FFB, OHS, pruning (under / over), nursery and raw FFB namely PMU (Plantation Management Unit) assessment ratings).
- Inspection activities for Early Warning System for IPM, consist of census and sampling.
- 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.

Environmental Aspects

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

- Management and monitoring of fires in company border areas that benefit the community.
- The use of renewable fuels accordance to reduce the use of fossil fuels.
- Using renewable energy-producing technology, namely methane capture or biogas.
- The 2021 HCV Management Plan improved in terms of both the quantity and the quality of monitoring.
- Waste management and monitoring through WWTP pond management, testing the quality of the effluent and reporting it to the Environmental
- Air quality management and monitoring through road maintenance, air quality testing and reporting to the Environmental Agency
- Management and monitoring of groundwater through testing ground water quality and reporting it to the Environmental Agency
- Hazardous waste management through Hazardous Waste Storage in permitted, management and monitoring of Hazardous waste also reported to the Environmental Agency.
- Greenhouse Gas (GHG) Management. Implement a zero-burning policy, utilization of EFB, shells and fiber as renewable energy, regular engine maintenance, and regular emission quality tests.

3.2.2

The company has shown the auditor regarding the RSPO metric template Version 2.1 for the period of 2021 that has been filled in according to the facts and data in the company's record documents. Based on the team auditor's review, the information has been matched with other documents, such as supply chain records, demographic workers, production area, water usage, FFB productions, work accidents, etc.

The company showing annual report document using RSPO Metric Template. For BMP aspect data some items that have been filled in by management has been accurate, total area estate, FFB production, peat area, pesticide using, FFB Process and water consumption.

Status: Comply

3.3

Operating procedures are appropriately documented, consistently implemented and monitored.

3.3.1

The company has a SOP for Plantation and Factories which explains the main processes such as harvesting, transportation, fertilizing, IPM, GAP, and supply chain requirements for the factory. Examples of SOP document numbers owned by a company are as follows:

Procedure Factory and Plantation

Agricultural Reference Manual Policy No. 110 / EST-ARM / 13 which was ratified on September 1, 2013, and signed by the Head of Plantation Upstream Indonesia SOP, explained all agronomic activities. The company also showed the Minamas Plantation palm oil mill guidelines for Part I and Part II dated April 30, 2007 for processing palm oil mills. The procedure that is owned by the company has covered all the main process activities from land clearing up to transporting FFB and for Palm Oil Mill starting from receiving fruit to dispatch CPO

Based on observations and interviews with workers in factories and plantations, it is known that this procedure is implemented well in the field, workers can explain and demonstrate their work according to procedures, referring to operational, safety and environmental best practices.

3.3.2

The company has a system that ensures consistency in the implementation of its procedure, internal audit operational plantation and Mill, internal audit ISPO and RSPO, Financial audits conducted by external parties. Daily internal supervision is carried out by the supervisory level starting from the Overseer, Division Assistant, Assistant Head, to the Estate Manager. Internal operational audits are conducted every 6 months, operational audits evaluate the operational and administrative operations of plantations and mills. Whereas an RSPO internal audit is carried out every 6 months to evaluate the implementation of sustainability procedures in plantations and factories. Financial audits of public accountants are conducted once a year to ensure the use or costs used are in accordance with the rules set by the company. Furthermore, management representatives (Assistant, Managers, and related Superiors) regularly visit inspectorates to control the implementation of procedures.

All of the Unit of Certification operational activities are recorded in the form of Monthly Reports for plantations and factories. The operational activity report is a daily activity report. This report is a routine report prepared by the plantation and mill management unit and submitted to top management.

3.3.3

The last internal audit for RSPO and SCCS was conducted on 25 – 30 August 2021. This assessment including contractor. Based on internal audit report it's known there are 16 non-conformity that has been complied by management.

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 company has an environmental impact assessment document, as follows:

- The environmental impact analysis which has been compiled in 1998 on behalf of PT Kridatama Lancar (15,500 hectare) and PT Teguh Sempurna (16,000 hectare) and Mill with the capacity of 2 x 40 tons FFB per hour. There's an increasing of capacity which has been 60 tons of FFB / hour and has been approved by the Environmental Agency of Kalimantan Tengah Province No. 660/614/II/BLH on 10 August 2012 and elucidated regarding to the increasing activity of mill capacity as much 60 tons of fresh fruit bunch per hour didn't need the amendment or preparation environmental document.
- Environmental Permit for Processing of Palm Kernels and Biogas Utilization with a production capacity of 150 tons of kernel/day and 1000 MWH according to Decree No. 188.45/338/2014 dated November 3, 2014.
- The Certificate Holder has document of Social Impact Assessment. The assessment process was done on October 2009 and the scopes of study are impact of plantation and mill operation to workers and community adjacent of plantation area. The assessment and reported was carry out by AKSENTA Consultant on 14 to 22 August 2009. This document was explained of negative and positive impact of plantation and mill operation to social aspect and the recommendation for negative impact reduction and increasing of positive impact.
- Social and Environmental Impact Analysis of Replanting in PT TSA for period 2014 – 2017. Carried out by third party "Aksenta" on November 2014 – January 2015.
- HCV identification was carried out on August 2009 through cooperation with competent third party "Aksenta". The HCV assessment used standard and method refers to RSPO endorsed HCV Assessment Toolkit of 2008.

Based on the above documents, it has included an explanation of the important impacts on the environment from plantation and factory activities, including: impacts of road construction and transportation, impacts on biological components (vegetation and animals), disturbances of biodiversity, impacts in the form of pests and diseases, including health and safety in the environment work.

Regarding social aspect the Certificate Holder has document of Social Impact Assessment. The assessment process was done on October 2009 and the scopes of study are impact of plantation and mill operation to workers and community adjacent of plantation area. The assessment and reported was carry out by AKSENTA Consultant on 14 to 22 August 2009. This document was explained of negative and positive impact of plantation and mill operation to social aspect and the recommendation for negative impact reduction and increasing of positive impact. There was showed also the minutes meeting of consultation process with community surround the company. The evidence was consisting of Attendant List of village member on Focus Group Discussion as phase of data gathering for Social Impact Assessment Report. SIA documents has been involving all affected parties including female and workers

Based on interview with related stakeholder that known, there is no significant issue was not raised in Social Impact Assessment. In 2014 the company has compiled a social impact study for replanting activities. The activity was carried out by Aksenta to determine the environmental and social impact of the activities of replanting.

3.4.2

An Environmental Management and Monitoring Plan has been determined as integrated part of EIA document. The aspects to be managed and monitored were soil erosion, decrease of river water, decrease of air quality and noise, disturbance on flora biodiversity, disturbance on wildlife habitat, disturbance on aquatic biota, social and cultural impact, community health, as well as fire risk and replanting .

The company shows the management plan has been developed and evaluated with stakeholder in a meeting with residents of the villages of Pantap, Sahabu, Tabion and Kapuk on July 9, 2019. From the results of the meeting, the company prepared a 2019-2020 Social Impact management plan as follows the Employment Aspects, Public Services, Community Economic Development, FPIC & conflict resolution and environmental aspects. The plan has been explained about the types of activities, farming, impact occurs (direct or derivative), the action plan and the realization of activities. Furthermore The company has conducted periodic reviews every 2 years related to its Social Impact Management and Monitoring Plan. The review process was carried out by involving the participation of the affected parties through a questionnaire. However, based on the results of the 2021 review, it is known that:

- The participatory method carried out has not fully covered all the factors that can cause social impacts (both positive and negative) such as use and access rights, traditional rights or customary rights owned by indigenous peoples, to the latest issues developing in the community. around the company's operational area.
- Sample representation is not fully representative of all affected parties (including representatives of women, migrants, new villages/new communities (PDR), workers (local, migrants, *KHT or KHL*) to identify sources of impact and potential social impacts, and determine management recommendations and social impact monitoring.
- There is not enough evidence that the results of the management and monitoring of social impacts carried out by the company in the previous period have become a benchmark in the identification of the latest monitoring and management of social impacts.

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

- Pay special attention to the indirect impacts caused by the company, for example, the dynamics of the social development of new community settlements around the company's area which has an impact on operational activities and company image.
- Attention to the impact of the company's operational activities and efforts to minimize it, for example for oil palm replanting activities
- The existence of an occupation area / enclave in the company area
- Employee status and relationship with the company (*SKU, PKWT, Contractor*)
- Dissatisfaction with the CSR program run by the company

Based on that's explanation can be concluded if review process method does not involve the participation of all affected parties, so there are several issues which have not been monitored and managed in a comprehensive and integrated manner. Based on that's explanation raised **Non-conformity No.2022.02 with Minor Category**

3.4.3

The company shows an electronic receipt of environmental management report for semester 2 of 2021 PT TSA which has

been reported to the Environmental Agency of Central Kalimantan Province and Ministry of Environment and Forestry of Indonesia on 16 March, 2022. The aspects to be managed and monitored were soil erosion, decrease of river water, decrease of air quality and noise, disturbance on flora biodiversity, disturbance on wildlife habitat, disturbance on aquatic biota, social and cultural impact, community health, as well as fire risk and replanting . This is in accordance with the company's Environmental Management and Monitoring matrix.

Based on public consultation with elderly in Dusun Tabion (previous land owner), Kapuk Village and Pantap Village obtained information that the company has made efforts to develop the surrounding community through CSR programs, acceptance of local workers, local contractor, etc. In addition, it is known that so far the relationship between the company and the community has run quite well and harmoniously. Communication between the company and the village is quite good.

3.4.2	Status: Non-conformity No.2022.02 with Minor Category
-------	--

3.5
A system for managing human resources is in place.

3.5.1
The system implemented by the certification unit for recruitment, selection, promotion, retirement, and termination of employment is available to employees in accordance with the applicable regulations contained in the company regulation period 2021-2023 approved by GM HRM and Manpower Agency on January 2020. For example, in the process of retirement and termination of employment, it is stated that every worker has the right to work protection in accordance with the provisions of the applicable labor regulations.

Based on the results of interviews with workers and worker representatives (LKS Bipartite and Gender Committee), it is known that workers have understood several points stated in the work agreement and company regulations, such as related to working days and hours, calculation of overtime, wages, social security, and others. Company regulation copy is available in LKS Bipartite.

3.5.2
Employment procedures are carried out and records are maintained, which are shown in the normal pension payment document for employees of Division 2 HTE on behalf of PU (initials), dated May 20, 2011, where the person concerned has reached the age of 55 on May 15, 2021. This is in accordance with Company Regulations Article 11 paragraph 8.

Based on the results of document review, interviews with worker representatives (LKS Bipartite and Gender Committee), it is known that employment procedures have been implemented and documented such as documented employee recruitment, payment of wages and overtime are in accordance with the provisions and there is an assessment of work performance. During an audit there is example a retirement worker with criteria as explain in company regulation, such as; age 55 years old. The retire payment has been paid on 20 May 2021 in accordance with regulation.

	Status: Comply
--	-----------------------

3.6
An Occupational Health and Safety (H&S) plan is documented, effectively communicated and implemented.

3.6.1
The certification unit has carried out a risk assessment to identify OHS problems through the HIRAC document on the estate which was last updated March 15, 2021, and the mill was last updated on March 21, 2021. The document has explained the type of work, potential hazards, effects, risks, risk control, preventive measures, and management efforts. HIRAC assessment is conducted in every 2 years. If any accident occurred, the safety officer shall identify, investigate, evaluate, take corrective action using the triangle control principle, and updating the HIRAC.

HIRAC has identified all activities both in the estate and at the factory, for example for processing activities, maintenance, sorting and grading, workshops, integrated pest control, handling of chemical hazardous and hazardous waste, harvesting activities, plant care, fertilization, etc.

The realization of the program, for example, is as follows:

- Unit certification providing of OHS facilities and infrastructure such as free PPE, availability of fire extinguishers and hydrants, first aid kits, safety signs, clinics with paramedics.

- OHS inspections such as monitoring of fire extinguishers, first aid kits, machines for estate and mills that are routinely carried out every month.

3.6.2

The company monitors the effectiveness of the OHS plan regularly in every month by doing P2K3 meetings. One example is the monthly P2K3L meeting which will be held on February, 2022. In the P2K3 meeting, it was discussed about work safety, occupational health, employee welfare, and others. The meeting also discussed suggestions for improvement.

Status: Comply

3.7

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

3.7.1, 3.7.2

There is a documented training program that covers aspects of the RSPO principles and criteria in the 2022 Training Matrix document, which are shown as follows:

- Harvesting training for harvesters, foreman I, and Assistant is planned for April 2022
- Fertilization training for fertilizers, fertilizer foreman, warehouse employees, foreman I, and assistants is planned for June 2022
- Pesticide application training for herbicide applicators and foreman, foreman I, and assistant is planned for October 2022
- First aid training for harvest foreman, workshop employees, security, foreman I, and assistant is planned for September 2022
- For contractor there was several trainings held in 2021 such as; FFB processing, FFB quality criteria, grading, and emergency respons.

Based on the results of field observations and interviews with workers such as warehouse staff and contractor workers related to handling pesticides, interviews with herbicide applicators related to safe work practices, and fertilizers related to waste handling, it is known that the interviewed workers understand aspects related to their respective jobs. This unit also didn't have smallholder/outgrower.

Records of training are maintained by the unit of certification, as shown below:

- Basic FFB processing training at Pemantang Factory, March 04, 2021, which was attended by 18 participants
- Training on FFB quality criteria at Pemantang Factory, March 01, 2021, which was attended by 46 participants
- Pesticide Application Training at Pemantang Estate, 22 November 2021
- Fertilizer Training at Pemantang Estate, September 1, 2021
- PT TSA Pest and Disease Training which was held on July 9, 2020, attended by 52 participants.
- Spraying training at Pemantang Estate on March 16, 2020, the training was attended by 17 foremen and spray workers
- Spraying training at Kawan Batu Estate on May 23, 2020, which was attended by 22 foremen and spray workers.

3.7.3

The company showed the latest SCCS training records which were conducted on 04 August 2020. The training was attended by administrative staff, estate workers (clerks), weighbridge operators, and people in charge of sustainability. The training materials were in the form of an introduction to the RSPO SCCS system as well as implementations and documentations (data recording, dispatch of CSPO and CSPK). the results of interviews with Head of Administration and weighbridge operator showed that workers have already known the duties and responsibilities of each in the implementation of SCCS in accordance with the procedure.

Status: Comply

3.8

Supply Chain Requirements for Mills

3.8.1; 3.8.2

Pemantang Factory implementing SCCS Module IP. Based on verification document and interview with management, Pemantang Factory (PMF) only received and processed FFB from RSPO certified estate. The FFB supplied from own

estate; consist of Pematang Estate, Hatantiring Estate, Kawan Batu Estate and Batang Garing Estate and certified estate under management of PT Kridatama Lancar Subsidiary of Sime Darby Plantation Berhad (RSPO Certified area),

3.8.3

Estimated certified product recorded in the last Assessment Report and Certificate and updated in the RSPO Palm Trace. The actual certified product has been verified during this assessment. The estimates of certified production for the next license period also have been set, in a reasonable amount considering the last year's production. The data are shown in the following table:

Product	Last Projected Certified Volume (Ton)	Actual Production July 2019 to February 2022 (MT)	Estimate Production next 12 months (MT)
FFB	561,900	733,138.30	280,000
CSPO	160,406	157,613.34	61,600
CSPK	33,428	32,316.32	12,600

Since the last period of assessment, Pematang Factory applied scenario 4 in accordance with RSPO Contingency Audit Procedures, and there is no new license since issued after ASA 1.3 (2019) assessment. Normally recertification of this audit shall be conducted in early 2021 however due to Covid 19 pandemic the recertification assessment was postponed and conducted in 2022. with there is no new license since the expired period, palm trace id of PT TSA extended every three months since the license expired (04 July 2020) and the volume of certified products will be added according to the request of the certification unit. During the period of 2020 and 2021 there are several additional RSPO Products for example:

Dated	Additional Volume (MT)			
	FFB Estate	FFB scheme or associated	CSPO	CSPK
01-February-2021	-	-	38,936.6	8,545.97
12-January-2022	143,700	-	34,470	6,023

3.8.4

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

Member Information	
Member Name	Sime Darby Plantation - Pematang POM, PT TSA
Member ID	RSPO_PO1000000314
Member Country	INDONESIA
Member Category	Oil Mill
Core Product	Palm Oil

License Information	
License ID	CB93408
Issued By	PT Mutuagung Lestari
Issued On	11/07/19
Start Date	11/16/2019
End Date	10/04/2022
License Status	Active

All transaction has been announced to RSPO IT Platform and confirmed shipped. During license it was known there is product sold as RSPO certified and non-certified/conventional as described in indicator 3.8.8 and 3.8.16. The company

has been removed of certified stock for products sold as conventional.

3.8.5

The Certificate Holder has RSPO SCCS Procedure in the document RSPO Supply Chain Certification Manual (SCCS-td/RSPO/PSQM/02 rev 01 dated 02 July 2020) that has been authorized by manager PSQM. The procedure rules all element related SCC aspects covering the Inform flow chart of mill business process starting from FFB acceptance to CPO dispatch, internal audit, document retention period, certified CPO selling, logo and trademark use, business communication, product complaint mechanism, and management review etc. Based on document verification it was known the procedure has been referring to latest standard of SCCS. Furthermore, the procedure has covered all aspects in SCCS MB model. the results of interviews with Head of Administration and weighbridge operator showed that workers have already known the duties and responsibilities of each in the implementation of SCCS in accordance with the procedure

3.8.6

Internal Audit procedures are ruled in on RSPO Supply Chain Certification Manual (SCCS-td/RSPO/PSQM/02 rev 01 dated 02 July 2020) which describes Internal audits are conducted at least annually to ensure: the organization complies with RSPO SCCS requirements and RSPO Market Communication & Claim documents. Where the internal audit is done at least 2 months before the external audit. The internal audit results are included in the management review conducted at least once a year.

The last internal audit was conducted on 25 – 30 August 2021. Based on the internal audit there are two (2) non-conformity regarding SCCS requirements about Supporting documents about selling certified products and Separation between products sold as conventional and certified. All non-conformity has been followed up and evaluated by the unit of certifications

3.8.7

Based on documents verifications and interviews with management it was known if all FFB processed are sourced from RSPO certified and Pematang Factory does not receive FFB from another uncertified unit. Documentation for the Sustainable Crude Palm Oil (Sustainable CPO) consists of daily record of the FFB acceptance, the daily record of CPO production, which is classified as the CSPO, sale record, stock record that has been reconciled with the FFB acceptance, monthly production, and sale and annual recapitulation.

Period July – Dec 2019			
Month	FFB (MT)		
	RSPO Certified	Non-Certified	Total
Jul-19	27,514.59	-	27,514.59
Aug-19	26,647.82	-	26,647.82
Sep-19	25,024.33	-	25,024.33
Oct-19	25,965.54	-	25,965.54
Nov-19	24,407.71	-	24,407.71
Dec-19	23,208.77	-	23,208.77
Total	152,768.76	-	152,768.76
Period Jan – Dec 2020			
Month	FFB (MT)		
	RSPO Certified	Non-Certified	Total
Jan-20	22,519.34	-	22,519.34
Feb-20	20,440.33	-	20,440.33
Mar-20	20,343.42	-	20,343.42
Apr-20	21,905.41	-	21,905.41
May-20	22,219.53	-	22,219.53

Jun-20	26,218.23	-	26,218.23
Jul-20	21,103.49	-	21,103.49
Aug-20	21,322.84	-	21,322.84
Sep-20	23,999.45	-	23,999.45
Oct-20	24,549.28	-	24,549.28
Nov-20	25,466.87	-	25,466.87
Dec-20	25,548.83	-	25,548.83
Total	275,637.02	-	275,637.02
Period Jan – Dec 2021			
Month	FFB (MT)		
	RSPO Certified	Non-Certified	Total
Jan-21	23,217.23	-	23,217.23
Feb-21	20,309.23	-	20,309.23
Mar-21	24,440.38	-	24,440.38
Apr-21	23,673.36	-	23,673.36
May-21	22,961.55	-	22,961.55
Jun-21	24,596.13	-	24,596.13
Jul-21	21,567.72	-	21,567.72
Aug-21	22,731.25	-	22,731.25
Sep-21	20,287.72	-	20,287.72
Oct-21	18,297.94	-	18,297.94
Nov-21	20,412.37	-	20,412.37
Dec-21	20,698.42	-	20,698.42
Total	263,193.30	-	263,193.30
Period Jan – February 2022			
Month	FFB (MT)		
	RSPO Certified	Non-Certified	Total
Jan-22	22,124.85	-	22,124.85
Feb-22	19,414.37	-	19,414.37
Total	41,539.22	-	41,539.22
GRAND TOTAL	733,138.30	-	733,138.30

Estimated certified product recorded in the last Assessment Report and Certificate and updated in the RSPO Palm Trace. The actual certified product has been verified during this assessment. The estimates of certified production for the next license period also have been set, in a reasonable amount considering the last year's production. The data are shown in the following table:

Product	Last Year Projected Certified Volume (Ton)	Actual Production August 2019 – July 2021 (MT)	Estimate Production next 12 months (MT)
FFB	561,900	733,138.30	280,000
CSPO	160,406	157,613.34	61,600
CSPK	33,428	32,316.32	12,600

Since the last period of assessment, Pematang Factory applied scenario 4 in accordance with RSPO Contingency Audit Procedures, and there is no new license since issued after ASA 1.3 (2019) assessment. Normally recertification of this audit shall be conducted in early 2021 however due to Covid 19 pandemic the recertification assessment was postponed

and conducted in 2022. with there is no new license since the expired period, palm trace id of PT TSA extended every three months since the license expired (04 July 2020) and the volume of certified products will be added according to the request of the certification unit. During the period of 2020 and 2021 there are several additional RSPO Products as follows:

Dated	Additional Volume (MT)			
	FFB Estate	FFB scheme or associated	CSPO	CSPK
01-February-2021		-	38,936.6	8,545.97
12-January-2022	143,700	-	34,470	6,023

3.8.8

Documentation for the Sustainable Certified Product (CSPO and CSPK), consists of a daily record of the FFB acceptance, a daily record of certified production, which is classified as the CSPO and CSPK, a sales record, a stock record that has been reconciled with the FFB acceptance, monthly production and sale and annual recapitulation. Based on documents verifications and interviews with management units obtained information since July 2019 there are 32,011.20 MT CSPO and 30,374.36 CSPK sold as certified products and there are 119,749.30 MT CSPO and 1,338.17 MT CSPK sold as conventional

Documents verification and interview during an audit it was known the claimed RSPO product of CSPO and CSPK is no longer than 3 months since the product delivered. Those documents cover information's of delivery date, description of product and supply chain model, product quantity, identification number, certificate number, sender's name, and address of the seller, for example:

1. CSPK
 - Shipping Announcement for CSPK volume 776.83MT dated 21 September 2021, with transaction TR-024f570d-7dde, shipping date on 10 September 2021 with buyer PT Sime Darby Plantation – PT Teguh Sempurna – Pemantang Kernel Crushing Plant
2. CSPO
 - Shipping Announcement for CSPO volume 1,496.64 MT dated 16 August 2021, with transaction ID TR-0f20763d-c400, Seller Contract Number 00784/TSA/KTR- CPO/LOK/VII/2021, shipping date in 13 August 2021 with buyer PT PT Simerdarby Oils Pulau laut Refinery

Furthermore, the unit of certification can present document related claim product such as delivery order and weighbridge slip that informed CSPO products that sold, RSPO Certificate Number and SCCS Model (Segregated)

3.8.9; 3.8.10

PMF doesn't outsource refining and crushing activity. The company uses third party contractors for CPO transportation activities. PK transportation are delivered by conveyor to Pemantang Kernel Crushing Plant. For transportation of certified products, the company uses contracting services. Based on the contractor's list, there are 19 contractors to transport CPO. Pemantang Factory has been record the names and contact details of all contractors used for the processing or physical handling of RSPO certified oil palm products

Documents verification it the unit of certification can present Inter office mail to PT Transcoal Pacific Tbk 014/TSA-PMF/IX/2019 regarding Mutual agreement CPO and PK transporting. On that's agreement has been stated to support SCCS the certification body can inspect to transporter to verify data that presented by PT TSA.

3.8.11

Based on document verification and interview with PSQM Assistant, until this assessment there are no new outsources (transporters).

3.8.12

Based on Supply chain procedure known that retention time for supply chain document is 2 years. Records of transaction from the past two years were also available such as sales record of previous license period. The Mill does not purchase RSPO certified oil palm products from outsider. The RSPO product from the Mill were from FFB of its own certified Estates

as summarized in the following table:

FFB

Period July – Dec 2019			
Month	FFB (MT)		
	RSPO Certified	Non-Certified	Total
Jul-19	27,514.59	-	27,514.59
Aug-19	26,647.82	-	26,647.82
Sep-19	25,024.33	-	25,024.33
Oct-19	25,965.54	-	25,965.54
Nov-19	24,407.71	-	24,407.71
Dec-19	23,208.77	-	23,208.77
Total	152,768.76	-	152,768.76
Period Jan – Dec 2020			
Month	FFB (MT)		
	RSPO Certified	Non-Certified	Total
Jan-20	22,519.34	-	22,519.34
Feb-20	20,440.33	-	20,440.33
Mar-20	20,343.42	-	20,343.42
Apr-20	21,905.41	-	21,905.41
May-20	22,219.53	-	22,219.53
Jun-20	26,218.23	-	26,218.23
Jul-20	21,103.49	-	21,103.49
Aug-20	21,322.84	-	21,322.84
Sep-20	23,999.45	-	23,999.45
Oct-20	24,549.28	-	24,549.28
Nov-20	25,466.87	-	25,466.87
Dec-20	25,548.83	-	25,548.83
Total	275,637.02	-	275,637.02
Period Jan – Dec 2021			
Month	FFB (MT)		
	RSPO Certified	Non-Certified	Total
Jan-21	23,217.23	-	23,217.23
Feb-21	20,309.23	-	20,309.23
Mar-21	24,440.38	-	24,440.38
Apr-21	23,673.36	-	23,673.36
May-21	22,961.55	-	22,961.55
Jun-21	24,596.13	-	24,596.13
Jul-21	21,567.72	-	21,567.72
Aug-21	22,731.25	-	22,731.25
Sep-21	20,287.72	-	20,287.72
Oct-21	18,297.94	-	18,297.94
Nov-21	20,412.37	-	20,412.37
Dec-21	20,698.42	-	20,698.42

Total	263,193.30	-	263,193.30
Period Jan – February 2022			
Month	FFB (MT)		
	RSPO Certified	Non-Certified	Total
Jan-22	22,124.85	-	22,124.85
Feb-22	19,414.37	-	19,414.37
Total	41,539.22	-	41,539.22
GRAND TOTAL	733,138.30	-	733,138.30

- CPO

Period July – Dec 2019							
Period	CPO production (MT)		Total	Cert CPO Dispatch (MT)			Total
	Cert	Non Cert		RSPO	Other scheme	Non Cert	
opening stock	3,420.89	-	3,420.89	-	-	-	-
Jul-19	5,680.65	-	5,680.65	4,289.11	-	3,448.17	7,737.28
Aug-19	5,682.21	-	5,682.21	4,594.05	-	-	4,594.05
Sep-19	5,500.62	-	5,500.62	2,731.79	-	4,205.38	6,937.17
Oct-19	5,641.91	-	5,641.91	3,907.91	-	1,644.06	5,551.97
Nov-19	5,308.14	-	5,308.14	3,492.99	-	1,000.37	4,493.36
Dec-19	5,084.25	-	5,084.25	1,500.38	-	3,697.90	5,198.28
Total July - Dec 2019	36,318.65	-	36,318.65	20,516.23	-	13,995.88	34,512.11
Closing stock 2019	1,806.55	-	1,806.55	-	-	-	-

Period Jan – Dec 2020							
Period	CPO production (MT)		Total	Cert CPO Dispatch (MT)			Total
	Cert	Non Cert		RSPO	Other scheme	Non Cert	
opening stock	1,806.55	-	1,806.55	-	-	-	-
Jan-20	5,117.47	-	5,117.47	-	-	4,903.85	4,903.85
Feb-20	4,567.12	-	4,567.12	1,099.35	-	4,153.58	5,252.93
Mar-20	4,394.81	-	4,394.81	1,100.00	-	3,208.73	4,308.73
Apr-20	4,595.15	-	4,595.15	2,301.37	-	3,694.36	5,995.73
May-20	4,625.82	-	4,625.82	1,000.71	-	3,251.81	4,252.52
Jun-20	5,593.26	-	5,593.26	-	-	5,633.40	5,633.40
Jul-20	4,483.38	-	4,483.38	2,002.04	-	2,579.37	4,581.41
Aug-20	4,376.96	-	4,376.96	-	-	4,536.61	4,536.61
Sep-20	5,050.31	-	5,050.31	-	-	4,445.65	4,445.65
Oct-20	5,203.21	-	5,203.21	-	-	5,391.09	5,391.09
Nov-20	5,217.78	-	5,217.78	900.45	-	3,520.77	4,421.22
Dec-20	5,596.18	-	5,596.18	-	-	6,422.32	6,422.32
Total 2020	60,627.99	-	60,627.99	8,403.92	-	51,741.54	60,145.46
Closing stock 2020	482.53	-	482.53	-	-	-	-

Period Jan – Dec 2021

Period	CPO production (MT)		Total	Cert CPO Dispatch (MT)			Total
	Cert	Non Cert		RSPO	Other scheme	Non Cert	
opening stock	482.53	-	482.53	-	-	-	-
Jan-21	4,961.78	-	4,961.78	-	-	4,569.12	4,569.12
Feb-21	4,322.51	-	4,322.51	-	-	4,878.08	4,878.08
Mar-21	5,434.81	-	5,434.81	-	-	6,370.99	6,370.99
Apr-21	5,258.36	-	5,258.36	-	-	4,310.53	4,310.53
May-21	4,939.45	-	4,939.45	-	-	4,100.56	4,100.56
Jun-21	5,322.36	-	5,322.36	-	-	5,696.81	5,696.81
Jul-21	4,712.73	-	4,712.73	1,496.64	-	2,890.73	4,387.37
Aug-21	4,655.44	-	4,655.44	-	-	4,398.70	4,398.70
Sep-21	4,350.32	-	4,350.32	1,594.41	-	2,993.20	4,587.62
Oct-21	3,994.37	-	3,994.37	-	-	4,658.47	4,658.47
Nov-21	4,496.36	-	4,496.36	-	-	4,644.33	4,644.33
Dec-21	4,550.29	-	4,550.29	-	-	4,500.78	4,500.78
Total 2021	57,481.32	-	57,481.32	3,091.05	-	54,012.30	57,103.36
Closing stock 2021	377.97	-	377.97	-	-	-	-

Period Jan – February 2022

Period	CPO production (MT)		Total	Cert CPO Dispatch (MT)			Total
	Cert	Non Cert		RSPO	Other scheme	Non Cert	
opening stock	377.97	-	377.97	-	-	-	-
Jan-22	4,798.30	-	4,798.30	-	-	4,851.00	4,851.00
Feb-22	4,097.04	-	4,097.04	-	-	4,039.60	4,039.60
Total 2022	9,273.31	-	9,273.31	-	-	8,890.61	8,890.61

- PK

Period July – Dec 2019

Period	CSPK production (MT)		Total	Cert PK Dispatch (MT)			Total
	Cert	Non Cert		RSPO	Other scheme	Non Cert	
opening stock	342.16	-	342.16	-	-	-	-
Jul-19	1,244.26	-	1,244.26	1,429.42	-	-	1,429.42
Aug-19	1,266.05	-	1,266.05	1,237.94	-	-	1,237.94
Sep-19	1,232.62	-	1,232.62	1,318.37	-	-	1,318.37
Oct-19	1,273.82	-	1,273.82	-	-	1,338.17	1,338.17
Nov-19	1,131.50	-	1,131.50	1,010.23	-	-	1,010.23
Dec-19	966.65	-	966.65	1,069.27	-	-	1,069.27
Total July -	7,457.06	-	7,457.06	6,065.23	-	1,338.17	7,403.40

Dec 2019							
Closing stock 2019	53.66	-	53.66	-	-	-	-
Period Jan – Dec 2020							
Period	CSPK production (MT)		Total	Cert PK Dispatch (MT)			Total
	Cert	Non Cert		RSPO	Other scheme	Non Cert	
opening stock	53.66	-	53.66	-	-	-	-
Jan-20	1,072.15	-	1,072.15	1,057.07	-	-	1,057.07
Feb-20	984.30	-	984.30	931.90	-	-	931.90
Mar-20	923.69	-	923.69	1,012.58	-	-	1,012.58
Apr-20	945.49	-	945.49	843.77	-	-	843.77
May-20	981.30	-	981.30	966.82	-	-	966.82
Jun-20	1,199.85	-	1,199.85	1,192.53	-	-	1,192.53
Jul-20	949.39	-	949.39	901.40	-	-	901.40
Aug-20	955.52	-	955.52	811.69	-	-	811.69
Sep-20	1,031.87	-	1,031.87	1,315.26	-	-	1,315.26
Oct-20	1,090.94	-	1,090.94	1,034.36	-	-	1,034.36
Nov-20	1,024.01	-	1,024.01	985.07	-	-	985.07
Dec-20	1,114.38	-	1,114.38	1,097.16	-	-	1,097.16
Total 2020	12,326.53	-	12,326.53	12,149.61	-	-	12,149.61
Closing stock 2020	176.92	-	176.92	-	-	-	-
Period Jan – February 2021							
Period	CSPK production (MT)		Total	Cert PK Dispatch (MT)			Total
	Cert	Non Cert		RSPO	Other scheme	Non Cert	
opening stock	176.92	-	176.92	-	-	-	-
Jan-21	989.66	-	989.66	969.07	-	-	969.07
Feb-21	877.69	-	877.69	1,005.39	-	-	1,005.39
Mar-21	993.36	-	993.36	855.09	-	-	855.09
Apr-21	981.04	-	981.04	1,068.77	-	-	1,068.77
May-21	1,002.36	-	1,002.36	776.83	-	-	776.83
Jun-21	1,053.20	-	1,053.20	1,348.23	-	-	1,348.23
Jul-21	915.77	-	915.77	710.73	-	-	710.73
Aug-21	918.50	-	918.50	1,059.40	-	-	1,059.40
Sep-21	858.10	-	858.10	757.29	-	-	757.29
Oct-21	809.23	-	809.23	832.76	-	-	832.76
Nov-21	913.99	-	913.99	1,084.31	-	-	1,084.31
Dec-21	887.98	-	887.98	870.47	-	-	870.47
Total 2021	11,377.80	-	11,377.80	11,338.34	-	-	11,338.34
Closing stock 2021	39.46	-	39.46	-	-	-	-
Period Jan – Dec 2022							

Period	CPO production (MT)		Total	Cert CPO Dispatch (MT)			Total
	Cert	Non Cert		RSPO	Other scheme	Non Cert	
opening stock	39.46	-	39.46	-	-	-	-
Jan-22	926.88	-	926.88	821.18	-	-	821.18
Feb-22	800.79	-	800.79	-	-	-	
Total	1,727.67	-	1,727.67	821.18	-	-	821.18

Based on table above, can be summarized as table below:

a. Tonnage Product

Description	Volume (MT)
Certified FFB	733,138.30
CSPO Production	157,613.34
CSPK Production	32,316.32

b. Product Selling

Description	Volume (MT)
CSPO sold as RSPO certified product	32,011.20
CSPK sold as RSPO certified product	30,374.36
CSPO sold under another scheme	0
CSPK sold under another scheme	0
CSPO sold as conventional	119,749.30
CSPK sold as conventional	1,338.17

3.8.13; 3.8.14

Based on document verifications and interview with management it was known if there is no conversion rate of production of CPO (OER) and PK (KER) that applied by the mill. The production of CPO (OER) and PK (KER) are based on actual daily, monthly, and yearly production.

3.8.15

Pematang Factory implementing SCCS Module IP. Based on verification document and interview with management, Pematang Factory (PMF) only received and processed FFB from RSPO certified estate. The FFB supplied from own estate; consist of Pematang Estate, Hatantiring Estate, Kawan Batu Estate and Batang Garing Estate and certified estate under management of PT Kridatama Lancar Subsidiary of Sime Darby Plantation Berhad (RSPO Certified),

3.8.16

Documentation for the Sustainable Certified Product (CSPO and CSPK) consists of a daily record of the FFB acceptance, a daily record of certified production, which is classified as the CSPO and CSPK, a sales record, a stock record that has been reconciled with the FFB acceptance, monthly production and sale and annual recapitulation. Based on documents verifications and interviews with management units obtained information since July 2019 there are 32,011.20 MT CSPO and 30,374.36 CSPK sold as certified products and there are 119,740.30 MT CSPO and 1,338.17 MT CSPK sold as conventional

Documents verification and interview during an audit it was known the claimed RSPO product of CSPO and CSPK is no longer than 3 months since the product delivered. Those documents cover information's of delivery date, description of product and supply chain model, product quantity, identification number, certificate number, sender's name, and address of the seller, for example:

1. CSPK
 - Shipping Announcement for CSPK volume 776.83MT dated 21 September 2021, with transaction TR-024f570d-7dde, shipping date on 10 September 2021 with buyer PT Sime Darby Plantation – PT Teguh Sempurna – Pematang Kernel Crushing Plant
2. CSPO
 - Shipping Announcement for CSPO volume 1,496.64 MT dated 16 August 2021, with transaction ID TR-0f20763d-c400, Seller Contract Number 00784/TSA/KTR- CPO/LOK/VII/2021, shipping date in 13 August 2021 with buyer PT PT Sime Darby Oils Pulau laut Refinery

Furthermore, the unit of certification can present document related claim product such as delivery order and weighbridge slip that informed CSPO products that sold. For the products that's sold as conventional the unit certification can present evidence if the product has been remove or allocated to credit in the RSPO IT Platform (Palm Trace), that described in the following table:

Stock Transaction ID	Date	Product	Transaction Type	Volume (MT)
ST-TR-94c0cd50-eb72	14-08-2020	CSPO	Credit Allocation	29,692
ST-TR-be425215-84d2	14-08-2020	CSPO	Credit Allocation	9,708
ST-TR-87ca0b92-996d	23-03-2022	CSPO	Remove From Certified Stock	64,560
ST-TR-e5218bc4-c398	23-03-2022	CSPO	Remove From Certified Stock	8,891

3.8.17

Based on management representative interview and document review, the mill not use trademark on its sales activities and communication

Status: Comply

PRINCIPLE #4 RESPECT COMMUNITY AND HUMAN RIGHTS AND DELIVER BENEFITS

4.1

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

4.1.1

The policies regarding human rights described in the Sime Darby human rights charters February 2017 that's described respect the rights of their employees, workers in their operations and communities through the commitments which include, but are not limited to providing equal opportunities, respecting freedom of association, eradicating any form of exploitation, ensuring favorable working conditions, enhancing safety and health, respecting community rights and the rights of indigenous people, protecting the rights of vulnerable people, protecting the rights of children, eliminating violence and sexual harassment. Furthermore, the policy regarding prohibiting retaliation against Human Rights Defenders (HRDs) ruled in the Code of Business Conduct (February 2022) Which described The Group does not tolerate retaliation against individual who discloses any actual or suspected violations in good faith. The spokes did not suffer harassment, retaliation, or adverse employment consequence for speaking up or cooperating in an investigation.

This policy has been conveyed and socialized to workers at least once a year at safety town hall activities or once a month through morning briefing activities. The last socialization was held on 29 July 2020 and was attended by a total of 81 stakeholder representatives. The speaker in the socialization was PSD staff.

4.1.2

Based on interview with stakeholder such as government agency, community around, labor union, and workers known that there is no indication of human rights violation. Based on field visit also known that the company does not use mercenaries and paramilitaries in its operations.

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

The unit of certification has a mutually agreed system, is open to all affected parties, can resolve disputes effectively, in a timely and appropriate manner, and ensures the protection of the identity (anonymity) of the complainant, human rights defenders, community representatives, whistleblowers, who some of them are listed in the Communication Procedure document, document number SOP/TSA/056, which among others explains the list of documents that can be accessed by the public, scope, internal communication, external communication, feedback, general information, the person in charge, procedures and so on. In addition, it is also stated in the SOP document for the Grievance Handling Mechanism against the Management of PT TSA, document number for Administrative SOP, dated March 04, 2009. The company has shown evidence of socialization of the procedure to stakeholders, including that which was carried out on September 13, 2021. Based on the results of interviews with workers and workers' representatives (LKS Bipartite and Gender Committee), it was stated that complaints can be submitted to their direct superiors, or to LKS Bipartite or to the gender committee (special complaints on women's issues).

In general, all field management staff (assistant managers) and workers' supervisors directly play a role in managing the handling of worker complaints.

4.2.2

There is a procedure in place to ensure the system is understood by affected parties, including those who cannot read and write, which is stated in the Communication Procedure, Policy No. 725/PSQM-ESH/2017, revision number 04, January 27, 2017, which explains that communication and information media can in the form of official letters/emails, advertisements, brochures, direct visits, surveys, and others.

In general, all field management staff (assistant managers) and workers' supervisors directly play a role in managing the handling of worker complaints.

In terms of duties and responsibilities, Plantation Service Department (PSD), the Manager, General Manager are responsible for hearing and recording all complaints and dissatisfactions and play a role in making decisions on handling complaints and aspirations.

The company has appointed people who act as communicators between the company and society so that people who cannot read/write can be informed by the relevant communicators.

4.2.3

As explained in the previous indicators, it is known that there are procedures related to communication and consultation procedures. Regarding how the certification unit informs the progress of complaint handling to the parties, this is done in several ways such as through a complaint and dissatisfaction recording form or with a company representative appointed as a liaison between the two parties who can hold formal and informal meetings as well as direct communication or by telephone. Based on interview with stakeholders (internal and external) found that there was no any complaint and grievance recorded.

4.2.4

As explained in the previous indicators, it is known that there are procedures related to communication and consultation procedures. Regarding how the certification unit informs the progress of complaint handling to the parties, this is done in several ways such as through a complaint and dissatisfaction recording form or with a company representative appointed as a liaison between the two parties who can hold formal and informal meetings as well as direct communication or by telephone. Based on interview with internal and external stakeholder it is known that all parties understood about the procedure of complaints handling.

Status: Comply

4.3

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

4.3.1

Contributions to the development of the surrounding community include the existence of a CSR program. In the SOP Guidelines for Sustainable Plantation Management Number 724/TQEM-SPMS/09 dated 27 August 2010 Chapter I point

1.5 states that the company has a commitment to identify, through consultation, potential social benefits and determine how to exploit this potential so that it becomes something that is profitable for the company. as well as the local community.

The company has compiled a CSR budget estimates for the period 2021, categorize into five groups of items, namely: education program, donations, health, infrastructure and development, economic empowerment. In the preparation for CSR programme has involved the local community when company determined CD/CSR priorities. CSR program can be proved by CSR monitoring document, for example;

- Religion: Submission fee for church renovation on 31 November 2021
- Educational program: teachers honors on 06 October 2021
- Health: ambulance fuel on 31 December 2021
- Infrastructure: road maintenance on 30 June 2021
- etc

Based on public consultation with elderly in Dusun Tabion (previous landowner), Kapuk Village, Sahabu Village and Pantap Village obtained information that the company has made efforts to develop the surrounding community through CSR programs, acceptance of local workers, local contractor, etc. In addition, it is known that so far, the relationship between the company and the community has run quite well and harmoniously. Communication between the company and the village is quite good.

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

Formerly, the area of PT TSA was forest concession company (Natural Forest Management Permit / HPH) namely Sarmiento Parakanca Timber, Prakanca Djaya Raya and Inhutani III. Based on Forest Map Governance Agreement (*Peta TGHK*) province of Kalimantan Tengah in 1990 the location of PT TSA is Conversion Production Forest (*Hutan Produksi Konversi*). For the area in 8 October 1996 Ministry of Forestry has released the area from a conversion production forest area (SK 640.KPTS-II/1996) for plantation development PT TSA. Based overlay between operational map of PT TSA with Provincial-level Spatial Plan (*RTRWP*) map Province of Kalimantan Tengah 2015 the area of PT TSA in other uses land (APL).

Based on documents verifications, interview with managements, there is no changes related land ownership and concession documents. The certificate holder has had land use rights No 10 valid until 9 August 2034, for area covering 16,601.657 Ha. Based on the statement area document, the area managed by PT TSA is 16,601.657 Ha, which divided into planting area and unplanted area.

4.4.2

Even though the area of PT TSA is from a forest concession company, the company has been carrying land compensation to the affected parties. The land compensation was carried out from 2006 to 2009 which was divided into 12 stages with the total area ± 2,091.19 Ha. The CH has shown that land acquisition has been done through negotiation. For example, the land dispute resolution in 2009 has been done through negotiation. Based on the results of interviews with the Previous landowners on Pantap Village, Sahabu Village, and Kapuk Village obtained information if all compensation process has been held with transparent regarding the mutual agreement. The whole area managed by the company has been compensated. The compensation process involved all community witnessed also by the Village Head, Sub-district head, and other relevant parties. Records of land compensation process consist of document of land identification and inventory, land location maps, statement of the release of land rights by the owner, Receipt of Payment, Minutes of compensation/Compensation, and witnesses. This is stored in their respective estate according to the location of the land. Until the audit was carried out, there was no written complaint from the community regarding the land dispute.

4.4.3; 4.4.4; 4.4.5

Company can show HGU maps published *Badan Pertanahan Nasional* based on Peta Bidang Tanah No. D.I.302:04/1999 dated 19 April 1999. There is no change from previous assessments related to Procedures of land conflict resolution or land acquisition mentioned in the Occupational Land Release Procedure (No. 343/PSD-OKUP/10). The Procedure

explains that the settlement of the land dispute was conducted through the negotiation phase between the company and the party claiming the land and witnessed by various parties.

Formerly, the area of PT TSA was forest concession company (Natural Forest Management Permit / HPH) namely Sarmiento Parakanca Timber, Prakanca Djaya Raya, and Inhutani III. Based on Forest Map Governance Agreement (Peta TGHK) province of Kalimantan Tengah in 1990 the location of PT TSA is Conversion Production Forest (Hutan Produksi Konversi). For the area on 8 October 1996 Ministry of Forestry has released the area from a conversion production forest area (SK 640.KPTS-III/1996) for plantation development PT TSA. Based overlay between the operational map of PT TSA with Provincial-level Spatial Plan (RTRWP) map Province of Kalteng 2015 the area of PT TSA in other uses land (APL).

As mentioned in indicator 4.4.2 PT TSA are a long-established company that has been started operationally in the early period of 1990, were on that's period, the FPIC concept not yet available. However, based on interviews with management as well as previous landowner, obtained information if all compensation process has been held with transparent regarding the mutual agreement. The whole area managed by the company has been compensated. The compensation process involved all community witnessed also by the Village Head, Sub-district head, and other relevant parties. Interview results with customary landowners found that he has free access to information regarding the impacts of the palm oil plantation project. There were a long communication and discussion between community representatives, the government, and the company during the project preparation. Furthermore, they stated that Company never conducted any intimidation/coercion and never use paramilitary during the negotiation process. They have enough time to negotiate and meet the decision to become part of palm oil plantation development. The process has been made in Bahasa, Local Language, and provided by participatory mapping.

Based on documents verifications as well as field observations its was known there are no indications if the company plant and maintain oil palm outside the permits area.

4.4.6

As mentioned in indicator 4.4.2 PT TSA are a long-established company that has been started operationally in the early period of 1990, were on that's period, the FPIC concept not yet available. Based on documents verifications, interviews with communities, and management obtained information until the audit was carried out, there is no expansion of area so there is no land compensation activity. last compensation has been carried out in 2009. Records of land compensation process consist of document of land identification and inventory, land location maps, statement of the release of land rights by the owner, Receipt of Payment, Minutes of compensation/Compensation, and witnesses. Beside that the implementation of FPIC demonstrated also 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

Based on document review of areal statement, interview with management, and field observation, it is known that there is no new planting activity after 1 January 2010. The planting year after 2010 is classified as second cycle.

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 procedure explains that the Identification method by consult or communicate with local government. The settlement of land dispute and identifying peopled entitled to compensation was conducted through the negotiation phase between the company and the party claiming the land and witnessed by various parties. There is no change from previous assessments related Procedure's land conflict resolution or land acquisition that mentioned in Occupational Land Release Procedure (No. 343/PSD-OKUP/10). The Procedure explains that the settlement of land dispute and identifying peopled entitled to compensation was conducted through the negotiation phase between the company and the party claiming the

land and witnessed by various parties. Until now, there is no expansion of the company area. The land acquisitions have been conducted in the period before 2010, based on the HGU Decree and interview with management, the process of land acquisition until the granted of HGU has been in accordance with the law and with participatory mapping (cadastral mapping and identification), because the HGU process has been conducted through by Land Agency inspection.

4.6.2;

As mentioned in indicator 4.4.2 PT TSA are a long-established company that has been started operationally in the early period of 1990, were on that's period, the FPIC concept not yet available. However, procedure for calculating and distributing fair was conducted through the negotiation phase between the company and each landowner claiming the land and witnessed by various parties.

4.6.3, 4.6.4

Based on documents verifications, interviews with communities, and management obtained information until the audit was carried out, there is no expansion of area so there is no land compensation activity. last compensation has been carried out in 2009 and there's no scheme smallholder program for local community. Records of land compensation process consist of document of land identification and inventory, land location maps, statement of the release of land rights by the owner, receipt of payment, minutes of compensation, and witnesses. Based on interview with pervious land owner report as mention above has been made available to them.

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; 4.7.2

The procedure explains that the Identification method by consult or communicate with local government. The settlement of land dispute and identifying peopled entitled to compensation was conducted through the negotiation phase between the company and the party claiming the land and witnessed by various parties. There is no change from previous assessments related Procedure's land conflict resolution or land acquisition that mentioned in Occupational Land Release Procedure (No. 343/PSD-OKUP/10). The Procedure explains that the settlement of land dispute and identifying peopled entitled to compensation was conducted through the negotiation phase between the company and the party claiming the land and witnessed by various parties

Formerly, the area of PT TSA was forest concession company (Natural Forest Management Permit / HPH) namely Sarmiento Parakanca Timber, Prakanca Djaya Raya and Inhutani III. Based on Forest Map Governance Agreement (*Peta TGHK*) province of Kalimantan Tengah in 1990 the location of PT TSA is Conversion Production Forest (*Hutan Produksi Konversi*). For the area in 8 October 1996 Ministry of Forestry has released the area from a conversion production forest area (SK 640.KPTS-II/1996) for plantation development PT TSA. Based overlay between operational map of PT TSA with Provincial-level Spatial Plan (*RTRWP*) map Province of Kalimantan Tengah 2015 the area of PT TSA in other uses land (APL).

Even though the area of PT TSA is from a forest concession company, the company has been carrying land compensation to the affected parties. The land compensation was carried out from 2006 to 2009 which was divided into 12 stages with the total area ± 2,091.19 Ha. The CH has shown that land acquisition has been done through negotiation. For example, the land dispute resolution in 2009 has been done through negotiation. Based on the results of interviews with the Previous landowners on Pantap Village, Sahabu Village, and Kapuk Village obtained information if all compensation process has been held with transparent regarding the mutual agreement. The whole area managed by the company has been compensated. The compensation process involved all community witnessed also by the Village Head, Sub-district head, and other relevant parties. Records of land compensation process consist of: document of land identification and inventory, land location maps, statement of the release of land rights by the owner, Receipt of Payment, Minutes of compensation/Compensation, and witnesses. This is stored in their respective estate according to the location of the land. Until the audit was carried out, there was no written complaint from the community regarding the land dispute.

Interview results with landowners found that he has free access to information regarding the impacts of the palm oil plantation project. There were a long communication and discussion between community representatives, the

government, and the company during the project preparation. Furthermore, they stated that Company never conducted any intimidation/coercion and never use paramilitary during the negotiation process. They have enough time to negotiate and meet the decision to become part of palm oil plantation development. The process has been made in Bahasa, Local Language, and provided by participatory mapping.

4.7.3

Until now, there is no expansion of the company area. This statement supported by stakeholder community agency.

Status: Comply

4.8

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

4.8.1

As a guidance to resolved land dispute ruled in the land dispute resolution dated 10 October 2008. The procedure described the resolution process if any land conflict.

4.8.2; 4.8.3; 4.8.4

Until this assessment, there were no open conflicts and land disputes within the certification area. This is also in line with the results of interviews with surrounding communities and related agencies during a public consultation, which stating that there were no land conflicts in the company's operational area. The whole area that managed by the company has been compensated. However, based areal statement documents, interview with managements and stakeholder its known there is area covering ± 597.18 Ha that occupied by community due to the landowner not willing to be compensated.

Based on field observation in occupied area in Kawan Batu Estate Estate, it's known if the area is community settlement (Kampong) namely Dusun Tabion which is part of Kapuk Village. Moreover, field observation in the occupation area Block R 7 Hatantiring Estate and Block W60 its known if that area are ex illegal mining and community settlement. For areas that are currently still controlled by the community (occupational area) and have never been compensated the company respects the existence and didn't force to give the land to the company. The area was clearly bounded by roads and ditches.

Status: Comply

PRINCIPLE #5 SUPPORT SMALLHOLDER INCLUSION

5.1

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

5.1.1, 5.1.2, 5.1.3, 5.1.4, 5.1.5, 5.1.6, 5.1.8 & 5.1.9

Based on the results of document review and interviews with management, it is known that Pemantang Factory does not accept FFB from farmers. So, there is no publication of FFB prices.

5.1.7

Equipment for weighing has been periodically verified by an independent third party, some of which are shown in:

- Certificate of Testing Results from the Department of Trade and Industry of Kotawaringin Timur District, number 510.63/038/DPP/SKHP/MET/II/2022, dated 3 February 2022, which among other things explains that Bridge Scales (WB 1) have been tested on 3 February 2022 and valid until January 17, 2023.
- Certificate of Testing Results from the Department of Trade and Industry of Kotawaringin Timur District, number 510.63/039/DPP/SKHP/MET/II/2022, dated 3 February 2022, which among other things explains that Bridge Scales (WB 2) have been tested on 3 February 2022 and valid until January 17, 2023.

Status: Comply

5.2

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

5.2.1, 5.2.2, 5.2.3, 5.2.4 & 5.2.5

Based on the results of document review and interviews with management, it is known that Pemantang Factory does not

accept FFB from farmers.

Status: Comply

PRINCIPLE #6 RESPECT WORKERS' RIGHTS AND CONDITIONS

6.1 Any form of discrimination is prohibited.

6.1.1

A publicly available non-discrimination and equality of opportunity policy that is implemented by preventing discrimination based on ethnicity, caste, nationality, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation, or age, as set out in the Policy Social, which was signed by the Head of Plantation Upstream Indonesia in December 2011.

Based on the results of the review of the employee list, it is known that the composition of workers varies in terms of race/ethnicity, religion, gender, educational background, etc.

Based on the results of field observations, interviews with workers, interviews with LKS Bipartite and the Gender Committee as well as the results of consultations with the Manpower Office, it is known that the certification unit has implemented policies related to non-discrimination and equality of opportunity, such as employees who work vary from race/ethnicity, religion, gender, educational background, etc.

6.1.2

Based on the results of a review of employee list documents, such as the 2022 PT TSA Employee Data document, it is known that there are workers from the surrounding community and female workers. However, there are no migrant workers in the unit of certification.

Based on the results of interviews with workers, interviews with internal stakeholders, interviews with representatives of surrounding villages, and interviews with the Manpower Office, it is known that workers come from surrounding villages (local residents) and workers who come from outside the region such as Java, Sumatra, Lombok, and others.

Based on the results of document review and interviews with management, it is known that the company does not recruit collectively from other provinces. Workers from other provinces individually and voluntarily come to look for jobs recruited by this company. In addition, they also get information from their relatives if the company opens a job vacancy. Based on the results of interviews with the Manpower Office, it is known that workers come from surrounding villages and workers who come from outside the region such as Java, Bali, and Nusa Tenggara individually and do not go through the AKAD (Inter-Regional Workforce) procedure.

6.1.3

The certification unit can show examples of employee class increases, for example, Promotion Decree Number 01 / TSA-PMF / SKP / III / 2020 for NIK 0000027331 employees who get an upgrade to F8 and Promotion Decree Number 02 / TSA-PMF / SKP / III / 2020 for employees of NIK 0000027384 who gets a promotion to G8. The document is accompanied by a record of the evaluation results as evidence of an objective and open assessment by the company.

Based on the document review, it is known that for 2020 there will be no recruitment process for permanent employees. Recruitment is for *PKWT* employees, for example in accordance with a Specified Time Work Agreement between worker NIK 137990 and a company represented by the KBE Estate Manager on March 16, 2020.

6.1.4

Based on the results of interviews with workers, LKS Bipartite and the Gender Committee, it is known that the company does not carry out pregnancy tests which are a discriminatory measure.

The company shows the Recruitment SOP, policy number 431/HRM-RCT/07, dated May 24, 2007. Based on the document, it is known that there is no clause that mentions a pregnancy test, but that prospective employees must pass

a medical test.

6.1.5

The certification unit has established a gender committee consisting of workers' representatives with a focus on training on women's rights; Counseling for women involved in cases of violence; Child care facilities provided by oil palm plantations and mills; Guarantee that women can breastfeed for up to 6 months before being assigned to use or application chemicals; And provide a special break time for women to be able to breastfeed effectively.

Based on the results of interviews with representatives of the Gender Committee, it is known that the company has implemented gender equality in work, such as having a female worker who was appointed as a foreman and the core management structure was formed in the name of the company and in each mill and estate unit there is a representative.

Interviews with the Chair of the Gender Committee who is also the Principal of the Kindergarten School, it is known that the Gender Committee has been formed since 2010 and she has been the chair of the gender committee since its establishment until the time the audit assessment was conducted. Selection of the organizational structure of the gender committee is carried out every 3 years. The company shows the Organizational Structure of the Gender Committee of PT Teguh Sempurna for the period 2021 – 2024, which explains, the chairman on behalf of the STR (initials) and the secretary on behalf of the RCO (initials).

6.1.6

There is evidence of payment of equal wages for the same scope of work, some of which are shown in the salary slip for the February 2022 period, for example at Batang Garing Estate as follows:

- NIK: 124515 (Genset Operator)
Basic wage: Rp. 3,317,668
Wages paid: Rp. 4,930,396
- NIK: 71794 (Genset Operator)
Basic wage: Rp. 3,317,668
Wages paid: Rp. 4,930,396

Based on the results of interviews with workers, for example herbicide applicators at PME, it is known that herbicide applicators get the same salary, which is in accordance with the Inter-Official Mail on Wages in 2022, which is set at Rp. 3,317,668,-.

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

Wages documentation is available, which is shown as follows:

- Decree of the Governor of Kalimantan Tengah number 188.44/445/2021 concerning District/City Minimum Wages in 2002, dated November 30, 2021. Based on this document, it is known that the minimum wages in each district/city, such as Kotawaringin Timur District, are Rp. 3,014,732.66 and Seruyan District, which is Rp. 3,317,667.5,-.
- Inter-Official Mail number 020/HRM-i5.1/XII/2021 regarding the SKU Structure and Scale of Wages for PT TSA in 2022, dated 20 December 2021. Based on the document, it is known that the 2022 wage is set at Rp. 3,317,669,-.
- February 2022 Salary Slip for employees NIK 000067483, it is known that the wage component consists of wages (Rp. 3,317,668,-), BPJS deductions and other deductions.

The work requirements are in accordance with the applicable labor regulations for workers in the national language, along with explanations for workers in a language they understand, which is stated in the Company Regulations 2021 – 2023.

6.2.2

There are Company Regulations for the period 2021 – 2023, which regulate detailed wages and work requirements. For example, regular working hours in article 9, BPJS deductions in article 25, overtime in article 21, sick leave in article 13, the right to vacation (leave) in article 13, maternity rest in article 13, reasons for dismissal in article 11, notice period before termination of work article 11 people and others

In addition, for workers with PKWT status, it is also explained in the work agreement letter regarding the statement of compliance clause. For example, the Specific Time Work Agreement No. 003/PKWT-PT TSA-KBE//2022, dated January 13, 2022, which among other things explains the clauses related to the basis of the work agreement for a certain time (article 1), the term of the agreement (article 2), scope of agreement, duties and responsibilities (article 3), rights and obligations of the parties (article 4), working days and time (article 5), basic salary and allowances (article 6), welfare facilities (article 7), annual rest day (article 8), giving warnings and disciplinary sanctions (article 10) and others.

There are penalties in the form of deductions / penalties for workers who have been arranged, including in the employment contract. For example, in a work agreement letter number 003/PKWT-PT TSA-KBE//2022, dated January 13, 2022, stated in article 6 paragraph 7.3.

Regarding deductions, among others, as explained in company regulations and PKWT work agreement letters that workers are included in the BPJS program, where workers are subject to wage deductions for payment of contributions, the amount of which is determined by government regulations. Based on the results of interviews with workers and verification of payroll documents, it is known that there are wage deductions such as for BPJS Employment, BPJS Health, and Pension Security. For example, the salary slip for PME harvesters in the name of KN (initials) for November 2021, explains the total deduction for that month's salary which consists of BPJS Employment, BPJS Health, and Pension Security.

Payroll documents provide accurate information about compensation for all work performed. For example, what is shown in the February 2022 salary slip, for example, the PMF compound employee salary slip, which explains basic wages, overtime, BPJS Health and BPJS Employment contributions. The overtime calculation has been shown and is in accordance with the overtime provisions. Wage deductions for contributions have been in accordance with the percentage of responsibility that must be paid by workers.

6.2.3

Evidence of legal compliance is available, some of which are shown as follows:

- Document for payment of normal pension for employees of Division 2 HTE under the name of PU (initials), dated May 20, 2011, where the person concerned has reached the age of 55 on May 15, 2021. This is in accordance with Company Regulation article 11 paragraph 8.
- Regarding compliance with regular working hours, based on the results of field observations and interviews with workers, for example, herbicide applicators and fertilizer workers in estates and processing station workers in mills, it is known that the company has implemented a working hour rule where 1 working day is 7 working hours.
- Regarding deductions, among others, as explained in company regulations and PKWT work agreement letters that workers are included in the BPJS program, where workers are subject to wage deductions for payment of contributions, the amount of which is determined by government regulations. Based on the results of interviews with workers and verification of payroll documents, it is known that there are wage deductions such as for BPJS Employment, BPJS Health, and Pension Security. For example, the salary slip for PME harvesters in the name of KN (initials) for November 2021, explains the total deduction for that month's salary which consists of BPJS Employment, BPJS Health, and Pension Security.
- Based on the results of document review, for example the Overtime Order signed by the employee and the Overtime Recap per Date, it is known that there is no forced overtime by the company to workers. Based on the document Recap of Overtime Per Date Per Division February 2022, for example, on behalf of the loading ramp operator SB (initials), which explains the overtime recapitulation and calculation, it is known that the actual overtime hours on February 14, 2022, are 4 hours, where the first overtime hour is 150% and the second and third overtime hours are multiplied by 200%, so the total overtime hours paid are 7.5 hours.
- The company shows Application for Annual Leave Permit document on behalf of the PME nurse RS (initials), which explains the right to leave for 13 days and the requested leave is 8 days and there are still 5 days left. Leave is taken from 23 December 2021 to 3 January 2022, submission date is 18 December 2021. In addition, the entitlement to leave is also shown on the salary slip where the remaining days of leave are explained.

6.2.4

The unit of certification provides adequate housing, sanitation facilities, water supplies, medical needs, education, and public facilities in accordance with national standards. This is based on the results of field observations, for example in HTE and KBE, it is known that the certification unit has provided decent housing, sanitation facilities, water supplies, medical needs, education, sports facilities, worship facilities, buses to pick up school children and other facilities another common.

The company shows documentation of the facilities provided for workers, such as at BGE, it is known that there are polyclinics, school buses, mosques, churches, child care, housing, volleyball courts, football fields, water supply, employee halls, and others.

6.2.5

The unit of certification seeks to increase workers' access to adequate, sufficient, and affordable food. This is consistent with the results of field observations and interviews with workers, for example at BGE, which explained that there is an Employee Cooperative with the business sector of providing basic necessities. In addition, workers at BGE also explained that there are vegetable traders, sellers of other basic needs who sell around the housing. For PME and THE, based on the results of interviews and field observations, it is known that there are markets that are close to housing. So that employees have no difficulty in getting decent, sufficient, and affordable food.

6.2.6.

A decent living wage is given to all workers in accordance with applicable regulations, where it has been explained that the company provides wages in accordance with the Decree of the Governor of Kalimantan Tengah in 2022 as the basis for determining company management. In addition, the company also provides In-Kind Benefits, where the company has calculated the prevailing wages and in-kind benefits received by each employee. The other benefits provided in broad outline are housing, health, social and transport. Based on the calculations shown by the company, for example at BGE, it is known that the total nominal in kind benefit received per worker in 2021 is Rp. 1,875,204, the average wage per worker is in line with the minimum wage for Seruyan Regency, which is Rp. 3,193,750, - so the total value of prevailing wage is Rp. 5,068,954,-. Calculation of prevailing wage is in accordance with local prices.

6.2.7

Based on the results of field observations for example at PME, PMF and BGE, it is known that permanent workers are employed for all the main work carried out by the certification unit, such as harvesting and machine operators in the mill area. Based on field results, it was also found that non-permanent workers (PKWT) who work for pesticide application and fertilizer application.

Status: Comply

6.3

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

6.3.1.

The company has policies related to labor unions. Regulations related to the existence of labor unions are contained in the Sustainable Plantation Management Guidelines document (No. POLICY: 724 / TQEM-SPM / 09) issued by the Management of Minamas Plantation dated November 8, 20 10 concerning Social Policy, at Point 5 it states that the Company is Expected to Respect The rights of all employees to form and join the trade union community of their choice and negotiate collectively.

The Company presented the Report on the implementation of the Socialization on Employee Freedom in Association and Organization, which was conducted on July 2, 2021.

Based on the results of interviews with representatives from LKS Bipartite, it is known that the company gives freedom to associate or organize, but until now there is no desire from the workers to form a union. From the results of interviews with several workers, it is also known that there are no complaints from workers so there is no need for a labor union.

6.3.2

The company has shown recordings related to the Bipartite Meeting, among others, held on January 14, 2019 at the Hatantiring Estate Head Office with discussions including:

- In-kind rice allowances are said to be given in the form of money, but the workers' representatives did not agree, so they are still given in the form of rice.
- Employee salary payments have been made through ATM (BNI), both for monthly and daily employees
- Eid meat allowance is given together with THR funds in the form of money.

Based on the results of interviews with workers' representatives or in this case the Bipartite Cooperation Institute, it is explained that the company gives freedom to workers to form labor unions, but so far there has been no initiation from workers to form labor unions. In compliance with regulations, companies and employees have established Bipartite Cooperation Institutions in their respective units. Regarding meetings between workers and management representatives, it has been explained in indicator 6.3.1 that during the pandemic no meeting activities are held as a step to prevent the spread of the Covid-19 virus.

6.3.3

The company has implemented the union policy by showing the registration of the Bipartite Cooperation Institution with the Decree of the Head of the Manpower and Transmigration Office of Kotawaringin Timur District number 560.565/412/KEP/HI-KESJA/IX/2020 concerning Ratification/Record of the Management of the LKS Bipartite PT Teguh Sempurna, dated 21 September 2020 with a validity period of 3 years.

Based on the results of interviews with LKS Bipartite, it is known that the company has implemented policies related to freedom to form LKS Bipartite. In addition, it was explained that the management of the LKS Bipartite was elected transparently without any intervention from the company. The election was carried out by majority vote of the members of the chairman election meeting and the management did not interfere in the formation or election of the chairman or worker representatives in the Bipartite Cooperation Institute.

Status: Comply

6.4

Children are not employed or exploited.

6.4.1 & 6.4.2

The company has a policy regarding age requirements for workers. The policy is contained in the Sustainable Plantation Management Guidelines, namely in the Social Policy sub, point 6 (Policy No: 724 / TQEM-SPMS / 09, dated 27 August 2010) and the Company Regulation 2021 - 2023 regarding general requirements that must be met in the recruitment of prospective workers. In addition, there is a specific clause in each agreement regarding the age policy for workers and the prohibition on exploiting children as described in 2.2.3

Based on the list of employees of PT TSA it is known that there are no workers under 18 years of age. In addition, in recruitment, one of the mandatory requirements is the employee's identity (*KTP*) so that the company can ensure that there are no underage workers.

In addition, the Minamas Plantation group human rights protection policy at point 10 states children's rights (for example protection by parents, family, community, and the state, worship according to their religion, expression, special treatment for children with disabilities, protection from economic exploitation, employment, sexual harassment, child trafficking, abuse of narcotics, psychotropic substances and other addictive substances

6.4.3

Based on the results of document review and field observations, both at the factory and at the estate, it is known that there are no young workers.

6.4.4.

Based on the results of field observations, for example at BGE, PME, KBE, THE, and PMF, it is known that there are policies that prohibit child labor from using warnings installed at strategic points such as housing areas, office areas, warehousing areas and access to villages. In addition, the employment agreement with the contractor has also been mentioned regarding the prohibition of child labor, as described in criterion 2.2.

Based on the results of the study of employee data documents and field observations, there was also no finding of child labor under the age of 18 years. The results of public consultations with village representatives, contractors and trade unions also found that the company prohibits underage workers.

Status: Comply

6.5

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

6.5.1.

The unit of certification has a policy on the prevention of sexual harassment and violence in SOP Guidelines for Sustainable Plantation Management No. Policy 724 / TQEM-SPMS / 09 dated 27/08/2010 in the Chapter Policies and Objectives, Sub-Chapter of Plantation Upstream Indonesia Policy on Social Policy point 4, which is to develop and implement policies to protect women workers from sexual crimes and harassment and protect their rights. rights related to reproduction.

In addition, there is also a Social Policy signed by the Head Plantation Upstream Indonesia in December 2011. At point 4, it is stated that the Certification Unit develops and implements a policy to prevent sexual harassment and forms of crimes against women and protect rights related to reproduction for female workers.

Based on the results of an interview with the Chair of the Gender Committee, it is known that the company has a policy on preventing sexual harassment and violence. The policy has been communicated to all workers during morning apples, posyandu activities or special times specified. The gender committee also explained that so far there have been no incidents of sexual harassment and violence.

6.5.2.

Policies on the protection of reproductive rights are listed in the following documents:

- Sustainable Plantation Management Guidelines No. Policy 724 / TQEM-SPMS / 09 dated 27/08/2010 Chapter Policies and Objectives, Sub-Chapter of Plantation Upstream Indonesia Policy on Social Policy point 4, namely developing and implementing protection of rights related to reproduction.
- PT TSA company regulations which include regulating menstrual and maternal leave

Based on the results of interviews with the Gender Committee Chair, it is known that the company has a policy on the protection of reproductive rights, especially for women, such as Menstrual leave (H1). The company's policy regarding the protection of reproductive rights can also be explained by female workers in the application of pesticides and fertilizers, that if there are workers who are pregnant or breastfeeding, they will be assigned to work that is not related to chemicals as long as she is pregnant and breastfeeds her child to the maximum age reach 2 years.

6.5.3

The management has carried out an assessment of the needs of new mothers by asking for their opinions and involving medical parties such as nurses. Based on the document on the Identification of Needs for New Mothers, it is known that there are several needs, such as visits by health workers, nutritious food, vitamins, and others. Based on the results of field observations and interviews with workers, it is known that breastfeeding female workers are given permission to breastfeed their children. In addition, there is also space for breastfeeding in the daycare center. There is no new mother assesment because as reported by medical officer, all the female worker already not in maternity productivte age.

Based on the results of interviews with the Chair of the Gender Committee, it is known that when new mothers give birth, the company provides light work which is located close to the housing so that new mothers can provide exclusive breastfeeding to their children.

6.5.4.

Based on the results of interviews with LKS Bipartite, the Gender Committee, and workers in estate and mill, it is known that workers understand the mechanism for submitting complaints, such as reporting directly to supervisors (foreman or assistant), reporting to the Gender Committee if there are complaints related to women's issues, the existence of a suggestion box and a complaint book, which can guarantee the anonymity and protection of the reporter if requested.

Based on the results of interviews with Bipartite LKS, Gender Committee and workers in estate and factories, it is known that there were no complaints related to sexual harassment, sexual violence, domestic violence and so on.

Status: Comply

6.6

No forms of forced or trafficked labour are used.

6.6.1.

Based on the results of a document review, such as an Overtime Work Order, it is known that the company provides overtime wages for employees who work above normal working hours. The Overtime Work Order has been signed by the giver of the order (supervisor) and the one who receives the order is the employee.

Based on the results of the review of employee list documents, interviews with the Bipartite Cooperation Institute (LKS Bipartite) and gender committee, interviews with management, and the results of field visits at BGE, it was found that there were no migrant/foreign workers.

Based on the results of interviews with worker representatives (LKS Bipartite) regarding workers who came from other areas (not from nearby villages), it was found that there was no practice of withholding identity documents, paying recruitment fees, the substitution of work agreements without labor approval, forced overtime, prohibition of workers from leaving their employment relationship, imposition of penalties for termination of employment, coercion of work due to debt obligations and withholding of wages.

6.6.2

According to the list of employees as per February 2022 review, it was known that there were no migrant workers in the unit of certification. Job descriptions were presented in a contract agreement which was agreed by both parties (employer and employee) through signed and legal stamp. As looking to the several online sources, it was known that there was no negative case related to forced labour, debt bondage, contract substitution, involuntary overtime, lack of freedom of workers to resign, penalty for termination of employment, withholding of wages, etc in the unit of certification operational areas.

In addition, for workers with PKWT status, it is also explained in the work agreement letter regarding the statement of compliance clause. For example, the Specific Time Work Agreement number 003/PKWT-PT TSA-KBE/II/2022, dated January 13, 2022, which among other things explains the clauses related to the basis of the work agreement for a certain time (article 1), the term of the agreement (article 2), scope of agreement, duties and responsibilities (article 3), rights and obligations of the parties (article 4), working days and time (article 5), basic salary and allowances (article 6), welfare facilities (article 7), annual rest day (Article 8), giving warnings and disciplinary sanctions (Article 10) and others.

Based on the results of interviews with the LKS Bipartite, it is known that there is no practice of retaining identity documents, paying recruitment fees, substituting work agreements without labor approval, enforcing overtime work, preventing workers from leaving employment, imposing penalties for termination of employment, forced employment due to debt obligations and withholding wages.

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 Organization

It was realized in the form of a P2K3 team in accordance with the Pengesahan Panitia Pembina Keselamatan dan Kesehatan Kerja (P2K3) PT Teguh Sempurna – Pematang Factory by the Manpower and Transmigration Office, which is stated in the Decree of the Head of the Manpower and Transmigration Office of the Kalimantan Tengah Provincial Government with No. Kep.19/DISNAKERTRANS/III/2021 dated February 18, 2021, with an organizational structure including the chairman with the initials S and the secretary on behalf of the DPH for the period 2021-2024

The P2K3 Secretary has attended the OHS Expert Training for the Indonesian Ministry of Manpower Certification which was held on 27 November 2020 as indicated in the Decree of the Minister of Manpower No. 5/11929/AS.02.04/XI/2020

with Reg No. 46453/PK3/AJ/31/2020/P1 which is valid until November 27, 2023.

P2K3 PT TSA Organization Structure:

The organizational structure includes a chairman with the initials S and a secretary initials DPH for the period 2021-2024, divided into 5 sub division, each division has 1 coordinator and 5 members, including;

- Steam and Pressure Vessel
- Mechanical and Electrical
- Field of Fire Hazard Prevention and Management
- Work Environment and Environment
- Sector of OHS Laws and Regulations, and
- Construction and Building Sector.

Regular Meeting

It is carried out once a month in the context of discussing issues regarding OHS before being summarized and reported in the P2K3 quarterly reporting. Documentation of routine meetings, for example;

- Estate; held on February 15, 2022 at the Hatantiring Estate Meeting Room attended by 15 participants, which are recorded in the Minutes of the PT Teguh Sempurna P2K3 Meeting - Committee Meeting 2022.
- Mill; held on February 14, 2022 at the PMF Meeting Room attended by 22 participants, which are recorded in the Minutes of the PT Teguh Sempurna P2K3 Meeting - Committee Meeting 2022.

6.7.2

The unit of certification shown an Emergency Response SOP (No. Policy 719 / TQEM-ESH / 10), rev 00, signed by the SOU Chair on 23 August 2010. This procedure is to provide guidance to ensure that all employees practice in their duties or actions in emergency state. The emergencies referred to include land fires, earthquakes, floods, handling of Hazardous and Toxic Materials and its waste. Based on management interview, company periodically conducted emergency response training to ensure that all workers understand how to manage the emergency condition.

First aid training

The company has submitted a list of 2 participants for the licensed OSH officer training which is planned to be held on 22-27 April 2022. As for PT TSA's First Aid officers, 2 people have been proposed to receive training which is scheduled to be held in 2022. From observation at field, known that foreman brought first aid kit and understood how to handling first aid accident.

Recording of Work Accidents

As with the recording of work accidents carried out for the January – December 2021, the following information is known :

Unit	First Aid Accident	LTA	FR	SR
PME	21	36	21	35
KBE	1	2	1	2
BGE	1	4	1	5
HTE	16	36	22	50
PMF	0	0	0	0

Work accidents have been discussed and recorded in the P2K3 report. For example, in the P2K3 report for the second quarter of 2021, PT TSA stated that during the 2021 period there were no major work accidents. Work accidents with lost days are categorized as moderate with an average lost working days < 3 for each work accident case. The dominant case is being hit by the frond during harvesting.

Safety Equipment & Infrastructure

Unit certification has provided emergency response facilities and infrastructure including OHS. The results of the field visit found that the company has the opportunity to improvements regarding:

- Monitoring the completeness and preparedness (appropriate and ready to use) for all fire extinguishers in the

company

- Placement of symbols or warnings for OHS, hazardous materials, and hazardous waste in places where hazardous materials are stored, including waste.
- Monitoring the use of the first aid kit provided at several temporary storage for hazardous waste locations, offices and field activities. **(OFI)**.

6.7.3

PT TSA can show documents related to Procedure No. Policy 739/TQEM-ESH/10 (Rev. 02) dated 01 November 2016, regarding personal protective equipment (PPE). The procedure describes the minimum requirements for determining PPE for scope of incidental (non-routine) and complex work, in more detail this procedure describes:

- The person in charge of activities is a business unit manager
- Risk assessment methodology by considering system/equipment/workplace, type of work, additional factors
- General guidelines on risk assessment
- Stages of risk assessment
- Hazard identification for each task
- Risk assessment for each task
- Determine risk control measures and work plans
- Overall analysis

In order to implement these regulations, the Company provides adequate Personal Protective Equipment (PPE) in accordance with its designation for each worker, which is shown in the document:

- Hazard Identification Risk Assessment and Risk Control table. It describes the type of work, the hazards, and the required PPE specifications.
- Minutes of the Handover of PPE to factory employees on March 14, 2021 in the form of masks, earplugs and shoes, as well as estate employees of masks and shoes that are intended through the Recipient List document, the PPE that is divided includes safety shoes, gloves, boots, face shields, aprons, helmets for manuring and harvesting activities.
- There is a rinse house and storage of work tools and PPE for workers with spraying activities.

Based on the results of field visits to the hazardous waste warehouse at Pematang Factory and the hazardous Pesticide warehouse in the Batang Garing Estate, it was found that officers did not use PPE even using a medical masks and buffs at each location, as opposed to what has been determined in company standard procedure. It is explained in the procedure that for the work of handling chemicals, use an EN 141 mask or another equivalent international standard.

However, based on interviews with worker and management revealed that the assessed mandatory use of PPE has been communicated to workers, and management has provided the mask at each area.

Management has opportunity to encouraged to ensure that the use of PPE for workers in the field is in accordance with the risk identification. **OFI**

6.7.4

Has been provided the first aid room facility in the respective divisions, clinic that can serving inpatient, maternity, first aid and health education services. Accident insurance conducted in collaboration with BPJS, all employees are registered for insurance. Based on document verification and interview with worker representative known all worker (both of contract and permanent) has been covered in its program. For example, BPJS Health payment receipt BGE in period January 2022 paid on 05 January 2022 for 795 person including worker and families, BPJS worker welfare payment receipt BGE in period February 2022 paid on 01 March 2022 for 402 worker.

Based on verification document and interview with management as well as worker, obtained information there is no fatal accident and BPJS claim for period 2020/2021.

6.7.5

Lost Time Accident (LTA) monitoring and calculation has still consistently conducted by the unit of certification. The record

informed number of employees on the particular monitoring months, number of working days, non effective working days, overtime, total employees man hours, number of lost days, lost time accident, number of accident, manday lost recapitulation, frequency rate (FR) and severity rate (SR). LTA report has prepared by OSH Committee Secretary and approved by Unit Manager. Summary of LTA calculation in all unit scope for period January-December 2021 is presented in the following table:

Unit	First Aid Accident	LTA	FR	SR
PME	21	36	21	35
KBE	1	2	1	2
BGE	1	4	1	5
HTE	16	36	22	50
PMF	0	0	0	0

Status: Comply

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

7.1

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

7.1.1

The Unit of Certification has shown evidence that pests, diseases, weeds and invasive species are effectively managed using appropriate Integrated Pest Management (IPM) methods. The integrated pest management plan is regulated in the procedure for the Control of Plant Pest Organisms No. 110 / EST-ARM / 13 Chapter 15. Procedures for establishing an early warning system with monthly detection of pests and potential diseases netter caterpillars and mouse, emphasizing mechanical and biological control such as by planting beneficial plants (*Turnera subulata* and *Antigonon leptosus*), and installing and monitor the nest box to suppress mouse infestation. This procedure also establishes an economic threshold for each pest and disease, that chemical control will be carried out only if the infestation has exceeded the economic threshold. For example, 10 larvae / netter caterpillars, rats > 5% of infestation and Orictes > 10 trees / ha

The Unit of Certification has documented the potential for monthly pest and disease detection carried out by trained workers. Based on a specific summary in 2021, there were no pest attacks above the economic threshold. The company will exercise control if pest attack levels are above the economic threshold.

Field observations at each estate also verified that visually there were no symptoms of netter caterpillar attacks in the canopy, or mouse attacks on FFB collected at the FFB collection points. Beneficial plants such as *Turnera subulata* and *Antigonon leptosus* have been planted on the main road and collection road.

Based on the monitoring document of the owl's cage (gupon), it is known that the company has used *Tyto alba* as a biological pest control method with 128 units in the Kawan Batu estate. The results of field visits, for example in Block R47 division 1 of Kawan Batu Estate, it is known that the owl's cage is in good condition and active.

7.1.2

Based on document review and field observations, the Unit of Certification applies several biological control practices to suppress pest and disease attacks such as *Antigonon leptopus* and barn owls (*Tyto alba*) and is well managed for example there are poles at the crossroads of the paths where *Antigonon leptopus* grows. The results of verification on the cabi.org website is known that the species was declared not invasive in Indonesia.

The company also conducted socialization on the management and control of invasive species December 9, 2021, which explained types of invasive species in the company's operational areas.

7.1.3

Based on document reviews, field observations, and interviews with workers and stakeholders, it is known that the company does not use fire to control pests.

Status: Comply

7.2

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

7.2.1

The company policy on safety in using chemicals is contained in ARM sections 15 and 16 concerning plant protection. The selective use of the product is contained in the procedure for protection of plants, example: Glyphosate is used to control broadleaf and narrowleaf weeds. The procedure also explains that only agrochemicals listed in the applicable laws and regulations may be used. PT. Teguh Sampurna has not applied paraquat in controlling weeds, its function has been replaced by chemicals that are more environmentally friendly. To ensure pesticides used are in accordance with the target, company conducted Identification the type of weed found in operational area. For example, the company used *Isopropilamina glyphosate* for narrow and broad-leaf weed and *Metil metsulfuron* which for broad-leaf weed.

7.2.2

The company has documented records of pesticide toxicity in the document of Monthly Pesticide Toxicity Data. The document is recorded product name, active ingredients, LD50, percentage of active ingredients, total application, total active ingredients, FFB production and pesticide unit/kg FFB. This document is constantly recorded and updated by Estate Sustainability Officer each month. All pesticides used here are for controlling weeds. For example; Prima Up (A.I Isopropilamina Glifosate 480 g/l) usage total in 2021 is 4,742.00 liter for 5,489 ha with LD50 5000 mg/kg.

7.2.3

Regarding reducing the use of pesticides, monitoring is carried out every day, monthly and yearly. Furthermore, the detection and census of pests and diseases are carried out regularly as an early warning system, aimed at preventing the spread of pests and diseases, so that it is expected to minimize the use of pesticides. Pesticides are only used if pest infestations have exceeded the economic threshold

The integrated pest management program is implemented by the certification unit and is monitored and evaluated every month. This evaluation is in the form of reports of pests and disease symptoms that describe the type of pest, average attack, attack analysis, level to threshold; conclusion to determine control techniques if needed. Based on data and a summary of the 2021 census in the Kawan Batu Estate, Pemantang Estate, Hatantiring Estate and Batang Garing Estate, it is known that there are no pests and diseases that exceed the economic threshold. So, there is no use of pesticides for pest and disease control because all pesticides used here are for controlling weeds. Based on observations of the Kawan Batu Estate, Pemantang Estate, Hatantiring Estate and Batang Garing Estate, visually there were no symptoms of netter caterpillars attacking the canopy, or handling mice on FFB collected.

7.2.4

There is no prophylactic way of using pesticides carried out by the company. The company controls using pesticides if the pest attack census shows results above the threshold. Whereas for weed control If the conditions of the circle and harvest pathway are still quite standard, weed control will be postponed. Based on observations of spraying activities, the application method is not a preventive application but is more selective for locations that have weeds.

Based on document review and field observation, several IPM program with biological approach that has been implemented such as rat control by *Tyto alba*, and nettle eater caterpillar by planting beneficial plant such as *Turnera subulata* and *Casia cobanensis*. Moreover, the company has also conducted early detection routinely listed in the monthly report of early warning system.

7.2.5

Based on Inter-Office Mail by Regional CEO KTB Number 021/STB-KTB/III/2018 that released on 17 February 2018 stated that *"Pesticides that are categorized as World Health Organization Class 1A or 1B, or that listed by the Stockholm or Rotterdam Conventions, are prohibited except in emergency situation. Paraquat usage is prohibited."*

Based on document verification and field visit to pesticide storage, Kawan Batu Estate, Pemantang Estate, Hatantiring Estate and Batang Garing Estate no longer use paraquat and do not use pesticide with WHO 1A or 1B class.

7.2.6

The company does not use pesticides with active paraquat ingredients so there are no limited pesticide applicators. However, the company also conducts training for each estate for workers to improve the abilities of the workers. The examples are:

- PT TSA Pest and Disease Training which was held on 15 - 16 June, 2021, attended by 36 participants.
- Spraying training at Pemantang Estate on November 22, 2021.
- Spraying training at Kawan Batu Estate on August 24, 2021, which was attended by 1 foreman and 18 spray workers.
- Spraying training at Batang Garing Estate on July 20, 2021, which was attended by 1 foreman and 20 spray workers.

The workers are equipped with shoes such as PPE, helmets equipped with face shield glass, aprons, shirts and trousers, masks and nitrile gloves. This type of PPE is in accordance with MSDS recommendations for glyphosate and methyl metsulfuron.

Based on interviews with spray workers, it is known that PPE is given free of charge by the company (gloves, aprons, goggles, and masks). Workers also store and wash the work tools in the washing place that has been provided, namely the rinse house. Field observation shows that workers also aware of safe work practices starts from how to spray, target weeds, and avoid spraying in the river zone.

7.2.7

PT Teguh Sampurna pesticide storage procedure explained on SOP related to pest monitoring and control contained in Minamas Plantation Agriculture References section 15 on plant protection, which among them states:

- Pesticides must be stored in a safe place, separate from fertilizers, food ingredients, and water sources.
- Each type of pesticide must be placed separately according to their respective groups (herbicides, fungicides, rodenticides, and insecticides).
- Used pesticide container send to temporary hazardous storage who has a permit in estate.

Based on the results of field visits in agrochemical warehouses, in Kawan Batu Estate, Pemantang Estate, Hatantiring Estate and Batang Garing Estate it is known that agroclimate materials are stored properly, officers conduct periodic monitoring for each incoming and outgoing agro-chemicals as well as expired chemicals. For example, a chemical monitoring report for chemicals in 2021 made by a warehouse clerk and reported to the estate manager, found that there were several types of pesticides being monitored in the storage agrochemical.

7.2.8

The certification unit has a procedure set out in the SOP for Hazardous & Non-Hazardous Waste Management with No. RA 012, dated April 1, 2010 which explains that chemical packaging is included in the category of hazardous waste, but is not considered hazardous waste if properly cleaned. Regarding to the procedure bellow, pesticide packages are collected in the designated storage area and company coordinated with collectors for recycling.

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

7.2.9

The sprayers workers on circles and path using selective pesticides three times a year. Based on field observations in Kawan Batu Estate, Pemantang Estate, Hatantiring Estate and Batang Garing Estate, it is known if the workers already know the method of selective spraying, for example, only spraying the circle or the existing weeds and if there is no weed, no spraying is carried out. The company also does not apply pesticides by air.

7.2.10

Medical check up (MCU) are carried out annually for all workers and specific examination for pesticide operator or for

workers with certain risks. In collaboration with the Central Clinic PT Kridatama Lancar. The last health check was carried out in the first semester of 2019. For the 2020 and 2021 health check itself it cannot be carried out due to covid-19 pandemic. The company has shown in the Inter-Office Mail of the Central Clinic of PT Kridatama Lancar No. 02/SME-Klinik/III/2022 dated March 10, 2022 related to the postponed of worker's medical check up was postponed due to the COVID-19 pandemic situation until the situation was declared back to normal by the authorities.

From the results of interviews with related paramedic, the company will conduct MCU for 2022. To ensure health status, all worker can be consulted with the paramedics in estate clinic, so that workers get the appropriate treatment. During the pandemic PT TSA also conduct the COVID screening periodically, gave treatment and facilities for COVID survivors well.

Based on this information, the company has the opportunity to carry out MCU activities which were delayed after the pandemic situation was declared recovered and or conditions made it possible to hold special health checks. **OFI**

7.2.11

The company has a policy prohibiting pregnant or breastfeeding women from working as spray workers. The company carries out regular checks on female workers to ensure that female workers who work in jobs containing chemicals (spray) are not currently pregnant or breastfeeding. In addition, the company has a policy of granting H-1 (for menstruation) and H-2 (for pregnant) work leave for female workers whose spray was signed by the Head of Plantation Upstream Indonesia in December 2011.

Based on the document lists of workers that have been shown and the results of interviews with company management, there are no child workers, pregnant or breastfeeding women. The company also explained that if there are workers dealing with chemicals who are pregnant, the worker will be transferred to work as light care workers.

Status: Comply

7.3

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

7.3.1

The Company SOP of Hazardous Waste and Non Hazardous Waste (No. SOP/TSA/21), SOP of Infectious Waste (No. 131/OPR). SOP of Solid Waste Management (No. TSA-PMF/K3L/009), and SOP of Waste Water Management (No. TSA-PMF/K3L/008).

Hazardous waste temporary warehouse that had permit from Seruyan Regent (No. 503-F.5/02.001/SK.DPMPTSP/II/2019 dated 14 January 2019, valid for five years), as well as disposed to licensed third party transporter and collector. The documentation was available in the form of logbook, manifest, and Hazardous Report to Environmental Agency.

The company collaborates with third parties in the handling and further management of hazardous waste as stated in the Cooperation Agreement Letter, namely the hazardous waste transport company PT Indo Rudy Jaya. The company shows the handover and hazardous waste manifest from PT Teguh Sempurna to PT Indo Rudi Jaya on December 30, 2021. Hazardous waste managed by the company are; used oil, used batteries/batteries, used filters, used rags, contaminated waste/pesticide packaging, infectious medical waste. For domestic waste periodically picked every week, if the material contains metal cans or plastic, it can be dropped to an existing sanitary landfill determined.

The company does not discharge POME into water bodies. The company utilizes POME from palm oil processing to be a substitute for fertilizer which is channeled to the Land Application (LA) in accordance with the SOP for Palm Oil Mill Technical Guidelines – 1 (No.110/POD-FAC/07 CHAPTER III) regarding Pematang Factory Waste Processing (Wastewater Potential, Pollution Control Efforts, Wastewater Control with Fermentation).

Hazardous Waste and Non Hazardous Waste already managed well as per procedure and government requirement.

7.3.2

Based on interviews with company management and the Head of the Hazardous and Toxic Waste Warehouse at the

sampling location, it was found that they had an understanding of the handling of waste disposal, especially hazardous waste and domestic waste, and the management of hazardous waste in accordance with procedures owned by the management unit. In addition, respondents also stated that these regulations are strictly enforced and there are sanctions for those who violate them. All waste disposal facilities have also been provided by the company such as organic, non-organic and hazardous waste bins. The respondent's understanding of waste management is the result of routine and consistent socialization and training.

Regarding the transportation of Hazardous and Toxic Waste, the company cooperates with authorized waste collection contractors PT Indo Rudy Jaya. The company can show the cooperation agreement and licensing requirements that have been owned by all parties involved in the transportation, processing, and monitoring of waste. The company has and can show documents for storing and handling Hazardous and Toxic Waste in accordance with SOPs for storing and handling waste and Government Regulation Number 101 of 2014. These documents include balance sheets, logbooks and Hazardous and Toxic waste manifests. Based on the results of a visit to the Pematang Factory hazardous waste warehouse, information was obtained that the last transportation was carried out on December 31, 2021. PT TSA also routinely report on hazardous and toxic waste management every 6 months.

The results of interviews with management, workers and people living in the company's area also stated that the waste management carried out by the company was very good and regular. Trash cans are provided properly and are replaced if damaged. Regulations related to waste disposal are also strictly enforced and there are sanctions for those who violate them. Resource persons understand very well how to separate the types of waste they produce. The field visit also showed that the housing conditions were very clean and there was no scattered garbage. Based on interviews with management and employees, they already know and understand related to waste management implemented by the company. Domestic waste periodically picked every week, if the material contains metal cans or plastic, it can be dropped to an existing sanitary landfill determined.

However based on the results of field visits it is known that there is hazardous masteral waste management that is not in accordance with existing procedures, for example:

- The workshop at Batang Garing Estate has an empty oil storage drum that is not stored in a licensed storage
- There is use of chemical packaging, for example used water purification chemicals for storage of diesel fuel at Pematang Factory and the use of pesticide jerry cans as water containers/slurry for poison in each estate, but monitoring of hazardous waste that is reused has not been shown.

Its can be concluded if the company has not been able to show evidence that the disposal / treatment of waste is in accordance with the procedures it has. Based on that's explanation raised **Non-conformity No.2022.03 with Minor Category**

7.3.3

The company does not use open burning for waste disposal. It can be proven through document review and management interviews, that the company has a Waste Management SOP with No. RA 012 revision 00 comes into force on April 1, 2010, as a reference for the management of used oil waste, used filters, used batteries/batteries, chemical packaging, scrap metal/iron scrap/scrap, used tires, non-organic waste (plastic, cans, paper, or non-organic materials that decompose easily such as fiber, shells, food waste, and household domestic waste), office waste. The scope of this procedure is for factories, estate, housing, offices at PT Teguh Sempurna.

It is also proven through the waste transportation manifest and the results of field observations in settlements in the Hantan Tiring Estate area that there were no traces of burning activities, besides that there were also many warnings to prohibit waste burning activities as well as the dangers that could arise from burning activities. Interviews with employees who live in the housing estate also stated that they had never burned waste due to sanctions.

7.3.2	Status: Non-conformity No.2022.03 with Minor Category
-------	--

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

7.4.1

The company has SOPs for managing soil fertility, which are as follows:

- Agronomic Reference Manual (ARM) - number 110 / EST-ARM / 13 dated September 16, 2013, especially in section 8 on Fertilization using Empty Lengths and on Fertilization with Liquid Waste POME.
- Agronomic Reference Manual (ARM) - number 110 / EST-ARM / 13 dated September 16, 2013, especially in section 4 on Field Preparation for Replanting. It was explained that the old stems were chopped as mulch to prevent pests and diseases.
- SOP Land Application and blank bed application in the 2009 SOP/TSA /13 document.

Practices to increase and maintain soil fertility with anorganic fertilization, empty bunches and POME applications.

These procedures establish many strategies for maintaining and increasing long-term fertility, by combining efficient and measurable organic fertilization, taking into account the age of oil palm and soil nutrients by taking leaf and soil samples.

7.4.2

The company shows the results of leaf and soil analysis:

Results of soil analysis

Soil analysis results of PT. Teguh Sampurna prospered on August 23, 2021 by the Institute for Research and Community Service at the University of Lambung Mangkurat. The Soil test was carried out to find out the content of age C, N, P2O5, pH, Ca-dd, Mg-DD, Na-dd, K, Al, Cu, Pb, Cd, Zn

Leaf analysis results

Kawan Batu Estate, Pemantang Estate, Hatantiring Estate and Batang Garing Estate have tested leaf samples on 11 May 2021. The leaf test was conducted by Minamas Research Center staff. Leaf test was carried out to determine the content of the elements N, P, K, Mg, Ca and B in plants as a reference to determine fertilizer recommendations.

7.4.3

The company has a nutrition recycling strategy that includes the use of EFB applications, soil applications, POME applications, and the use of palm oil frond. Based on the results of the document study, it is known that the application of EFB in 2021 is 52,461 ton, while for land applications in 2021 that is 330,644 m3.

From the field observations, the auditor also visited the realization of the application EFB in estate. It was found that the technical application EFB is in accordance with company regulations: applied among trees, using a dose of 30 tons / ha, non-overlapping, and not applied in streams.

7.4.4

The company has recorded inorganic fertilization and organic fertilizing well during 2021 and recorded it in the fertilization month report. Such as the fertilizer used by the company date 30 December 2021 for Rock Phosphate 533 MT (HTE), 533 (KBE) and 507 MT (BGE). For fertilizer NK 17:30 is 509 MT (HTE), 746 MT (KBE) and 1.422 MT (BGE). The fertilizer is considered sufficient based on general best practice. The fertilizing strategy has been proven to increase and maintain the productivity of sustainable palm oil. An overall yield PT TSA on years 2021 old planting and amounted to 19.20 tons / ha / year.

Fertilization records have been shown in the 2021 fertilization progress document, which includes fertilization programs and realization. Based on the review of documents in each Estate, it shows that the fertilizing activities (time, location, dosage, amount) are in accordance with the recommendations. Inorganic fertilizers used by the certification unit are CCM 44, HGFB and Rock Phosphate (RP) with a total application of 16,833.21 tons for the Kawan Batu Estate, Pemantang Estate, Hatantiring Estate and Batang Garing Estate. Overall, the certification unit has made efforts to maintain and improve soil fertility. Visually, there are no symptoms of nutritional deficiencies in the blocks that have been visited.

CH has record for waste application per 2021, such as;

- Total EFB 52,461,300 kg
- Total POME 330.644 m³

Status: Comply

7.5 Practices minimise and control erosion and degradation of soils.

7.5.1
The company has shown documents of Semi Soil Survey and Land Suitability for oil palm plantations for the 2017-2022 period which explain the land slope class (Pemantang Estate at 1: 40,000 scale, Kawan Batu Estate at 1: 40,000 scale, Hatantiring Estate at scale 1: 40,000, and Batang garing Estate with a scale of 1; 40,000) and maps (Pemantang Estate at a scale of 1: 40,000, Kawan Batu Estate at a scale of 1: 40,000, Hatan Tiring Estate at a scale of 1: 40,000, and Batang Garing Estate with a scale of 1; 40,000). The entire map is a geographic reference map.

7.5.2
The company has a management strategy for planting in slope areas contained in the Procedures for Oil Palm Cultivation. The document describes the management area in a sloping area, among others: conservation terrace (for slopes 0 - 2°), terrace with a width of 4 meters (for slopes of 6° - 12°), terrace with a width of 3 – 3.5 meters (for slopes of 20° - 25°), planting cover crops and empty fruit bunch applications.

Strategies for fragile and other problem soils are included in the semi-detailed soil survey report. The report describes the level of land suitability along with the actions that need to be taken to raise the level of land suitability. Based on the report it is known that the limiting factors in the area, the company's operational areas are slope area and a lowland area.

- Some recommended strategies include:
- Making terrace and planting a legume cover crop.
 - Increasing the organic content of the soil through recycling nutrients, namely the application of EFB, laying the frond in the joint and between the staples.
 - Carry out fertilization based on the results of leaf and soil analysis that is carried out regularly.
 - Water management settings, and making drain blocks.

Based on field observations in the replanting area in Pemantang Estate (Hilly area) the strategy to reduce the limiting factor in the sloping areas revealed that the company had carried out soil conservation by making a terrace, planting a legume cover crop, and EFB Applications.

7.5.3
Based on document review of areal statement, interview with management, and field observation, it is known that there is no new planting activity. The planting year after 2010 is classified as second cycle.

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, 7.6.2, 7.6.3
PT TSA are a long-established company that has been started operationally in the early period of 1990 and since 2010, was replanting for second cycle. Based on the results of a review of the area statement documents and interviews with company management, it was found that the company had not carried out any new oil palm plantation developments.

Field observations of Hatantiring estate shows that replanting activities by the company has made contour terraces for planting hilly area.

The soil type maps and topographic maps containing information on soil classification, texture, drainage, limiting factors and suitability information for the development of oil palm plantations have helped companies to manage blocks, roads, drainage, bridges, etc. The company also has a Road Maintenance Program that is equipped with adequate infrastructure and facilities to carry out the work. According to the results of the field visit, roads are in good condition and harvested FFB is transported smoothly to the factory.

Status: Comply

7.7

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

7.7.1

Based on the document of the area statement presented and the results of interviews with company management, it is known that the company did not develop new oil palm plantations in areas managed by the company.

7.7.2

The company has reported the peat area to the RSPO secretariat, this has been proven by the recording of Peat Inventory email sending to the RSPO secretariat dated on 14 November 2019 and being acknowledged on 18 November 2019.

7.7.3

Based on the results of the 2017-2022 soil survey, it is known that there are peat areas in the Hatantiring Estate and it has been reported to the RSPO secretariat as planted areas of 161 ha with a peat depth of 0.75 meters. The company can demonstrate a peat soil depth monitoring program. The company shows the minutes of installation of subsidence stakes on March 14, 2022 as many as 2 units in Division III Hatantiring Estate to measure the level of peat subsidence installed in Division III, field T001 (depth 2.5 m) and field V002 (4 m depth). OFI in ASA 1.4 has been followed up during this audit through results of interviews with management and a review of SOPs for peat management, peat subsidence measurements are carried out every 6 months, measurements will be carried out in September 2022. In addition, the company also manages peat by:

- Making a stop bund
- Water reservoir creation
- Canal maintenance on Sahabu river.

Based on the results of field visits in HTE division 3 (peat area) it was found that there was peat subsidence, water level (when the field visit was found the water was 20 cm deep) and the land cover in the peat area was dominated by *nephrolepis*.

7.7.4

The company can demonstrate a peat soil depth monitoring program. The company has shown documents on the peatland management plan at the Hatantiring Estate, such as:

- Water management
- Making a stop bund
- Water reservoir creation
- Canal maintenance on Sahabu river
- Peat subsidence 2 unit.

The company has shown one of the peatland management activities, namely by washing the 1x1 M trench and the 2x2 M trench for the period 27 March to 27 April 2020 with details: - Washing the trench 1x1 M: 13,883 Meters - Washing the trench 2x2 M: 6,483 Meters In land closure, the company explained that spraying was carried out selectively to protect the weed vegetation in the area.

7.7.5

The peat areas are only located in division III HTE, the replanting at HTE program will be done on year 2026, meanwhile drainability assessment not conducted because still waiting for a decision from the research team (MRC) and the certification unit.

7.7.6

Based on field observations in the area of peatland PT TSA, following the best farming practices peat areas the company has done:

- Water management
- Making a stop bund
- Water reservoir creation

- Canal maintenance on Sahabu river
- Peat subsidence 2 unit
- Emergency response procedures include:
- SOP Prevention and Fire Fighting.
- Land fire emergency response procedures.
- Emergency response procedures earthquake.
- Emergency Response Procedures Fuel Spill.
- Natural Disaster Emergency Response Procedures - Flood.
- The land cover in the peat area was dominated by *nephrolepis*.

7.7.7

Base on document verification and field observation, there is planted area on peat. There is no peatland reserves and for wet areas not planted is HCV area.

Based on the results of field visits in HTE division 3 (peat area) it was found that there was peat subsidence, water level on canal (when the field visit was found the water was 20 cm deep) and the land cover in the peat area was dominated by *nephrolepis*.

Status: Comply

7.8

Practices maintain the quality and availability of surface and ground water

7.8.1

The company has a management plan to maintain and manage water sources in the SOP. Procedures for the protection of river border areas are available in the document:

- SOP for River Buffer Zone Protection in document number RSPO/B.5.3 regarding Buffer Zone Management.
- Buffer zones are defined: 10 meters for river borders, 50 meters for reservoirs, 50 meters around springs, and around the main ditch > 1 meter wide and 3-5 meters wide.
- SOP for Conservation Forest Management in document number RSPO/B.5.4 concerning Conservation Forest Management including river boundaries.

Through the document Technical Recommendations for Permits for Concession and Use of Surface Water from the Public Works and Spatial Planning Office of the Central Kalimantan Provincial Government for Water Resources Concession at Sahabu river with No. 01/RMKT/DPUPR-SDA/III/2022 dated March 8, 2022, to collect water from the Sahabu River. With a water quota that can be utilized of + 55,000 m³/month or equivalent to a debit of 0.021 m³/second. The water is taken from the Sahabu River, which is in the Hanging Pengayuh Village, Seruyan District. The coordinates of the surface water extraction location are 112°17'46.690"E dan 2°46'72.0" S

The company has a river border management procedure - the riparian belt described in the SOP of Management of Buffer Zone (RSPO/B.5.3/TSA) on August 2018 which contains the determination of the location of the buffer zone, maintenance and management. Based on the procedure, described the limits of water resource management that are limitation of river border management by 50 meters and limit of lake/reservoir management is 50 meters. River border protection covers marking the river border area in the form of yellow paint on oil palm thrunk, prohibited of spraying and fertilizing applications, planting trees, etc. The company has implemented water management plans and has been verified based on document review that is :

- Perform river water quality testing every six months.
- Testing the quality of clean water for workers every six months.
- Record the debit for water usage for mill process activities.
- Installation of warnings prohibiting cutting down trees which are also displayed in conservation areas (including water sources) and passed by the community.
- The existence of water bodies that function to maintain the availability of water in the plantation both for the use in plantation activities and the activities of daily life in each estate. The company has shown plan data and realization of water bodies in each estate.

The unit of certification also does not limit access to clean water, and workers also have adequate access to clean water. Based on the results of field observations in the Estate housing area as well as interviews with fertilizer workers, spraying workers, and harvest workers, information was obtained that clean water facilities for housing were obtained from drilled wells provided by the company and for factory workers who lived in factory housing, the water source came from reservoirs which has been processed in WTP. The unit of certification has consistently had a water management plan for mills and plantations that is stated in the Environmental Management and Monitoring document as well as riverbank management programs and other water sources. As the company's concern for the health of its employees, PT Teguh Sempurna has consistently measured the quality of clean water used for daily needs. The quality standard for testing refers to the clean water standard of the Minister of Health Regulation No. 416 of 1991, which is reported on environmental monitoring measurements in semester 2 of 2021 by a KAN accredited laboratory.

7.8.2

Based on the SEIA and HCV documents, the watershed including its river boundaries are designated as protected areas in accordance with applicable laws and regulations and the requirements of the RSPO standard.

Based on the document review and field observations for border areas of the Sahabu River, Palapian River, and Simpang River, it is known that the company has managed and maintained water sources, including:

- Manage river water quality by not applying chemicals and fertilizers along the river border with a distance of 50 meters, placing warnings on the prohibition of chemical and fertilizer application with a yellow sign, and leaving the border in a natural condition.
- Putting signboard against cutting down trees which are also displayed in conservation areas (including water sources) and passed by the community.
- Enrichment Riparian Sides with planting 128 Waru trees in 7 June 2021.
- Socialization to workers and local community about riparian river as conservation areas, that can be proved by interview with spraying workers in Batang Garing Estate.

7.8.3

The management of POME from the processing of palm oil from the Pemantang Factory with a capacity of 96.292 is carried out in an WWTP pond located in the company's Business Use Rights (HGB) area. Before being channeled to the Land Application (LA), all POME is put into the WWTP with a single-feeding system which is then processed to reduce pollutant elements so that it is suitable for application to land. The certification unit has 9 WWTP pools. POME is managed according to the applicable national regulations, namely KepmenLH No.28 & 29 of 2003 regarding Technical Guidelines for the Assessment of Wastewater Utilization from Palm Oil.

The company already has a permit for the utilization of POME for Land Application (LA) from the authorized agency in the form of Permit for Utilization of Factory Wastewater at PT TSA in accordance with the Decree of Seruyan Regent No. 188.45/164/2016 dated April 5, 2016 and is valid for as long as the company conducts its business and will be reviewed at least once every 5 years. Based on the permit, the blocks allowed for POME to flow are 386 hectares, namely block T16-21, block U13-21 located in Sahabu Village, Seruyan District.

The company can show documents regarding the results of the measurement of the quality of POME, namely the POME Report per quarter and the RKL-RPL Implementation Report per semester which includes the results of the measurement of the quality of POME every month. The test is carried out by a laboratory that has been accredited by KAN (LP-195-IDN) with reference to the KepmenLH regulation Number 29 of 2003. The results of the latest POME quality testing are as follows:

POME test results

Parameter	Unit	QS*	Oct 2021	Nov 2021	Dec 2021
pH	-	6 - 9	7.7	7.35	7.57
BOD	Mg/l	5,000	1,805	1,469	1,567
COD	Mg/l	-	5,158	1,135	1,211
Oil and grease	Mg/l	-	2.80	0.90	0.60

*Quality standards are based on KepmenLH Number 29 of 2003

Monitoring the quality of wastewater at the outlet shows the results. Parameters monitored meet environmental quality standards. From the results of the 4th quarter data analysis in 2021, there has never been a test result value that is above the specified quality standard. This shows that the POME generated from FFB management activities is feasible to be applied to land (Land Application).

The company already has documents related to POME management, including:

- The company already has an SOP related to Effluent management with the Number No.110/POD-FAC/07 BAB III which explain procedure of effluent application and the manufacture of flat beds in the estate
- The company has also shown a plan document for the improvement of the WWTP pool and Fiber storage area Factory operational manual within the scope of Sime Darby, explaining the waste management process at WWTP

7.8.4

The water usage for FFB processing has been monitored and documented. The document of water usage in period of January – June 2020 shown that the water usage ratio in the range of 2.18 m³/ton of FFB, this range is still in accordance with the water quotas that can be utilized, that is + 5,000 m³/month

Status: Comply

7.9

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

7.9.1

In terms of efforts to increase the efficiency of fossil fuels, the company uses fiber and shells as boiler fuel. The company has shown data on shell and fiber usage as Renewable Energy Usage for the January to December 2021 has used the energy of 0.0247 kWh/Ton. In addition, the company has a biogas plant which is used as an energy source for processing PKO

The company also has made efforts to improve the efficiency of the use of fossil fuels in the transportation area (use of vehicles), including by periodic maintenance to reduce incomplete combustion and analyze fuel usage by selection of efficient transportation routes.

Status: Comply

7.10

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

7.10.1

Suppliers conduct GHG calculation using PalmGHG V4 RSPO (period of January to December 2021). Summary of GHG emission are listed as follows :

Summary Emission

Product	tCOe2 / tProduct
CPO	1.48
PK	1.48
PKO	1.67
PKE	1.67

Description	Unit	Value
Oil palm planted on mineral soil	Ha	27298.66
Oil palm planted area on peat	Ha	0.00
Total oil palm planted area	Ha	27298.66
Conservation area (Forested)	Ha	1469.18
Conservation area (Non-Forested)	Ha	36.50

FFB Production per hectare	t/ha	18.34
OER	%	21.66
KER	%	4.26

Mill Emissions and Credits

Description	tCO ₂	tCO ₂ e/t FFB
Emission Sources		
POME	5865.40	0.02
Fuel Consumption	411.85	0.00
Grid Electricity Utilization	0.00	0.00
Credits		
Export of Excess Electricity to Housing & Grid	0.00	0.00
Sale of PKS	0.00	0.00
Sale of EFB	0.00	0.00
Total	5777.25	0.02

Production	t/yr
FFB processed	263,193.30
CPO Produce	56,999
PK Produce	11,201
PKO	15,351.468

Summary of field emission and Sinks

Description	Own			Group			Total tCO ₂ e
	tCO ₂ e	tCO ₂ e/ha	tCO ₂ e/t FFB	tCO ₂ e	tCO ₂ e/ha	tCO ₂ e/t FFB	
Emission Source							
Land Conversion	188498.62	13.40	0.72	101.00	0.01	0.69	188599.62
CO ₂ Emissions from Fertilizer	17328.54	1.23	0.07	9.11	0.00	0.06	17337.65
N ₂ O Emissions from Peat	0.00	0.00	0.00	0.00	0.00	0.00	0.00
N ₂ O Emissions from Fertilizer	14693.36	1.04	0.06	7.70	0.00	0.05	14701.05
Fuel Consumption	3988.12	0.28	0.02	2.01	0.00	0.01	3990.13
Peat Oxidation	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Sinks							
Crop Sequestration	-126165.89	-8.97	-0.48	-66.48	-0.01	-0.45	-126232.37
Sequestration in Conservation Area	-2975.39	-0.21	-0.01	-2.93	-0.00	-0.02	-2978.32
Total	95367.36	6.78	0.36	50.41	0.00	0.34	95417.77

Emissions from Palm Kernel Crusher

Emission Source	tCO ₂ e
PK from own mill	51779.22
PK from other sources	2892.07
Fuel Consumption	793.88
Total Crusher Emissions	55465.17

POME Treatment

Emissions	%
Divert to compost	0
Divert to anaerobic digestion	100

POME Diverted to Anaerobic Digestion

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

The data from the GHG calculation is based on the period January - December 2021 and has been approved during onsite audit activities for recertification assessment.

7.10.2

Based on the results of the document review, it was found that there were no new plantings at PT Teguh Sempurna and that only replanting activities had been carried out since 2015.

7.10.3

The company has identified source of waste pollution and emissions from Estate and Mill activities, In the Mill, the major emission source is from POME and the use of diesel fuel for generators and vehicles. The other main sources of emission are liquid waste from processing, engine emissions, boiler emission of combustion of renewable fuel, dust from road transportation, emission from CPO and FFB transportation. Greenhouse gas emissions source from Estate are mostly from the use of chemical fertilizers, fossil fuel for transportation, and N₂O emission.

Fossil fuel reducing have been implemented by fiber and shell usage, and biogas plant. Realization of renewable energy have been monitored on monthly report for fiber and shell usage. Monitoring for emission and pollutants (air emission, air ambient, odor, noise, and vibration) from Estate and Mill was done periodically, covered on RKL/RPL implementation report and reported to Environmental Agency of Kalimantan Tengah Province.

Status: Comply

7.11

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

7.11.1

The company does not prepare land for new plantings or replanting by burning. This is in accordance with the results of field observations in the replanting area in 2022, for example in block Q29 BGE, it is excavators and bulldozers were found carrying out land preparation/uprooting oil palm trees for replanting.

7.11.2

The unit of certification stipulates fire prevention and control measures for the lands it manages directly, some of which are shown as follows:

- SOP for Land Fire Management (SOP-TSA-021-B) Revised 01 dated 10 February 2014. The procedure describes the composition of the Fire Management Team, information system and team coordination, unit team structure, and job descriptions for each team. In addition, it is also explained about fire prevention.
- The SOP for Fire Hazard Management (TSA-PMF/K3L/001) was approved by the Manager on 11 June 2009. The procedure explains the references and practical instructions regarding systematic steps that can be taken by all parties to overcome/manage fires so as to minimize losses. material and immaterial and environmental impacts.
- SOP on Fire Prevention Procedures (No. Policy 716/TQEM-PK/10), rev 00, approved by the Head of SOU on 23 August 2010.
- Emergency Response SOP (No. Policy 719/TQEM-ESH/10), rev 00, endorsed by the SOU Chair on 23 August 2010. This procedure is to provide guidance to ensure that all employees practice in their duties or actions in an emergency.

Based on the results of field observations at the Mill and interviews with workers, it is known that workers have understood

the danger signs of fire or other emergencies, namely the presence of a siren that sounds unusual. Based on the results of field observations, a fire monitoring tower was also found. Based on this explanation, it is known that the company already has a Fire Prevention and Management SOP.

7.11.3

The unit of certification involves stakeholders in adjacent locations for fire prevention and control measures, which are shown in the Minutes of Fire Extinguisher Simulation, October 28, 2021, at Pematang Factory. This activity was attended by estate and factory worker, and contractor.

	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

No new clearing since 15 November 2018. PT TSA cleared land after November 2005 without prior identification of HCV. Sime Darby Plantation Berhad as the parent of PT TSA has made a disclosure of liability according to a letter from the Head of PSQM Department dated 15 July 2015. Certificate Holder shows the RSPO compliance advisory note dated 6 April 2021 and inform LUCA status still in review with raw liability 239.63 Ha.

7.12.2

The company has identified existence of habitat with high conservation value as well as rare and protected flora and fauna contained in document of HCV Assessment. The identification was carried out on August 2009 through cooperation with competent third party "Aksenta". The HCV assessment used standard and method refers to RSPO endorsed HCV Assessment Toolkit of 2008.

The identification of HCV has been carried out through participatory ways. The community was involved as responder and resources in the social survey. Public consultation was done on August 12, 2009 involving the stakeholder from surrounding village such as youth organization, village head, religious leader, local scholar, etc. HCV Assessment covers identification of conservation value in individual biodiversity, population biodiversity, ecosystem biodiversity, environmental service, and socio-cultural value.

The scope of HCV Assessment was HGU (land title) of PT TSA and its surrounding ecosystem. The assessment identified protected areas, flora and fauna and its protection status, and identification of habitat with HCV area. Total identified potential HCV area covers 1,045.69 ha, distributed into four Estates as follows: KBE – 88.13 ha; BGE – 391.58 ha; SME - 60.30 ha; HTE – 80.5 ha and PME – 88.08 ha. Based on the results of the 2022 re-delineation, the company determined the area of HCV that was included in the scope of the authorized by the company certification covers **991.68 ha**.

No new clearing since 15 November 2018, so HCS is not applicable.

7.12.3

Based on the results of the document review, it was found that there were no new plantings at PT TSA and that only replanting activities had been carried out since 2015. Based on the areal statement, the oldest plant in the concession area of PT TSA is the plant in 1996, for planting 2020 is replanting activities.

7.12.4

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

The company has HCV management plan in 2021, such as:

- Flora and fauna identification carried out every 3 months
- HCV socialization once a year

- Monitoring of HCV area conditions every 3 months
- Tree planting once a year
- Reservoir water quality analysis and river every 6 months
- Monitoring the condition of the buffer zone every 3 months
- Painting trees (as buffer zone marker) every 3 months and evaluating the program every 6 months.

Based on field observation, HCV management plan has been implemented by Certificate Holder. Field visits verification there are HCV signboard in certain area, enhance with natural vegetation, and there is no identification spraying activity. However, there is a planting area in block Q23 division 1 of the PME Sahabu riparian and in blocks Q22 & R19 division 1 of the Sahabu HTE riparian, there was no marking on palm oil trees as the HCV area boundaries, but based on interview with pesticide operator, they are understood with application boundaries. In this regard, the company has the opportunity to ensure the implementation of the HCV management plan for palm oil marking activities as the boundaries of the HCV area which is carried out every 3 months. **OFI**

The HCV officers in each estate (concurrently as assistant) are responsible for implementing the HCV work plan and monitoring the success of HCV management in each working area. The company also demonstrated evaluation and consultation with stakeholders related to the HCV program which was carried out on July 29, 2021 which was attended by Pantap Village, RT Tambion and Kapuk Village.

7.12.5

Based on interviews with management, it was found that there were HGU areas that were still controlled by the people in the Tabion area. The area has been compensated but is controlled by the community. The results of the HCV identification carried out in 2009, the Tabion area was identified as having potential HCV 1,2, 4,2,4,4 5 and 6 but could not be managed directly by the company.

The company has a Decree of Appointment as the HCV coordinator for the Tabion community who is also a PT TSS harvest employee with No. 001 / BGE / SKP-SKU-H / III / 2017 dated February 1, 2017. The company also involved evaluating and consulting the HCV program with the community, especially the Tabion area community. During the recertification audit, information was obtained that the area (Tabion area community) had been removed from the HCV area and declared an enclave area.

7.12.6

The company showed evidence of the socialization of the HCV program to the community and employees on July 17, 2021 in Rantau Pulut village, Pemantang village, Sahabu village, Gantung Pengayuh village, Batu Menangis village, RT Alas Empeng, Kapuk village, Kawan Batu village and Durian Kait village.

The employees around the company have conducted socialization on every morning circle activity related to wildlife protection and the installation of HCV signs that are installed in the plantation area as a means of outreach to the community and employees. The company also has SOPs for the protection of RTE species that have explained the penalties for those who carry out activities that harm, capture or kill species that are included in the RTE category. In accordance with Law No. 5 of 1990 concerning Biodiversity and PP. 7 of 1999, which is now changed to Environmental Ministry Decree No.106 years 2018. There is also an RTE signboard regarding the prohibition of hunting in HCV areas. The company also has Internal Mail no. 130 / bge-kry / I / 2017 / M regarding the Prohibition of Hunting Wildlife on January 10, 2017.

The document has been described about the landscape situation around PT TSA and not identified the existence of protected forest / conservation area set by the government. However, there is still a secondary forest vegetation and riparian in the area of PT TSA.

The Identified flora and fauna among others:

- Flora; The plants identified from herbaceae, shrubs, lianas and trees. Of the 300 identified species, no plant species are protected in accordance with PP. 7 of 1999 and Environmental Ministry Decree No.106 years 2018.
- Fauna; Identified 26 Mamalian species and there are 9 protected species according to Government Regulation No.

7 of 1999 / Environmental Ministry Decree No.106 years 2018 for example Kubung Malaya (*Cynocephalus variegatus*), *Trenggiling* (*Manis javanica*), Hedgehog (*Hystrix brachyura*), Sigung (*Mydaus javanensis*) *Sero Ambang* (*Aonyx cinerea*), *Macan Akar* (*Felis bengalensis*), *Pelanduk* (*Tragulus javanensis*) and *Kijang* (*Muntiacus muntjak*); 76 species of birds and there are 5 species protected by the Government Regulation No. 7 of 1999 / Environmental Ministry Decree No.106 years 201 such as *Pekaka Emas* (*Pelargopsis capensis*), *Kipasan Belang* (*Rhipidura javanica*), *Burung Madu Raja* (*Aethopyga siparaja*) and *Pijantung Kecil* (*Arachnothera longirostra*); 8 types of reptiles, no protected by government regulation.

Monitoring of RTE species has been conducted routinely (every semester), the monitoring result will be the input in the next monitoring plan.

Based on interview with workers known that they are understood about protected species and HCV area with no collect, illegal hunting, and consume RTE species.

7.12.7

The company has HCV implementation management and monitoring plan period of 2021, the program consists of:

- Riparian area management (HCV boundaries marking and maintaining, marking of chemicals application borders, HCV socialization to surrounded community and workers, planting of erosion control plants and HCV area patrols)
- Management and monitoring of RTE species.
- To conduct species identified protection.
- Implementation of company procedure related to HCV management, such as prohibition policy on all employees to hunt, maintain animals protected by the law set forth in SOP's for Wildlife Handling and Protected Flora Preservation, including sanctions provided by the company to the offending employee.
- HCV monitoring (monitoring of HCV attribute, monitoring of HCV in three monthly basis and monitoring of HCV rehabilitation).

Monitoring of HCV & RTE species has been conducted routinely (every semester), the monitoring result will be the input in the next monitoring plan. CH was able to shows evidence of receipt note document of flora and fauna identified in implementation monitoring and management HCV Period 2021.

7.12.8

Base on document verification of area statement, there is new planting activities after November 2005, not preceded by an HCV assessment (HCV conducted on 2009).

The company has reported LUCA on May 12, 2017 were based on the LUCA SDP REPORT REVIEW STATUS data as of July 3, 2020, it is known that the status for PT Teguh Sempurna is Pending LUCA checklist from RSPO. During the Surveillance 1.4 activity, there was an email from the RSPO on 25 September 2020 which explained that "Following your email dated 21 September and after reviewing the current LUCA progress, we agreed to allow the NC to remain open until the next Surveillance audit". In this regard, the unit of certification may be granted concessions until the next surveillance.

The company shows the progress of the RaCP / LUCA approval process from the RSPO according to an email from the RSPO secretariat dated 18 February 2022 which explained that the RSPO secretariat gave conditional approval "Conditional Approval" to Sime Darby Plantation (SDP) for certified management units including PT Teguh Sempurna for continue recertification assessment. There is no evidence that the RaCP has been approved by the RSPO. Based on that's explanation raised **Non-conformity No.2022.04 with Major Category**

7.12.8	Status: Non-conformity No.2022.04 with Major Category
--------	--

3.2 Conformity Checklist of Certificate and Trademark Use

1.	Evidence of permission or approval certificate and trademark from Certification Body which submitted by Client	X or√
ASA-1.4 & RC-2	PT TSA do not use RSPO Trademark and CB Logo, However PT TSA has had a trademark license under Sime Darby Plantation Berhad Group number RSPO – 1106024.	√
	Status: Comply	
2.	Implementation of certificate and trademark used by Client comply with size and type (shape) against Guideline of Logo Use	X or√
ASA-1.4 & RC-2	PT TSA do not use RSPO Trademark and CB Logo, However PT TSA has had a trademark license under Sime Darby Plantation Berhad Group number RSPO – 1106024.	√
	Status: Comply	
3.	Implementation of Certificate and Trademark is not used on product	X or√
ASA-1.4 & RC-2	PT TSA do not use RSPO Trademark and CB Logo, However PT TSA has had a trademark license under Sime Darby Plantation Berhad Group number RSPO – 1106024.	√
	Status: Comply	
4.	Controlling of Certificate and Trademark, including withdrawing inappropriate logo.	X or√
ASA-1.4 & RC-2	PT TSA do not use RSPO Trademark and CB Logo, However PT TSA has had a trademark license under Sime Darby Plantation Berhad Group number RSPO – 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</p>

		including LUCA analysis to RSPO Secretariat on 2 December 2014 and 2 nd revision on 24 June 2016. Current status of LUCA report of SDP Berhad 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 ASA 1.3

<i>NCR No.</i>	: 2019.01	<i>Issued by</i>	: Satria Adi Putra
<i>Date Issued</i>	: 28 June 2019	<i>Time Limit</i>	: 26 September 2019
<i>NC Grade</i>	: Major	<i>Date of Closing</i>	: 19 September 2019
<i>Standard Ref. & Requirement</i>	: 2.1.1 Evidence of compliance with relevant laws and legal regulations must be available		
<p>Evidence observed (filled by auditor): Based on the results of the document review, interviews with management and workers revealed that:</p> <ol style="list-style-type: none"> 1. In May 2019, the company set a working day at the Batang Garing Estate as 7 days a week and workers did not get a day off. Where is the division of working hours 2 shifts for <i>centeng</i>. 2. Based on Inter Office Mail No. 086/RSP-i2/XII/ 2016 dated December 28, 2016 as compensation related to excess work time the company provides a fixed premium of 60 hours. Based on a simulation of overtime calculations conducted by the team of auditors for <i>Centeng</i> in May 2019 (Referring to the Minister of Manpower and Transmigration No. 102 of 2004) the number of overtime hours is 152 overtime hours with a total of overpaid hours of 381.5 hours <p>This is not in accordance with,</p> <ol style="list-style-type: none"> 1. Law No. 13 of 2003 concerning Manpower in article 77 paragraph 2 which states that working days in 1 week is 6 days for 7 hours of work / day and 5 days for 8 hours of work / day and Law No. 13 of 2003 article 79 paragraph 2 which states that for workers who work 6 days a week must get a day off for 1 day. 2. Kepmenakertrans No. 102 of 2004 concerning Overtime and Overtime Work Wages, Article 11 on how to calculate overtime wages, which explains that: <ol style="list-style-type: none"> a. If overtime is done on weekdays: <ul style="list-style-type: none"> - a.1. for the first hours of overtime work must be paid a salary of 1.5 (one and a half) times an hour's wages; - a.2. for each subsequent overtime working hour, wages must be paid in the amount of 2 (two) times an hour's wages. b. overtime work is done on weekly rest days and/or official holidays for 6 (six) work days 40 (forty) hours a week then the calculation of overtime wages for the first 7 (seven) hours is paid 2 (two) times an hour's wages, and the eighth hour is paid 3 (three) times an hour's wages and the ninth and tenth overtime hours are paid 4 (four) times an hour's wages. 			
<p>Non-Conformance Description (filled by auditor): The company has not been able to show that the implementation of the work schedule has been in accordance with applicable laws.</p>			
<p>Root Cause Analysis (filled by organization audited): That happened because the watchman's job was considered not as heavy as the work of other employees so that only 2 shifts were made and given a fixed premium.</p>			
<p>Correction (filled by organization audited): Watchman and Security work schedule has been reset and given a rest / off a day in 6 working days. Schedule and examples of overtime simulation are attached. Evidence of Socialization of the New Work Sift and Attendance for August is attached.</p>			
<p>Corrective Action (filled by organization audited):</p>			

will run the schedule consistently so that it does not conflict with applicable regulations. Socialization has been carried out on all BGE Security and Watchmen (Minutes and proof of socialization attached)

Assessor Evaluation and Conclusion (filled by auditor):

Verification date is August 26, 2019

The company has shown evidence of improvements including:

- Security overtime simulation which includes calculation of overtime simulation by considering 40 working days a week, overtime calculation on short days and overtime calculation according to the multiplication of hours specified in the regulation (Kepmenakertrans No. 102 of 2004).
- Overtime simulation on behalf of Siswandi and Muji in Batang Garing Estate.
- Batang Garing Estate Security Team Work Schedule with reference to the division of 3 work shifts and days off (Day Off)

Based on the evidence of improvements that have been sent, there are still things that need to be verified by the auditor team including:

- What is the basis of the company in terms of determining hourly wages (attachment of repairs of Rp. 18,087.00 / hour) Note on the circled part. Revision Not Rp. 18,087 but Rp17,777
- Please attach proof of payment to workers related to overtime payments that have referred to Kepmenakertrans No. 102 of 2004. (But the payment of salaries and justification of wages / hours appears)

Related to this, **the non conformity No. 2019.01 declared unfulfilled.**

Verification September 6, 2019

The company has shown evidence of additional improvements in the form of:

- Records of the realization of the Batang Garing Estate Security Team Work Attendance with the division of labor into 3 shifts and there are days off.
- Photo socialization of Wages and Shift Security Systems at Batang Garing Estate on 30 July 2019
- Minutes of Meeting on 29 July 2019 with material evaluation of wage systems and worker shifts, the meeting was attended by 18 participants.

Based on the evidence of improvements that have been sent, additional evidence is still needed that is in accordance with auditor verification dated August 26, 2019 regarding the basis for determining hourly overtime pay and proof of salary payment realization. Related to this, **the non conformity No. 2019.01 declared unfulfilled.**

Verification September 19, 2019

The company has shown evidence of improvements including:

- Simulation of overtime hours calculation for workers with initial S and M at Batang Garing Estate in August 2019.
- Justification List of Establishment of Hourly Wages based on the calculation of wages / hours includes the basic wage of workers, the value of rice supply money and the number of hours worked in one week, the number of weeks in 1 year and the number of months in one year. The document was made by Head of Section and known by the Acting Manager of Batang Garing Estate.
- Proof of payment of salary slips for employees with initial S and MS in August 2019.

Based on the evidence that has been provided, **the non conformity No. 2019.01 has been declared fulfilled.**

<i>Verified by</i>	:	Satria Adi Putra
--------------------	---	-------------------------

<i>NCR No.</i>	2019.02	<i>Issued by</i>	Satria Adi Putra
<i>Date Issued</i>	28 June 2019	<i>Time Limit</i>	26 September 2019
<i>NC Grade</i>	Major	<i>Date of Closing</i>	28 August 2019
<i>Standard Ref. & Requirement</i>	4.7.3 Records of Occupational Safety and Health (OHS) training programs (see 4.8) and Personal Protective Equipment (PPE) in accordance with the results of hazard		

	identification and risk analysis must be available to all workers.
<p>Evidence observed (filled by auditor): Based on the results of field visits and interviews on estate and PKS it is known that:</p> <ol style="list-style-type: none"> (1) At the sterilizer station it is known that there are 1 worker using PPE (shoes) that has been damaged and at the grading station it is known that there are 2 workers who provide PPE (shoes) on a personal/personal basis. (2) In the harvest activity at Kawan Batu Estate there are 1 harvest worker, 2 fruit pusher workers and 1 fruit picker who buys personal PPE (shoes) personally. (3) In the EFB application activities in Hatantiring Estate, there are 2 workers who purchase PPE (shoes) on a personal/personal basis. <p>In addition, the results of the visit at the Spare Parts and PPE Warehouse in Hatantiring Estate found that there was no PPE stock in the form of Shoes and Masks while in Kawan Batu Estate it was found that there were PPE stock of 5 pairs of shoes.</p> <p>Also based on the results of verification of company documents, it can show the Good Received Document No.GR/PMF/2019/05/060 and No.GR/PMF/2019/05/061 dated May 26, 2019 at the Pemantang POM related to the receipt of goods in the form of safety shoes as many as 73 pairs, but not yet distributed because they are still waiting for the goods to arrive</p> <p>Meanwhile in Personal Protective Equipment Procedure No.Policy 739 / TQEM-ESH / 10 Rev 01, Point 6.1 (Principle) states that Management of Minamas Plantation requires that exposed employees who work in the premises of the Minamas Plantation Operational Unit work unit be given adequate protection adequate against hazards that might arise reasonably could be done, and that this protection be maintained.</p> <p>Non-Conformance Description (filled by auditor): The company has not been able to demonstrate that the provision of PPE is in accordance with the procedures that are in place and the applicable laws and regulations.</p>	
<p>Root Cause Analysis (filled by organization audited):</p> <ol style="list-style-type: none"> 1. Safety shoes stock in the Warehouse already exists but it has not been distributed because there are still a few pairs whose sizes are not suitable and if distributed first the PMF Management is concerned about jealousy among employees. The waiting period is what can cause some shoes to be damaged. For 2 Grading personnel who make personal PPE purchases because the shoes given have been damaged so they take the initiative to buy their own. 2. The Harvest worker at KBE personally purchased PPE Shoes because the shoes had been damaged and were reluctant to make a replacement request because they did not know the procedure. 3. Employee Application at HTE makes personal PPE purchases of shoes also because the given shoes have been damaged and do not know the procedure for requesting a replacement. 	
<p>Correction (filled by organization audited):</p> <ol style="list-style-type: none"> 1. PPE Safety Shoes have been distributed to all PMF employees (Evidence attached) 2. APD Shoes have also been distributed to harvest employees at KBE (Evidence attached) 3. APD Shoes have also been distributed to EFB HTE application employees (Evidence attached) 	
<p>Corrective Action (filled by organization audited): To prevent this from happening again in the future throughout the Estate and Mill operations, the Management Team of PT. TSA has revised the SOP for granting PPE. Including the replacement procedure if damage occurs. SOP and Proof of Socialization are attached. Besides that, the availability of PPE Stock must be Ready at the warehouse (Minutes of PPE Stock attached).</p>	
<p>Assessor Evaluation and Conclusion (filled by auditor): Verification is August 12, 2019 The company has shown evidence of improvements including:</p> <ul style="list-style-type: none"> - Minutes of PPE stock inspection at the warehouse which states that on August 3, 2019, PPD stock safety shoes 	

were inspected at the PMF warehouse (10 pairs of stock), documents were made by the Safety Officer and known by Sr.Factory Manager.

- Minutes of PPE handover to PMF employees on July 1, 2019 and August 5, 2019 in the form of safety shoes for 34 process employees, 9 laboratory employees and grading at Pematang Mill. The handover document has been accompanied by a handover list and photos.
- Socialization of PPE replacement SOPs at the Pematang Mill on August 6, 2019.
- Minutes of PPE stock inspection at KBE warehouse on August 3, 2019 which stated that there were 20 pairs of boots and 18 helmets, documents were made by the Safety Officer and known by the Estate Manager.
- Register for attendance and handover of boots on June 28, 2019 to 56 employees of the KBE Division II harvest
- Documentation in the form of photos of harvesters shoes
- Socialization of PPE replacement SOP (No Policy 739 / TQEM-ESH / 10 Rev 02) at Kawan Batu Estate on August 6, 2019.
- Minutes of PPE stock inspection at HTE warehouse which states that on August 1, 2019 which stated that there were 25 pairs of boots and 20 helmets, documents were made by the Safety Officer and known by the Estate Manager.
- Minutes of PPE handover on July 2, 2019 to 14 employees of the EFB application, the official report includes documentation in the form of photos.
- Documentation of PPE replacement socialization and prohibition memorandum involving other parties who are not bound to work in working on July 7, 2019 at Hatantiring Estate, documents made by *Krani* RSPO-ISPO HTE and known by the Estate Manager.
- APD SOP with No Policy 739 / TQEM-ESH / 10 dated July 1, 2019 Rev.02 with a revision point that is to replace damaged shoes before 6 months must meet the requirements to report to the boss that there is damage, submit evidence of damaged shoes, shoes submitted shoes are given last time, damage to shoes due to being used for work (not for other activities outside of work), must be delivered chronologically care and storage of shoes, if it is correct it will be replaced.

Based on the evidence of improvement provided, the auditor team still needs some evidence of improvement including:

- Are there rules / procedures governing the period for checking PPE stocks?
- Are there mechanisms related to checking PPE that are carried out periodically so as to ensure that the PPE used is still in good condition before doing work?

Related to the above, the **non-conformity No. 2019.02 declared unfulfilled.**

Verification is August 26, 2019.

The company has shown evidence of improvements including the Daily Process PPE Check Form, among others at Kawan Batu Estate and Pematang Mill.

Based on the corrected evidence that has been sent, other additional evidence is still needed, in accordance with the results of verification on 12 August 2019 related to the rules/procedures governing the period of PPE examination. Where are the procedures / rules written and what are the examples of their implementation?

Related to this, the **non-conformity No. 2019.02 declared unfulfilled.**

Verification August 28, 2019

The company has shown evidence of improvements including:

- Memorandum No.108 / RSPO-ISPO-TSA / VII / 19 dated July 7, 2019 concerning Monthly Examination of PPE Stocks, documents made by the SOU Chairman of PT TSA.
- Minutes of the Examination of PPE Stock at the Hantantiring Estate Warehouse on August 1, 2019 which stated that there were 25 pairs of boots and 20 helmets. The report was prepared by *Krani* RSPO-ISPO and is known by the Acting Manager of Hatantiring Estate.
- Minutes of APD Stock Inspection at Pematang Factory on August 3, 2019 which stated that there were 10 pairs of boots. The report is made by the Safety Officer and is known by Sr. Factory Manager.
- Minutes of APD Stock Inspection at Gudang Kawan Batu Estate on August 3, 2019 which stated that there were 20 pairs of boots and 18 helmets. The report is made by the Safety Officer and is known by the Estate Manager of Kawan Batu Estate.

Based on the evidence of corrections that have been sent, the non-conformity No. 2019.02 has been declared fulfilled.	
<i>Verified by</i>	: Satria Adi Putra

NCR No.	: 2019.03	Issued by	: Moh. Arif Yusni
Date Issued	: 28 Juni 2019	Time Limit	: 26 September 2019
NC Grade	: Major	Date of Closing	: 20 August 2019
Standard Ref. & Requirement	: 6.1.3 Plans for management and monitoring of social impacts to avoid or reduce negative impacts and promote positive ones, based on social impact assessment, through consultation with the affected parties, shall be available, documented and timetabled, including responsibilities for implementation.		
Evidence observed (filled by auditor): The company can show the social impact Mitigation Plan at PT TSA for the period 2018 - 2019, which includes the Employment Aspects, Public Services, Community Economic Development, FPIC & conflict resolution and environmental aspects. The plan has been explained about the types of activities, farming, impact occurs (direct or derivative), the action plan and the realization of activities. However, in the program of management and monitoring of the social impact that the company has is known if;\ <ul style="list-style-type: none"> - Social management and monitoring plan not yet informed time frame / scheduled and responsible persons (PIC) - not be presented documentation of the realization of activities 			
Non-Conformance Description (filled by auditor): Not enough evidence is available The program of management and monitoring of the social impacts of the company has covered all issues, prepared based on the consultation process with the affected parties, and has not included the person in charge of the activity			
Root Cause Analysis (filled by organization audited): The company has not been able to identify and contain all the social issues that arise because it has not yet been designated a responsible person for the preparation and periodic program review			
Correction (filled by organization audited): The company has established a person in charge and undertook the preparation and revision of a social impact management and monitoring plan based on the results of the participation of affected parties.			
Corrective Action (filled by organization audited): The company, through the person in charge of the program, will routinely identify and improve the program in accordance with established schedules and issues that develop in the environment around the company.			
Assessor Evaluation and Conclusion (filled by auditor): Verification 20 August, 2019 The company presented the corrective evidence in the form of documents social mitigation plans for the period 2019-2020 which includes aspects of Labor, Public Service Aspects, Community Economic Development Aspects, FPIC Aspects and conflict resolution and Environmental Aspects. In the social mitigation plan it explains about the types of plantation activities, impacts that occur, the mitigation plan, the person in charge and the time of implementation. It can also be shown evidence of the consultation process with affected parties carried out on 09 July 2019. Related to the evidence of improvement sent, the non-conformity in this indicator is stated closed and will be verified at the next assessment			
Verified by	: Moh Arif Yusni		

NCR No.	: 2019.04	Issued by	: Arif Faisal Simatupang
Date Issued	: 28 June 2019	Time Limit	: 26 September 2019
NC Grade	: Major	Date of Closing	: 28 August 2019
Standard Ref. & Requirement	6.5.2 Collective labor agreements / company regulations in accordance with labor regulations, are available in clear language and are explained by management or trade unions to workers.		
Evidence observed (filled by auditor): Based on the results of the field visit at Hatantiring Estate V12 Division 2, in the EFB application that was carried out by a third party (contractor) there were contractors who were assisted by other parties who did not have a working relationship with the contractor or the company. The results of interviews with contractor workers acknowledged that those who helped were not company employees or contractors.			
Non-Conformance Description (filled by auditor): Related to this the company has not been able to show the mechanism that has been implemented to ensure that all workers have work ties.			
Root Cause Analysis (filled by organization audited): Other parties participating in the work are the children of workers who are on school holidays. The worker acknowledges the error and will not repeat it.			
Correction (filled by organization audited): The manpower concerned has been given a Letter of Reprimand by the Chairman of HTE and has made a statement that he will not repeat the error.			
Corrective Action (filled by organization audited): In addition to making a statement will not repeat these mistakes again and so that the same mistakes are not repeated by other parties (Contractors / Employees), HTE Management issued a Memorandum on Prohibition from involving other parties who have no work ties with companies / Work Agreement Letter holders in their work.			
Assessor Evaluation and Conclusion (filled by auditor): Verification is August 12, 2019. The company has shown evidence of improvements including: <ul style="list-style-type: none"> - Memorandum No. 107 / HTE-I / VII / 19 dated July 6, 2019, which was signed by the Acting Estate Manager of HTE regarding the Prohibition of Including parties not related to the company/Work Agreement Letter holder in their work. - Letter of Reprimand No. 13 / THE-ST / VII / 2019 to initial R employees related to bringing other people who are not bound to work with the company/Work Agreement Letter holders and do not use PPE. - Statement letter on June 26, 2019 for employees with initial R stating that they will not bring others to help/accompany them in their work. - PPE replacement socialization document and prohibition of including other parties who are not bound to work in working on July 7, 2019 at Hatantiring Estate. Based on the evidence of improvement that has been sent, the auditor team still needs additional proof of improvement and completes the corrective action. The non conformity No.2019.04 declared unfulfilled.			

Verification date is August 26, 2019

In accordance with the corrective actions that have been given, please provide proof of the implementation of the System/Monitoring related to supervision by the Security Guard/watchman officer for work carried out by third parties. (Attached)

Related to this, the **NCR No. 2019.04 declared unfulfilled.**

Verification August 28, 2019

The company has shown evidence of improvement, namely Monitoring of Other Party's Involvement in Third Party Work carried out by Security and conducted daily (Point 2). Related to this, the NCR No. 2019.04 **non conformity No.2019.04 declared unfulfilled.**

Verified by : **Satria adi Putra**

NCR No.	: 2019.05	Issued by	: Arif Faisal Simatupang
Date Issued	: 28 June 2019	Time Limit	: ASA 1.4
NC Grade	: Major	Date of Closing	:
Standard Ref. & Requirement	7.3.1 There shall be evidence that no new plantings have replaced primary forest, or any area required to maintain or enhance one or more High Conservation Values (HCVs), since November 2005. New plantings shall be planned and managed to best ensure the HCVs identified are maintained and/or enhanced (see Criterion 5.2).		
Evidence observed (filled by auditor):			
The company has reported LUCA on May 12, 2017, until the audit activities take place, the concept note not approved by RSPO yet. Based on the Email from Head of Sustainability on May 9, 2019 to the RSPO Secretariat, explained the results of the meeting between Sime Darby Plantation and the RSPO Secretariat which explained that Sime Darby Plantation was given 1 year for all nonconformities in the indicator 7.3.1. So this nonconformity is given until ASA-1.4.			
Non-Conformance Description (filled by auditor):			
The company has not been able to show that the RACP concept note has been approved by the RSPO.			
Root Cause Analysis (filled by organization audited):			
-			
Correction (filled by organization audited):			
-			
Corrective Action (filled by organization audited):			
-			
Assessor Evaluation and Conclusion (filled by auditor):			
Until the remote audit ASA 1.4, the concept note not approved by RSPO yet. Its became non conformity (NCR No. 2020.01) on indicator 7.12.8 RSPO P&C 2018 INANI			
Verified by	:	Yohanes Hardian	

3.4.2. Identification of Findings, Corrective Actions and Observations at ASA 1.4 (Remote Audit)

NCR No.	: 2020.01	Issued by	: Yohanes Hardian/ Radytio Puspanjana
Date Issued	: 12 August 2020	Time Limit	: 18 September 2022
NC Grade	: Major	Date of Closing	:
Standard Ref. & Requirement	: 7.12.8 Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV- HCSA assessment since 15 November 2018, the Remediation and Compensation Procedure (RaCP) applies.		
<p>Evidence observed (filled by auditor): The company has reported LUCA on May 12, 2017, until the audit activity took place there was no concept note approved by RSPO. Based on data from the LUCA SDP REPORT REVIEW STATUS as of July 3 2020, it is known that the status for PT Teguh Sempurna is Pending LUCA checklist from RSPO and until the audit activities take place, the concept note not approved by RSPO yet.</p> <p>Non-Conformance Description (filled by auditor): The company has not been able to present the evidence of the RACP concept note has been approved by RSPO or has received conditional approval from RSPO</p> <p>Root Cause Analysis (filled by organization audited): PT TSA has not received information from Management Sime Darby after August 9, 2019.</p> <p>Correction (filled by organization audited): GSQM coordinated with Sime Darby for the reporting process and LUCA status of PT TSA and obtained progress status until September 25, 2020.</p> <p>Corrective Action (filled by organization audited): GSQM will continue to coordinate with Sime Darby to update the LUCA report to the RSPO</p> <p>Assessor Evaluation and Conclusion (filled by auditor): Verification 28 September 2020 The unit of certification can present an email from RSPO dated 25 September 2020, who described "Following your email dated 21 September and after reviewing the current LUCA progress, we agreed to allow the NC to remain open until the next Surveillance audit". Based on the explanation above the time limit of this non-conformity are changed being next surveillance audit.</p> <p>Verification 26 March 2022 (Onsite ASA-1.4 & RC-2) The company shows the progress of the RaCP / LUCA approval process from the RSPO according to an email from the RSPO secretariat dated 18 February 2022 which explained that the RSPO secretariat gave conditional approval "Conditional Approval" to Sime Darby Plantation (SDP) for certified management units including PT Teguh Sempurna for continue recertification assessment.</p> <p>Email on 18 February 2022 from Aryo Gustomo <aryo.gustomo@rspo.org> to Alagendran Maniam <alagendran.maniam@sime-darbyplantation.com> which stated, "Dear Pak Alagendran, first of all, thank you for being patient with us. After reviewing your request and doing some internal checking within our team, herewith our response to you.</p> <p><i>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.</i></p> <p><i>Now, this Conditional Approval would only be given for those Management Units that have been certified before to allow</i></p>			

*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.*

*While for the **uncertified management units**, The Initial Certification audit may be conducted, but the **Certificates can only be issued when the completion of the RaCP Process (i.e approval of Compensation and Remediation Plans) is approved** by the Compensation Panel.*

The following, extracted from our Sales Force database (as per last week), is the list of all Management Units under your Sime Darby Operation in Indonesia with detailed status of Certification and RaCP process. (PT Teguh Sempurna)”

Based on explaining above, the **NCR No. 2020.01** remains open **until the next 6 months** from 18 February 2022 for **PT Teguh Sempurna** (18 September 2022).

Verified by : **Radytio Puspanjana**

3.4.3. Identification of Findings, Corrective Actions and Observations at ASA 1.4 and Recertification

NCR No.	: 2022.01	Issued by	: Afiffuddin
Date Issued	: 26 March 2022	Time Limit	: ASA 2.1
NC Grade	: Minor	Date of Closing	:
Standard Ref. & Requirement	<p>2.2.2 All contracts, including contracts with FFB suppliers, have separate clauses regarding the fulfillment of relevant legal obligations, and can be proven by the relevant third party.</p>		
<p>Evidence observed (filled by auditor): The company shows contract documents that have separate clauses regarding the fulfillment of relevant legal obligations, including but not limited to the application of minimum wages, provision of PPE, and involving workers in the BPJS Health and Employment program, which are listed in:</p> <ul style="list-style-type: none"> • Transportation Service Agreement Letter, number 004/Jasa Transport/TSA/IV/2021, dated April 10, 2021, with CV Gelora Seruyan, article 5 related to the implementation of special regulations regarding health, security, environment, and employment. • Transport Service Agreement Letter number 003/Jasa Pengangkutan/TSA/IV/2021, dated April 10, 2021, with CV Ayawan Jaya, article 5 related to the implementation of special regulations regarding health, security, environment, and employment. <p>Based on the results of interviews with representatives of contractors, including the contractor PT Central Pratama Property, it is known that the work agreement has its own clause regarding the fulfillment of relevant legal obligations and this has been known by the contractors. However, regarding the fulfillment of the relevant legal obligations, it has not been proven either by the third party concerned or by the company.</p>			
<p>Non-Conformance Description (filled by auditor): Based on the explanation above, it is known that the company has not been able to show proof that the fulfillment of the relevant legal obligations by third parties/ contractors has been fulfilled in accordance with the agreement.</p>			
<p>Root Cause Analysis (filled by organization audited):</p>			
<p>Correction (filled by organization audited):</p>			
<p>Corrective Action (filled by organization audited):</p>			
<p>Assessor Evaluation and Conclusion (filled by auditor):</p>			
Verified by	:		

NCR No.	: 2022.02	Issued by	: Moh Arif Yusni
Date Issued	: 25 Maret 2022	Time Limit	: ASA 2.1
NC Grade	: Minor	Date of Closing	:
Standard Ref. & Requirement	3.4.2 For the unit of certification, a social and environmental impact assessment document is available and a management and monitoring plan has been developed with the participation of affected stakeholders.		
Evidence observed (filled by auditor): <p>The company has conducted periodic reviews every 2 years related to its Social Impact Management and Monitoring Plan. The review process was carried out by involving the participation of the affected parties through a questionnaire. However, based on the results of the 2021 review, it is known that:</p> <ul style="list-style-type: none"> - The participatory method carried out has not fully covered all the factors that can cause social impacts (both positive and negative) such as use and access rights, traditional rights or customary rights owned by indigenous peoples, to the latest issues developing in the community. around the company's operational area. - Sample representation is not fully representative of all affected parties (including representatives of women, migrants, new villages/new communities (PDR), workers (local, migrants, <i>KHT or KHL</i>) to identify sources of impact and potential social impacts, and determine management recommendations and social impact monitoring. - There is not enough evidence that the results of the management and monitoring of social impacts carried out by the company in the previous period have become a benchmark in the identification of the latest monitoring and management of social impacts. <p>Thus, with the limited number of parties involved in the preparation of the management plan and social monitoring, there are several issues which have not been monitored and managed in a comprehensive and integrated manner, for example:</p> <ul style="list-style-type: none"> - Pay special attention to the indirect impacts caused by the company, for example, the dynamics of the social development of new community settlements around the company's area which has an impact on operational activities and company image. - Attention to the impact of the company's operational activities and efforts to minimize it, for example for oil palm replanting activities - The existence of an occupation area / enclave in the company area - Employee status and relationship with the company (<i>SKU, PKWT, Contractor</i>) - Dissatisfaction with the CSR program run by the company 			
Non-Conformance Description (filled by auditor): <p>The review process method does not involve the participation of all affected parties, so there are several issues which have not been monitored and managed in a comprehensive and integrated manner.</p>			
Root Cause Analysis (filled by organization audited):			
Correction (filled by organization audited):			
Corrective Action (filled by organization audited):			
Assessor Evaluation and Conclusion (filled by auditor):			
Verified by	:		

NCR No.	: 2022.03	Issued by	: Moh Arif Yusni
Date Issued	: 25 Maret 2022	Time Limit	: ASA 2.1
NC Grade	: Minor	Date of Closing	:
Standard Ref. & Requirement	7.3.2 There is evidence of waste disposal according to procedures that are fully understood by workers and manager		
Evidence observed (filled by auditor): As a guide in waste disposal, the company has developed procedures for managing hazardous waste and non-hazardous waste waste (RA 012 dated April 01, 2010). The procedure explains that the procedures for managing B3 waste include hazardous Waste Storage and Ways to Reduce and Non-Bhazardous Waste. During the audit process, procedures and understanding of B3 waste management can be explained, but based on the results of field visits it is known that there is B3 waste management that is not in accordance with existing procedures, for example: <ul style="list-style-type: none"> - The workshop at Batang Garing Estate has an empty oil storage drum that is not stored in a licensed storage - There is use of chemical packaging, for example used water purification chemicals for storage of diesel fuel at Pemtangan Factory and the use of pesticide jerry cans as water containers / slurry for poison in each estate, but monitoring of hazardous waste that is reused has not been shown. 			
Non-Conformance Description (filled by auditor): the company has not been able to show evidence that the disposal / treatment of waste is in accordance with the procedures it has			
Root Cause Analysis (filled by organization audited):			
Correction (filled by organization audited):			
Corrective Action (filled by organization audited):			
Assessor Evaluation and Conclusion (filled by auditor):			
Verified by	:		

3.4.4. Opportunity for Improvement

No	Ref.	Description
1	2.1.1	Currently the company is in the process of ANDAL addendum where there are additional activities, such as replanting activities and the implementation of permits in the environmental sector. Where the final process is in the stage of preparing the revised ANDAL addendum draft document as evidenced by the Minutes of the requirements and obligations of PT TSA's environmental permit on April 7, 2021 from Environmental Agency of Kalimantan Tengah Province. The next process was delayed due to a COVID incident within the agency. Thus, the company agreed to continue to encourage the AMDAL document revision process
2	2.2.3	The company shows contract documents that have separate clauses that prohibit practices involving child labor, forced labor, and workers from human trafficking, which are stated in the Transportation Services Agreement dated April 10, 2021, with CV Gelora Seruyan and CV Ayawan Jaya, article 5 related to restrictions on hiring underage and/or illegal workers. The company has the opportunity to add the date of birth information to the contractor's workforce list.
3	6.7.2	<p>Unit certification has provided emergency response facilities and infrastructure including OHS. The results of the field visit found that the facility good condition, but the company has the opportunity to re-assure regarding:</p> <ul style="list-style-type: none"> - Monitoring the completeness and preparedness (appropriate and ready to use) for all fire extinguishers in the company - Placement of symbols or warnings for OHS, hazardous materials, and hazardous waste in places where hazardous materials are stored, including waste. - Monitoring the use of the first aid kit provided at several temporary storage for hazardous waste locations, offices and field activities.
4	6.7.3	<p>The unit certification already has procedures related to PPE requirements in the PPE Procedure SOP No. 739/TQEM-ESH/10 which describes the minimum requirements for determining PPE for scope of incidental (non-routine) and complex work.</p> <p>Based on the results of field visits to the hazardous waste warehouse at Pemantang Factory and the hazardous Pesticide warehouse in the Batang Garing Estate, it was found that officers did not use PPE even using a medical masks and buffs at each location, as opposed to what has been determined in company standard procedure. It is explained in the procedure that for the work of handling chemicals, use an EN 141 mask or another equivalent international standard.</p> <p>However, based on interviews with worker and management revealed that the assessed mandatory use of PPE has been communicated to workers, and management has provided the mask at each area. Management has opportunity to encouraged to ensure that the use of PPE for workers in the field is in accordance with the identified risk identification.</p>
5	7.2.10	<p>Medical check up (MCU) are carried out annually for all workers and specific examination for pesticide operator or for workers with certain risks. In collaboration with the Central Clinic PT Kridatama Lancar. The last health check was carried out in the first semester of 2019. For the 2020 and 2021 health check itself it cannot be carried out due to covid-19 pandemic. The company has shown in the Inter-Office Mail of the Central Clinic of PT Kridatama Lancar No. 02/SME-Klinik/III/2022 dated March 10, 2022 related to the postponed of worker's medical check up was postponed due to the COVID-19 pandemic situation until the situation was declared back to normal by the authorities.</p> <p>From the results of interviews with related paramedic, the company will conduct MCU for 2022. To ensure health status, all worker can be consulted with the paramedics in estate clinic, so that</p>

		<p>workers get the appropriate treatment. During the pandemic PT TSA also conduct the COVID screening periodically, gave treatment and facilities for COVID survivors well.</p> <p>Based on this information, the company has the opportunity to carry out MCU activities which were delayed after the pandemic situation was declared recovered and or conditions made it possible to hold special health checks.</p>
6	7.12.4	<p>The company has HCV management plan in 2021 which explains the HCV management plan, namely flora and fauna identification carried out every 3 months, HCV socialization once a year, monitoring of HCV area conditions every 3 months, tree planting once a year, reservoir water quality analysis and river every 6 months, monitoring the condition of the buffer zone every 3 months, painting trees (as buffer zone limit) every 3 months and evaluating the program every 6 months. Based on the results of field visits in the HCV area which is planting area in <i>block</i> Q23 division 1 of the PME Sahabu riparian and in blocks Q22 & R19 division 1 of the Sahabu HTE riparian, information was obtained that there was no painting of oil palm trees as the HCV area boundary. In this regard, the company has the opportunity to ensure the implementation of the HCV management plan for palm oil painting activities as the boundaries of the HCV area which is carried out every 3 months.</p>

3.4.5. Noteworthy Positive Components

No	Ref. Std.	Description
1		The company's commitment to implementing the principles of sustainable palm oil management.
2		Good teamwork and providing data during the audit.
3		Has obtained an ISPO certificate

3.5 Summary of Arising Issues from Public and Auditor Verification

Public Issues	Auditor Verification
<p>Manpower Agency Province Kalimantan Tengah</p> <ul style="list-style-type: none"> • Regarding administration, it is good • Occupational accidents have been reported regularly in the OHS Guiding Committee (<i>P2K3</i>) quarterly report. There are no cases of fatality. • There are no negative issues related to wages and wages are in accordance with the district minimum wages that have been set. • Regarding the Social Insurance (<i>BPJS</i>) program, there are no issues. All employees are registered in the <i>BPJS</i> program. • Workers come from surrounding villages (local residents) and workers who come from outside areas such as Jawa, Sumatera and Nusa Tenggara. • There are no migrant workers employed by suppliers and contractors, and there is no system of forced labor • Workers who come from outside the region come voluntarily and individually 	<p>There are no negative issues that need further verification.</p>
<p>Village official of Pantap Date 22 March 2022</p> <p>There are no negative issues related to environmental pollution. There are Pantap villagers who feel that they have not received compensation for land compensation, related to this process, the village has involved the company in its management.</p> <p>The CSR program has not yet involved the village. CSR is submitted to the company based on incoming proposals and previous activities. So far, the relationship between the company and the community is going quite well and harmoniously. Communication between the company and the village is going quite well.</p>	<p>The company has shown land compensation documentary evidence carried out referring to the concept of FPIC. Described in detail in criteria 2.2; 2.3 6.4</p>
<p>Village official of Kapuk and Sahabu</p> <p>There are no negative issues, land dispute issues or environmental pollution. The land compensation process has been carried out by involving various parties</p> <p>The company has made efforts to develop the surrounding community through CSR programs, the use of local labor and local contractors.</p> <p>The relationship between the company and the community has run quite well and harmoniously. Communication between the company and the village is quite good.</p>	<p>The company has shown land compensation documentary evidence carried out referring to the concept of FPIC. Described in detail in criteria 2.2; 2.3 6.4</p>

Public Issues	Auditor Verification
<p>Previous land owner on Dusun Tabion (elderly)</p> <p>The land compensation process has been carried out with a negotiation process, good administration, involving witnesses and mediation of the traditional leader, village head, sub-district head and police.</p> <p>The company has made efforts to develop the surrounding community through CSR programs, the use of local labor and local contractors.</p> <p>The relationship between the company and the community has run quite well and harmoniously. Communication between the company and the village is quite good.</p>	<p>The company has shown land compensation documentary evidence carried out referring to the concept of FPIC.</p>
<p>Elders of Sahabu (Previous land owner)</p> <p>The land compensation process has been carried out with a negotiation process, good administration, involving witnesses and mediation of the traditional leader, village head, sub-district head and police.</p> <p>The company has made efforts to develop the surrounding community through CSR programs, the use of local labor and local contractors.</p> <p>The relationship between the company and the community has run quite well and harmoniously. Communication between the company and the village is quite good.</p>	<p>The company has shown land compensation documentary evidence carried out referring to the concept of FPIC.</p>
<p>Gender Committee</p> <ul style="list-style-type: none"> • No cases of sexual harassment and domestic violence in the last 3 years • Many program activities cannot run due to the Covid-19 pandemic. • Participate in the needs assessment of new mothers. • New mothers can leave work to breastfeed. • There is a lactation room at the Day Care • Have an understanding of gender equality • Availability of reproductive protection policies such as menstrual permits and birth permits. • Submission of reports/complaints can be through private lines via telephone, WhatsApp and others so that the complainant feels safe. 	<p>There are no negative issues that need further verification.</p>
<p>LKS Bipartite</p> <ul style="list-style-type: none"> • The management of the LKS Bipartite consists of representatives of workers and employers. • There is an approval of a new structure in 2020 	<p>There are no negative issues that need further verification.</p>

Public Issues	Auditor Verification
<ul style="list-style-type: none"> • The worker union has not yet been formed because there has been no initiation from workers. Company policy has given freedom for workers to form unions or to organize • There was a meeting in 2019, which discussed the proposal to change the provision of rice allowances to be replaced with money, but this was rejected by workers so that currently the rice allowances are given in the form of physical rice. • There are no very Critical complaints. So far, the company has handled complaints such as complaints related to damage to housing facilities and the company has responded well • There are no complaints regarding BPJS Health and Employment 	
<p>Employee Cooperative</p> <p>Employee cooperatives are engaged in providing basic commodities and its helpful for workers. There are support from company.</p>	<p>There are no negative issues that need further verification. The company has employee cooperatives in accordance with the regulations.</p>
<p>Upkeep Contractor</p> <p>There are no issues related to the cooperative relationship between the company and the contractor.</p> <p>When payment of work is done on time in accordance with the agreement that has been made. In addition, contractor workers have been given PPE by the contractor in accordance with the risk analysis that has been identified. Contractor workers have also provided health insurance for workers.</p>	<p>There are no negative issues that need further verification. The company has contributed in empowering local communities by collaborating with local contractors.</p>

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><tr><td><p>PT Teguh Sempurna Head of Sustainability & Quality Management</p><p><u>Alagendran Maniam</u> Tuesday, 29 March 2022</p></td><td><p>Mutuagung Lestari Lead Auditor</p><p><u>Moh Arif Yusni</u> Tuesday, 29 March 2022</p></td></tr></table>	<p>PT Teguh Sempurna Head of Sustainability & Quality Management</p>  <p><u>Alagendran Maniam</u> Tuesday, 29 March 2022</p>	<p>Mutuagung Lestari Lead Auditor</p>  <p><u>Moh Arif Yusni</u> Tuesday, 29 March 2022</p>
<p>PT Teguh Sempurna Head of Sustainability & Quality Management</p>  <p><u>Alagendran Maniam</u> Tuesday, 29 March 2022</p>	<p>Mutuagung Lestari Lead Auditor</p>  <p><u>Moh Arif Yusni</u> Tuesday, 29 March 2022</p>		

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

No	Institution/ NGO/ Community	Address	Phone/ Email	Form of Communication	Date of Contact	Response	
						Yes	No
1	Village official of Pantap	Seruyan District	-	Interview via telephone	22 March 2022	✓	
2	Elders of Sahabu (Previous land owner)	Seruyan District	-	Interview via telephone	22 March 2022	✓	
3	Previous land owner on Dusun Tabion (elderly)	Seruyan District	-	Interview via telephone	22 March 2022	✓	
4	Village official of Kapuk	Seruyan District	-	Interview via telephone	22 March 2022	✓	
5	Village official of Sahabu	Seruyan District	-	Interview via telephone	22 March 2022	✓	
6	Upkeep Contractor	Seruyan District	-	Interview via telephone	22 March 2022	✓	
7	Employee Cooperative	Seruyan District	-	Interview via telephone	22 March 2022	✓	
8	LKS Bipartite	Seruyan District	-	Interview via telephone	22 March 2022	✓	
9	Gender Committee	Seruyan District	-	Interview via telephone	22 March 2022	✓	
10	Environmental Agency of Kotawaringin Timur District	Kotawaringin Timur District	-	Interview via telephone	22 March 2022	✓	
11	Labor Agency of Korawaringin Timur Regency	Kotawaringin Timur District	-	Interview via telephone	22 March 2022	✓	
12	Environmental Agency of Kotawaringin Timur District	Kotawaringin Timur District	-	Interview via telephone	22 March 2022		✓
13	Environmental Agency of Seruyan District	Seruyan District	-	Interview via telephone	22 March 2022		✓
14	Plantation Agency of Kotawaringin Timur District	Kotawaringin Timur District	-	Interview via telephone	22 March 2022		✓
15	Plantation Agency of Seruyan District	Seruyan District	-	Interview via telephone	22 March 2022		✓
16	Environmental Agency of Seruyan	Seruyan District	-	Interview via telephone	22 March 2022		✓
17	Pematang Factory (12 Workers)	PT Teguh Sampurna	-	Field observation and direct interview	23 March 2022	✓	
18	Hatantiring Estate (16 Workers)	PT Teguh Sampurna	-	Field observation and direct interview	23 March 2022	✓	
19	Kawan Batu Estate (19 Workers)	PT Teguh Sampurna	-	Field observation and direct interview	24 March 2022	✓	
20	Pematang Estate	PT Teguh Sampurna	-	Field observation	23 March	✓	

No	Institution/ NGO/ Community	Address	Phone/ Email	Form of Communication	Date of Contact	Response	
						Yes	No
	(16 Workers)			and direct interview	2022		
21	Batang Gading Estate 17 Workers)	PT Teguh Sampurna	-	Field observation and direct interview	24 March 2022	✓	
22	Sawit Watch	Jakarta	info@sawitwac h.or.id	Questionnaire via email	15 March 2022		✓
23	WALHI	Jakarta	info@walhi.or.i d	Questionnaire via email	15 March 2022		✓
24	AMAN	Jakarta	rumahaman@c bn.net.id	Questionnaire via email	15 March 2022		✓
25	WWF Indonesia	Jakarta	wwf- indonesia@ww f.or.id	Questionnaire via email	15 March 2022		✓

Appendix 2. Assessment Program

Remote Audit

DATE	11 to 12 August 2020	
PROGRAM	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
Tuesday, 11 August 2020		
08.00 – 08.30	Opening meeting preparation	
08.30 – 09.00	Opening meeting (recorded video conference) <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	<ul style="list-style-type: none"> • Document review and completing audit checklist. • Verification of Basic Information Mill and Estate • Confirmation of Time Bound Plan • Review of Partial Certification 	All Auditor
12.00 – 14.00	• Break	All Auditor
14.00 – 16.15	• Document review and completing audit checklist.	All Auditor
16.15 – 17.00	• Presentation of Daily Progress.	All Auditor
Wednesday, 12 August 2020		
08.00 – 11.00	• Document review and completing audit checklist.	All Auditor
12.00 – 15.30	Internal discussion by auditor team preparing for Closing Meeting	All Auditor
15.30 – 16.30	Closing Meeting (recorded video conference) <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	20 to 26 March 2022	
TIME	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
Sunday, 20 March 2022		
06.00 – 10.00	JAKARTA → SAMPIT / PANGKALAN BUN	All Auditor
11.00 – 12.00	PCR Test in Sampit / Pangkalan Bun	
12.00 – 16.00	Sampit / Pangkalan Bun → PT TSA (AUDITOR STAY IN MESS FOR THREE DAY QUARANTINE) (DAY ONE QUARANTINE)	
Monday, 21 March 2022		
08.30 – 09.30	AUDITOR STAY IN MESS FOR THREE DAY QUARANTINE (DAY TWO QUARANTINE) Opening meeting (recorded video conference) <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
09.30 – 12.00	Interview with Gender Committee, Worker's Union, Worker's Cooperative (if any), Local Contractor (for Mill and Estate), Third Party Supplier and scheme smallholders	All Auditor
09.30 – 12.00	Documents Review <ul style="list-style-type: none"> • Review of previous (Initial assessment) findings • Verification of Basic Information Mill and Estate • Confirmation of Time Bound Plan • Review of Partial Certification 	All Auditor
12.00 – 14.00	Break	
14.00 – 16.15 16.15 – 17.00	<ul style="list-style-type: none"> • Document review and completing audit checklist. • Presentation of Daily Progress. 	All Auditor
Tuesday, 22 March 2022		
08.00 – 11.00	AUDITOR STAY IN MESS FOR THREE DAY QUARANTINE (DAY THREE QUARANTINE) <ul style="list-style-type: none"> • Document review and completing audit checklist. • Public consultation with stakeholder to relevant agency in Seruyan and Kotawaringin Timur District (by Phone) • Stakeholder consultation to affected communities surrounding the plantations and previous land owner 	All Auditor
12.00 – 14.00	Break	
14.00 – 17.00	<ul style="list-style-type: none"> • Verification of stakeholder consultation result and field visit. • Document review and completing audit checklist. 	All Auditor
17.00 – 18.30	<ul style="list-style-type: none"> • Auditor Antigen Test 	
Wednesday, 23 March 2022		
08.00 – 12.00	Field Observation to PEMANTANG ESTATE & HATANTIRING ESTATE Aspect to be verified : <ul style="list-style-type: none"> • Implementation of Legal Aspect (Land Ownership, Legal Boundaries); 	All Auditor

DATE	20 to 26 March 2022	
TIME	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
	<ul style="list-style-type: none"> Implementation of Agronomy Aspect (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application) Implementation of Environmental, Conservation/HCV and Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management) Implementation of Occupational Health & Safety Aspect Implementation of Employment Procedure and Mechanism Aspect Observation of Workers Facilities (Housing, School, Worship Place). 	
12.00 – 14.00	Break	All Auditor
14.00 – 16.15	Field observation to PEMANTANG POM : Aspect to be verified : <ul style="list-style-type: none"> Supply Chain verification (FFB Receiving, Weighbridge, FFB Sorting, Processing Activity, Despatch CPO) Occupational Health & Safety Aspect (Inspection to Chemical Storage, Hazardous Waste Storage, Fire Control Simulation, POME Pond) Implementation of Employment Procedure and Mechanism Aspect 	All Auditor
16.15 – 17.00	Presentation of Daily Progress	
Thursday, 24 March 2022		
08.00 – 12.00	Field Observation to KAWAN BATU ESTATE & BATANG GARING ESTATE Aspect to be verified : <ul style="list-style-type: none"> Implementation of Legal Aspect (Land Ownership, Legal Boundaries); Implementation of Agronomy Aspect (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application) Implementation of Environmental, Conservation/HCV and Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management) Implementation of Occupational Health & Safety Aspect Implementation of Employment Procedure and Mechanism Aspect Observation of Workers Facilities (Housing, School, Worship Place). 	All Auditor
12.00 – 14.00	Break	
16.00 – 17.00	<ul style="list-style-type: none"> Verification of stakeholder consultation result and field visit. Document review and completing audit checklist. 	All Auditor
16.15 – 17.00	<ul style="list-style-type: none"> Presentation of Daily Progress 	
Friday, 25 March 2022		
08.00 – 11.00	<ul style="list-style-type: none"> Verification of stakeholder consultation result and field visit. Document review and completing audit checklist. 	All Auditor
12.00 – 14.00	Break	
14.00 – 16.00	<ul style="list-style-type: none"> Document review and completing audit checklist. 	
16.00 – 18.00	PT TSA → Sampit	All Auditor

DATE	20 to 26 March 2022	
TIME	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
Saturday, 26 March 2022		
08.00 – 09.00	Internal discussion by auditor team preparing for Closing Meeting	All Auditor
09.00 – 10.30	Closing Meeting (Secara Remote): <ul style="list-style-type: none"> • Presentation of audit findings (Noteworthy Positive Component, Non Conformities, OFI, Timelie of CAR's, Conclusion)/ • Comments, Responses and Questions 	
12.00 -	SAMPIT → SURABAYA → JAKARTA	