

Roundtable on Sustainable Palm Oil Certification R S P O

[✓] Surveillance

Name of Management Organisation : Bukit Makmur Palm Oil Mill – PT Karya Makmur Bahagia, subsidiary of Bunitama Agri Limited
 Plantation Name : Bukit Makmur Estate and Bukit Kecubung Estate
 Location : Sungai Hanya Village, Antang Kalang Sub-District, Kotawaringin Timur District, Kalimantan Tengah Province, Indonesia
 Certificate Code : **MUTU-RSPO/140**
 Date of Certificate Issue : 27 December 2019 Date of License Issue : 27 September 2022
 Date of Certificate Expiry : 26 December 2024 Date of License Expiry : 26 December 2022

Assessment	Assessment Date	PT. Mutuagung Lestari Auditor	Reviewed by	Approved by
ASA-1 (Remote Audit)	21 to 22 January 2021	Trismadi Nurbayuto (Lead Auditor), Moh Arif Yusni, Brigitta Prita, Yudhi Yuniarto Tallutondok	Ardiansyah	Leonada
ASA-1 & ASA-2 (Onsite Audit)	29 March to 01 April 2022	Haikal Ramadhan Kharismansyah (Lead Auditor), Afiffudin, Bayu Yogatama, Septian Maulana		

Assessment	Approved by MUTUAGUNG LESTARI on:
ASA-1 & ASA-2	25 August 2022

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Figure 1. Location Map of PT Karya Makmur Bahagia

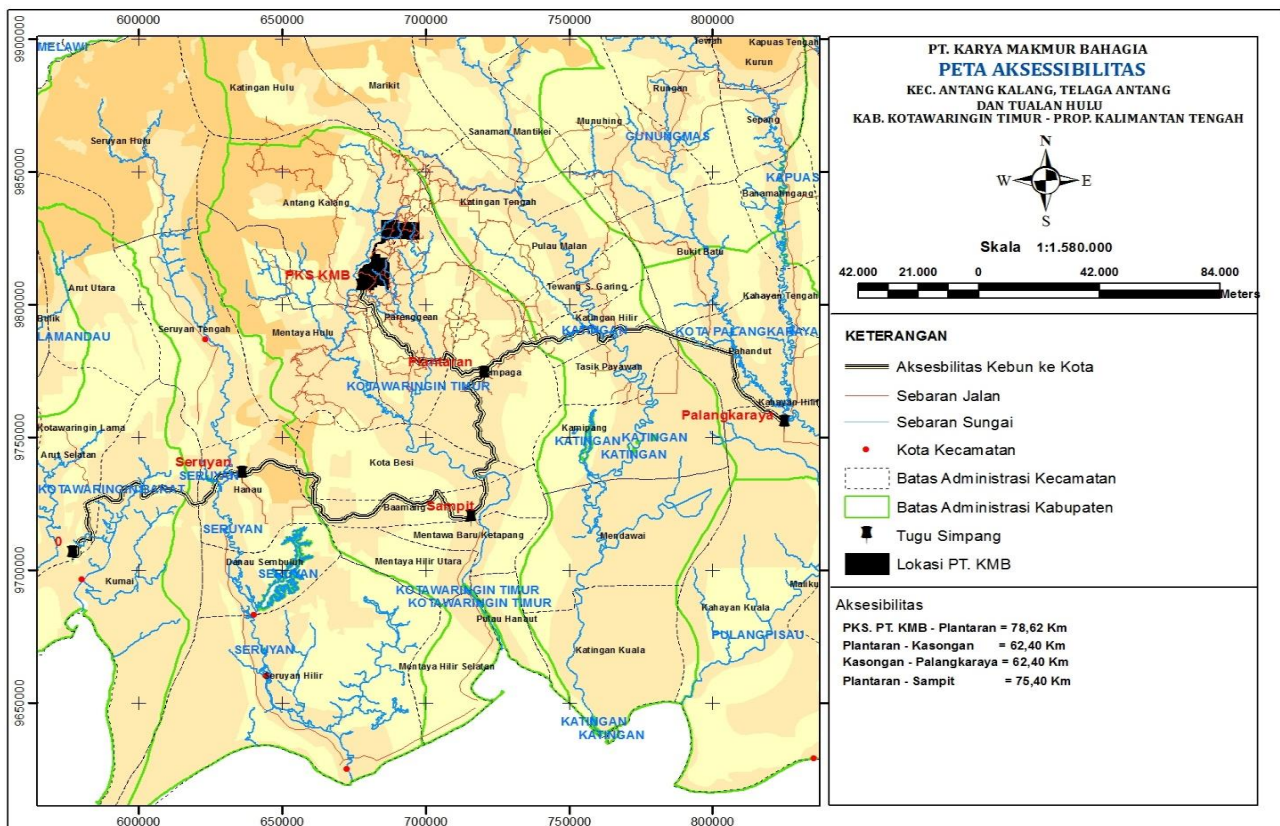
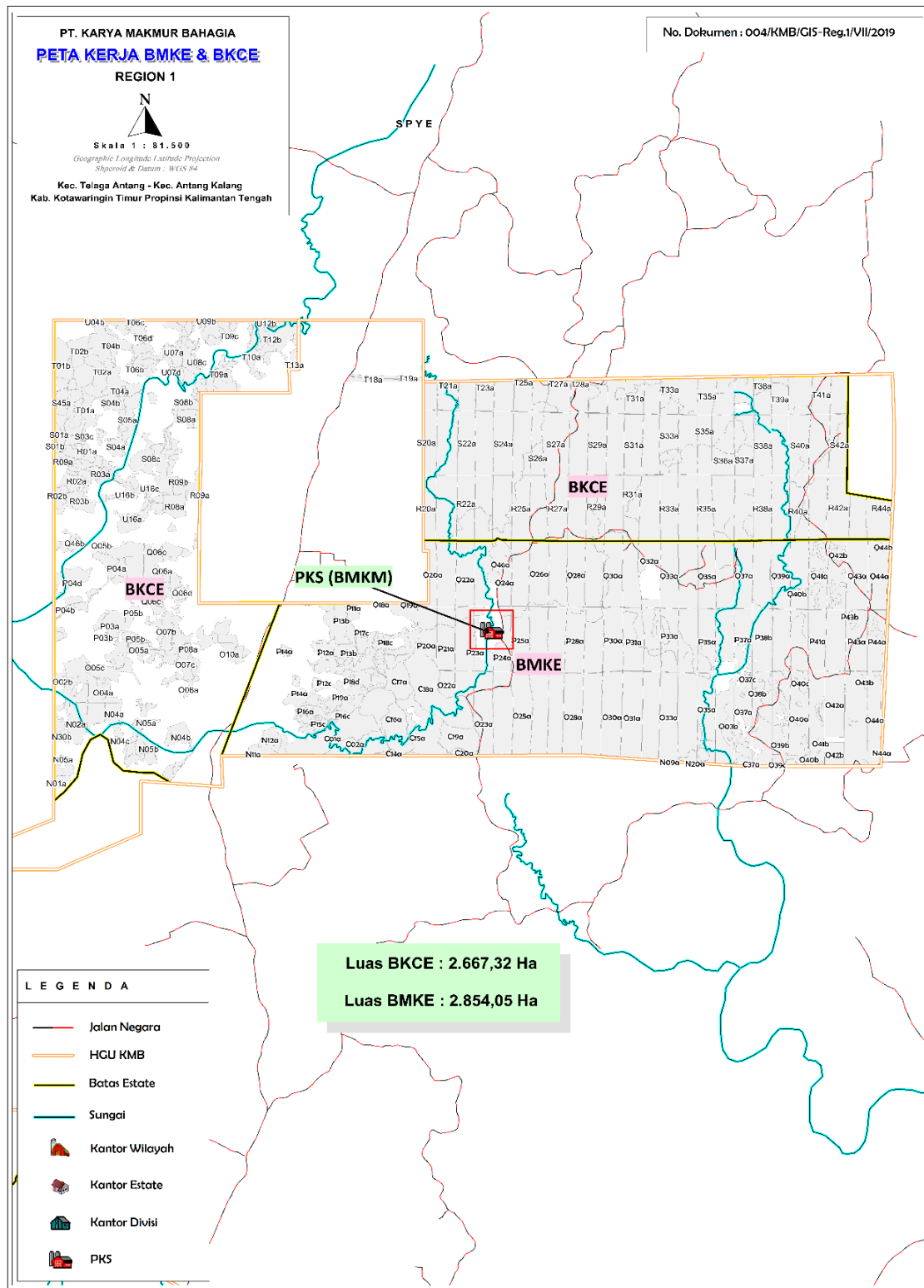


Figure 2. Operational Map of PT Karya Makmur Bahagia



Abbreviations Used

AMDAL	:	<i>Analisis Mengenai Dampak Lingkungan</i>
ANDAL	:	<i>Analisis Dampak Lingkungan</i>
BGA	:	Bumitama Gunajaya Agro
BLH	:	<i>Badan lingkungan hidup</i> (environment agency)
BML	:	<i>Baku Mutu Lingkungan</i>
BMS	:	BGA Manuring System
BOD	:	Biological Oxygen Demand
BPJS	:	<i>Badan Penyelenggara Jaminan Sosial</i> (Social Security Agency)
BPN	:	<i>Badan Pertanahan Nasional</i>
CD	:	Community Development
CMNT	:	Central Mentaya Traksi
CPO	:	Crude Palm Oil
CSR	:	Corporate Social Responsibility
EFB	:	Empty Fruit Bunch
EIA	:	Environmental Impact Assessment
FFB	:	Fresh Fruit Bunch
GHG	:	Green House Gas
GRTT	:	<i>Ganti Rugi Tanam Tumbuh</i>
HCV	:	High Conservation Value
HGB	:	<i>Hak Guna Bangunan</i>
HGU	:	<i>Hak Guna Usaha</i> (Land Use Title)
HIRAC	:	Hazard Identification Risk Assessment and Control
HPT	:	<i>Hama Pengganggu Tanaman</i>
IPM	:	Integrated Pest Management
JHT	:	<i>Jaminan Hari Tua</i>
JKK	:	<i>Jaminan Kecelakaan Kerja</i>
JKM	:	<i>Jaminan Kematian</i>
JP	:	<i>Jaminan Pensiun</i>
KER	:	Kernel Extraction Rate
KMB	:	Karya Makmur Bahagia
LB3	:	<i>Limbah Bahan Berbahaya dan Beracun</i> (hazardous waste)
LCC	:	Legume cover crop
LSU	:	Leaf Sampling Unit
LTA	:	Lost Time Accident
LUC	:	Land Use Change
LUCA	:	Land Use Change Analysis
MAGE	:	Mulya Agung Estate
MSDS	:	Material Safety Data Sheet
MUSREMBANG	:	<i>'Musyawarah Rencana Pengembangan'</i> – Meeting of Development Plan
NGO	:	Non-Government Organization
NPP	:	New Planting Procedure
OER	:	Oil Extraction Rate
OHS	:	Occupational Health and Safety
OHSE	:	Occupational Health Safety and Environment
P2K3	:	<i>Panitia Pembina Keselamatan dan Kesehatan Kerja</i> (OHS Committee)
PAD	:	Public Affair Department
PIC	:	Person In Charge
PK	:	Palm Kernel

POM	:	Palm Oil Mill
POME	:	Palm Oil Mill Effluent
PP	:	<i>Peraturan Pemerintah</i> (Government Regulations)
PPE	:	Personal Protective Equipment
TTL	:	Tanah Tani Lestari
R & D	:	Research and Development
RKL/RPL	:	<i>Rencana Pengelolaan Lingkungan/ Rencana Pemantauan Lingkungan</i>
RSPO	:	Roundtable on Sustainable Palm Oil
SEIA	:	Social and Environment Impact Assessment
SIA	:	Social impact Assessment
SMNE	:	Sungai Mentaya Estate
SMRE	:	Sungai Meraya Estate
SOP	:	Standard Operational Procedure
SPM	:	<i>Serikat Pekerja Mandiri</i>
SPYE	:	Sungai Penyahuan Estate
SSU	:	Soil Sampling Unit
TPS LB3	:	<i>Tempat Penyimpanan Sementara LB3</i> (Hazardous Waste Storage)
UKL/UPL	:	<i>Usaha Pengelolaan Lingkungan/ Usaha Pemantauan Lingkungan</i>
VOPS	:	Volunteer Oil Palm Seedlings
WHO	:	World Health Organization
WTP	:	Water Treatment Plant
WWTP	:	Waste Water Treatment Pond

1.0	SCOPE OF THE CERTIFICATION ASSESSMENT		
1.1	Assessment Standard Used		
		<ul style="list-style-type: none">• RSPO Certifications Systems for Principles & Criteria and RSPO Independent Smallholders Standard (Endorsed by RSPO Board of Governors on 12 November 2020).• Indonesia National Interpretation RSPO Principles and Criteria for the Production of Sustainable Palm Oil 2018 Endorsed by the RSPO Board of Governors on 20th April 2020.	
1.2	Organisation Information		
1.2.1	Organization name listed in the certificate	PT Karya Makmur Bahagia subsidiary of Bumitama Agri Limited	
1.2.2	Contact person	Lim Sian Choo	
1.2.3	Organisation address and site address	<ul style="list-style-type: none">• RSPO registered company: Jl. Melawai Raya No. 10 Kebayoran Baru Jakarta Selatan 12160 Indonesia .• Liaison Office: Jl. Melawai Raya No. 10 Kebayoran Baru Jakarta Selatan 12160 Indonesia.	
1.2.4	Telephone	(62-21) 727 98418	
1.2.5	Fax	(62-21) 727 98665	
1.2.6	E-mail	lim.sian.choo@bumitama.com	
1.2.7	Web page address	www.bumitama-agri.com	
1.2.8	Management Representative who completed the application for certification	Lim Sian Choo (Head of CSR and Corporate Sustainability)	
1.2.9	Registered as RSPO member	1-0043-07-000-00 – 08 October 2007	
1.3	Type of Assessment		
1.3.1	Scope of Assessment and Number of Management Unit	Palm Oil Mill and Supply Base Bukit Makmur Mill, Bukit Makmur Estate, and Bukit Kecubung 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 (S)Longitude (E)
	Bukit Makmur Mill	Sungai Hanya Village, Antang Kalang Sub-District, Kotawaringin Timur District, Kalimantan Tengah Province, Indonesia.	S 01° 34' 04"E 112° 43' 16"
1.4.2	Location of Certification Scope of Supply Base		
	Name of Supply Base	Location	Coordinate
			Latitude (S)Longitude (E)
	Bukit Makmur Estate	Sungai Hanya Village, Antang Kalang Sub-District, Kotawaringin Timur District, Kalimantan Tengah Province, Indonesia.	S 01° 34' 23"E 112° 45' 15"
	Bukit Kecubung	Waringin Agung Village, Antang Kalang	S 01° 33' 22"E 112° 43' 00"

	Estate	Sub-District, Kotawaringin Timur District, Kalimantan Tengah Province, Indonesia.					
1.5	Description of Area Statement						
1.5.1	Tenure						
	• State HGU		15,056.31*	State			
	• Community		-	Community			
*The HGU was titled to PT Karya Makmur Bahagia, consist of Bukit Makmur Estate (3,122.50 ha), Bukit Kecubung Estate (3,382.03 ha) the scope of certification of Bukit Makmur POM consist of Bukit Makmur Estate and Bukit Kecubung Estate only, covers 6,504.53 ha .							
1.5.2	Area Statement						
	Description	TOTAL (Ha)					
	Total area	6,504.53 Ha					
	Mature Area	5,533.03 Ha					
	Mill	43.93 Ha					
	Housing and Building	54.68 Ha					
	Road and Bridge	331.98 Ha					
	HCV	7.91 Ha					
	HCV Riparian	268.00 Ha					
	Occupation	19.00 Ha					
	Other	246.00 Ha					
1.6	Planting Year and Cycles						
1.6.1	Age profile of planting year						
	Planting Year	Hectarage (Ha)		Total (Ha)			
		BMKE	BKCE				
	2000	75.66	-	75.66			
	2002	109.90	-	109.90			
	2003	2.36	-	2.36			
	2005	1.42	10.38	11.80			
	2006	179.30	115.22	294.52			
	2007	1,563.24	1,036.32	2,599.56			
	2008	460.70	520.42	981.12			
	2009	194.78	102.28	297.06			
	2010	121.05	153.49	274.54			
	2011	109.53	282.29	391.82			
	2012	16.31	216.23	232.54			
	2013	17.31	244.84	262.15			
	Total	2,851.56	2,681.47	5,533.03			
1.6.2	New Planting area after January 2010			Ha			
1.6.3	Planting Cycle			1 st 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 (%)
	Bukit Makmur Mill	60	734,154.01	178,165.54	24.27	37,685.19	5.13
*Production data source from January 2020 to February 2022							

1.7.2	Description of Certification Scope of Supply Base						
	Name of Estate	Total Area (Ha)	Production Area (Ha)	FFB (ton/year)	Yield (ton/ha/ year)	Supplied to Mill	
						FFB (ton/year)	%
	Bukit Makmur Estate	3,122.50	2,851.56	118,242.21	19.23	118,242.21	100
	Bukit Kecubung Estate	3,282.03	2,681.47	99,443.44	17.64	99,443.44	100
	TOTAL	6,504.53	5,533.03	217,685.65	18.16	217,685.65	100
*Production data source from January 2020 to February 2022							
1.7.3	FFB description from other source						
	Name of sources/Organisation (RSPO certified / non-certified)		Type of Organisation	number of smallholders	Production Area (Ha)	Supplied to Mill FFB (tonnes/year)	
	RSPO Certified :						
	Gunung Makmur Estate		PT KMB subsidiary of Bumitama	-	3,282.42	27,335.72	
	Bukit Daman Estate			-	1,295.57	3,816.74	
	Sungai Mentaya Estate			-	2,674.52	19,745.84	
	RSPO Non Certified :						
	GMKE-TTL		PT KMB subsidiary of Bumitama	-	-	2,326.60	
	MAGE-KopSekartani, Kop Marga Rahayu, Kop Hapakat, PT TTL			-	-	111,295.80	
	SPYE-Kop Usaha bersama, Kop Eka Harahap, PT TTL			-	-	90,334.75	
	SMNE-TTL			-	-	1,717.03	
	BAGE-Kop Mekar Jaya, Kop Tani Santoso			-	-	260.03	
	SMRE-Kop Bina Tani, Kop Rika Bersatu, PT TTL			-	-	270.67	
	BDME-Kop usaha bersama, PT TTL			-	-	300.90	
	BHJE-Kop Lestari, Kop Makarti Jaya			-	-	12,131.90	
	BKCE-Kop Waringin Jaya, PT TTL			-	-	8,863.92	
	BMKE-TTL			-	-	12,971.30	
	BBGE-PT TTL, Kop Berkat Usaha Bersama			-	-	38,048.72	
	SPGE-LMS		Independent Supplier	-	-	71,724.65	
	BHPE-LMS		Independent Supplier	-	-	88,742.75	
	TOTAL					507,191.51	
	*Production data source from January 2020 to February 2022						
	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 (January 2020 – February 2022) (MT)	
	FFB Processed			258,712		278,899.77	
	CPO Production			86,468		67,462.32	
	Palm Kernel (PK) Production			18.105		14,274.31	

1.8.2	Product selling							
	Type of selling product			Actual selling product for last year (January 2020 – February 2022) (MT)				
	CSPO sold as RSPO certified product			0				
	CSPK sold as RSPO certified product			0				
	CSPO sold under another scheme			0				
	CSPK sold under another scheme			0				
	CSPO sold as conventional			64,455.00				
	CSPK sold as conventional			13,085.77				
1.8.3	Estimate of Certified FFB Claim							
	Name of Estate(s)		Total Area (Ha)	Production Area (Ha)		FFB (tones/year)		Yield (tones/ha/year)
	Bukit Makmur Estate		3,122.50	2,851.56		58,600		20.55
	Bukit Kecubung Estate		3,282.03	2,681.47		50,600		18.87
	TOTAL		6,504.53	5,533.03		109,200		19.74
	*Projected FFB production for 12 months of certificate							
1.8.4	Estimate of Certified Palm Product Claim							
	Name of Mill	Capacity (tones/ hour)	FFB Processed (tones/year)	CPO		Palm Kernel		Supply Chain Module
				Out put (tones)	Extraction (%)	Out put (tones)	Extraction (%)	
	Bukit Makmur Mill	60	109,200	26,500	24.3	5,600	5.20	MB
*Projected CSPO and CSPK production for 12 months of certificate								
1.9	Other Certifications							
	ISO 9001:2008			-				
	ISO 14001: 2004			-				
	OHSAS 18001:2007			-				
	ISCC							
	Others			-				
1.10	Time Bound Plan							
1.10.1	Time Bound Plan for Other Management Units							
	Management Unit		Estate (Supply Base)	Time Bound Plan	Location	Status		
	MILL	Time Bound Plan						
	Pundu Nabatindo (PT Windu Nabatindo Lestari)	2014	Pundu Nabatindo	2014	Kotawaringin Timur Regency Kalimantan Tengah	Certified		
			Koperasi Harapan Abadi	2023		-		
			Kelompok Tani Tenera (Independent Smallholders)	2018	Katingan Regency, Kalimantan Tengah	Certified		
PT Fajar Bumi Nabati (FBI)			2022	Kotawaringin Timur Regency Kalimantan Tengah	-			

		PT Gemilang Subur Maju (GSM)	2022		-
Katari Agro (PT Windu Nabatindo Lestari)	2016	Pelantaran Agro Estate	2016	Kotawaringin Timur Regency, Kalimantan Tengah	Certified
		Katari Agro Estate			
		Pantai Mas Estate			
Gunung Makmur (PT Karya Makmur Bahagia)	2014	Gunung Makmur	2014	Kotawaringin Timur Regency, Kalimantan Tengah	Certified
		Sungai Mentaya			
		Bukit Daman			
		KUD Mekar Jaya	2022		-
		KUD Sekar Tani	2022		-
		KUD Lestari	2022		-
		KUD Marga Rahayu	2022		-
		KUD Usaha Bersama	2022		-
		KUD Tani Santoso	2022		-
		PT Tanah Tani Lestari	2022		NPP Audit (2018)
		Koperasi Hapakat (PT TTL)	2022		-
		Koperasi Rika Bersatu (PT TTL)	2022		-
		Koperasi Usaha Bersama (PT TTL)	2022		-
		Koperasi Eka Kaharap (PT TTL)	2022		-
		Koperasi Berkat Usaha Bersama (PT TTL)	2022		-
		Koperasi Bina Tani (PT TTL)	2022		-
		Kelompok Tani Karya Bersama (Independent Smallholders)	2020		Certified
Bukit Makmur (PT Karya Makmur Bahagia)	2019	Bukit Makmur	2014	Kotawaringin Timur Regency, Kalimantan Tengah	Certified
		Bukit Kecubung	2014		Certified
		Sungai Puring (PT Langgeng Makmur Sejahtera)	2022		No NPP have got sanction
		Koperasi Telawang Bersatu	2022		-
		Koperasi Hinje Ate	2022		-
		Koperasi Eka Kaharap (PT LMS)	2022		-
Kotawaringin (PT Bumitama Gunajaya Abadi)	2019	Sepantaian	2022	Kotawaringin Barat Regency, Kalimantan Tengah	No NPP have got sanction
		Danau Merah			
		Kotawaringin			
		Tonam Raya			
Lamandau Mill (PT Bumitama Gunajaya Abadi)	2020	(PT Bumitama Gunajaya Abadi)	2023	Lamandau Regency, Kalimantan Tengah	-
		Kumai Hilir Estate (PT Andalan Sukses Makmur)	2023	Kotawaringin Barat Regency, Kalimantan Tengah	NPP Was Complete
		PT Investa Karya Bhakti	2023	Lamandau Regency, Kalimantan Tengah	NPP Was Complete

		Koperasi Kompak Maju Bersama	2023	Lamandau Regency, Kalimantan Tengah	-
		Koperasi Mitra Bahaum	2023	Lamandau Regency, Kalimantan Tengah	-
		Koperasi Tanjung Biru	2023	Lamandau Regency, Kalimantan Tengah	-
		Koperasi Seberang Jaya Sejati	2023	Lamandau Regency, Kalimantan Tengah	-
		Koperasi Pulai Sejahtera	2023	Kotawaringin Barat Regency, Kalimantan Tengah	-
	Kendawangan Mill (PT. Gunajaya Karya Gemilang)	Mekar Utama	2015	Ketapang District, Kalimantan Barat	Certified 2015
		Kendawangan			
		Banjar Sari			
		Seriam Jaya			
		Membuluh Jaya			
		Koperasi Serba Usaha Bersama	2022	Ketapang District, Kalimantan Barat	-
		Koperasi Binasari			
		Koperasi Serba Usaha Karya Bersama			
		Koperasi Binasari			
		Koperasi Perkebunan Fajar Mandiri			
		Koperasi Rimba Sari			
	SukaDamai (PT Rohul Sawit Industri)	PT Masuba Citra Mandiri – 1,567.07 Ha	2019	Rokan Hulu Regency, Riau	Certified 2019
		PT Masuba Citra Mandiri – 326.04 Ha the area which suspect into liability mechanism	2022	Rokan Hulu Regency, Riau	-
		Koperasi Karya Melayu Sejati	2019	Rokan Hulu Regency, Riau	Certified 2019
	Pembangunan Raya Mill (PT Agro Sejahtera Mandiri)	PT ASM – 4,861.48 Ha	2019	Ketapang District, Kalimantan Barat	Certified 2019
		KopBun Agro Seriam Mandiri	2019		
		Teluk Rengit (PT Gunajaya Harapan Lestari)	2022	Ketapang District, Kalimantan Barat	-
		PT ASM – 768.72 Ha the area which suspect into liability mechanism	2022	Ketapang District, Kalimantan Barat	-
		Koperasi Bawal Sejahtera Mandiri	2022	Ketapang District, Kalimantan Barat	-
		PT ASM – 494.49 Ha	2020	Ketapang District, Kalimantan Barat	Certified 2020
		Kelompok Tani Sawit Maju Sejahtera (1,427.09 Ha)	2022	Ketapang District, Kalimantan Barat	-
	Sungai Rasau Mill (PT Karya Bakti Agro Sejahtera)	Marau Raya	2022	Ketapang District, Kalimantan Barat	ST-1 (2014)
		KUD Rangkong Bertuah	2022	Ketapang District, Kalimantan Barat	-

			KUD Rasau Tiga Bersama	2022	Ketapang District, Kalimantan Barat	-
			PT Agriplus	2022	Ketapang District, Kalimantan Barat	NPP process
	Selucing Mill (PT. Windu Nabatindo Abadi)	2020	Serawak Damai (PT Windu Nabatindo Sejahtera)	2022	Central Kalimantan	Have not obtained the HGU
	Sungai Cempaga Mill (PT. Windu Nabatindo Abadi)	2020	PT. Windu Nabatindo Abadi	2022	Central Kalimantan	No NPP have got sanction
PT Nabatindo Karya Utama			2022	Central Kalimantan	NPP was complete	
KSU Sehati Pundu			2022	Central Kalimantan	-	
Koperasi Koling Hapakat			2022	Central Kalimantan	-	
	Bukit Tunggul Jaya Mill (PT Ladang Sawit Mas)	2020	PT Ladang Sawit Mas	2020	Ketapang District, West Kalimantan	Certified
KopBun Bukit Tunggul Sejahtera			2022	-		
KopBun Mitra Perjalanan Permai			2022	-		
PT Lestari Gemilang Intisawit			2022	NPP was complete		
Koperasi Kayong Sekayuk			2022			
Koperasi Mitra Sejati			2022	-		
PT Ago Manunggal Sawitindo			2022	NPP was complete		
PT Nabati Agro Subur			2022	-		
PT Sejahtera Sawit Lestari			2021	-		
PT Karya Makmur Langgeng			2022	NPP was complete		
PT Gemilang Makmur Subur			2021	NPP on Process		
Koperasi Istana Pawan Mandiri			2021	-		
Koperasi Rungau Sejahtera			2021	-		
PT Damai Agro Sejahtera			2021	NPP on Process		
	Bukit Belaban Mill (PT Sentosa Prima Agro) **Replanting from Acquisition	2021	PT Sentosa Prima Agro	2023	Ketapang District, West Kalimantan	-
PT Raya Sawit Manunggal			2023	-		
PT Wahana Hijau Indah			2023	-		
PT Hungarindo Persada			2022	-		
	*TBP is approve on November 2021.					
1.10.2	Progress of Associated Smallholders and Out growers for Certifiable Standard					
	Initial assessment of smallholders Bukit Kecubung Estate (KUD Waringin Jaya), Mulya Agung Estate (KUD Sekar Tani dan KUD Marga Rahayu), Sungai Penyahuan Estate (KUD Usaha Bersama) were conducted together with re-certification assessment.					

2.0	ASSESSMENT PROCESS
2.1	Assessment Team
ASA-1 (Remote Audit)	<ol style="list-style-type: none"> Trismadi Nurbayuto (Lead Auditor). Indonesian Citizen. Diploma of Forest Management from Forestry Faculty; Associate Degree of Economic from Economic and Management. He has experienced as field assistant on oil palm plantation year of 2008. Therefore, he has experienced as HCV and SEIA Assessor on 2010-2013. He has been followed HCV identification and management training; ISO training (9001;14001; 22000); ISPO Lead Auditor's training; Safety Expert; RSPO Lead Auditor's; OHS Auditors by Government Regulation No 50 year of 2012; RSPO Next, and SA 8000. He has been conducted audit on ISPO and RSPO scheme since year of 2013 as an Auditor on several aspect as environment, OHS, Legality, Best Management Practices, Social, Worker Welfare, Conflict Resolutions, Long term Business Plan and Supply Chain on Palm Oil Mill. In this audit activity performs the assessment of the Environment, HCV, GHG, waste management and social. Moh Arif Yusni (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. In this audit, he was assessing the aspects of worker welfare and OHS. Brigitta Prita (Auditor). Citizen of Indonesia. Bachelor of Forestry, Department of Forest Resources Conservation and Ecotourism. She had attended Training ISPO by Commission ISPO on June 2013, Training ISO 9001:2008 Quality Management System on January 2014, In House Training 17021 and 17065 management system and Product Quality, Training High Conservation Value by IPB on September 2015, In House Training HCV on August 2016, In House Training Roundtable Sustainable Palm Oil on January 2014; In House Training ISO 14000:2004 Environmental Management System, Training Lead Auditor RSPO by Daemeter and Proforest on July 2017; Training SA 8000 by Internal Company; Training Lead Auditor Supply Chain by BM Trada on June 2018; and Training social & worker welfare from RSPO on January 2019. She has been audited experience ISPO & RSPO since April 2013 in the environmental, conservation, waste management and worker welfare aspects. In this audit activity performs the assessment of legalities, time bound plan and Supply Chain. Yudhi Yuniarto Tallutondok (Auditor). Indonesian citizen, Bachelor of Fisheries, Padjadjaran University. Have experience of working over three years since 2013 as plantation operations staff in private palm oil plantation companies in Indonesia. Training have been followed including Auditor of Indonesian Sustainable Palm Oil (ISPO), Lead Auditor of Roundtable on Sustainable Palm Oil (RSPO) P&C, Lead Auditor of ISO 9001:2015, Lead Auditor of ISO 14001:2015, ISO 22000:2009, ISO 19011:2011, Social Accountability 8000, Basic Management Development Program Agronomy, Fire Anticipation on Land and Forest, Potential Mapping and Conflict Resolution in Production Forests, Awareness ISO 17021 and ISO 17065. Has participated in audit activities for the ISPO and RSPO scheme since 2017 for agronomy, OHS, labor, social and legality aspects. In this audit activity performs the assessment of transparency, and Best Management Practices.
ASA-1 & ASA-2 (Onsite Audit)	<ol style="list-style-type: none"> Haikal Ramadhan Kharismansyah (Lead 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, Social Auditing by WIRE and SCCS. Has conducting ISPO and RSPO audit with expertise on best management practices, OHS, Worker Welfare, Legal, Social and SCCS. During this audit he verify Best Legal, Social, and SCCS. Septian Maulana (Auditor). Indonesian Citizen, Bachelor of Economic, Pamulang University. Have experience as sustainability staff on oil palm plantation. Training have been followed including Occupational Health and Safety Expert Candidate certification by Ministry of Manpower and Transmigration of Indonesia; Awareness Integrated Management Systems (ISO 9001:2015, ISO 14001:2015, ISO 45001:2018); Basic Fire Fighting; Basic First Aid; Understanding the regulations and technical aspects of environmental management; Training of Immobilization after a venomous snake bite; Awareness ISO 19011:2011; Awareness ISO 17065:2012; Awareness ISO

17021:2015; and ISO 45001:2018; ISO 9001:2015 Lead Auditor, ISPO Lead Auditor, and RSPO Lead Auditor. In this audit activity was verified Worker Welfare and Transparency.

3. **Bayu Yogatama (Auditor)**. Bachelor of Forestry, Department of Forest Resources Conservation and Ecotourism, Bogor Agricultural University. Has attended the ISO 9001: 2015 Quality Auditor / Lead Auditor Course Quality Management System (QMS) course and ISO 19011: 2011 Guidelines for Auditing Management System, ISPO Lead Training, RSPO Lead Training, Green Industry Lead Training, SA 8000, IHT RSPO NPP, IHT RSPO RaCP, IHT ISO 17021, and IHT ISO 17065. Having experience working in plywood field as Inspector in foreign private company. Currently working for an independent certification body. During this audit, will verify for Environment, GHG, and HCV aspects.
4. **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 BMP and OHS aspect.

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

2.2	Assessment Methodology, Assessment Process and Locations of Assessment
2.2.1	Figure of person days to implement assessment
ASA-1 (Remote Audit)	Number of auditors: 4 auditors. Number of days for ASA-1 remote audit: 2 days. Number of working days for ASA-1 remote audit: 8 Working days.
ASA-1 & ASA-2 (Onsite Audit)	Number of auditors: 4 auditors. Number of days for Onsite ASA-1 + ASA-2 at site: 4 days. Number of working days for Onsite ASA-1 + ASA-2 at site: 16 Working days.
2.2.2	Assessment Process
ASA-1 (Remote Audit)	<p>The assessment was conducted by measuring the sufficiency of implementation with the consistency done by the PT Karya Makmur Bahagia 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>The assessment was conducted in two methods: (1) document review, aiming to observe the sufficiency of types or substances from required documents; (2) <i>interview</i>, aiming to obtain more detailed information and cross check the information.</p> <p>Some opportunities for improvement of the results ASA-1 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).</p> <p>Improvement of findings from main assesment findings were observed by auditors at this ASA-1 assessment. All information obtained was recorded in Check List of PT Mutuagung Lestari (MUTU) and part of ASA-1.</p> <p>Opening meeting were followed by the auditor team, sustainability team in Jakarta, Management unit, and Assurance Services International (ASI). This assessment also witnessed by ASI Lead Assessor and Facilitator. The certification unit has agree with auditor conclusions.</p> <p>The assessment program please find Appendix 2</p>
ASA-1 & ASA-2	<p>The assessment was conducted by measuring the implementation of certification system and standard conducted by PT Karya Makmur Bahagia, Bukit Makmur POM Unit Certification based on:</p> <ul style="list-style-type: none"> • RSPO Principles and Criteria for Sustainable Palm Oil Production 2018, The Indonesian National Interpretation,

(Onsite Audit)

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

Additional Documents:

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

The scope of certification of Bukit Makmur POM consist of one mill (Bukit Makmur Mill) and two estates (Bukit Kecubung Estate, and Bukit Makmur Estate).

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

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

The opening meeting was held on 29 March 2022. As for the participants who attended the online opening meeting included the Estate and Mill Managers, Sustainability staff, Support Team from Jakarta and other staff. Closing meeting was held on 01 April 2022 attended by the same participants as the opening meeting. Management PT Karya Makmur Bahagia accept all this audit results.

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

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

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

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

	All information obtained was recorded in Check List of PT Mutuagung Lestari (MUTU). The assessment program please find Appendix 2.
2.2.3	Locations of Assessment
	<p>The sampling location consider the issue arose from the review documents and stakeholder's consultation that are fundamental and crucial. On this assessment sample locations that visited and respondent that interviewed by team auditor are:</p> <p>Bukit Makmur POM</p> <ul style="list-style-type: none"> • St. Sortation. Field observation related BMP, OHS and workel welfare aspect • St. Sterilizer. Field observations related to BMP, OHS and Environmental aspects. • St. Press. Field observations related to BMP, OHS and Environmental aspects. • Workshop. Field observations related to BMP, OHS and Environmental aspects. <p>Bukit Makmur Estate</p> <ul style="list-style-type: none"> • Harvesting Activity Division II. Field observation and interview related BMP, OHS, Worker welfare and environment aspect. • Harvesting Activity Division I. Field observation and interview related BMP, OHS, Worker welfare and environment aspect. • Land Application Area. Division II. Field observation and interview related BMP, OHS, Worker welfare and environment aspect. <p>Bukit Kecubung Estate</p> <ul style="list-style-type: none"> • Manuring Activity Division II. Field observation and interview related BMP, OHS, Worker welfare and environment aspect. • Spraying Activity Division II. Field observation and interview related BMP, OHS, Worker welfare and environment aspect. • Harvesting Activity Division III. Field observation and interview related BMP, OHS, Worker welfare and environment aspect.
2.3	Stakeholder Consultation and Stakeholders Contacted
2.3.1	Summary of stakeholder consultation process.
	<p>Summary of stakeholder consultation process for PT Karya Makmur Bahagia was held by:</p> <ul style="list-style-type: none"> • Public Notification on website on MUTU Website • Public consultation with NGOs (by email) such as WALHI, AMAN, and Sawit Watch on 21 March 2022 • Public consultation meeting with government institution 29 March 2022 • Public consultation meeting with communities on 29 March 2022 • Public consultation meeting with internal stakeholders and contractor 29 March 2022 <p>Numbers of input from stakeholders were clarified by PT Karya Makmur Bahagia – Bukit Makmur POM</p>
2.3.2	Stakeholder contacted
	Please find appendix 1
2.4	Determining Next Assessment
	The next visit (ASA-3) will be conducted eight (8) months to twelve (12) months after (26 December 2022).

3.0 ASSESSMENT FINDINGS

3.1 Summary of Assessment Report of the RSPO Certification

MUTUAGUNG LESTARI has conducted an assessment of Bukit Makmur POM – PT Karya Makmur Bahagia, subsidiary of Bumitama Agri Limited operation consisting of one (1) mill and two (2) oil palm estates.

During the assessment, there were eight (8) Nonconformities were assigned against Major Compliance Indicator's 7.3.1. (INA-NI RSPO P&C 2016) 3.6.2; 3.8.5; 6.2.3; 6.2.4; 6.7.3; 7.12.4 (INA-NI RSPO P&C 2018), and RSPO Certification System Clause 5.5.2; seven (7) nonconformity was assigned against Minor Compliance Indicators; and one (3) opportunity 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 actions taken that consist of seven (7) Major non-conformities and had been closed out shall be verified during next assessment.

MUTUAGUNG LESTARI found that Bukit Makmur POM – PT Karya Makmur Bahagia, subsidiary of Bumitama Agri Limited 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 Governor on 12th 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>Unit of certification has a procedure to explain the process of requesting information that is the Communication Procedure (Policy No. 725/PSQM-ESH/2017), the procedure aims to provide practical instructions for communication between unit of certification and stakeholders. This has been socialized for example in <i>Musrembang</i> activities every year.</p> <p>Besides that, unit of certification has demonstrated the Transparency and Mechanism SOP (BGA-SOP-KMB 16-RO) explaining that the information requested requires coordination between departments and requires preparation time so it needs to be conveyed that there will be a notification of certainty no later than 10 days after the request is received by the informing official. And the official concerned must consult with the highest leadership to obtain approval to accept or reject requests for information.</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 unit of certification</p>
1.1.2	<ul style="list-style-type: none"> • Proof of sending the PT Karya Makmur Bahagia Plantation Business Development Report for the fourth quarter of 2021 to the Department of Agriculture of the Kotawaringin Timur Regency on January 4, 2022. • Proof of sending the OHS Committee Report of PT Karya Makmur Bahagia for the fourth quarter of 2021 to the Department of Manpower and Transmigration of Kotawaringin Timur Regency on March 1, 2022. • PT Karya Makmur Bahagia Online Investment Activity Report Receipt for the fourth quarter of 2021 on January 10, 2022.

1.1.3 and 1.1.5

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 unit of certification. The latest of stakeholder list (updated on January 2020) sighted during audit, informs type/group, name, institution, address and contact number. The stakeholder include a government institution, supplier/contractor, NGO and communities leader/village leader.

Status: Comply

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

1.2.1
The policy contains commitments to the code of integrity and ethical behavior in all operations and transactions in the Code of Conduct (BGA-COC-HC-333.1-R0) which was approved by the directors on October 28th, 2014. The document includes explaining:
CHAPTER III. Company Ethical Standards against Stakeholders.

- 3.5: The ethics of the company relationship with business partners. Prioritize the principle of benefits by choosing business partners who provide the best synergy to the company and are free of corruption, collusion and nepotism.
- 3.6: The ethics of the unit of certification relationship with suppliers/contractors/vendors. Avoiding corruption, collusion and nepotism in the procurement process with suppliers/contractors/vendors.

CHAPTER IV. BGA Group Employee Code of Conduct:

4.12: Giving and Receiving Gifts, Bribery and Others. Not allowed to accept and or give gifts, souvenirs, business meals or other facilities that can affect decisions that violate the provisions in force the unit of certification.

1.2.2
A system for monitoring compliance and the implementation of ethical business policies and practices has been contained in the SOP Code of Conduct No. BGA-COC-HC-333.1-R0 which was ratified by the board of directors on October 28, 2014. In summary, the monitoring mechanisms include:

- All BGA Group employees are required to sign an Integrity Pact which is a commitment to implement the Code of Conduct.
- Every BGA Group employee who knows of a violation of the Code of Conduct is required to report to the HC Group Dept. or direct supervisor if it is related to fraud to the whistle blower channel.
- Every BGA Group employee who is proven to have violated the Code of Conduct will be given sanctions in accordance with company regulations and applicable legal provisions.
- If the supplier/contractor/vendor, business partner or other stakeholder violates the CoC, the provisions as stated in the contract agreement have been agreed upon by both parties and in accordance with the applicable legal provisions.

Status: Comply

PRINCIPLE #2 OPERATE LEGALLY AND RESPECT RIGHTS
2.1
There is compliance with all applicable local, national and ratified international laws and regulations.

2.1.1
The unit certification has list of regulation consist of :

a. OHS regulation

- Permenaker No.9 year 2016 related occupational safety and health in work at height.
- Regulation of the Minister of Manpower of the Republic of Indonesia No. 8 year 2020 concerning Safety and Health at Work of Lift and heavy equipment.
- IOM No.020 / [OM / CRC-BG AltXl2AZA 2020 concerning Traffic Safety on Roads and Company Operational Areas BGA Group.
- IOM No.022l | OMICRC-BC AltX.IZAZA 2020 concerning IOM Conditions of Work in Flood Areas.

b. Worker welfare

- Permenaker No.14 year 2020 regarding Guidelines for Providing Assistance Government in the form of subsidized salaries / wages for workers / laborers in handling the Impact of Corona Virus Disease 2019 (COVID-19).
- Regulation of Republic of Indonesia No. 49 yeara 2020 regarding concerning Adjustment of Employment Social Security

Program contributions during Non-Natural Disasters of Corona Virus Disease (COVID-19).

- Central Kalimantan Governor Decree Number 188.44/1587/2020 concerning Provincial Minimum Wages in 2021 and others.

c. Agriculture

- *PermenLHK* of Indonesia Republic Number 106 year 2018 concerning protected flora and fauna species.
- Central Kalimantan Governor Regulation Number 41 year 2014 concerning Management of High Conservation Value Areas in Plantation Business in Central Kalimantan Province and others.

d. Environment

- The unit of certification has conducted emission and ambient air quality measurements as well as fixed source noise such as noise and vibration every 6 months as stated in the RKL / RPL implementation report of 2nd semester of 2019. While during 1st Semester of 2020 have not been conducted emission and ambient air quality test, due to Covid-19 Pandemic. All test parameters on 2nd Semester 2019 is still in accordance with the applicable quality standards.
- The unit of certifications has fulfill the regulatory compliance in the aspects of employment and OHS such as the implementation of minimum wage, providing decent PPE to all workers, registered bipartite institution, national employment and health insurance (BPJS), no child and force labor, etc. The detail will be described in the related indicators.

2.1.2

Procedure of laws and/or regulations pursuance is presented in procedure No. BGA-SOP-CCS-1102.1-R0 dated 09 May 2012, which mentioned that several aspects to be monitored, as well as its person in charge (PIC), summarized as follows:

- Manpower aspect monitoring is carried out by Human Capital Group Department (HCGD).
- Environment management, occupational, safety and health (OSH) aspect monitoring is carried out by Corporate Communication Sustainability Department (CCSD).
- Plantation and legal aspect monitoring is carried out by Public Affair Department (PAD).

2.1.3

The company has not been able to show sufficient evidence that it has carried out marking of legal area boundaries with clear boundary markings consistently in accordance with the latest published field maps. **NCR No. 2022.01 with grade Minor**

2.1.3 Status: NCR No. 2022.01 with grade Minor

2.2

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

2.2.1

The unit of certification showed the names and details of the contractors for the 2020/2021 period, such as:

CPO

1. PT Surya Mentaya Jaya, located at *Jl Nanas III No.99, Sampit, Kotawaringin Timur, Provinsi Kalimantan Tengah.*
2. CV Mitra Lintas Borneo, located at *Jl. Seribu Dahan No.315, Sampit, Kotawaringin Timur, Provinsi Kalimantan Tengah.*
3. CV Lintas Mentaya, located at *Jl Lingkar Selatan, Kelurahan Ketapang, Kecamatan Mentawa Baru Kabupaten Kotawaringin Timur, Provinsi Kalimantan Tengah.*

PK.

1. CV Catur Borneo, located at *Jl Poros, Beringin Agung, Telaga Antang, Kabupaten Kotawaringin Timur, Provinsi Kalimantan Tengah.*
2. CV Borneo Mulia Abadi, located at *Kelurahan Mentawa Baru Hilir, Kabupaten Kotawaringin Timur, Provinsi Kalimantan Tengah.*

2.2.2

The company has not been able to show sufficient evidence that all contracts have their own clauses regarding the fulfillment of relevant legal obligations, and can be proven by the third party concerned. **NCR No. 2022.02 with grade Minor**

2.2.3

The company has not been able to show sufficient evidence that contracts with third parties have separate clauses that prohibit practices involving child labor, forced labor, and workers from human trafficking. **NCR No. 2022.03 with grade Minor**

2.2.2 Status: NCR No. 2022.02 with grade Minor

2.2.3 Status: NCR No. 2022.03 with grade Minor

2.3

All FFB supplies from outside of the unit of certification are from legal sources.		
2.3.1 & 2.3.2.		
The unit of certification receive FFB from group plantation which is certified or non-certified.		
	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		
PT KMB has a 5-year long-term plan contained in the 5-Years Financial Projection for the period 2021-2025 which was approved by top management. The document contains projections of FFB production, CPO, PK, CPO and PK revenue, estates cost, mill cost, FFB purchase price, CPO price, PK price, plasma FFB purchases, third party FFB purchases, profit and loss, to net profit and loss. It was further explained that the long-term plan was approved by top management (Head Administration).		
3.1.2		
Based on the results of interviews with management and review of area statement documents, it is known that the plants in the company's area are between 2000 – 2013 so that the company does not have a replanting plan for the next 5 years.		
3.1.3		
The company shows the recording of the management review meeting which was held in the Regional Office Meeting Room 2 on March 24, 2022. In the meeting briefly discussed related:		
<ul style="list-style-type: none"> • Follow up on previous management reviews. • Previous External and Internal audit results. • Status Corrective and preventive action. • Process performance and product conformity. • Feedback from customers. • Complaints from stakeholders. • External FFB supplier performance. • Contractor performance. • Review of the HCV Management Plan for the Period 2020/2021. • Program to increase understanding of Plasma/Independent farmers. • Etc. 		
	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		
Unit of certification shows several internal audits which aims to monitor consistency of continuous improvement in every aspect, as shows through RSPO and SCCS internal audit report		
3.2.2		
Unit of certification has delivered RSPO metric template to the CB.		
	Status: Comply	
3.3		
Operating procedures are appropriately documented, consistently implemented and monitored.		
3.3.1		
Oil Palm Agronomy Procedures		
There is no revision on the current procedure of oil palm agronomy since issued by company Director on 25 May 2011. The procedure (Ref. No. BGA-AGR-KS-SOP-xx) consist of three volumes, as follows:		
<ul style="list-style-type: none"> • Volume I has covers nursery (SOP-01), land preparation (SOP-02), installation and maintenance of road and bridge (SOP-03), 		

installation and maintenance of drainage system (SOP-04), conservation of water and soil (SOP-05), planting of legumes or land cover crop (SOP-06) and planting of oil palm (SOP-07).

- Volume II has covers weeds management control (SOP-08), manuring or fertilizer application (SOP-09) and integrated pest management (SOP-10).
- Volume III has covers castration and canopy management (SOP-11), census of palms and FFB production (SOP-12), harvesting (SOP-13), pesticide management (SOP-14), transportation management (SOP-15), marginal soil management (SOP-16) and replanting (SOP-17).

Furthermore, estate management also has procedure on RSPO supply chain management and FFB traceability which presented in document No. BGA-SOP-GKG-0415-29-RO. Delivery Letter of FFB from RSPO certified areas will be marked by RSPO Logo.

Oil Palm Processing Procedure

There is no revision on the current procedure of oil palm processing technique since issued by COO, CSO and CFO on 17 January 2013. The procedure consist of three (3) volume, as follows:

- Volume I have covers Weighbridge (BGA-SOP-OP-1001.1-RO).
- Volume II has covers technical matters on several stations such as Loading Ramp (BGA-SOP-OP-1002.1), Sterilizer (BGA-SOP-OP-1002.2), Thresher (BGA-SOP-OP-1002.3), Digester and Press (BGA-SOP-OP-1002.4), Clarification (BGA-SOP-OP-1002.5), Nut and Kernel Separation (BGA-SOP-OP-1002.6), Boiler (BGA-SOP-OP-1002.7) and Power Supply (BGA-SOP-OP-1002.8).
- Volume III has covers technical matters on several stations such as Storage Tank and Bulk Silo (BGA-SOP-OP-1002.9), Final Effluent (BGA-SOP-OP-1002.10), Commodity Dispatch (BGA-SOP-OP-1002.11), Water Treatment (BGA-SOP-OP-1002.12), Mill Maintenance (BGA-SOP-OP-1002.13) and Mill Laboratory (BGA-SOP-OP-1002.14).

Based on the results of field observations and interviews with Mill and Estate workers (FFB Processing, Harvesting, Spraying) it is known that workers can briefly explain their duties and responsibilities in their respective work areas.

3.3.2

The management unit already has a mechanism to shut down the implementation of procedures carried out consistently. These include conducting annual operational audits and periodic inspections for each activity, in addition to conducting inspections of work carried out by Third Parties prior to submitting payment for each completion of work.

3.3.3

The company shows records of monitoring and follow-up carried out, for example the RSPO P&C 2018 Internal Audit Results Report and RSPO SCCS 2020 dated 18 – 20 January 2022 which informs the findings, analyzed corrective and preventive actions and the status of the findings.

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 have the environmental documents, such as:

- EIA document, legalized by Environmental Impact Management Agency, Kotawaringin Timur District No. 25/Komisi-Kotim/VIII/02 on August 9th 2002 for 17,500 hectare of estate and POM with 40 ton per hour capacity. EIA Analysis is conducted by Environment Research Institute of Palangkaraya University.
- Environmental management and monitoring effort document, legalized by Kotawaringin Timur District No: 188.45/299/Huk-BLH/2013 on 26th June 2013 in term of permit for POM construction of Bukit Makmur Mill and its supporting installation with capacity of 90 Ton of FFB / hour in Sungai Hanya Village, Telaga Antang Subdistrict, Kotawaringin Timur District.

The unit of certification has document of Social Impact Assessment was described social impact of plantation and mill operation. The SIA was done on 2012 collaboration with consultant. The company also has carried out Re-Social Impact Assessment activities on 7 – 19 December 2018 with scope of PT KMB including GMKM, GMKE, SMNE, BDME, BHJE, BAGE; BMKM, BKCE, BMKE, MAGE.

The assessment were carried out in a participatory manner involving 20 villages: Rantau Katang, Tumbang Mangkup, Luwuk Kowan,

Rantau Tampang, Tumbang Bajanei, Tumbang Boloi, Agung Mulya, Beringin Agung, Gunung Makmur, Tanjung Jorong, Waringin Agung, Tumbang Sangai, Bhakti Karya, Sungai Hanya, Wonosari, Tanjung Harapan, Bukit Makmur & Buana Mustika Village. And also involving estates & mills managements and workers.

3.4.2.

The company has conducted environmental management based on documents of Environmental Management Plan / Environmental Monitoring Plan of 2013, such as potential increase of noise, river water quality, the increase rate of soil erosion, potency of land fire, biodiversity, income increase and community perception.

Social Impact Management Plan period of 2019 to 2021 consist of Affected Components, Issues, Strategies, Activities, Outputs, Time Line, and PIC. As follows:

1. Components affected: employment, Issue: Improvement of housing facilities and sanitation, Strategy: improvement of inadequate employee housing, improvement of water quality, improvement of waste management; Activity: gradual improvement of employee housing, gradual addition of wells, provision of separate waste bins; output: fulfillment of employee facilities and infrastructure; Output: fulfillment of staff/employee facilities and infrastructure; Timeline: from 2019 onwards; PIC: HCGD.
2. Components affected: Social management plan; Issue: lack of understanding about FPIC; strategy: strengthen staff understanding of FPIC guidelines, document external complaints, the stage of problem tracking, and the process of resolving the land disputes properly; Strengthening the ability of staff/employees in develop of communications and relationships with the community. So that they can support the role of the PAD and CSR team. Conducted periodic communication with the communities in the surrounding villages and not only be focused on the village government board. Customary institutions and cooperatives, however to expand to other communities; Activity: socializing FPIC provisions, logbooks on periodically problem handling. Providing socialization about technical implementation, community development, implementing joint community programs, developing economic empowerment programs in the field of agribusiness, determining priorities in implementing of CSR that have an impact on improving the economy; Output: staff understands how to run FPIC, it can monitor the problem solving progress. The relationship and communication and interaction with the community are well developed, interaction with the community in general can be maintained well, meeting the basic needs of the community in the food sector, the program will be implemented more on target. Timeline: from 2019 onwards; PIC: CSR, D&L, and partnership.

3.4.3.

The certification unit has monitored the implementation of social management plan year of 2020, for example:

- Land tenurial resolution issues by making a socialization schedule to the villagers, there are realization in Waringin Agung Bersama Village. Therefore land conflict condition been inventarized dated 11 November 2019.
- Company social relations issues with stakeholders and the community by making a classification of villages around the company and a stakeholder's consultation program for the CSR program.
- Associated Smallholders organization and independent smallholders as FFB suppliers are not transparent issues, for example: making a schedule for socialization of cooperative accountability report, schedule for SHK payment, and a schedule for outreach of plasma cooperative.

The social management and monitoring plan document for 2021 & 2022 does not include a monitoring schedule, PIC, number of repetitions of monitoring, targets or targets in accordance with the recommendations from the 2020 SIA Review/review report. **NCR**

No. 2022.04 with grade Minor

3.4.2	Status: NCR No. 2022.04 with grade Minor
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3.5

A system for managing human resources is in place.

The employment procedures has been set in the SOP Selection & Recruitment (No. Document: KMB-SOP-HRD-001.1-R0 Rev 02 dated 14 August 2020). Those procedures ruled selection and recruitment process including regulating the probation period (3 months), contract employees and permanent employees as well as the mechanism for requesting employee needs.

Document verification and interview with management employee's recruitment are based on company requirements without considering ethnic, religious, racial and class backgrounds. All prospective employees have rights for employment opportunities according to their educational background and company requirement. The unit of certifications is able to demonstrate evaluation of work performance assessment form of contract employee in which the assessed aspects include Discipline, work quality, work quantity and etc.

Status: Comply

3.6

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

3.6.1
The results of the risk assessment to identify OHS problems have been included in the HIRADC document for each job in the Mill and Estate which informs the Type of Work, Hazard, Effect, Risk Control, and Residual Risk.

Based on the results of field observations and interviews with Mill and Estate workers (Processing, Harvesting and Spraying) it is known that workers can briefly explain the potential hazards in their respective work areas.

3.6.2
The company shows several records of monitoring the effectiveness of OHS including:

- Inspection of the use of PPE for example BMKM unit on 10 February 2022 for St. Press, St. Boiler and Workshop with 100% completeness.
- Periodic health checks for workers with certain risks at BMKE, BKCE and BMKM in 2022 with all fit to work results.
- The OHS Management System Guidelines Checklist, for example, Mill units dated January 19, 2022, with an achievement of 88%.

Based on the results of field visits and interviews, the following facts were found:

- WWTP → The WWTP area is a limited area where there is a "no entry" warning, equipped with a guardrail and big trench, but at some points the fence is found in a hole in the condition and there are footbridges at several points of the trench so as to allow the WWTP area to be accessed by unauthorized persons. In addition, 1 (one) fire extinguisher was found with the type of tube without a pressure indicator and also that was not equipped with a monitoring form.
- BMKE → Water source reservoir areas Mill in the BMKE area are not equipped with guardrails and OHS warnings.
- The Sustainability Work Program in 2021 and 2022 includes conducting OHSE inspections every 1 (one) month but OHSE inspections have not been shown according to the program.
- The HIRAC Mill and Estate document for 2021 has not identified hazards and established risk controls related to reservoir areas and water reservoirs.

Based on the explanation above, it is concluded that the company has not been able to show sufficient evidence that it has fully implemented the established OHS plan and has consistently monitored and evaluated the effectiveness of the plan, so this is a **non-compliance with NCR No. 2022.05**.

3.6.2 **Status: Non-Conformity NCR 2022.05 with grade Major**

3.7

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

3.7.1
The company has set annual training program of 2020 for every unit including scheme smallholders and contractors. The training program covered all operational and RSPO aspects, such as agronomy best practices, chemical/pesticide handling, OHS, and environmental. There is no gender discrimination in the program but based on the operational and previous evaluation. Moreover, the gender specific need training has been handled by the Gender Committee.

3.7.2; 3.7.3
Records of trainings and its evaluation available, such as the training of pesticide application in Bukit Kecubung Estate on 03 December 2020, Training of HIRAC, PPE and MSDS in Bukit Makmur Estate on 02 December 2020. Furthermore, the unit of certification has also documented training activity records for each individual basis in the Personal Training Card document. The document describes the position / job position and the type of training that has been followed.

Status: Comply

3.8

Supply Chain Requirements for Mills

3.8.1 & 3.8.2
The unit of certification applied the mass balance module, which accepts both certified and non-certified FFB.

3.8.3.

The unit of certification showed the estimated FFB, CPO & PK products for the certificate period and actual (January - December 2020) with details:

Product	Volume (MT) certificate *Extension scope	Actual period (January 2020 to February 2022)
FFB	258,712	278,899.77
CPO	86,468	67,462.32
PK	18,105	14,274.31

3.8.4.

The Mill has registered on the RSPO IT Platform with details as follows:

Member Name	PT Karya Makmur Bahagia – Bumitama
Member ID	RSPO_PO100000 5302

3.8.5.

The unit of certification showed the identification procedures and product traceability document number KMB-SUST-SOP-43 Revision No 06 revised date December 10, 2020 which was endorsed by the Regional Head on December 25, 2020.

Scope:

- This procedure applies from the receipt of raw materials (FFB), the production process, the Bulking Station and the process of sending the product to the buyer in the operating unit in PT KMB.
- All document and data control activities in the context of implementing SOPs for identification and traceability of products and their supporting administration in all work units within PT KMB.
- The supply chain model applied in the procedure is the mass balance module E-CPO Mills.

The Certification & compliance Department will conduct training for all staff and employees involved in implementing the supply chain certification system requirements.

1. The company has not been able to show sufficient evidence of the existence of SOPs / work instructions that have included elements in the overall supply chain implementation.
2. It has not been demonstrated in detail the implementation related to the separation of certified and uncertified FFB from the field to the separation in the mill

NCR No. 2022.06 with grade Major

3.8.6.

The unit of certification showed the Internal Audit SOP with document number KMB-SUST-SOP-39 revision number 04 dated December 10, 2020, endorsed by the Regional Head. Internal audit will be carried out by auditors who do not have direct responsibility for the part / area being audited. Internal supply chain audits are conducted at least once a year or are carried out based on the interest status of the area to be audited.

The results of the internal supply chain audit carried out on December 1, 2020, it was recognized that there were 2 non-conformance regarding the supply chain such as the internal audit SOP that was in accordance with the requirements in the RSPO-SCCS 2017 and records of management review meeting minutes were available and corrective actions on December 10 & 22, 2020 by providing update of SOP for internal audit and record of minutes of RSPO - SCCS management review meeting.

3.8.7.

The unit certification showed FFB production in January 2020 to February 2022 consist of:

- FFB certified is 278,899.77 MT.
- FFB non-certified is 456,293.21 MT.

Mechanism to handling and control nonconformance product are described in SOP No.: KMB-SUST-SOP-51, regulating among others controlling / handling of raw materials received (FFB), product identification in process, control of final product to be shipped to buyer

and controlling/handling the improper document.

3.8.8.

The unit of certification showed documents such as;

- Sale and purchase contract number 8104142019 for buyer PT Wilmar Nabati Indonesia, type of goods is Palm Kernel RSPO Mass Balance, quantity 500 tons, terms for delivery of Franco Bagendang.
- Sales and purchase contract number 8104142886 buyer PT Wilmar Nabati Indonesia, Type of goods is Palm Kernel RSPO Mass Balance, quantity 500 tons, terms for delivery of Franco Bagendang.

CSPK shipping announcement of 249.67 MT, shipping date July 21, 2020, transaction ID TR-1a65dd43-bc4d, buyer PT Wilmar Nabati Indonesia.

CSPK shipping announcement of 499.07 MT, shipping date November 19, 2020, transaction ID TR-1e8f878b-6290, buyer PT Wilmar Nabati Indonesia.

3.8.9.

The unit certification showed a work order for the delivery of PT KMB CPO with number 533 / LO / CD-HO / VII / 20 PT Surya Mentaya Jaya dated July 31, 2020, with the destination of Kabau Pier, Sampit. There is a clause on PT Surya Mentaya Jaya willing to be examined by the RSPO certification body at the time of conducting audits for shipments as supply chain PT KMB. The unit of certification shows the socialization policy of the contractors regarding code of ethics and policies to CPO and PK stakeholders on August 14, 2020 (photo documentary evidence).

3.8.10.

The unit of certification showed the names and details of the CPO & PK contractors for the 2020 period, such as:

CPO

1. PT Surya Mentaya Jaya, located at *Jl Nanas III No.99, Sampit, Kotawaringin Timur, Provinsi Kalimantan Tengah.*
2. CV Mitra Lintas Borneo, located at *Jl. Seribu Dahan No.315, Sampit, Kotawaringin Timur, Provinsi Kalimantan Tengah.*
3. CV Lintas Mentaya, located at *Jl Lingkar Selatan, Kelurahan Ketapang, Kecamatan Mentawa Baru Kabupaten Kotawaringin Timur, Provinsi Kalimantan Tengah.*

PK.

1. CV Catur Borneo, located at *Jl Poros, Beringin Agung, Telaga Antang, Kabupaten Kotawaringin Timur, Provinsi Kalimantan Tengah.*
2. CV Borneo Mulia Abadi, located at *Kelurahan Mentawa Baru Hilir, Kabupaten Kotawaringin Timur, Provinsi Kalimantan Tengah.*

3.8.11.

Based on interview with management representative, its known there were no new contractors.

3.8.12.

The unit certification showed FFB, CPO and PK production in January 2020 to February 2022 consist of:

- FFB certified is 278,899.77 MT.
- CPO certified is 67,462.32 MT.
- PK certified is 14,274.31 MT.

3.8.13 & 3.8.14.

The extraction rate follows the actual data for a 12-month period for January 2020 to February 2022.

3.8.15.

The unit of certification applied the mass balance module, which accepts both certified and non-certified FFB.

3.8.16.

The unit of certification showed CPO & PK production and sales of CPO & PK in January 2020 to February 2022 such as:

- Total CPO certified production is 67,462.32 MT.

- Total CPO non-certified production is 110,703.23 MT.
- Total sales conventional of CPO is 64,455.00 MT.
- Total PK certified production is 14,274.31MT.
- Total PK non certified production is 23,410.88 MT.
- Total sales conventional of CSPK is 13,085.77 MT.

3.8.17.

The unit of certification didn't use logo and trademark RSPO.

3.8.5	Status: NCR No. 2022.06 with grade Major
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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 company can show PT Karya Makmur Bahagia's Human Rights Policy document signed by Regional Head Mentaya on November 4, 2020. In brief, the policy explains, among others:

- The company pays attention to the impact of decisions taken on parties around the company, both small and large decisions.
- The company respects the rights of local communities and other local communities in land development where stakeholders have legal, communal or customary rights using an FPIC approach.
- Providing equal employment opportunities without discriminating against race, religion, degree, ethnicity, gender, skin color, imperfection (disability), sexual orientation, political affiliation, organizational membership, and age.
- Protecting women workers from sexual harassment, violence, and rights related to women's reproduction, respecting and respecting the right of every worker to form or become a member of a trade union, etc.
- The Company strives to resolve conflicts and complaints with all parties amicably, openly and constructively through a whistle-blowing procedure, in addition to the RSPO complaint mechanism.

The policy has been communicated to internal and external stakeholders. The policy is communicated to all employees through the morning briefing. Based on interviews with workers Until the audit carried out there is no report about cases of human rights violations. Until the audit activities carried out there have been no incidents of human rights violations that occurred in the company's scope

4.1.2

Based on the results of interviews with village representatives and community leaders, it was found that there was no form of intimidation by the company in carrying out its operational activities.

Status: Comply

4.2

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

4.2.1; 4.2.2.

The unit o certification has procedure of Complaint and Grievance (KMB-SUST-SOP-45, Revised on August 5, 2015). These document as guidance in related of complaint and grievance receive from external and internal (employee). The personnel in charge for received and documented of complaint and grievance from related parties are Corporate Affair, Estate Controller and Mill Controller. The complaints will review and consulting with related party for overcome. Related to protection for whist blower, the company has have mechanism and was installed the notification announcement in estate, mill and several place surround of plantation area. The main point of these notification announcement was related to telephone number and email for addressed the information and the information from whist blower will keep.

4.2.3 & 4.2.4

The unit of certification has procedure of Complaint and Grievance (KMB-SUST-SOP-45, Revised on August 5, 2015). These document as guidance in related of complaint and grievance receive from external and internal (employee). The personnel in charge for received and documented of complaint and grievance from related parties are Corporate Affair, Estate Controller and Mill Controller. The complaints will review and consulting with related party for overcome. Related to protection for whist blower, the company has have mechanism and was installed the notification announcement in estate, mill and several place surround of plantation

area. The main point of these notification announcement was related to telephone number and email for addressed the information and the information from whist blower will keep.

There is a land claim in the name of Garisno (Masin & Resi) in BMKE Division 1 covering an area of 4.19 ha. The area has been in GRIT under the name of Senggo, covering an area of 2.35 ha in 2006 and Liu area of 1.84 ha in 2011. According to the relevant area, the area is a rubber plantation. At the meeting on September 3, 2014, he received compensation amount to IDR 175,000,000 (There is evidence of the meeting and attendance list).

But then in 2019, there was an agreement regarding the payment of *sago hati* on behalf of Masin BMKE Division 01 dated November 1, 2019 amount to IDR 20,000,000 for an area of 2.35 ha witnessed by the heirs and the unit management (There is map and submission documentation).

Status: Comply

4.3

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

4.3.1

CSR (Corporate Social Responsibility) program is a form of concern and responsibility of the company in fostering good relations with the surrounding community. CSR can be interpreted as an effort from a company to raise its image in the eyes of the public by making programs, both external and internal. External program by running partnerships by involving all stakeholders to show the company's concern for the community and the surrounding environment. While internally able to produce well, achieve maximum profit and improve the welfare of its employees. In general, there are 3 forms of CSR carried out by PT Karya Makmur Bahagia in the field, namely CSR based on give assistance directly to people in need (Charity), CSR in the form of generosity and CSR in the form of community development. The forms of corporate CSR PT Karya Makmur Bahagia, among others:

- Plasma Procurement
- Education, among others in the form of scholarships, teacher training, educational facilities and infrastructure, counseling, competitions, and others
- Health (fogging, mass circumcision, free treatment, drug assistance)
- Program for strengthening and strengthening plantation families to improve the quality of life of Emplacement
- Procurement or improvement of accessibility (roads, bridges, culverts)
- Tournaments, training and counselling and other assistance.

From the CSR activities carried out above based on / referring to the results of the identification of the needs of the community around the company through SIA (Social Impact Assessment) conducted by independent consultations and the company has made efforts to fulfill and determine the program. The program implemented and given to the community is a coaching program in the form of improving and fulfilling work skills as well as capital assistance, so that later it is hoped that the surrounding community can be independent and or open up independent work opportunities/opportunities.

The certificate holder has been implemented of smallholder program with full manage system (5 cooperative) and independent FFB suppliers (35 members). Overall of plantation manage was handle by the company and the cooperation unit as representation of the community was monitored all operational activities and earn the report from the company. The certificate holder was providing palm seed for independent smallholders and giving consultation about best management practices, as well as give training for smallholder member..

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.; 4.4.2; 4.4.3; 4.4.4; 4.4.5

The unit of certification has Land Use Title (HGU) No. 19 dated 22nd October 2001 for 15,056.31 Ha that has released by National Land Agency of Kotawaringin Timur Regency. This HGU located in Rantau Tampang Village, Kotawaringin Timur Regency, Kalimantan Tengah Province. This HGU valid until 22nd October 2036. Based on HGU maps, all over area demarcated by 104 boundary poles. The CH also has plantation business permit (IUP) covered ± 15.056,31 Ha dated 4 August 2006.

However, the certification scope is Bukit Makmur Mill and its supply bases, that are Bukit Makmur Estate and Bukit Kecubung Estate covered an area of 6,566.79 ha.

The map listed in the map document HGU coordinate point PT. KMB that has been prepared by the Dept. GIS with a scale of 1: 100,000. Mapping was done using geo reference WGS 84 with coordinates UTM ZONE 49 S.

Status: Comply

4.5

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

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

There is no land expansion activity during this audit. Based on document Identification of HCV and stakeholder consultation, there was not found customary/indigenous rights in operational area. There were the records of the process of collecting information on the preparation of the High Conservation Values Identification Report and the Social Impact Assessment Report. The recording evidence comprising of participants' list and photographs.

Status: Comply

4.6

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

4.6.1; 4.6.2; 4.6.3; 4.6.4

The certificate holder has document of land acquisition procedure (SOP-PAD-001) in term of the procedure of land and crops compensation. Based on stakeholder consultation with village head and also interview with previous land owners, known that they know about the procedure through the socialization given and they agree with the procedure. The land compensation agreement is made in the Indonesian language, understood by the parties, and known by the village government. known that the procedure was understood by the related party and has been socialized. Besides that, landowners are given the freedom to release their land without coercion, and given an equal opportunity to both men and women.

The documentation of evidence of compensation to land owner in each estate and the participation of village representatives, customary leader, village-head and sub-district head as witnessed was documented in each estate. Overall, of compensation document was kept as historical of land acquisition by company. All of document was signed by company representation, early land owner and included of government in village and sub district level.

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; 4.7.3

The company has a procedure in place to identify people and/or community groups entitled to compensation presented in document No. BGA-SOP-GL-903.1-R0, approved by CFO dated 5 June 2013. The procedure is described how to identify people and/or community groups entitled to compensation. Based on public consultation with village representatives, known that they know about the procedure through the socialization given and they agree with the procedure and compensation process was done directed to the land owner and landowners are given the freedom to release their land without coercion.

The certificate holder has document of land acquisition procedure (SOP-PAD-001) in term of the procedure of land and crops compensation, The procedure is described how to calculate and distribute fair and gender-equal compensation in all activities related to the compensation process for land over the land right cultivated by the company, the purpose is to ensure the area of plantation free from others right. Based on public consultation with village representatives, known that they know about the procedure through the socialization given and they agree with the procedure and they can access the procedure through management representative of the company if they need it.

The documentation of evidence of compensation to land owner in each estate and the participation of village representatives, customary leader, village-head and sub-district head as witnessed was documented in each estate. Overall, of compensation document was kept as historical of land acquisition by company. All of document was signed by company representation, early land

owner and included of government in village and sub district level.

Status: Comply

4.8

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

4.8.1; 4.8.2; 4.8.3

During the audit, there were no significant land disputes. The certificate holder has a procedure of land dispute handling (SOP No. BGA-SOP-KMB 25-RO) that described that land dispute resolution based on agreement between interested parties. The step of land dispute resolution in KMB is (1) land identification or potential of land dispute, (2) gradual resolution starting from gathering information, negotiation, agreement, land compensation (if needed), (3) payments, administration process and (4) legal action by court if no deal in negotiation.

There has been documentation on land disputes such as:

1. Land occupation map of PT. Karya Makmur Bahagia compiled by the Department of GIS Region I with scale 1: 50.000. Based on the map, it was recorded that the occupational area covered of 626 Ha.
2. A reference from the PAD Regional Staff 1 on 29 May 2017 stating that there are 98 occupants in the HGU area of PT. KMB with overlapping ownership status.
3. Management plan for settlement of overlapping land ownership area signed by Region Head Region I and Document & License Department. The program is the identification of overlapping areas of ownership, meeting with the owner of the area, checking the common area, making participatory maps, making agreement documents, signing documents, maps, and maintaining agreement. The program is planned gradually from 2017 to 2021.

According to the procedure of land dispute handling (SOP No. BGA-SOP-KMB 25-RO) that has approved by top management, conflict resolution must have to do with soft approach such as discussion and negotiation. Based on negotiation document that shown, all land dispute case always involves the local government. Through the public consultation with representatives' villagers, previous land owners, sighted that there was no coercion approach by the company to handling land dispute cases so far. All compensation implemented by mutual agreement.

The management unit was sighted the documentation of land compensation to land owner. These documents was filed in main office. FPIC process have been showed by evidences of land compensation process, for examples; letter of land delivery (included attachment of land position & boundaries), citizenship card of land owner and payment receive by company to land owner.

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.

FFB pricing from smallholders was following Government Prices that set by Kalimantan Tengah Governor. While FFB pricing from independent FFB suppliers was refers to government be considerate OER and KER quality from the Mill. The information regarding to FFB prices can access real time from the government website, circular memorandum, whatsapp message from Commercial Department staff etc.

5.1.5.

The unit certification has agreement with five cooperatives: Lestari, Waringin Jaya, Mekar Jaya (Tani Santoso), and Sekar Tani. The total area is 7,033 Ha with period of agreement 25 years. That agreement was sign by each of cooperative year of 2008. Based on interview with Plasma Officer sighted that there is monthly meeting between company and cooperative board to discuss the smallholder's production and financial report.

5.1.6.

The unit of certification showing several payments of SHK to the KUD Lestari and KUD Mekar Jaya dated 2 October 2020. That payment is in accordance to the FFB price from government.

5.1.7.

The unit of certification has conducted weighbridge calibration by *Dinas Perdagangan & Perindustrian*, Kotawaringin Timur Regency. There are letter number 74/DPP/ML/TJ/II/2020 dated 17 February 2020 for the weighbridge I with serial number: 120350297 with validity period to 10 February 2021.

5.1.9.

The unit of certification has procedure of Complaint and Grievance (KMB-SUST-SOP-45, Revised on August 5, 2015). These document as guidance in related of complaint and grievance receive from external and internal (employee). The personnel in charge for received and documented of complaint and grievance from related parties are Corporate Affair, Estate Controller and Mill Controller.

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

Unit of certification has delivered socialization on RSPO matters included improvement on livelihoods through taking part in RSPO certification to smallholders and indirect FFB suppliers since 28 August 2019, took place in the Village of Anggang Mulya and Telaga Antang. Socialization has also included subject on best management practices and safety aspect such as integrated pest management, land management, zero burning method, pesticide handling, etc.

As a support for independent smallholders to make their plantations RSPO certified, the unit of certification has facilitated farmers with some initial training such as the one that was held on 19-22 October 2019, training materials provided include: RSPO Certification System for independent smallholders, management and group dynamics, Internal Control System (ICS), functions and performance, internal audit system and documentation system. The result of this training is the formation of an ICS group / team which will be maximized in conducting internal audits as well as providing outreach / socialization related to the RSPO certification program.

5.2.2

As a support for independent smallholders to make their plantations RSPO certified, the unit of certification has facilitated farmers with some initial training such as the one that was held on 19-22 October 2019, training materials provided include: RSPO Certification System for independent smallholders, management and group dynamics, Internal Control System (ICS), functions and performance, internal audit system and documentation system. The result of this training is the formation of an ICS group / team which will be maximized in conducting internal audits as well as providing outreach / socialization related to the RSPO certification program.

5.2.3

To ensure traceability of FFB received, the unit of certification has conducting "traceability to plantation (TTP)" which aims to obtain several data through visiting FFB supplier areas owned by the independent smallholders, collectors (indirectly obtained) and plasma. Data collected are point of coordinates, then to checks and overlays the spatial layout to ensure the area is in the "APL area". When location of FFB sources is not overlapping with conservation or forest areas, the contract agreement of FFB supply could be continued. Based on this explanation, it could be concluded that unit of certification has make selection of FFB sources through checking on its status of land ownership.

5.2.4

Unit of certification has delivered pesticide management to KKPA smallholders on 28 August 2019 and 22 October 2019. Based on interview with Foreman and Pesticide Applicators in Division 2 Block G36 Batang Hijau Estate and Division 2 Block F03 Beringin Agung Estate, it was known that unit of certification has deliver training on pesticide application and handling, and be able to explain and demonstrate several technical matters such as mixing, dilution on the field, PPE used, first aid should be taken, placement, annual special medical check up that should be carried out.

5.2.5

All support programs for smallholders are reviewed and evaluated regularly in the RSPO internal audit for smallholders which was lastly conducted on 27 July 2020 and 19 April 2021. Last audit informed there were five findings and all has been closed on 31 May 2021. In addition, the support program for smallholder's development is also reported publicly through the media annually in the Annual Report of Bumitama Agri Ltd. and LPUP or plantation development report which delivered to the Plantation Agency of

Kotawaringin Timur Regency.		
	Status: Comply	
PRINCIPLE #6 RESPECT WORKERS' RIGHTS AND CONDITIONS		
6.1		
Any form of discrimination is prohibited.		
6.1.1.		
The certification unit has a policy related to non-discrimination and equal opportunity and was approved by the Regional Head on 04 November 2020. The company is committed to complying with all applicable and relevant labor laws and regulations as well as complying with the Company's internal procedures. The company is committed to achieving this through: ... "Providing equal employment opportunities regardless of racial, ethnicity, religion, caste, nationality, disability, gender, sexual orientation, union membership, political affiliation or age".		
6.1.2.		
The Certification unit has employee's recruitment procedure number SOP Selection & Recruitment (No. Document: KMB-SOP-HRD-001.1-R0 Rev 0) dated 14 August 2020. The recruitment in accordance to request to fill in shortage or replace employee stops; additional request using the labor requirement form; the process of selection, interview, and medical checkup. The procedure also explains that costs arising from recruitment activities are borne by the company. The terms and conditions regarding this fee are further stipulated/regulated in company regulations and policies.		
6.1.3.		
Based on review of recruitment and promotion document, known that the recruitment is conducted in accordance with the procedure. It is based on skill, capabilities, and health condition for all workers. Worker promotion, mutation or demotion is done through the employee performance assessment. Certification holder has shown documentation of new recruitment and promotion such as application letter, copy of identity card, result of medical examination, letter of submission of appointment to permanent worker and work agreement. For example, recruitment process on behalf of RR on 21 January 2021		
6.1.4		
The unit of certification has carried out pregnancy tests for spray and fertilizing workers. The test is carried out as a way of protecting female workers during pregnancy from exposure to chemicals. The inspections are carried out periodically to workers and the results are notified directly to workers. Based on interviews with spraying worker in Gunung Makmur Estate, it is known that pregnancy checks are carried out regularly, the workers said that this is not a form of discrimination but rather as a source of initial identification of workers for high risk activities (chemical handling).		
6.1.5.		
The unit of certification has established a gender committee in each unit as an organization to manage the complaints of women workers in the event of sexual harassment and violations of reproductive rights Moreover, there is no gender issue raised during one year previous the audit.		
6.1.6.		
Based on recapitulation of the payment and the list of workers, known that there is no payment discrimination in the same scope regarding to the religion, race, gender, or area of origin. The differentiation of wage occurs due to the competencies, productivity, working period, or promotion.		
	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; 6.2.3		
The unit of certification has had a Company regulation period of 2019 – 2020, ratified on 24 May 2018 by by the Ministry of Manpower of the Republic of Indonesia Directorate General of Industrial Relations and and Labor Social Security, valid until 24 may 2020. The unit of certification has shown the current progress extension, as stated in the letter no 21/PK/PP/VIII/2020 dated 18 August 2020 from the Head of the Company Regulations Section of the Ministry of Manpower of the Republic of Indonesia, the Directorate General of Industrial Relations and Labor Social Security. Based on this Company regulation and applicable regulation, this current Company		

regulation still applicable while the process of extension.

The unit of certification regulation set the company and worker rights and responsibilities, recruitment process, promotion and demotion, work time management, payment system, social insurance, contract termination, and so on. Based on interview with the worker, it is known that they understand about worker's rights and obligation as written in collective labor agreement. It has been disseminated to the worker by management representative.

In the Company regulation set that the minimum wage referred to the governmental regulation. Based on the payment slip verification, the company paid the minimum wage to the workers referred to the Kalimantan Tengah Province Minimum Wage of 2020 based on Governor Decree No. 188.44/546/2019 dated 29 November 2019. the unit of certification has paid the employees wage in accordance with applicable regulation, payment of wages has been held in accordance with the mechanism mentioned in employment contracts and company regulation. review overtime record at Mill, the calculation of overtime has been met the applicable regulation, procedure, and company regulation

6.2.2

Based on the list of employees, it is known that the composition of employees in the unit of certification are all permanent employees (PTH and PTB). Documents that regulate in detail regarding wages and working conditions are company regulations. In addition, there is also the determination of wages through Internal office memo No. 002 / IOM-A / HC-BGA / I / 2020 dated January 8, 2020 from the Human Capital Group Dept Head regarding the determination of the wages for PTB and PTH

Based on documents verifications and interview with managements there are several type of worker in PT KMB are permanent workers and contractor's workers. Each type of worker has its own work agreements in accordance with the duties and responsibilities. The company can show the work agreement for workers, company regulations for permanent workers, direct contract for contract workers and work agreement for contractors. The employment contract, company regulations and work agreements are in a language under stable, written in Bahasa and the copies are available for both parties, (the workers and company).

6.2.3

The company has not been able to show sufficient evidence that it has been fully consistent in applying evidence of legal compliance such as regular working hours, overtime, the right to vacation, in accordance with other applicable employment provisions. **NCR No. 2022.07 with grade Major**

6.2.4

The company has not been able to show sufficient evidence that the sanitation facilities provided are fully adequate for all workers. **NCR No. 2022.08 with grade Major**

6.2.6

The unit of certification has calculated the prevailing wage and in-kind benefit for each workers year of 2020 as follows: average of wage, housing allowance, school transport allowance, health allowance, pension allowance, workers allowance, rice allowance, bonus, and religious holiday allowance. Based on that calculation sighted that company has paid wages above the minimum wages of 2020.

6.2.3 Status: NCR No. 2022.07 with grade Major

6.2.4 Status : NCR No. 2022.08 with grade Major

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; 6.3.2; 6.3.3

The unit of certifications policy that gives the freedom of workers described in the Documents Sustainability Policy, that mentioned Respect for Workplace Human Rights: Recognition of International Labor Organization (ILO) core conventions and the United Nations (UN) Universal Declaration on Human Rights, including a ban on forced and child labor, elimination of discrimination, provision of fair wages and working hours, and respect for freedom of association. Provision of a healthy and safe working environment, ethical conduct and efforts to eliminate corruption. Furthermore, there are Employee responsibility policies, November 2015 that described the respect and appreciate the right of every worker to form or join trade unions in accordance with Act No. 21 of 2000.

Documents verification and interviews with management it's known if there is no worker union in PT KMB but the unit of certifications formed Bipartite Cooperation Institution and has been reported to the relevant agencies, as a forum for the settlement of the existing industrial relations and related to the compliance with the applicable regulations

Status: Comply

6.4

Children are not employed or exploited.

6.4.1; 6.4.2; 6.4.3; 6.4.4

Policy related no child labor mentioned in the Documents Sustainability Policy, that mentioned Respect for Workplace Human Rights: Recognition of International Labor Organization (ILO) core conventions and the United Nations (UN) Universal Declaration on Human Rights, including a ban on forced and child labor, elimination of discrimination, provision of fair wages and working hours, and respect for freedom of association. Provision of a healthy and safe working environment, ethical conduct and efforts to eliminate corruption. Furthermore, there are Employee responsibility policy, November 2015 that explains:

- Protect women workers from sexual harassment, violence, and rights related to human reproduction.
- Not employing children under the age of 18, in accordance with Law No. 13 of 2003 concerning Manpower, as well as Law No. 1 of 2000 concerning the ratification of ILO Convention No. 182

List of workers is available in each estate and mill unit, which is completed with information like personnel identity number, name, personnel' status, position, date of birth, hiring date gender, ethnicity. Based on the document's review, it's known that there is no workers under 18 years

Status: Comply

6.5

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

6.5.1; 6.5.2; 6.5.3; 6.5.4

The unit of certification has a responsibility policy for workers which was endorsed in November 2015 by Regional Head I. The policy explains relating to protecting female workers from sexual harassment, acts of violence, and rights related to human reproduction.

The Company has established a gender committee in each unit as an organization to manage the complaints of women workers in the event of sexual harassment and violations of reproductive rights. Interviews with the management of gender committee shows that they already know the duties and responsibilities as the socialization about the complaints mechanism, the socialization of sexual harassment, etc.

Status: Comply

6.6

No forms of forced or trafficked labour are used.

6.6.1 & 6.6.2

The unit of certification has had a policy of no forced labor, which is contained in the Documents Sustainability Policy, that mentioned Respect for Workplace Human Rights: Recognition of International Labor Organization (ILO) core conventions and the United Nations (UN) Universal Declaration on Human Rights, including a ban on forced and child labor, elimination of discrimination, provision of fair wages and working hours, and respect for freedom of association. Provision of a healthy and safe working environment, ethical conduct and efforts to eliminate corruption.

There are no migrant workers who work in the company's operational area. All workers come from within one country (although from various regions). In addition, each worker has been provided with a clear work contract. The rights and obligations of workers are also clearly stated in company regulations, collective labor agreements, and in work agreements. Based on the employee list, it is known that all employees are permanent employees (PTH and PBT). There are no contract employees or casual daily employees.

Status: Comply

6.7

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

6.7.1

The company already has an OHS organization in accordance with the OHS Committee Ratification Decree PT Karya Makmur Bahagia from the Head of the Manpower and Transmigration Office of Central Kalimantan Province number: KEP.164/DISNAKERTRANS/XII/2019 dated December 23, 2019 with OHS Committee secretary on behalf of Chandra Bayu and can

be shown recording of regular meetings of the OHS Committee, for example the meeting on 15 February 2022 which was attended by 11 participants.

The OHS Committee secretary on behalf of Chandra Bayu is a General OHS Expert as stated in the Decree on the Appointment of General OHS Expert number: KEP.P.2352/NAKER-BINWASK3/XI/2018 dated 30 November 2018 which is valid for 3 (three) years until 30 November 2021. However, until the audit activity is carried out, the Company has not been able to show a recording of the progress of managing the extension of the General OHS Expert Decree of the OHS Committee Secretary or the recording of the process of changing the management of the OHS Committee if there is a change in personnel.

Based on the explanation above, it is concluded that the Company has not been able to show sufficient evidence that the person in charge of Occupational Safety and Health already has a valid OHS Decree and license so that this is a **NCR No. 2022.09 with grade Minor**

6.7.2

The company shows the SOP for Emergency Response which is contained in the document BGA-SOP-KMB 13-R0. The procedure briefly describes, among others:

- Classification of emergencies.
- Formation of emergency response team.
- Emergency response structure is equipped with duties and responsibilities
- Evacuation facilities and infrastructure
- Evacuation process, coordination, communication and reporting

Based on the results of field visits and interviews, it is known that the company has equipped the Office and Mill areas with warnings of evacuation routes and gathering points that are understood by workers in case of an emergency.

However, based on the results of document review, field visits and interviews, the following facts were also found:

- Based on the Estate Safety Condition (OHS Management System) Work Paper Report (Office, Housing, Harvest Team, Fertilizer Team, Spray Team) it is known that one of the indicators is to see the availability, identify, check/maintain the first aid kit.
- BMKE → Based on the results of the interview, it was conveyed that each foreman was provided with a first aid bag to handle emergencies, but the results of the field visit found that 1 (one) foreman was not ready for a first aid bag because it was brought by the clerk, in addition there were foreman who did not know the function of the contents of the first aid bag and there is no monitoring of the completeness of the contents of the first aid bag.
- BKCE → 2 (two) of the 3 (three) foremen interviewed brought a first aid bag with incomplete contents according to the list of first aid kits, for example, no Aquades and Iodine items. In addition, there are no records of item use and monitoring of its completeness.
- First aid kits → The results of the field visit revealed that there were no first aid kits available in the TPA Pondok 2 BMKE area, the BKCE division 3 generator house, and in the WWTP area, regarding this, the justification for not providing a first aid kit in the Daycare, generator house and WWTP area has not been shown.

Based on the explanation above, it is concluded that the Company has not been able to show sufficient evidence that the first aid kit is available at the workplace in accordance with the identification specified and the first aid kit has been understood by the assigned personnel so that this is **NCR No. 2022.10 with grade Minor**

6.7.3

Provision of PPE

Based on the results of the document review, it is known the following:

- The Mentaya Regional HIRAC document review in 2021 explains, among others:
 - PPE for Harvesting Work including Boots / short rubber shoes, Gloves and Safety Helmets.
 - PPE for the work of Berondol including Safety Helmets and Shoes.
- SOP for Personal Protective Equipment number: BGA-SOP-CCS-1106.1-R0 explains including:
 - Point 7.3.5 The amount of stock/reserve of PPE in the warehouse should not be less than 10% of the existing needs, prior orders must be made to ensure that no work is done without using PPE.
 - Point 7.5.1 If the employee's PPE is damaged, the employee has the right to get new PPE by submitting the damaged PPE

and filling in the handover proof form.

- Point 7.6.3 Every morning during the master morning/ morning briefing, assistants and supervisors ensure that all workers bring and use PPE according to the job, and fill out the PPE Inspection Data form.

Based on the results of field visits and interviews, several facts were found as follows:

- BMKE → Based on the results of interviews, it was found that 2 lose fruit picker used PPE in the form of boots and 1 harvest worker used short rubber shoes that were provided by themselves. This is because the PPE boots provided by the company were damaged.
- BKCE & BMKE → based on the results of interviews with harvest and lose fruit picker, it is known that PPE in the form of boots is provided by the company every 6 months, and if there is damage before the PPE distribution period, the workers replace the damaged PPE by providing their own because there is no stock available at the company where this has been reported by workers but has not been followed up.

Based on the explanation above, it is concluded that the Company has not been able to show sufficient evidence that PPE has been provided to workers in accordance with the SOPs it has, for example, having 10% stock and damaged employee PPE can be replaced even though the replacement period has not yet arrived, so this is a **NCR No. 2022.11 with grade Major**

Sanitation Facilities

Based on the results of interviews with spraying and fertilizing workers, it was said that the company already has sanitation facilities that can be used by workers to remove PPE, clean themselves and put on personal clothes. This is in line with the results of field observations that the sanitation facilities have been equipped with a place for rinsing oneself that functions properly.

6.7.4

The company shows proof of payment for BPJS Health and Employment, for example as follows:

BPJS Employment

- Proof of payment of BPJS Employment for February 2022 for 257 participants including 114 BMKM workers.
- Proof of payment of BPJS Employment for February 2022 for 4,136 participants including 308 BKCE workers and 381 BMKE workers.

BPJS Health

Proof of BPJS Health payment for January 2022 for 1,227 participants and 1,766 dependents including 60 BKCE workers, 74 BMKE workers and 32 BMKM workers (166 workers in total). Based on the employee list as of January 2022, it is known that the total number of BKCE, BMKE and BMKM employees is 802 workers. Related to this, the company shows proof of submitting BPJS Health registration for 774 workers via email on March 26, 2022 which has been received by BPJS Health and is waiting for further feedback according to the information contained in the email reply dated March 28, 2022.

Based on the explanation above, the company has an opportunity for improvement by ensuring the BPJS Health registration process. **(OFI)**

Based on the results of interviews with the Manpower Office of Kotawaringin Timur Regency, information was found that there were work accidents against harvest workers which resulted in the death of the victim. Based on the results of the document review, it is known that work accidents occur to SPYE harvest workers which are outside the scope of certification, but the company can show proof of reporting to BPJS Employment as well as calculating workers' rights and proof of payment of compensation to heirs.

6.7.5

The company shows the recording of work accidents using the LTA contained in the Recap SR & FR Region 2 document, for example the period January – December 2021 briefly as follows:

- LTA: 112
- FR: 143
- SR: 27

6.7.1	Status: NCR 2022.09 with grade Minor
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6.7.2 Status: NCR 2022.10 with grade Minor

6.7.3 Status: NCR 2022.11 with grade Major

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 IPM plan has been included in the Pest and Disease Control SOP document no. BGAAGRKS-PTKS-PHT. Briefly, the document describes the following:

- Pest and Disease Detection
- Pest and disease census system
- Types of oil palm pests

a. Palm Leaf Eater Catterpillar

- Economic Threshold:

Pest Type	Threshold	
	Immature	Mature
<i>Senthosea asigna</i>	5	10
<i>Setora nitens</i>	5	10
<i>Darna trima</i>	30	60
<i>Ploneta diducta</i>	15	25
<i>Thosea bisura</i>	10	20
<i>Mahasena corbetti</i>	5	10
<i>Metisa Plana</i>	10	20
<i>Pteroma pendula</i>	10	20
<i>Dasychira inclusa</i>	5	10
<i>Calliteara horsefieldii</i>	5	10

- Control Measures: Manual, Biological and Chemical.

b. Rat Pest

- Immature Affected Trees are trees where there is a crack at the base of the midrib.
- Mature infected trees are identified through grading at the Yield and Mill.
- The economic threshold is 5% new affected principal per block. In certain circumstances, it may be necessary to feed a block where the Economic Threshold is < 5% if a significant rat attack is seen on the adjacent block.
- Control with Rat and Owl Poison.

c. Beetle (*Oryctes rhinoceros*)

d. Tirathaba

e. Termite

f. *Adoretus* dan *Apogonia*

g. Wild boar

- Oil Palm Disease

- a. Leaf diseases in nurseries
- b. Root rot disease – *Ganoderma*
- c. Fruit bunch rot disease – *Marasmius*
- d. Shoot rot disease
- e. Deformity

The company shows the census records of Plant Destruction Pests, for example in 2021 the BKCE unit for attacks by *Oryctes*, *Tirathaba*, Rats, Termites, UPDKS and Oil Palm Plant Diseases, it is known that there are only *Thirataba* attacks (1.9%) and Rats (2.8%). This is in accordance with the results of field visits where no signs of massive pest attacks were found.

7.1.2
Based on the results of field visits, it is known that the company does not use species that are classified as invasive species introduced

in the Minister of Environment and Forestry Regulation No. P94/MENLHK/SEKJENKUM.1/12/2016.

7.1.3

Based on the results of the field visit, it was found that there was no use of fire for pest control. In accordance with the Pest and Disease Control SOP, it is known that the control of pests and diseases includes manual, chemical and biological methods.

Status: Comply

7.2

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

7.2.1

Based on the results of the analysis of the use of Pesticide Active Ingredients, it is known that the company has used pesticides selectively specifically to deal with targeted pests, weeds or diseases. For example, in 2021 the pesticides used for BMKE and BKCE units include:

Merk	Active Ingredients	Target
Metaprima	Metil Metsulfuron	broadleaf weed
Kleen Up	Isopropilamina Glyphosate	broadleaf weed
Garlon 480 EC	Triclopyr	broadleaf weed

7.2.2

The company shows records of pesticide use contained in the Pesticide Active Ingredient Analysis document, for example the use of the pesticide Kleen Up (*Isopropylamine Glyphosat*) in 2021 at BKCE as follows:

- Number of Applications: 16.525 L
- LD50: >5.000
- A.I: 480 g/l
- A.I per Ha: 6,58 g/Ha

7.2.3

PT KMB has program to reduce the pesticide usage by replacing pesticides with biological controls such as using natural predators to control rat and planting the beneficial plant. 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 leaf eater caterpillar by planting beneficial plant such. Moreover, it has also conducted early detection routinely.

7.2.4

Based on the results of the analysis of the use of Pesticide Active Ingredients, it is known that there is no use of pesticides for the purpose of controlling animal pests. This is in accordance with the recording of the census of Plant Pests where there is no pest attack that exceeds the control threshold, so it can be concluded that there is no use of pesticides with prophylactic purposes.

7.2.5

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

7.2.6

To ensure that pesticides are handled by personnel who have received training, the company has conducted periodic training for workers who handle pesticides, for example the BKCE Spraying Activity Training on December 3, 2020 which was attended by 19 participants.

Based on the results of interviews with spraying workers at BKCE, it was found that workers had understood safe working procedures in spraying activities.

7.2.7

Based on the results of the field visit at the chemical storage warehouse, it was found that the chemical storage area was equipped with the symbol of Hazardous Materials, MSDS, First Aid Box, secondary containment and storage was grouped according to its type.

7.2.9

Based on the results of field visits and document studies, it is known that the company does not spray pesticides through the air.

7.2.10

The company shows the recording of the Special Health Checkup for pesticide operators conducted by the Mentaya Regional Doctor. For example:

- Special MCU results for 40 BSS & BMS employees of the BKCE unit on January 25, 2022 with all results fit to work.
- Special MCU results for 40 BSS & BMS BMKE employees on January 25, 2022 with all fit to work results.

7.2.11

The company shows IOM No. 01/INT-KMB/III/2021 dated March 8, 2021 regarding Monitoring of Spraying and Manuring Female Employees who are not Pregnant/Breastfeeding by:

- Make a monitoring checklist of the menstrual cycle of female workers, productive age and corrective action if menstruation is delayed in the form of checking to the Polyclinic.
- Direct interviews with female workers by the foreman regarding the condition of being pregnant or not.

Pregnancy checks are also carried out for female workers during the implementation of the Special MCU in January 2022. Based on the results of the study of the Special MCU Results document and interviews with spraying workers, it is known that there are no workers who work with chemicals who are pregnant or breastfeeding.

Status: Comply

7.3

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

The company has not been able to show sufficient evidence that waste disposal is in accordance with its procedures. **NCR No. 2022.12 with grade Minor**

7.3.2 Status: NCR No. 2022.12 with grade Minor

7.4

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

7.4.1

Procedure (SOP) related to soil fertility management is presented in procedure of Agronomy (doc. No. BGA-AGR-KS-SOP-xx) dated 25 May 2011, as follows:

- Volume I: instalation and maintenance of drainage system (SOP-04), conservation of water and soil (SOP-05), planting of legumes or land cover crop (SOP-06).
- Volume II: covers weeds management (SOP-08) and manuring (SOP-09).
- Volume III: marginal soil management (SOP-16).

Several records related to soil fertility management shows are leaf and soil sampling analysis, program and realization record of fertilizer in all estates of PT KMB, by-products (POME and EFB) application record.

7.4.2

Unit of certification shows leaf sampling unit (LSU) and soil sampling unit (SSU) analysis for PT KMB results that presented in several documents, for example that contained in the Comparison of Leaf and Soil Analysis Results document for 2020 VS 2021 (BKCE and BMKE) with parameters including:

- Leaf Analysis: N, P, K, Mg, Ca, dan B.
- Soil Analysis: N, P, K, Mg, dan B.

7.4.3

The company shows records of nutrient recycling, for example:

- EFB applications in 2021 amount to 39,080 Tons.
- Composting application in 2021 amounted to 18,799 Tons.
- POME applications in 2021 amount to 332,941 Tons (2,220 Ha)

7.4.4

Based on the review of planning documents and the realization of BKCE and BMKE fertilization, it is known that the fertilizers recommended and applied by the company include: NPK 13, Kieserite, TSP, Borate, CoSu4, NPK and Bio Granules. The achievement of applications, for example in 2021, is 97% (BKCE).

Status: Comply

7.5

Practices minimize and control erosion and degradation of soils.

7.5.1

The company shows maps including:

- PT KMB Soil Type Map No. Reg01/KMB/GIS-Reg.1/I/2022 scale 1:76,000 with soil types including *Dystrudepts*, *Plinthudults*, *Haplohumods*, *Quartzpsamments*, *Local Alluvium*, *Udfluvents*, *Paleudhults*.
- PT KMB Planting Year Map No. Reg03/KMB/GIS-Reg.1/I/2022 scale 1:75,000 with slope classes including 0 – 8%, 8 – 20% and > 20%.

Based on the study of the document and field visit, it is known that there is no marginal peat soil and there are areas with steep slopes in the group > 20%.

7.5.2

Based on the results of the study of the area statement document and field visits, it is known that the company does not yet have a plan and carry out replanting activities for the next 5 years.

7.5.3

Based on the results of the study of the area statement document and field visits, it was found that the company did not carry out any new planting activities.

Status: Comply

7.6

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

7.6.1

The company shows maps including:

- PT KMB Soil Type Map No. Reg01/KMB/GIS-Reg.1/I/2022 scale 1:76,000 with soil types including *Dystrudepts*, *Plinthudults*, *Haplohumods*, *Quartzpsamments*, *Local Alluvium*, *Udfluvents*, *Paleudhults*.
- PT KMB Planting Year Map No. Reg03/KMB/GIS-Reg.1/I/2022 scale 1:75,000 with slope classes including 0 – 8%, 8 – 20% and > 20%.

Based on the study of the document and field visit, it is known that there is no marginal peat soil and there are areas with steep slopes in the group > 20%.

7.6.2; 7.6.3

Based on the results of the document review and field visits, it was found that the company did not develop new plantations.

Status: Comply

7.7

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

7.7.1; 7.7.2; 7.7.3; 7.7.4; 7.7.5; 7.7.6; 7.7.7

The company shows maps including:

- PT KMB Soil Type Map No. Reg01/KMB/GIS-Reg.1/I/2022 scale 1:76,000 with soil types including *Dystrudepts*, *Plinthudults*, *Haplohumods*, *Quartzpsamments*, *Local Alluvium*, *Udfluvents*, *Paleudhults*.
- PT KMB Planting Year Map No. Reg03/KMB/GIS-Reg.1/I/2022 scale 1:75,000 with slope classes including 0 – 8%, 8 – 20% and > 20%.

> 20%.

Based on document review and field visits, it was found that no peat soil type was found, so this indicator is not relevant.

Status: Comply

7.8

Practices maintain the quality and availability of surface and ground water

7.8.1; 7.8.2

Unit of certification demonstrates practices to maintain the quality and availability of surface and ground water as outlined in the 2020 high conservation value management plan. This document describes the management plan for surface water and groundwater sources as follows:

- Conducting education to the surrounding community regarding the importance of river border preservation.
- Carrying out river border restoration such as: Habitat restoration on riverbanks and tree planting.
- Monitoring and measuring the quality of domestic water and river water on periodically.
- Measuring and monitoring the quality of monitoring clean water.
- Controlling the use of chemicals.
- Define and control the buffer zone area.
- Soil and water conservation programs to reduce erosion and increase water infiltration.
- Water management program.
- Installation of the sign board.
- Monitoring the rate of erosion regularly.

Surface water quality testing is carried out every 6 months upstream and downstream of the Mentaya River, the last test was carried out on April 21, 2020 by the BARISTAN commodity and environment testing laboratory, Banjarbaru Regency refers to PP 82/2001, Observations were made for testing in semester II 2019 and semester I 2020 with the test results still in accordance with the quality standards set in the regulations.

Testing of clean water quality is carried out in every housing and factory (GMKE, BDME, BMKE, BMKM) which is carried out once a year. The last test was carried out on October 15, 2019 by the BARISTAN environmental and commodity testing laboratory, Banjarbaru Regency, referring to Permenkes 32/2017 with test results still in accordance with the quality standards set in the regulations.

Monitoring clean water quality testing is carried out every 6 months on 3 monitoring wells, the last test was carried out on April 21, 2020 by the BARISTAN commodity and environment testing laboratory, Banjarbaru Regency refers to *Permenkes* 32/2017, observations were made for testing in semester II 2019 and semester I 2020 with the test results still in accordance with the quality standards set in the regulations

7.8.3.

POME is processed first in the POME pond and BMKM Mill has 12 POME pond. The unit of certification has managed its effluent of FFB processing as regulated. Document review shows there is monthly effluent quality against national regulation for waste that is discharge to land application.

Permit of effluent utilities was accordance decree regent Number No.: 660/437/DLH-Ek.SDA/VI/2017 May 13 December 2015, valid for five years. The POME quality and river quality test result by accredited laboratory shows that the effluent quality especially BOD, TSS, pH and COD has fulfilled the standard required Law of Minister of Environment.

7.8.4.

The unit of certification has recorded its actual water use. The average water uses per ton FFB for period of January – December 2020 is 1.31 m³/ton FFB. The water usage is 457,462 m³ and FFB processed is 349,338 ton. Based on document verification sighted that the unit of certification been realized water usage ratio in accordance to the budget.

Status: Comply

7.9

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

7.9.1.

The Company already maximizing the use of renewable energy (fiber & shell) as boiler fuel. For example, use of shells and fiber in January to December 2020 were 17,615 ton and 48,987 ton respectively. Result Direct fossil fuel used is 5,644.64 KJ/ton CPO.

Status: Comply

7.10

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

7.10.1.

The certification unit has calculated GHG emissions in the RSPO Palm GHG Calculator, however the input data is still not in accordance with the basic information data period of January till December 2020. For example:

1. FFB production is total of PT KMB, it has not been separated between BMKE & BKCE. Therefore, there is no information FFB from BKCE & BMKE (Non RSPO Certified Area).
2. The fertilizer and chemical use have not been separated in accordance to each estate.

7.10.2.

The company has identified potential significant emission source generated from company operational area as well as the GHG calculation. It is covered in summary report of GHG management and mitigation plan of PT KMB year 2018. The GHG calculation is calculated using Palm GHG Calculator version 3.0.1 and has been submitted to RSPO. Company has conducted RSPO New Planting Procedure (NPP) assessment on 10th December 2013. The company has finished its planting activity in 2012 and no new expansion for new planting, therefore the company has no obligation to calculate its high carbon stock assessment.

7.10.3.

The unit of certification has identified the source of pollution and has assessed the pollution resulted from the mill and estates activities. The identified source of pollution in estate are manuring activity, clinic, workshop, spraying activity, office, warehouse and housing complex, generator use and transportation. Meanwhile, the source of pollution and waste identified in mill among others are processing activities, workshop, office, laboratory and Palm Oil Mill Effluent. The regular quality test has been conducted for monitoring well for land application monitoring, soil in land application area, air emission, air ambient, water quality odor level, noise level and effluent quality. The water result shows that pH is under the regulated range which is too acid. The water has been in acid condition before entering the company area. The company evaluation informs that the acid water is due to the soil type of the area and the biological decomposition in the water body.

Status: Comply

7.11

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

7.11.1

Based on verification document of land used change analysis shown by unit of certification, there was land clearing between November 2005 and December 2010, however, land preparation was carried out mechanically with heavy equipment and not by burning, this is in line with the BGA group sustainability policy issued in 13 August 2015 the first point on Forest Conservation and Sustainable Land Use mentions No peat, protection of High Conservation Value (HCV) and High Carbon Stock (HCS) landscapes, reducing the use of chemical fertilizers and pesticides, eliminating Paraquat and preventing fires. In addition, the Environmental and Biodiversity Policy issued on 11 May 2011 was approved by the director, which among other things stated a commitment to clearing land to implement a zero-burn system in all plantation development and waste management activities.

7.11.2

Unit of certification has established preventive and control measures in case of fire which are compiled in the emergency response SOP with number BGA-SOP-KMB13-R0 which was ratified and came into effect on April 17, 2012 which describes the classification of emergencies which includes fire the formation of an emergency response team, duties and responsibilities of each personnel as well as a flow chart of the evacuation, first aid and firefighting process.

7.11.3

In addition to the involvement of the fire department emergency response team, in terms of fire prevention and management, unit of certification also involves the role of the surrounding community, this is explained in the SOP which includes relationships with the community in collecting data and information on disaster management that occurs as well as establishing information and communication networks by disseminating information about the disaster (fire) that occurred.

In addition, unit of certification has also conducted training on the prevention and control of forest and land fires to farmers who supply around the plantation on September 26, 2020 and to the surrounding village community on October 10, 2020, Unit of certification can show to during the audit of documents of attendance at training participants, training minutes and photos of activities.

Status: Comply

7.12
Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.

7.12.1.

The Company has carry out the HCV assessments in 2012 by the RSPO approved assessors using the HCV toolkit 2008. Against areas planted since November 2005 without prior HCV assessment, the company has submitted disclosure and LUCA to the RSPO, has been response by RSPO Compensation Executive RSPO (Dillon Sarim) by e-mail to Head Sustainability of BGA on April 25, 2016.

7.12.2.

HCV identification was performed in 2012 for scope of 17,500 Ha (in accordance with the company's location permit) by the RSPO approved assessors, assessment are done using the HCV toolkit 2008. Based on the review of HCV report for PT KMB not found any of HCV which rare and threatened ecosystem, which can be significantly affected by estate and mill operational activities, there are species of flora and fauna which protected under PP No. 7 of 1999, CITES and IUCN. The Company has fixed the HCV area to be managed as much as 514.52 Ha for scope of PT KMB, however for Bukit Makmur Estate and Bukit Kecubung Estate, the HCV area covers 338.58 ha. Species RTE found for example: Owa (*Hylobates agilis*), Kelempiau (*hylobates muelleri*), Pangolin (*Manis javanica*) and Bird pergam (*Ducula pickeringii*).

7.12.3

Not relevant, until a further decision is made by the RSPO.

7.12.4.

The company has not been able to show sufficient evidence that the HCV management plan has been implemented according to the procedures and management plans that it has. **NCR No. 2022.13 with grade Major**

During the audit activity, there are several evidences, such as:

1. HCV Identification report year of 2012, in this document contains several recommendations for HCV management and monitoring which are used as references by the unit of certification in carrying out the HCV management.
2. The unit of certification reviewed the HCV management and monitoring plan which carried out on December 16, 2020. Several matters discussed included: evaluation of HCV management and monitoring results, evaluation of facilities and infrastructure for HCV management, evaluation of socialization of HCV safeguards and utilization in the community. HCV monitoring officer appointment, review the latest government regulations.

Based on interview result with HCV staff, it was explained that the result of the evaluation of HCV management were socialized to the stakeholders. The unit of certification has not been able to shown evidence that the HCV management plan developed/reviewed in consultation with stakeholders at least once every five years. **It was raised as nonconformance number 2020.4 with Major category.**

7.12.5; 7.12.6; 7.12.7

Based on documentation of HCV monitoring in 2020, it was found that there were no RTE species in the unit of certification. However, the socialization has been carried out to all employees by install several signboards for prohibits storing, hunting the wildlife that are categorized as RTE species and National Regulations. In addition, the unit of certification also conducted outreach to the villagers from Sungai Hanya Village, Bakti Karya Village, and Waringin Agung Village on June 29, 2020.

7.12.8.

Based on the results of the Land Use Change Analysis it is known that the total raw area of liability is 5,268 ha with a total area of liability conservation covering 1,855 ha (net area: 856 Ha). Bumitama Agri Ltd has sent Liability Disclosure and LUCA for PT KMB to

the RSPO Compensation Plan on April 25, 2016 and declared PASS. In addition, the RAC-Plan has also been sent to the RSPO but there is not enough evidence available that the RAC-Plan for PT KMB has been approved by the RSPO.

The results of communication between PT Mutuagung Lestari and the RSPO on May 27, 2019 were informed that "kindly note that there is a land liability issue for this certified unit where the compensation plan has not yet been endorsed. Therefore, the certificate for this certified unit cannot be issued upon completion of the assessment until everything is clear".

The company showing evidence of communication with RSPO by email on July 16, 2020. One of the important points as follows:
 "Due to the tight timeline and Bumitama's commitment to the RaCP, the compensatio panel has grant a conditional approval with the condition that the Compensation Plan must be reviewed as Satisfactory by the next Surveillance audit. The decisión on this conditional approval is applicable for the following units (14 units)" including PT Karya Makmur Bahagia".

Based on RSPO statement, it nonconformance is still open until next assessment.

7.12.4	Status: NCR No. 2022.13 with grade Major
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3.2 Conformity Checklist of Certificate and Trademark Use

1.	Evidence of permission or approval certificate and trademark from Certification Body which submitted by Client	X or √
ASA-1 & ASA-2	Bumitama Agri Ltd has license of trademark use with number 1-0043-07-100-00. Based on interview with the management and document verification sighted that there are no using RSPO trademark.	√
	Status: Comply	
2.	Implementation of certificate and trademark used by Client comply with size and type (shape) against Guideline of trademark Use	X or √
ASA-1 & ASA-2	Bumitama Agri Ltd has license of trademark use with number 1-0043-07-100-00. Based on interview with the management and document verification sighted that there are no using RSPO trademark.	√
	Status: Comply	
3.	Implementation of Certificate and Trademark is not used on product	X or √
ASA-1 & ASA-2	Bumitama Agri Ltd has license of trademark use with number 1-0043-07-100-00. Based on interview with the management and document verification sighted that there are no using RSPO trademark.	√
	Status: Comply	
4.	Controlling of Certificate and Trademark, including withdrawing inappropriate trademark.	X or √
ASA-1 & ASA-2	Bumitama Agri Ltd has license of trademark use with number 1-0043-07-100-00. Based on interview with the management and document verification sighted that there are no using RSPO trademark.	√
	Status: Comply	

3.3 Summary of RSPO Partial Certification.

Compliance of the uncertified management units of Bumitama Agri, Ltd against the rules for partial certification was determined through Self-Assessment in accordance with RSPO Certification System clause 5.5.3. A summary of findings is as stated below.

Bumitama Agri, Ltd Time Bound Plan is explained in table 1.10. Bumitama Agri, Ltd has informed the Time Bound Plan progress, MUTU has considered that MP Bumitama Agri, Ltd is complied with the RSPO requirement for Time Bound Plan. The Time Bound Plan was revised and declared by Bumitama Agri, Ltd on November 2021.

MUTU has verified partial certification for un-certified unit's subsidiary of Bumitama Agri, Ltd based on their Time Bound Plan. There are nine (9) uncertified mills and thirty-two (32) uncertified estates management units of Bumitama Agri, Ltd. MUTU Auditor verified positive assurance against the company internal audit and supporting evidence as well as any information from others sources.

MUTU Auditor has verified company partial certification and concludes that:

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

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?	Based on the document review, there is a company internal audit that was conducted and the positive assurance is at this table that is also been verified.
2.1.2	No replacement of primary forest or any area identified as containing High Conservation Values (HCVs) or required to maintain or enhance HCVs in accordance with RSPO criterion 7.3 (it has changed be Criterion 7.12 in P&C 2018)	<p>PT Langgeng Muara Makmur Sejahtera</p> <ul style="list-style-type: none"> - RaCP Plan document are wait for LUCA documents to be submitted and approved by RSPO. - HCV conducted March 2012 by Forestry IPB. <p>PT Andalan Sukses Makmur</p> <ul style="list-style-type: none"> - LUCA was sent on January 2015 to RSPO - Documents RaCP Plan are wait for LUCA approved by RSPO - HCV was conducted on October 2013 by Sonokeling Akreditasi Nusantara <p>PT Investa Karya Bhakti</p> <ul style="list-style-type: none"> - LUCA was sent on 13 June 2016 to RSPO - Documents RaCP Plan are wait for LUCA approved by RSPO <p>PT Gunajaya Harapan Lestari</p> <ul style="list-style-type: none"> - LUCA has not been submitted to RSPO - HCV was conducted on October 2012 by Forestry IPB <p>PT Windu Nabatindo Sejahtera</p> <ul style="list-style-type: none"> - LUCA was sent on 19 June 2016 to RSPO - Documents RaCP Plan are wait for LUCA approved by RSPO - HCV was conducted on March 2012 by Forestry IPB <p>PT Ladang Sawit Mas</p>

Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<ul style="list-style-type: none"> - LUCA was sent on 16 July 2014 to RSPO - Documents RaCP Plan are wait for LUCA approved by RSPO - HCV was conducted on December 2013 by Sonokeling Akreditasi Nusantara <p>PT Lestari Gemilang Intisawit</p> <ul style="list-style-type: none"> - LUCA was sent on 7 November 2014 to RSPO - Documents RaCP Plan are wait for LUCA approved by RSPO - HCV was conducted on 2013 by Sonokeling Akreditasi Nusantara <p>PT Agro Manunggal Sawitindo</p> <ul style="list-style-type: none"> - LUCA was sent on 7 November 2014 to RSPO - Documents RaCP Plan are wait for LUCA approved by RSPO - HCV was conducted on July 2013 by Sonokeling Akreditasi Nusantara <p>PT Karya Makmur Langgeng</p> <ul style="list-style-type: none"> - LUCA was sent on January 2015 to RSPO - Documents RaCP Plan are wait for LUCA approved by RSPO - HCV was conducted on July 2013 by Sonokeling Akreditasi Nusantara <p>PT Gemilang Makmur Subur</p> <ul style="list-style-type: none"> - HCV was conducted on November 2016 by PT Gagah Dinamika Aksenta. <p>Auditor verification Based on internal audit results and evidence provided (communication to RSPO on liability disclosure) shows that all subsidiaries of Bumitama has been sent to RSPO and now on progress of LUCA review.</p>
2.1.3	Any new plantings since January 1 st 2010 must comply with the RSPO New Plantings Procedure.	<p>PT Langgeng Muara Makmur Sejahtera, there is no new planting after January 1st 2010.</p> <p>PT Andalan Sukses Makmur, NPP was completed for areal 5,630 Ha and publish on March 10th 2016.</p> <p>PT Investa Karya Bhakti, NPP was completed for areal 5,700 Ha and publish on October 4th 2016.</p> <p>PT Gunajaya Harapan Lestari, there is no new planting after January 1st 2010.</p> <p>PT Windu Nabatindo Sejahtera, there is no new planting after January 1st 2010.</p>

Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<p>Auditor verification</p> <p>Based on internal audit, documented time of land clearing and liability disclosure sent to RSPO, there is new planting/land clearing after 1st January 2010 for PT Andalan Sukses Makmur and PT Investa Karya Bhakti but NPP has been conducted for these units. Evidence of submission to RSPO is provided and the NPP notification are at RSPO website.</p>
2.1.4	Land conflicts, if any, are being resolved through a mutually agreed process, such as the RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO criteria 2.2, 6.4, 7.5 and 7.6 (it has changed be Criterion 4.8, 4.7 and 4.5 in P&C 2018).	<p>There is no land conflicts.</p> <p>Auditor verification</p> <p>There is land conflicts and has been resolved with RSPO Grievance procedure or Dispute Settlement Facility.</p>
2.1.5	Labour disputes, if any, are being resolved through a mutually agreed process, in accordance with RSPO criterion 6.3 (it has changed be Criterion 4.2 in P&C 2018).	<p>There is labor disputes. There is no information from public source and RSPO website on any labour conflict for uncertified unit of the group subsidiaries.</p> <p>Auditor verification</p> <p>There is labour dispute in uncertified unit i.e PT Bumitama Gunajaya Abadi. The dispute has been resolved as we can seen in RSPO website that the status of dispute in closed for monitoring.</p>
2.1.6	Legal non-compliance, if any, is being addressed through measures consistent with the requirements of RSPO P&C criterion 2.1 (it has changed be Criterion 4.2 in P&C 2018).	<p>PT Langgeng Muara Makmur Sejahtera</p> <ul style="list-style-type: none"> Izin Prinsip Arahan Lokasi No. 525.21/660/Ek.SDA/IX/2014 dated 12 September 2014 5,325 Ha Location Permit SK District Kotawaringin Timur No. 188.45/330/Huk-BPN/2014, 23 September 2014 5,370 Ha Environment Permit No. 660/2140/BLH-Ek.SDA/2015, 19 October 2015 for 5,325 Ha IUP No. 188.45/490/Huk-Ek.SDA/2014, 19 December 2014 4,810.72 Ha SK HGU No. 5/HGU/KEM-ATR/BPN/2017, January 10th 2017. <p>PT Andalan Sukses Makmur</p> <ul style="list-style-type: none"> Izin Prinsip Arahan Lokasi SK District Kotawaringin Barat No.590/105/Pem-XI/2012, November 21 2012 for areal 9,000 Ha. Location Permit SK District Kotawaringin Barat No.525/68/XII/2012, December 18th 2012 for 9,275 Ha IUP No. 525/45/ek, 06 February 2013 HGU on process. <p>PT Investa Karya Bhakti</p> <ul style="list-style-type: none"> Izin Prinsip Arahan Lokasi No. 590/09.Pem-II/2014, 3rd February 2014 for areal 14,500 Ha.

Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<ul style="list-style-type: none"> Location Permit SK District Kotawaringin Barat No. 525/62/IX/2014, 1st September 2014, 11,746.74 Ha IUP No. 525/014/EK, April 21 2015, 5,700 Ha <p>PT Rohul Sawit Industri and PT Masuba Citra Mandiri</p> <ul style="list-style-type: none"> HGU on process Panitia B Inti No. 03/RSL/HGU/2015 seluas 1,893.11 Ha Panitia B Plasma No. 04/RSL/HGU/2015 seluas 938,16 Ha <p>PT Gunajaya Harapan Lestari</p> <ul style="list-style-type: none"> Izin Prinsip Arahan Lokasi No. 525/426/Bappeda-D year of 2007, 08 May 2007 for areal 3,000 Ha. Location Permit SK District Kendawangan No. 265 year of 2007, 28 June 2007 for 3,000 Ha Revision Location Permit No. 370 year of 2008, 07 October 2008 for 3,000 Ha Extention Location Permit No. 415 year of 2010, 27 July 2010 for 3,000 Ha IUP No. 365/DISBUN-D/2012, August 23rd 2012 for 1,750 Ha HGU No. 62/HGU/KEM-ATR/BPN/2016, 1,973.45 Ha <p>PT Windu Nabatindo Sejahtera</p> <ul style="list-style-type: none"> Izin Prinsip Arahan Lokasi No. 02.04.28/525.26/463/XI/Ekbang/03, 8th November 2003 for areal 7,000 Ha. Location Permit SK District Kotawaringin Timur No. 165.460.42, 26 February 2004 for 5,370 Ha IUP No. 525.26/152/V/Ekbang/2004, 17 May 2004 for 5,370 Ha Permit Location No. 374.460.42, December 13 2006 for 5,000 Ha (Revision) IUP No. 525.26/386/V/Ekbang/2007, May 30th 2007 for areal 5,000 Ha (Revision) Kadastral Map No. 355-15.05-2007, July 6th 2007 for areal 4,998.76 Ha Surat Permohonan HGU 003/WNS-Dir/VII/2007, July 11th 2007 for areal 5,000 Ha. <p>PT Windu Nabatindo Abadi</p> <ul style="list-style-type: none"> Sertifikat HGU No. 37/HGU/BPN RI/2014 seluas 1,987.8 Ha Sertifikat HGU No. 48/HGU/KEM-ATR/BPN/2015 tanggal 20 Mei 2015 seluas 5.773 Ha <p>PT Nabatindo Karya Utama</p>

Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<ul style="list-style-type: none"> Sertifikat HGU No. 17/HGU/KEM-ATR/BPN/2016 tanggal 07 April 2016 seluas 3,298.63 Ha <p>HGU on process for Ladang Sawit Mas, PT Lestari Gemilang Intisawit, PT Agro Manunggal Sawitindo, PT Karya Makmur Langgeng, and PT Gemilang Makmur Subur</p> <p>Auditor verification Land legal process is still going on and there is a detail update progress documented by the company for each year.</p>

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

3.4.1. Identification of Findings, Corrective Actions and Observations at Initial Certification Audit

NCR No.	:	2019.01	Issued by	:	Yudhi Yuniarto Tallutondok
Date Issued	:	12 July 2019	Time Limit	:	ASA 1
NC Grade	:	Minor	Date of Closing	:	13 January 2020
Standard Ref. & Requirement	:	1.1.1 List of information related to criterion 1.2 that can be accessed by relevant stakeholders shall be available			
Evidence observed (filled by auditor): Based on the results of document verification and interviews with management, it was found that the company has not reported all mandatory report to relevant agencies, for example report of liquid waste management in the first quarter of 2019 to the Kotawaringin Timur Environmental Agency, as stipulated in Environmental Minister Regulation No 28 of 2003.					
Non-Conformance Description (filled by auditor): Not all mandatory reports have been submitted to the relevant agencies.					
Root Cause Analysis (filled by organization audited): There are change an EHS staff and mill.					
Correction (filled by organization audited): 1. Reporting to the relevant agencies. 2. Decree on the appointment of new staff who are responsible for reporting waste management and others.					
Corrective Action (filled by organization audited): Monitoring through the internal audit mechanim by sustainability staff and management review meeting.					
Assessor Evaluation and Conclusion (filled by auditor): Verification on 13 January 2020 The unit of certification was shown several evidences: - Land application of fourth quarter of 2020 to the Environment Agency of Kotawaringin Timur. - Environment monitoring and management report to the Deputy of Environment Pollution Control, the Environment and Forestry Ministry. - Letter from Mill Manager number 06/INT-BMKM/KMB/VII/2019 dated 13 August 2019 regarding the confirmation of the implementation of the EHS work program, including OHS and PPE's inspection and environment management. Based on the description above, this is declared fulfilled.					
Verified by	:	Yudhi Yuniarto Tallutondok			

NCR No.	: 2019.02	Issued by	: Yudhi Yuniarto Tallutondok
Date Issued	: 12 July 2019	Time Limit	: ASA 1
NC Grade	: Minor	Date of Closing	: 22 January 2021

Standard Ref. & Requirement	: 2.1.3 A mechanism for ensuring compliance shall be implemented
Evidence observed (filled by auditor): Based on the results of the document review, it is known that there are some jobs submitted to third parties, for example: <ol style="list-style-type: none"> 1. Work Agreement Letter No. 001-PRWT / KMBL-BMKE / LKL / 01/2019 for empty bunch application in Bukit Makmur Estate. 2. Work Agreement Letter No. 005-PRW / KMBL-BKCE / LOCAL / I / 2019 for empty bunch application in Bukit Kecubung Estate. <p>In this regard, the company has not been able to demonstrate mechanisms to ensure compliance with the law as stipulated in the RSPO Principles and Criteria, related to:</p> <ul style="list-style-type: none"> • Proof of minimum wages payment • Health and employment insurance • Implementation of OSH aspects <p>(In the 2017 RSPO certification system clause 4.4.6 states that In cases where an organization seeking certification contracts or outsources nonprocessing activities to independent third parties (such as labour, transport and external bulking activities), the activities of these third parties fall inside the scope of certification, and they shall comply with all relevant requirements of the RSPO certification standards))</p>	
Non-Conformance Description (filled by auditor): The company cannot demonstrate mechanisms to ensure compliance with the law as set out in the RSPO Principles and Criteria for work carried out by the contractor	
Root Cause Analysis: There has not been an evaluation of the fulfillment of the legal requirements of the Contractors performance for the empty length application activity, this is due to a lack of understanding from the Unit Manager regarding the legal compliance mechanism for the Contractor according to the 2017 certification system, clause 4.4.6.	
Correction: <ol style="list-style-type: none"> 1. Disseminate the legal requirements that must be compliance by the empty bunk Application Contractor. 2. Evaluating contractors in accordance with applicable SOPs. 	
Corrective Action: Internal Audit & Management Review regularly.	
Assessor Evaluation and Conclusion: Verification, 22 January 2021. The unit of certification showed the contractor procedure document number SUST-SOP-038 revision number 00 endorsed by the Regional Head December 10, 2020. This procedure is to select and evaluate contractors working with the unit and ensure the contractor meets the criteria set by the unit of certification. Control and evaluation of CPO and PK transportation contractors, for example: <ul style="list-style-type: none"> • The Commercial Department will review and ensure the requirements set out in the RSPO supply chain certification standard is set out in the CLA between the unit of certification and the relevant contractor. The related management unit makes a list of contractors and updates it if there are changes and provides counseling to CPO & PK transportation contractors. • Ensuring the contractors performance, the related mill manager will evaluate the performance of the CPO & PK transportation contractors used. • Related management units and commercial departments will also be ready to facilitate certification bodies if they have access to contractors. 	

Control and evaluation of civil / engineering contractors in the clause in the CLA between the management unit and the contractor involved must include the requirements in the clause:

- Willingness to have operational access and information for audit purposes by the CB
- Fulfillment of applicable laws and regulations.
- Fulfillment of OSH requirements and understanding awareness of the RSPO aspects.
- Fulfillment of labor regulations covering workers wages, age of workers and health insurance.
- Human rights rights (prohibit practices involving child labor, forced labor and workers from human trafficking).

Control and evaluation of contractors for Plantation and Mill operations such as transporting FFB, pruning, compost, leasing heavy equipment and mechanicals. The unit manager will review and ensure the requirements meet the requirements above. The evaluation results are categorized into recommended and not recommended. Contractors who are in the recommended category will still be made partners and included in the list of selected contractors for the next 1 year period and the non-recommended category will be excluded from the list of selected contractors for the next 2 years.

The company shows the evaluation of the plantation operational contractor for the application of empty bots and compost for the assessment period from 1 to 30 September 2019. This evaluation informs the readiness of operational access and information for the breadth of audits by the CB, the quality of goods / services, prices, implementation time, fulfillment of K3L requirements, and employment. . Dissemination of policies on code of ethics, human rights and government regulations to contractors on August 22, 2019. Based on the description above, this is declared fulfilled.

Verified by : **Brigitta P**

NCR No.	:	2019.03	Issued by	:	Yudhi Yuniarto Tallutondok
Date Issued	:	12 July 2019	Time Limit	:	ASA 1
NC Grade	:	Minor	Date of Closing	:	22 January 2021
Standard Ref. & Requirement	:	2.1.4 A system for tracking any changes in the law shall be available and implemented.			

Evidence observed (filled by auditor):

The company has a list of legal requirements contained in the List of Legal and Regulatory Provisions and Regulations which include:

1. Regulations related to occupational safety and health with document number LAW-KMB-001 dated May 31, 2019 with 46 regulations.
2. Regulations related to Environmental with document number LAW-KMB-002 dated May 30, 2019 with 77 regulations.
3. Regulations related to Plantation-related regulations with document number LAW-KMB-003 dated May 30, 2019 with 34 regulations.
4. Labor-related regulations with document number LAW-KMB-004 dated July 4, 2019 with a number of regulations of 50.

However, based on the document verification known that there are still regulations that have not been included in the list of company regulations, for example but not limited to:

- Regulation of the Manpower Minister No. 12 of 2015 concerning OHS Electricity in the Workplace.
- Regulation of the Manpower Minister No. 6 of 2016 concerning Feast Allowance.
- Regulation of the Manpower Minister No. 37 of 2016 concerning OHS Pressure Vessels and Storage Tanks.
- Regulation of the Manpower Minister No. 38 of 2016 concerning The Field of Power and Production Equipment
- Regulation of the Manpower Minister No. 1 of 2017 concerning structure and scale of wage.
- Regulation of the Manpower Minister No. 15 of 2018 concerning Minimum Wages.
- Regulation of the Environment Minister No. P.8 / MENLHK / SETJEN / KUM.I / 3/2018 concerning Fixed Procedure for Field Checking Hotspots Information and / or Forest and Land Fire Information.

- Regulation of the Environment Minister No. P.9 / MENLHK / SETJEN / KUM.I / 3/2018 concerning Technical Criteria for Preparedness and Emergency Status of Forest and Land Fires.
- Regulation of the Environment Minister No. P.21 / MENLHK / SETJEN / KUM.I / 7/2018 concerning Amendment to PermenLHK No 5 of 2014 concerning Wastewater Quality Standards.
- Regulation of the Manpower Minister No. 4 of 2019 concerning Obligatory Procedures for Reporting Employment in the Network.

Non-Conformance Description (filled by auditor):

The company has not been able to show evidence that the legal register documents (regulations) have contained all the regulations that support the company's operations.

Root Cause Analysis (filled by organization audited):

Ineffective control over the implementation of SOPs for identification and evaluation of regulation from Regional Sustainability.

Correction (filled by organization audited):

Update the law register according to the identification results for other new regulations that are relevant to the company.

Corrective Action (filled by organization audited):

1. Law register update and evaluation of regulation compliance in accordance to the SOP.
2. Implementation of internal audit & review.

Assessor Evaluation and Conclusion (filled by auditor):
Verification on 22 January 2021

The unit of certification was shown several evidences:

- List of OHS regulation with document number LAW-KMB-001 rev 08 dated 31 December 2020.
- List of Environment regulation with document number LAW-KMB-002 rev 08 dated 31 December 2020.
- List of land legal regulation with document number LAW-KMB-003 rev 08 dated 31 December 2020.
- List of labor regulation with document number LAW-KMB-003 rev 07 dated 31 December 2020.

Based on the description above, this is declared fulfilled.

Verified by : **Yudhi Yuniarto Tallutondok**

NCR No.	:	2019.04	Issued by	:	Moh Arif Yusni
Date Issued	:	12 July 2019	Time Limit	:	11 July 2020
NC Grade	:	Major	Date of Closing	:	06 November 2019
Standard Ref. & Requirement	:	4.7.1 There must be a health and safety policy. A safety and health plan that covers all activities must be documented and implemented, and the level of effectiveness monitored.			

Evidence observed (filled by auditor):

The Company's commitment to prevent workplace accident and unhealthy workplace to all employs, guest and contractor, explained in the document of Occupational Health and Safety Policy on June 2013. The policy explains that all worker have to obey, maintain, and implement the OHS in workplace. OHS committee is formed for monitoring the OHS implementation in workplace. The policy written in Bahasa and displayed in each units of estates and mill. however, based on field observation and interview with management units its known there is several issues related OHS aspect that's not yet implemented and monitored the effectively as follows:

- Store Office in mill located in same building with liquid chemical storage
- Food material (rice) placed in general storage with hazardous material
- There are no proper emergency facilities in hazardous waste storage in the mill (body or eyes shower)
- Emergency respond facility in hazardous storage doesn't work
- There is no second containment in liquid chemical storage

- There is no OHS signboard in chemical storage in mill and estate

Non-Conformance Description (filled by auditor):

There is several issues related OHS aspect that's not yet implemented and monitored the effectively

Root Cause Analysis (filled by organization audited):

1. Lack of control over OHS implementation, especially in mill
2. There is no substitute for the EHS Officer in charge of monitoring the implementation of the OHS program

Correction (filled by organization audited):

1. Move the warehouse office to the spare part warehouse according to the design
2. Provide a transit point for incoming rice
3. Provision / repair of eyewash and shower at Hazardous waste warehouse and chemical warehouse
4. Redesign of control tanks in liquid chemical warehouses

Installation of MSDS and hazardous material symbol according to the chemicals used / available

Corrective Action (filled by organization audited):

1. Establish a OHS monitoring and inspection program
2. Appointment of special OHS staff (EHS)
3. Proof of the results of monitoring and inspection

Assessor Evaluation and Conclusion (filled by auditor):
Verification November 6, 2019

The company can present corrective evidence in the form of:

1. Moving the warehouse office to the spare part warehouse according to the design
2. Provide a transit point for incoming rice
3. Provision / repair of eyewash and shower at Hazardous waste warehouse and chemical warehouse
4. Redesign of control tanks in liquid chemical warehouses
5. Installation of MSDS and hazardous material symbol according to the chemicals used / available

In addition, it can also be shown the appointment of officers who are responsible for monitoring related to safety and environmental as well as evidence of training of employees regarding safety, hazardous material and waste Management.

Related to the corrective evidence that addressed the non-conformity on this indicator declared closed and will be verify on the next assessment

Verified by : **Moh Arif Yusni**

NCR No.	:	2019.05	Issued by	:	Moh Arif Yusni
Date Issued	:	12 July 2019	Time Limit	:	11 July 2020
NC Grade	:	Minor	Date of Closing	:	06 November 2019
Standard Ref. & Requirement	:	4.7.2 All operations that can threaten safety and health must be assessed for risk. Procedures and actions to address identified risks must be documented and implemented. All precautions attached to the product must be properly monitored and applied to workers.			

Non-Conformance Description

The results of the field visit at the mill, it is known that there are several risk controls that not implemented, for example:

- Found mill workers that work in high area and workshop do not use adequate PPE (body harness, helm, face shield, apron, etc.)
- Found mill workers using PPE that not suitable for use (already broken)

Non-Conformance Description (filled by auditor):

The company has not been able to show evidence that all risk controls have been monitored and applied to all operational areas of the company.

Root Cause Analysis (filled by organization audited):

1. Lack of awareness and control of OSH implementation
2. There are still no EHS Officers in charge to monitoring the implementation of the OHS program

Correction (filled by organization audited):

1. Re-socialization to employees to increase OHS awareness
2. Provision of PPE for employees through the appropriate mechanism in the SOP

Corrective Action (filled by organization audited):

Monitoring the implementation of the OHS program through inspections, appointing special OHS staff (EHS)

Assessor Evaluation and Conclusion (filled by auditor):
Verification November 6, 2019

The company can present corrective evidence in the form of:

1. EHS Work Program Implementation and Appointment Decree about safety aspect
2. Minutes of PPE Socialization and OHS Awareness for employees
3. Minutes of Documentation Proof of Provision of PPE for employees
4. EHS BMKM 2019 Work Program
5. OHS inspection in October 2019

In addition, it can also be shown the appointment of officers who are responsible for monitoring related to safety and environmental as well as evidence of training of employees regarding safety, hazardous material and waste Management.

Related to the corrective evidence that addressed the non-conformity on this indicator declared closed and will be verify on the next assessment

Verified by : **Moh Arif Yusni**

NCR No.	:	2019.06	Issued by	:	Radytio Puspanjana
Date Issued	:	12 July 2019	Time Limit	:	11 July 2020
NC Grade	:	Major	Date of Closing	:	7 November 2019
Standard Ref. & Requirement	:	5.3.2 All chemicals and their containers shall be disposed of responsibly.			
Non-Conformance Description & Evidence observed (filled by auditor): Based on field visit it is known:					
<ul style="list-style-type: none">- Used oil drums are used as floats for submersible pumps in WWTP and pipe buoys in BMKM reservoirs.- Oil-contaminated spillkits have not been managed optimally on BMKM oil warehouse.- There is the use of used pesticide jerry cans (Penta-up) as a storage place for melting fertilizer in fertilizer regional warehouse.					

The implementation hazardous waste management hasn't accordance with hazardous waste management plan (SOP KMB-SUST-SOP-15 August 5, 2015).

The company has not been able to show evidence All chemicals and their containers shall be disposed of responsibly.

Root Cause Analysis (filled by organization audited):

1. Lack of monitoring related to hazardous waste management in BMKM.

Lack of understanding of warehouse employees related to hazardous waste management

Correction (filled by organization audited):

1. Return of lubricant drum and pesticide jerry can to hazardous waste storage.
2. Improved spill kit management in BMKM lubricant warehouse.

Corrective Action (filled by organization audited):

1. Programs for routine monitoring and inspection both on Mill and estate
2. Appointing a new EHS officer who is in charge of monitoring and OHS implementation monitoring and environment in company area's.

Assessor Evaluation and Conclusion (filled by auditor):

Auditor verification November 7 2019

The company shows evidence consist of:

- Minutes of evacuation of lubricant drums from BMKM reservoir August 15, 2019 10 pcs were used as buoys for water pumps on reservoirs. The evacuation documentation is attached.
- Decree of August 14, 2019 designation of PIC hazardous waste management Number. 001 / INT-BMKM / KMB / VIII / 2019 with the designated PIC (head of warehouse) assigned to manage the administration and monitoring of hazardous waste in BMKM warehouses. The job desk include: checking hazardous waste materials, separating hazardous waste according to categories, monitoring, carrying out hazardous waste storage SOPs and socializing.
- Minutes of hazardous waste socialization August 15 2019 attended by the Reg 1 sustainability team, Mill Manager, EHS members. Attached attendance list and documentation.
- Minutes of evacuation hazardous waste to warehouse storage region 2 July 11, 2019 for used pesticide jerry cans 8 pcs. Attached hazardous waste logbook and documentation.
- Minutes of making bundles and spilkit management in hazardous waste warehouses August 7, 2019. There is also a schedule for citing spilkits in hazardous waste warehouses every 2 times a week and spill kits on lubricant warehouses 1 time a week. Attached documentation.
- Checklist of technical guidelines for the implementation of the OHS management system BMKM October 23, 2019, which explains the hazardous waste inspection schedule at hazardous waste-producing locations such as hazardous waste warehouses, workshops and lubricant warehouses.
- Schedule of citing spilkit in hazardous waste warehouse by warehouse officers every 2 times a week and spill kit in oil warehouse 1 time a week.
- EHS BMKM work program January until December 2019 approved by the Mill Manager and made by PIC EHS. The programs is hazardous waste management inspection, which is scheduled every 4 times a year.

Based on the evidence submitted, Non-conformity No.2019.06 is comply and be observed for next audit.

Verified by : **Radytio Puspanjana**

NCR No.	:	2019.07	Issued by	:	Radytio Puspanjana
Date Issued	:	12 July 2019	Time Limit	:	ASA 1

NC Grade	:	Minor	Date of Closing	:	13 January 2020
Standard Ref. & Requirement	:	5.3.3 A documented waste management plan to avoid or reduce pollution and its implementation shall be available			
Evidence observed (filled by auditor): Based on field visit it is known if The company has not been able to show management implementation to avoid and reduce pollution has been implemented thoroughly in the scope of operations - EFB burned on Block Q25 BMKE - Domestic waste burned on front of BMKM Related to this the company has not been able to show that documented waste management plans to avoid and reduce pollution have been implemented thoroughly in the scope of operations.					
Root Cause Analysis (filled by organization audited): Lack of awareness of employee who burn EFB about dangers of fire caused by fire spread.					
Correction (filled by organization audited): Socialization was carried out again to field employees regarding to the zero burning policy and also SOP about EFB application.					
Corrective Action (filled by organization audited): EHS monitoring through RSPO internal audits by the sustainability department.					
Assessor Evaluation and Conclusion (filled by auditor): Verification on 13 January 2020 The certification unit shown several evidences, such as: - Socialization of hotspot reporting mechanism on 24 September 2019. - Dissemanitaion of hotspot reporting mechanism and the prohibition of firing waste on September 9, 2019. - Simulation of fire emergency response dated 1 April 2019.					
Auditor Conclusion: Based on above explanation, this nonconformance been fullfilled.					
Verified by	:	Radytio P			

NCR No.	:	2019.08	Issued by	:	Moh Arif Yusni
Date Issued	:	12 July 2019	Time Limit	:	11 July 2020
NC Grade	:	Major	Date of Closing	:	20 October 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.			
Non-Conformance Description (filled by auditor): The company has conducted a Re-Social Impact Assessment activity on 7 - 19 December 2018. The assessment is carried out in a participatory manner involving both external and internal affected parties. Based on the results of the assessment there were a number					

of internal and external issues identified, including

External Issues:	Internal Issues:
<ul style="list-style-type: none"> - Information of permit border in accordance to village administration border. - Job opportunities. - Environment. - Health. - Education. - Population. - Land dispute. - Plasma cooperative problems. - Constraints to CSR program. - Positive and negative impacts. 	<ul style="list-style-type: none"> - Improved the housing conditions. - Water quality from water reservoirs. - Domestic waste management. - Availability of clinics in mills. - Health insurance registration. - Complaint from workers regarding to BPJS employment transfer procedure. - Drugs distributions mechanism. - Repairing of ambulance conditions and number of ambulance. - Complaints regarding to incentives or bonuses. - School bus conditions, schedule of shuttle bus, and availability of school buses. - Number of student in one study group. - Drainage condition around of education complex. - The ratio of babysitter and children on the daycare. - Complaints regarding to incentive of babysitter on the daycare. - Availability of landfill facilities. - Improving the soft skill of babysitter on the daycare. - Availability of work tools replacement. - Controlling work tool usage and store. - Accelerating the availability of health facilities, especially around of mills.

Related to the issues found, based on the Re-Social Impact Assessment, the company has not been able to show a plan for managing and monitoring social impacts to avoid or reduce negative impacts and increase documented positive impacts with a clear timeline, accompanied by the person responsible.

Non-Conformance Description (filled by auditor):

The company has not been able to show a Social Impact Management and Monitoring Plan with a clear timeline, and the person responsible is based on these internal and external issues.

Root Cause Analysis (filled by organization audited):

Lack of coordination from the Corporate CSR & CSR Region with the KMB Management Unit and other relevant Parties in preparing a Social Impact Management and Monitoring Plan with a clear timeline, and the person responsible for referring to these internal and external issues.

Correction (filled by organization audited):

Provide a Social Impact Management and Monitoring Plan document with a clear timeline, and the person responsible for it refers to these internal and external issues.

Corrective Action (filled by organization audited):

The implementation of CSR Management Review that coordinated by Corporate CSR Department, at least annually.

Assessor Evaluation and Conclusion (filled by auditor):
Verification 20 October, 2019

The company can presented corrective evidence in the form of Social Impact Management Plan period of 2019 to 2021 consist of Affected Components, Issues, Strategies, Activities, Outputs, Time Line, and PIC. As follows:

3. Components affected: employment, Issue: Improvement of housing facilities and sanitation, Strategy: improvement of inadequate employee housing, improvement of water quality, improvement of waste management; Activity: gradual improvement of employee housing, gradual addition of wells, provision of separate waste bins; output: fulfillment of employee facilities and infrastructure; Output: fulfillment of staff/employee facilities and infrastructure; Timeline: from 2019 onwards; PIC: HCGD.
4. Components affected: Social management plan; Issue: lack of understanding about FPIC; strategy: strengthen staff understanding of FPIC guidelines, document external complaints, the stage of problem tracking, and the process of resolving the land disputes properly; Strengthening the ability of staff/employees in develop of communications and relationships with the community. So that they can support the role of the PAD and CSR team. Conducted periodic communication with the communities in the surrounding villages and not only be focused on the village government board. Customary institutions and cooperatives, however to expand to other communities; Activity: socializing FPIC provisions, logbooks on periodically problem handling. Providing socialization about technical implementation, community development, implementing joint community programs, developing economic empowerment programs in the field of agribusiness, determining priorities in implementing of CSR that have an impact on improving the economy; Output: staff understands how to run FPIC, it can monitor the problem solving progress. The relationship and communication and interaction with the community are well developed, interaction with the community in general can be maintained well, meeting the basic needs of the community in the food sector, the program will be implemented more on target. Timeline: from 2019 onwards; PIC: CSR, D&L, and partnership.

Related to the corrective evidence that addressed the non conformity on this indicator declared closed and will be verify on the next assessment

Verified by	:	Moh Arif Yusni
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NCR No.	:	2019.09	Issued by	:	Moh Arif Yusni
Date Issued	:	12 July 2019	Time Limit	:	11 July 2020
NC Grade	:	Minor	Date of Closing	:	6 November 2019
Standard Ref. & Requirement	:	6.5.1 Wage documentation and work conditions must be available in accordance with applicable labor provisions.			

Evidence observed (filled by auditor):

Based on interview and documents verification for Creche workers on BMKE and BKCE it's known there is nonconformity related the calculation regarding overtime calculation for those workers. The workers work more than 7 hours a day and 40 hours a week and based on overtime calculation the workers get paid only one hour a day with the nominal 1/173 monthly wages. Meanwhile based on Manpower decree no 102 the year 2004 about overtime and overtime calculation values, in article 11 mentioned:

- a. a.1 for every first hour overtime the calculation value is 1.5 (one and a half) time for one hour overtime
- a.2 for the next overtime the calculation value is 2 (two) for one hour overtime

Non-Conformance Description (filled by auditor):

there is nonconformity related the calculation regarding overtime calculation for crèche worker

Root Cause Analysis (filled by organization audited):

Lack of understanding of Unit Managers in terms of manpower, especially for overtime & overtime wages in accordance with Kepmenakertrans No. 102 of 2004 concerning Overtime Working Hours and Overtime Work Wages.

Correction (filled by organization audited):

Revision of overtime wages for related employees by the relevant Unit Manager (evidence of underpayment of overtime wages for related employees).

Corrective Action (filled by organization audited):

1. Review and set-up working hours for Creche employees
2. Socialization working system to work in Daycare (TPA)
3. Implementation of Internal Audit and Management Review regularly

Assessor Evaluation and Conclusion (filled by auditor):
Verification November 6, 2019

The company can presented corrective evidence in the form of:

- IOM Affirmation of Daycare Employee Working Hours from Regional Head 1 No 03 / INT-KMB / VII / 2019, which describes the special working hours of Daycare employees
- Minutes of the socialization related to employee work hours and underpaid payment of BMKE Daycare employees on September 18, 2019
- Minutes of the information session on Daycare BKCE employees' working hours on August 13, 2019
- Detailed calculation as a basis for payment of overtime wages for Daycare employees at BMKE. In addition, it can also be shown the appointment of officers who are responsible for monitoring related to safety and environmental as well as evidence of training of employees regarding safety, hazardous material and waste Management.

Related to the corrective evidence that addressed the non conformity on this indicator declared closed and will be verify on the next assessment

Verified by : **Moh Arif Yusni**

NCR No.	:	2019.10	Issued by	:	Moh Arif Yusni
Date Issued	:	12 July 2019	Time Limit	:	ASA 1
NC Grade	:	Minor	Date of Closing	:	22 January 2021
Standard Ref. & Requirement	:	6.5.3 Growers and millers shall provide adequate housing, water supplies, medical, educational and welfare amenities to national standards or above, where such public facilities are unavailable or inaccessible.			

Evidence observed (filled by auditor):

Based on the results of a field visit to the housing of SPYE and MAGE employees, it is known that the drainage ditch is inadequate (shallow) and domestic waste is found that is not placed in its place (dumped into the drainage). Meanwhile, in the company's domestic waste management procedures (No. Doc: KMB-SUST-SOP-47) where in clause, 7.3.1 explains "All employees and workers who are in housing, offices and other work facilities are required to dispose of waste in trash cans that have been provided.

Non-Conformance Description (filled by auditor):

Not enough evidence is available that domestic waste has been managed in accordance with the procedures that it has.

Root Cause Analysis (filled by organization audited):

Lack of awareness from housing employees & lack of control from HSE officer related to housing domestic waste management that has an impact on environmental pollution & aesthetic value.

Correction (filled by organization audited):

1. Internal Organization Memo about emplashment hygiene at BKCE.

Mobilization of housing employees to clean up rubbish in the company environment (cleaning garbage in drainage ditches and around housing) through the clean Friday program, it coordinated by the HSE officer.

Corrective Action (filled by organization audited):

HSE inspections and monthly review in each work unit.

Assessor Evaluation and Conclusion (filled by auditor):
Verification on 22 January 2021

The certification unit showing corrective actions, such as:

1. Internal Office Memo from BMKE Manager number 001/BKCE/IV/2020 dated 11 January 2020 addressed to all assistant at BKCE, regarding:
 - a. Consistently perform clean Friday.
 - b. Ensure the good drainage in emplashment.
 - c. Ensure that the household waste is disposed to the landfill every three times a week (Monday, Wednesday, and Friday).
 - d. Ensure that the hazardous waste is not disposed of carelessly and handed over to the hazardous waste store.
2. Minute of socialization with household waste management (domestic waste) on February 8, 2020 to BMKE employees as 15 employees.
3. Minute of activities for housing estate waste management and the BKCE division on February 28, 2020. Cleaning the yard and ditch of the housing area, managing the landfill in block T27 and making new garbage pits, carrying out transportation and sending residential waste to the landfill. The socialization of prohibition of burning waste in residential areas, cultivating the use of yard such as vegetables and medicinal plants.
4. EHS inspection and landfill on BKCE dated 13 October 2020, there are several aspects to be inspect, such as: sanitary conditions, restroom facilities, housing conditions, landfill conditions and others.
5. EHS inspection and landfill on BMKE dated 11 November 2020, there are several aspects to be inspect, such as: sanitary conditions, restroom facilities, housing conditions, landfill conditions and others.
6. Daily garbage collection program at BMKE housing and BKCE housing.

Auditor conclusions:

Based on above explanation, it has been fulfilled. And it will be re-verification during onsite audit.

Verified by : Trismadi N

NCR No.	:	2019.11	Issued by	:	Radytio Puspanjana
Date Issued	:	5 July 2019	Time Limit	:	ASA 2
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).			
Non-Conformance Description (filled by auditor): Based on the results of the Land Use Change Analysis it is known that the total raw area of liability is 5.268 ha with a total area of					

liability conservation covering 1,855 ha (net area: 856 Ha). Bumitama Agri Ltd has sent Liability Disclosure and LUCA for PT KMB to the RSPO Compensation Plan on April 25, 2016 and declared PASS. In addition, the RAC-Plan has also been sent to the RSPO but there is not enough evidence available that the RAC-Plan for PT KMB has been approved by the RSPO.

The results of communication between PT Mutuagung Lestari and the RSPO on May 27, 2019 were informed that "kindly note that there is a land liability issue for this certified unit where the compensation plan has not yet been endorsed. Therefore, the certificate for this certified unit cannot be issued upon completion of the assessment until everything is clear".

Non-Conformance Description (filled by auditor):

There is not enough evidence yet that the RAC-Plan for PT KMB has been approved by the RSPO.

Root Cause Analysis (filled by organization audited):

The long review process from the HCV Compensation Panel is related to the approval of the HCV Compensation Panel PT. KMB

Correction (filled by organization audited):

Submit a proposal for delaying the time limit for repairs related to indicator 7.3.1 (approval of approval from the HCV Compensation Panel) to the RSPO Secretariat.

Corrective Action (filled by organization audited):

Conduct intensive communication with the HCV Panel compensation so that they immediately approve the HCV Compensation Plan of PT. KMB ASAP.

Assessor Evaluation and Conclusion (filled by auditor):

Auditor verification on November 19, 2019

There is evidence of RSPO response dated 23/09/2019 15:20 aimy.nadiah@rspo.org regarding PT KMB's RAC-Plan status, which states the company can continue the certification process with NC major status 7.3.1 still open until the next surveillance audit.



Mon 23/09/2019 15:20

Wan Nur Aimy Nadiah Wan Solah <aimy.nadiah@rspo.org>

Re: The Progress of RaCP status for Gunung Makmur POM - PT Karya Makmur Bahagia subsidiary of Bumitama Agri, Ltd

To: Naila

Cc: Khing Su Li; adi; aminah ang; Wan Muqtadir Wan Abdul Fatah; RSPO Compensation; Agri 1; Octo Nainggolan; nurbayuto@mutucertification.com; Satria Adi Putra; bpri@mutucertification.com; Haikal Ramadhan Kharismansyah

Click here to download pictures. To help protect your privacy, Outlook prevented automatic download of some pictures in this message.

Dear Naila,

Following the conversation that you had with Suli, I believed you already aware with the current RaCP progress for this management unit. Therefore, with the consideration of time taken to complete the whole process, we agreed for you to proceed with the certification of this management unit with the Major NC 7.3.1 remain open until the next Surveillance audit. Do let your client know to work towards getting the compensation plan completed soonest.

Do keep this email as records of evidence that RSPO agreed with such arrangement. This is a case to case basis approval.

Thank you.

Best Regards,

Based on the evidence presented it was concluded that NCR No.2019.11 with a Major nonconformance grade was declared OPEN until the next surveillance audit.

Verification on 22 January 2021

The company showing evidence of communication with RSPO by email on July 16, 2020. One of the important points as follows: "Due to the tight timeline and Bumitama's commitment to the RaCP, the compensatio panel has grant a conditional approval with the condition that the Compensation Plan must be reviewed as Satisfactory by the next Surveillance audit. The decisión on this conditional approval is applicable for the following units (14 units)" including PT Karya Makmur Bahagia".

Auditor Conclusion:

Based on RSPO statement, it nonconformance is still open until next assessment.

Verified by	:	Radytio Puspanjana/Trismadi N

3.4.2. Identification of Findings, Corrective Actions and Observations at Remote ASA-1 (Remote Audit)

NCR No.	:	2021.01	Issued by	:	Brigitta Prita
Date Issued	:	22 January 2021	Time Limit	:	ASA-2
NC Grade	:	Minor	Date of Closing	:	6 February 2021
Standard Ref. & Requirement	:	2.2.2. All contract, including those for FFB supply, contain specific clause on meeting relevant legal requirements and this can be demonstrated by the third party .			

Evidence observed (filled by auditor):

The unit of certification showed the contractor procedure document number SUST-SOP-038 revision number 00 endorsed by the Regional Head December 10, 2020. This procedure is to select and evaluate contractors working with the unit and ensure the contractor meets the criteria set by the unit of certification.

Control and evaluation of CPO and PK transportation contractors, for example:

- The Commercial Department will review and ensure the requirements set out in the RSPO supply chain certification standard is set out in the CLA between the unit of certification and the relevant contractor. The related management unit makes a list of contractors and updates it if there are changes and provides counseling to CPO & PK transportation contractors.
- Ensuring the contractors performance, the related mill manager will evaluate the performance of the CPO & PK transportation contractors used.
- Related management units and commercial departments will also be ready to facilitate certification bodies if they have access to contractors.

The unit of certification shows a list of contractors for the period 2021 with the following details:

Company	Work order number	Date	Activities
PT Surya Mentaya Jaya	533/LO/CD-HO/VII/20	31 July 2020	CPO transporter
CV Mitra Lintas Borneo	752/LO/CD-HO/XI/20	10 November 2020	CPO transporter
CV Lintas Mentaya	751/LO/CD-HO/XI/20	10 November 2020	CPO transporter
CV Catur Borneo Abadi	869/LO/CD-HO/X/20	8 October 2020	PK transporter

The unit of certification showed the evaluation of the CPO transportation contractor CV Lintas Mentaya with number SPK 439 / LO / CD-HO / VI / 20 which informs a number of things:

1. Willingness to have operational access and information for audit purposes.
2. Product safety and preservation during product delivery from mil to the buyer.
3. The condition of the vehicle is roadworthy.
4. Drive in mill and on estate roads in an orderly manner and pay attention to public safety.

The unit of certification has not been able to show a contractor evaluation for the units of PT Surya Mentaya Jaya, CV Mitra Lintas Borneo and CV Catur Borneo Abadi.

Non-Conformance Description (filled by auditor):

Based on the description above, the unit of certification has not been able to show an evaluation of all contractors and evidence of their implementation in accordance with compliance with relevant laws.

Root Cause Analysis (filled by organization audited):

Ineffective document control & records related to CLA documents & Contractor Performance Evaluation records for CPO & Palm Kernel Transportation Services due to lack of coordination between Commercial Personnel in Head Office and BMKM Mill Manager.

Correction (filled by organization audited):

BMKM Mill Manager coordinates with Commercial Personnel at the Head Office to provide CLA documents & performance evaluation records for CPO & PK transportation contractors such as:

1. PT Surya Mentaya Jaya
2. CV Mitra Lintas Borneo
3. CV Catur Borneo Abadi

Corrective Action (filled by organization audited):

Implementation of Internal Audit & Management Review (at least once a year).

Assessor Evaluation and Conclusion (filled by auditor):
Verification February 6, 2021.

The unit of certification shows improvement documents, such as:

1. Work order document to contractor.

Name of company	Work order	date	Kegiatan
CV Catur Borneo Abadi	869/LO/CD-HO/X/20	08 October 2020	Delivery of kernels to the silo of PT Wilmar Nabati Indonesia
CV Mitra Lintas Borneo	752/LO/CD-HO/XI/20	10 November 2020	Delivery of CPO to PT Sukajadi Sawit Mekar
PT Surya Mentaya Jaya	756/LO/CD-HO/XI/20	12 November 2020	Delivery of CPO to PT Sukajadi Sawit Mekar

2. Evaluation of CPO & PK transportation contractors (CV Catur Borneo, CV Mitra Lintas Borneo & PT Surya Mentaya Jaya) which informs the readiness of operational access and information for auditing, security and product preservation purposes during product delivery from mill to buyers, vehicle conditions roadworthiness, employment (age, wages and health insurance) and compliance with OHS & Environment requirements.
3. The evaluation results for CV Catur Borneo Abadi dated January 29, 2021 get a score of 91 and can be recommended again. Evidence is available from the evaluation, namely the contractor unit inspection checklist (vehicle unit, letter completeness, fire extinguisher, first aid kit, hand break system, main lights, twilight lights, PPE, etc). In addition, there is photo documentary evidence and contractor attendance list.
4. The evaluation results for CV Mitra Lintas Borneo dated January 29, 2021 get a score of 87 and can be recommended again. Evidence is available from the evaluation, namely the contractor unit inspection checklist (vehicle unit, letter completeness, fire extinguisher, first aid kit, hand break system, main lights, twilight lights, PPE, etc) In addition, there is photo documentary evidence and contractor attendance list.
5. The evaluation results for CV Surya Mentaya Jaya dated January 29, 2021 get a score of 80 and can be recommended again & monitored intensively. Evidence is available from the evaluation, namely the contractor unit inspection checklist (vehicle unit, letter completeness, fire extinguisher, first aid kit, hand break system, main lights, twilight lights, PPE, etc). In addition, there is photo documentary evidence and contractor attendance list.

Based on the description above, this discrepancy is declared to have been fulfilled.

Verified by : **Brigitta P.**

NCR No.	:	2021.02	Issued by	:	Trismadi Nurbayuto
Date Issued	:	22 January 2021	Time Limit	:	22 April 2021

NC Grade	:	Major	Date of Closing	:	1 February 2021
Standard Ref. & Requirement	:	3.4.3. The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in participatory way.			
Evidence observed (filled by auditor): The certification unit also shown the following documents: <ol style="list-style-type: none">1. RKL-RPL Report period of 2nd Semester of 2019 and 1st Semester of 2020, in the conclusion chapter there are explanation that the community's perception is agree with company operations or the company relations with the community is a beneficial relationship.2. In accordance to the UKL-UPL matrix year of 2013, it's explained that the method of monitoring the parameters of community perceptions is to conduct direct interview every semester.3. Based on interview with the Environment Staff, it was explained that the conclusions drawn due to positive impacts from the company, such as: open village access, job opportunities, construction of public facilities, and community income increased.4. Based on the results document verification sighted that there is no evidence that participatory information collection been carried out by involving stakeholders. Based on above explanation, it can be concluded that the implementation of RKL-RPL has not been carried out in a participatory manner.					
Non-Conformance Description (filled by auditor): Based on above explanation, it can be concluded that the implementation of RKL-RPL has not been carried out in a participatory manner.					
Root Cause Analysis (filled by organization audited) : Lack of understanding of the environment and CSR staff regarding the requirement of indicator 3.4.3, the implementation of social environment management and monitoring plan by participatory involving the surrounding community/stakeholders that have been determined in the RKL-RPL matrix.					
Correction (filled by organization audited): Providing evidence of a recording of a participatory environment and social management and montiring plan implementations.					
Corrective Action (filled by organization audited): <ol style="list-style-type: none">1. Environment monitoring and management is will be carried out per Semester by the unit. The Sustainability Region will be review before final report. The community perceptions monitoring will be carried out every semester.					
Assessor Evaluation and Conclusion (filled by auditor): Verification on 1 February 2021 The certification unit was shown several evidence as follows: <ol style="list-style-type: none">1. Minute of meeting the community perception of the impact of company dated 26 to 27 January 2021 in Waringin Agung Village (8 people), Bhakti Karya Village (9 people), and Sungai Hanya Village (12 people).2. Questionnaire for community perceptions on each village and sample of respondents.3. The conclusion of community perceptions are: 70% respondents perceptions had a positive impact, 70% gave the perception that the village was became busting, 90% gave the perception that opened road access, 86% gave the perception that company provided a job vacancies, 74% gave the perception that company increasing community revenue, 65% gave the perception that the company provides the assistance programs, 39% gave the perception that the company provide public facilities.4. Environment improvement program in 2021 with the aim of reducing odors from BMKM operational, and targets to reduce public anxiety from BMKM operational. For example: the company will be conducted FGD with the community every semester, environment quality testing on February and March 2021.5. Follow up on input from stakeholders related to environmental management, for example: suggestions for rehabilitation of riparian zone, preventive maintenance to reduce nois and consider to use of anaerobic probioatic bacteria to reduce the odors.6. Minute of meeting RSPO P&C 2018 workshop bv Sustainability Department dated 16-18 December 2019 in the head office. It					

attended by all sustainability PICs including the Regional Sustainability.

7. Schedule of participatory social and environmental management & monitoring review for the period of 2021 to 2023 will be conducted every semester per year.

Based on above explanation, it has been fulfilled.

Verified by : **Trismadi N.**

NCR No.	:	2021.03	Issued by	:	Trismadi Nurbayuto
Date Issued	:	22 January 2021	Time Limit	:	22 April 2021
NC Grade	:	Major	Date of Closing	:	8 February 2021
Standard Ref. & Requirement	:	7.10.1. GHG emissions for the unit of certification are identified and assessed. Plans to reduce or minimize GHG emissions are implemented, monitored through the PalmGHG calculator, and reported publicly.			
Evidence observed (filled by auditor): The certification unit has calculated GHG emissions in the RSPO Palm GHG Calculator, however the input data is still not in accordance with the basic information data period of January till December 2020. For example: <ol style="list-style-type: none">1. FFB production is total of PT KMB, it have not been separated between BMKE & BKCE. Therefore, there is no information FFB from BKCE & BMKE (Non RSPO Certified Area).2. The fertilizer and chemical use have not been separated in accordance to each estate. So that calculation of greenhouse gas emissions has not been separated between RSPO Certified and Non-Certified Area.					
Non-Conformance Description (filled by auditor): Based on that explanation, it can be concluded that the unit of certification has not properly monitored and managed emission sources.					
Root Cause Analysis (filled by organization audited): The GHG emission calculation by GHG specialist is not detailed due to ineffective data gathering and controls.					
Correction (filled by organization audited): The GHG specialist preparing GHG emission calculation as required on RSPO P&C 2018.					
Corrective Action (filled by organization audited): Implementation of document review on the GHG emission calculation by CSC team.					
Assessor Evaluation and Conclusion (filled by auditor): Verification on 8 February 2021 The unit of certification was shown GHG emission calculation period of 2020 for BMKM as follows:					

Summary Emission

Product	tCO ₂ e / tProduct	Action
CPO	0.52	
PK	0.52	
PKO	0.00	
PKE	0.00	

Description	Unit	Value	Action
Oil palm planted on mineral soil	Ha	21476.85	✓
Oil palm planted on peat	Ha	0.00	✓
Total oil palm planted area	Ha	21476.85	✓
Conservation area (Forested)	Ha	691.46	✓
Conservation area (Non-Forested)	Ha	23.07	✓
FFB Production per hectare	t/ha	22.94	✓
OER	%	24.02	✓
KER	%	5.17	✓

Mill Emissions and Credits

Description	tCO ₂	tCO ₂ e t FFB	Action
Emission Sources			
POME	0.00	0.00	
Fuel Consumption	565.50	0.00	
Grid Electricity Utilisation	0.00	0.00	
Credits			
Export of Excess Electricity to Housing & Grid	-3.09	0.00	
Sale of PKS	0.00	0.00	
Sale of EFB	0.00	0.00	
Total	562.41	0.00	

Estate/Plantation field emissions and sinks

	Own			Group			3rd Party			
Description	tCO2e	tCO2e/ha	tCO2e/t FFB	tCO2e	tCO2e/ha	tCO2e/t FFB	tCO2e	tCO2e/ha	tCO2e/t FFB	Total
Emission Source										
LandConversion	82625.24	6.33	0.62	74030.03	15.44	0.37	7217.77	0.41	0.00	163873.04
CO2Emissionsfrom Fertiliser	9619.68	0.74	0.07	10191.72	2.12	0.05	1998.91	0.11	0.00	21810.31
N2O Emissionsfrom Peat	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
N2O Emissionsfrom Fertiliser	3954.48	0.30	0.03	4186.34	0.87	0.02	808.05	0.05	0.00	8948.87
FuelConsumption	1422.28	0.11	0.01	2453.75	0.51	0.01	392.24	0.02	0.00	4268.27
PeatOxidation	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Sinks										
CropSequestration	-89248.80	-6.84	-0.67	-44900.45	-9.36	-0.23	-7210.91	-0.41	0.00	-141360.15
Sequestrationin ConservationArea	-2858.93	-0.22	-0.02	-1819.88	-0.38	-0.01	0.00	0.00	0.00	-4678.81
Total	5513.95	0.42	0.04	44141.52	9.20	0.22	3206.06	0.18	0.00	52861.53

Based on above data, it's known that the emission from CPO: 0.52 tCO₂e/product and PK: 0.52 tCO₂e/product; with total emission from the Mill: 562.41 tCO₂ and emission from Own Estate: 0.04 tCO₂e/tFFB; emission from Group Estate: 0.22 tCO₂e/tFFB and

emission from 3rd Party: 0.00 tCO₂e/tFFB.

Based on above explanation, it has been fulfilled.

Verified by : Trismadi N

NCR No.	: 2021.04	Issued by	: Trismadi Nurbayuto
Date Issued	: 22 January 2021	Time Limit	: 22 April 2021
NC Grade	: Major	Date of Closing	: 2 February 2021
Standard Ref. & Requirement	7.12.4. Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An integrated management plans to protect and/or enhance HCV and HCS forests, peatland and other conservation areas are developed, implemented and adapted if necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan was developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considertaions (where these are identified).		
Evidence observed (filled by auditor): During the audit activity, there are several evidences, such as: <ol style="list-style-type: none">1. HCV Identification report year of 2012, in this document contains several recommendations for HCV management and monitoring which are used as references by the unit of certification in carrying out the HCV management.2. The unit of certification reviewed the HCV management and monitoring plan which carried out on December 16, 2020. Several matters discussed included: evaluation of HCV management and monitoring results, evaluation of facilities and infrastructure for HCV management, evaluation of socialization of HCV safeguards and utilization in the community. HCV monitoring officer appointment, review the latest government regulations. Based on interview result with HCV staff, it was explained that the result of the evaluation of HCV management were socialized to the stakeholders. Non-Conformance Description (filled by auditor): The unit of certification has not been able to shown evidence that the HCV management plan developed/reviewed in cosultation with stakeholders at least once every five years.			
Root Cause Analysis (filled by organization audited) : Lack of control the BMKM unit & CSC Department to conducte a participatory review (minimum 5 years) related to an integrated management plan protection and or enhancing HCV and HCS forest, peat land and other conservationareas within the concession area of PT KMB.			
Correction (filled by organization audited): <ol style="list-style-type: none">1. HCV Management plan period of 20202. Socialization & MoU for HCV management with surrounding community3. BKCE & BMKE HCV areas monitoring4. HCV management review by the unit5. Suggestion from community regarding the HCV management and follow-up6. Review of HCV management plan period of 2021 through consultation with community.			
Corrective Action (filled by organization audited): Pelaksanaan Internal Audit & Tinjauan Manaiemen (minimal 1 tahun sekali)			

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

Verification on 1 February 2021

The unit of certification was shown several evidence, as follows:

1. Minute of HCV management plan review with involving surrounding community from Waringin Agung Village, Bhakti Karya Village and Sungai Hanya Village dated 26 to 27 January 2021.
2. The HCV management plan period of 2021 is based on the participatory consultation results, for examples:
 - a. HCV1.1 (Anak Haya-1 River, Anak Merayak-1 River, Anak Penyahuan River, and Merayak River): conduct an inventory & identification of land cover conditions; conduct outreach to the community regarding the importance of riparian zone, prepare & socialize the SOP and HCV management program to all workers, carry out rehabilitation, surface water quality testing, etc.
 - b. HCV1.2 (Anak Haya-1 River, Anak Merayak-1 River, Anak Penyahuan River, Tenggirang River, Bukit Batu and Merayak River): conduct outreach to the community regarding the importance of preserving plants and RTE species protecting, HCV awareness to workers, making SOP for the management of RTE species, enrichment species, etc.
 - c. HCV6 (*Rumah Keramat* BMKE): placing boundary markers in the field, collaborating with the government & community for protection of sacred houses, socialization to stakeholders, etc.

Based on above explanation, it has been fulfilled.

Verified by	:	Trismadi N
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3.4.3. Identification of Findings, Corrective Actions and Observations at Onsite ASA-1 & ASA-2 (Onsite Audit)

NCR No.	:	2022.01	Issued by	:	Haikal Ramadhan Kharismansyah
Date Issued	:	01 April 2022	Time Limit	:	Next Surveillance
NC Grade	:	Minor	Date of Closing	:	
Standard Ref. & Requirement	:	2.1.3 Bukti batas areal yang legal ditunjukkan dengan tanda batas yang jelas dan dipelihara, serta tidak ada penanaman yang dilakukan melewati batas tersebut.			
Evidence observed (filled by auditor): <ul style="list-style-type: none"> Berdasarkan revisi peta bidang tanah PT Karya Makmur Bahagia yang diterbitkan oleh Kementerian Agraria dan Tata Ruang/Badan Pertanahan Nasional yang disahkan oleh Kepala Sub Direktorat pengukuran dan pemetaan bidang tanggal 27 November 2020 diketahui terdapat perubahan identitas dan letak patok batas jika dibandingkan dengan peta bidang sebelumnya Berdasarkan informasi dari pendamping diketahui bahwa peta bidang tersebut diterima oleh perusahaan pada Juni 2021. Dari hasil kunjungan lapangan ditemukan fakta sbb : <ul style="list-style-type: none"> BMKE : Patok HGU BT 77, BT 71 ditemukan; KMB-72 (patok baru) belum dipasang dan patok bantu tidak ditemukan BKCE : Patok HGU BT50 ditemukan, patok HGU 48 dan 49 tidak ditemukan Hasil monitoring patok HGU yang terakhir dilaksanakan pada Januari 2022 disebutkan seluruh kondisi patok dalam keadaan baik Identitas dan penomoran patok belum mengikuti peta bidang terbaru termasuk jumlah patok HGU yang seharusnya dipasang Berdasarkan penjelasan perwakilan manajemen disebutkan bahwa proses pemasangan patok sesuai dengan peta bidang terbaru baik dari segi jumlah dan identitasnya sedang dilaksanakan secara bertahap namun sampai dengan kegiatan audit selesai dilakukan dokumentasi terkait hal tersebut belum ditunjukkan 					
Non-Conformance Description (filled by auditor): Perusahaan belum dapat menunjukkan cukup bukti telah melakukan penandaan batas areal legal dengan tanda batas yang jelas secara konsisten sesuai dengan peta bidang terbaru yang telah diterbitkan					
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.	:	2022.02	Issued by	:	Afiffuddin
Date Issued	:	01 April 2022	Time Limit	:	Next Surveillance

NC Grade	:	Minor	Date of Closing	:	
Standard Ref. & Requirement	:	2.2.2 Semua kontrak, termasuk kontrak dengan pemasok TBS, memiliki klausul tersendiri mengenai pemenuhan kewajiban hukum yang relevan, dan dapat dibuktikan oleh pihak ketiga yang bersangkutan.			
Evidence observed (filled by auditor): <ul style="list-style-type: none"> Prosedur Kontraktor, nomor dokumen SUST-SOP-038, yang diantaranya menjelaskan pengendalian & evaluasi kontraktor serta pemenuhan peraturan ketenagakerjaan. Perjanjian Kerjasama Pengelolaan Limbah B3 dengan PT Sinar Bintang Albar, nomor 061-SPK/KM SBA/PLB3/Mei-21, tanggal 3 Mei 2021. Namun tidak terdapat klausul tersendiri mengenai pemenuhan kewajiban hukum yang relevan, seperti pemenuhan peraturan ketenagakerjaan yang meliputi upah pekerja, umur pekerja dan asuransi Kesehatan. Berdasarkan hasil wawancara dengan perwakilan kontraktor PT Sinar Bintang Albar, diketahui bahwa kontrak belum memiliki klausul tersendiri mengenai pemenuhan kewajiban hukum yang relevan, seperti dan tidak terbatas pada kepesertaan BPJS, pembayaran upah minimum sesuai dengan peraturan dan lain-lain Dokumen Berita Acara Monitoring Pematuhan Hukum Untuk Kontraktor BMKM, tanggal 25 Maret 2022, yang melampirkan Formulir Evaluasi Kontraktor PT Surya Mentaya Jaya, CV Catur Borneo Abadi dan CV Lintas Mentaya. Adapun kriteria yang dievaluasi yakni kesediaan diakses untuk keperluan audit oleh Lembaga Sertifikasi, keamanan produk, kelayakan kondisi kendaraan, ketertiban berkendara dan tanggapan positif. Belum dapat dibuktikan oleh pihak ketiga yang bersangkutan bahwa kontraktor telah memenuhi kewajiban hukum yang relevan, seperti pemenuhan peraturan ketenagakerjaan yang meliputi upah pekerja, umur pekerja dan asuransi Kesehatan. 					
Non-Conformance Description (filled by auditor): Perusahaan belum dapat menunjukkan cukup bukti bahwa semua kontrak telah memiliki klausul tersendiri mengenai pemenuhan kewajiban hukum yang relevan, dan dapat dibuktikan oleh pihak ketiga yang bersangkutan.					
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	:	Afiffuddin
Date Issued	:	01 April 2022	Time Limit	:	Next Surveillance
NC Grade	:	Minor	Date of Closing	:	
Standard Ref. & Requirement	:	2.2.3 Semua kontrak, termasuk kontrak dengan pemasok TBS, memiliki klausul tersendiri yang melarang praktik yang melibatkan pekerja anak, pekerja paksa, dan pekerja dari perdagangan manusia.			

Evidence observed (filled by auditor):

- Prosedur Kontraktor, nomor dokumen SUST-SOP-038, yang diantaranya menjelaskan pada klausul di surat perjanjian kerja antara unit manajemen dan kontraktor yang terkait harus mencantumkan persyaratan dalam klausul tersebut, antara lain mencakup kebijakan HAM (melarang praktik yang melibatkan pekerja anak, pekerja paksa, pekerja dari perdagangan manusia)
- Perjanjian Kerjasama Pengelolaan Limbah B3 dengan PT Sinar Bintang Albar, nomor 061-SPK/KM SBA/PLB3/Mei-21, tanggal 3 Mei 2021. Namun tidak terdapat klausul tersendiri mengenai klausul tersendiri yang melarang praktik yang melibatkan pekerja anak, pekerja paksa, dan pekerja dari perdagangan manusia.
- Berdasarkan hasil wawancara dengan perwakilan kontraktor PT Sinar Bintang Albar, diketahui bahwa kontrak belum memiliki klausul tersendiri mengenai klausul tersendiri yang melarang praktik yang melibatkan pekerja anak, pekerja paksa, dan pekerja dari perdagangan manusia.
- Dokumen Berita Acara Monitoring Pemuatan Hukum Untuk Kontraktor BMKM, tanggal 25 Maret 2022, yang melampirkan Formulir Evaluasi Kontraktor PT Surya Mentaya Jaya, CV Catur Borneo Abadi dan CV Lintas Mentaya. Adapun kriteria yang dievaluasi yakni kesediaan diakses untuk keperluan audit oleh Lembaga Sertifikasi, keamanan produk, kelayakan kondisi kendaraan, ketertiban berkendara dan tanggapan positif.
- Belum dapat dibuktikan oleh pihak ketiga yang bersangkutan tidak melibatkan pekerja anak, pekerja paksa, dan pekerja dari perdagangan manusia.

Non-Conformance Description (filled by auditor):

Perusahaan belum dapat menunjukkan cukup bukti bahwa kontrak dengan pihak ketiga telah memiliki klausul tersendiri yang melarang praktik yang melibatkan pekerja anak, pekerja paksa, dan pekerja dari perdagangan manusia.

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.	:	2022.04	Issued by	:	Bayu Yogatama
Date Issued	:	1 April 2022	Time Limit	:	Next Surveillance
NC Grade	:	Minor	Date of Closing	:	
Standard Ref. & Requirement	:	3.4.2 Untuk unit sertifikasi, tersedia dokumen penilaian dampak sosial dan lingkungan serta rencana pengelolaan dan pemantauannya telah dikembangkan dengan partisipasi dari para pemangku kepentingan terdampak.			
Evidence observed (filled by auditor): Berdasarkan hasil kajian dokumen diketahui beberapa informasi sebagai berikut:					
<ul style="list-style-type: none">- Unit manajemen telah melakukan penilaian Dampak Sosial yang dilakukan pada tahun 2012 bekerjasama dengan IPB.- Pada tahun 2018-unit manajemen melakukan penilaian Dampak Sosial ulang (review) bekerja sama dengan LINKS yang dilakukan secara partisipatif dengan berbagai macam stakeholders baik eksternal ataupun internal. Proses penilaian dampak					

sosial selesai dilakukan dan menjadi full report pada tahun 2020. Didalam Laporan kajian SIA PT KMB tahun 2020 telah dijelaskan beberapa contoh rekomendasi pengelolaan dampak sosial baik untuk stakeholders Eksternal ataupun Internal diantaranya. Penyelesaian permasalahan tenurial, peningkatan pengelolaan program CSR, pengelolaan plasma dan petani mandiri (eksternal). Perbaikan Fasilitas Perumahan dan Sanitasi, Perbaikan Pengelolaan tempat Penitipan Anak, Perbaikan pengelolaan Limbah Selain itu di dalam rekomendasi pengelolaan dampak sosial disampaikan beberapa arahan yang terdiri dari. membuat rencana terjadwal, untuk melakukan pemantauan yang disesuaikan dengan isu yang ada.

- Perusahaan menunjukkan Rencana Kelola SIA tahun 2021 & 2022. Rencana pengelolaan mengacu seutuhnya kepada rekomendasi dari hasil review SIA, namun rencana pengelolaan sosial yang dimiliki belum mengikuti arahan/rekomendasi sepenuhnya, dimana belum terdapat informasi jadwal pemantauan, PIC, jumlah pengulangan, Sasaran dan Target.

Non-Conformance Description (filled by auditor):

Dokumen rencana pengelolaan dan pemantauan Sosial tahun 2021 & 2022 belum mencantumkan jadwal pemantauan, PIC, jumlah pengulangan pemantauan, target ataupun sasaran sesuai dengan rekomendasi dari laporan Kajian/review SIA 2020.

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.	:	2022.05	Issued by	:	Septian Maulana
Date Issued	:	1 April 2022	Time Limit	:	30 June 2022
NC Grade	:	Major	Date of Closing	:	4 June 2022
Standard Ref. & Requirement	:	3.6.2 The effectiveness of the H&S plan to address health and safety risks to people is monitored			

Evidence observed (filled by auditor):

Based on the results of field visits and interviews, the following facts were found:

- WWTP → The WWTP area is a limited area where there is a "no entry" warning, equipped with a guardrail and big trench, but at some points the fence is found in a hole in the condition and there are footbridges at several points of the trench so as to allow the WWTP area to be accessed by unauthorized persons. In addition, 1 (one) fire extinguisher was found with the type of tube without a pressure indicator and also that was not equipped with a monitoring form.
- BMKE → Water source reservoir areas Mill in the BMKE area are not equipped with guardrails and OHS warnings.
- The Sustainability Work Program in 2021 and 2022 includes conducting OHSE inspections every 1 (one) month but OHSE inspections have not been shown according to the program.
- The HIRAC Mill and Estate document for 2021 has not identified hazards and established risk controls related to reservoir areas and water reservoirs.

Non-Conformance Description (filled by auditor):

The company has not been able to show sufficient evidence that it has fully implemented the established OHS plan and has

consistently monitored and evaluated the effectiveness of the plan.

Root Cause Analysis (filled by organization audited):

The inspection has not been carried out consistently because it has not been included in the discussion of the monthly OHS Committee meeting and the HIRACC evaluation has not been carried out based on the inspection results into the discussion of the OHS Committee meeting

Correction (filled by organization audited):

1. Installing a guardrail at several points in the WWTP area that has holes and installing a prohibition signboard
2. Installing a guardrail/closing people's access to the BMKM reservoir area and installing a prohibition signboard
3. Installing a guardrail in the BMKE div 1&2 pool area and installing a prohibition signboard
4. Conduct OHSE inspection of reservoir area every month
5. Equip the fire extinguisher in the WWTP pump house
6. Monitoring all fire extinguishers at BMKM every month
7. Update HIRAC documents related to the installation of guardrails and warnings in the Reservoir area

Corrective Action (filled by organization audited):

Monitoring inspections and evaluating inspection results in OHS Committee meetings and monitoring and evaluating through internal audits and periodic management review meetings

Assessor Evaluation and Conclusion (filled by auditor):
Verify proof of repair dated June 4, 2022

The company has shown the results of the identification of root cause analysis, corrective actions and has shown evidence of improvement including:

- Minutes of the installation of pool fences and appeals in the surrounding pool area on April 6, 2022
- Minutes of the installation of portals and warnings in the BMKM reservoir area on April 8, 2022
- Minutes of closing the access point to the waste pool on April 2, 2022 to ensure that only 1 lane of access to the waste pool enters
- Minutes of installation and repair of WWTP pool entrance fence on April 6, 2022
- Minutes of the replacement of APAR in the BMKM WWTP area on April 8, 2022 which is also equipped with a monitoring form
- A HIRAC evaluation dated April 4, 2022 which has added the results of hazard identification and risk control for works related to River areas, WWTP, LA, ponds/reservoirs, and deep ditches.
- Records of the implementation of periodic OHSE inspections for example for April 2022 for BKCE, BMKE and BMKM units.
- Minutes of the OHS Committee meeting on April 25, 2022 discussed the following:
 - Hazard identification of reservoirs and water reservoirs
 - Update on PT KMB's HIRAC for 2022
 - Installation of guardrails and warnings in the area of reservoirs and water reservoirs
 - OHSE inspection of reservoirs and water reservoirs
 - Dissemination to employees regarding potential hazards
- Minutes of socialization of Hazard Identification and Risk Control in Reservoir or Pond Areas for BKCE, MKE and BMKM units.

Kesimpulan auditor

Based on the assessment of the adequacy of the identification of the root cause of the problem, corrective actions and evidence of improvements that have been shown, the non-conformance is declared fulfilled.

Verified by : **Septian Maulana**

NCR No.	: 2022.06	Issued by	: Haikal Ramadhan Kharismansyah
Date Issued	: 01 April 2022	Time Limit	: 30 Juni 2022
NC Grade	: Major	Date of Closing	: 20 Juni 2022
Standard Ref. & Requirement	3.8.5. Prosedur tercatat (Kritikal) PKS wajib memiliki prosedur dan/atau instruksi kerja tertulis atau instrumen yang setara guna memastikan dilaksanakannya semua unsur model rantai pasok yang berlaku. Prosedur ini harus mencakup sekurang-kurangnya hal-hal berikut ini: a. Prosedur lengkap dan terbaru yang meliputi pelaksanaan semua unsur persyaratan model rantai pasok. b. Catatan serta laporan lengkap dan terbaru yang menunjukkan kepatuhan terhadap persyaratan model rantai pasok (termasuk di dalamnya catatan pelatihan). c. Identifikasi peran individu yang memiliki tanggung jawab menyeluruh dan wewenang atas pelaksanaan persyaratan tersebut dan kepatuhan terhadap semua persyaratan yang berlaku. Individu ini harus mampu menunjukkan pengetahuan mengenai prosedur-prosedur PKS untuk pelaksanaan standar ini. d. PKS wajib memiliki prosedur tercatat untuk menerima dan mengolah TBS bersertifikat dan non sertifikat, termasuk di dalamnya memastikan tidak adanya kontaminasi pada PKS IP.		
Evidence observed (filled by auditor): <ul style="list-style-type: none">• Prosedur Identifikasi dan Kemampuan Telusur Produk No Dokumen KMB-SUST-SOP-43 tanggal revisi 10-12-2020 diantaranya menjelaskan mengenai :<ul style="list-style-type: none">- Bahan baku PKS adalah TBS yang dapat berasal dari kebun inti, kebun plasma, dan eksternal (KUD,Petani dan perusahaan lain) yang diidentifikasi PKS melalui SPB- Identitas status bahan baku (TBS) yang berasal dari kebun yang bersertifikat RSPO ditandai dengan cap TBS bersertifikat pada setiap SPB• Berdasarkan penjelasan perwakilan manajemen diketahui bahwa penandaan area bersertifikat dan tidak bersertifikat adalah dengan cat berwarna biru (kebun inti – certified), berwarna kuning (PT Tani Tanah Lestari – uncertified), dan berwarna putih (plasma – uncertified). Hal tersebut diatur tersendiri dalam instruksi kerja tersendiri diluar prosedur kemampuan telusur produk namun sampai dengan kegiatan audit selesai instruksi kerja tersebut belum ditunjukkan• Hasil kunjungan lapangan diperoleh beberapa informasi sbb :<ul style="list-style-type: none">- BKCE : Blok A04A (Patok HGU BT49) dan Blok A02A (PAtok HGU BT50): Tidak terdapat batas yang jelas antara batas area bersertifikat dan tidak bersertifikat. Kondisi aktual pada saat dilakukan kunjungan lapangan area tersebut beririsan langsung dengan area PT Tani Tanah Lestari yang merupakan anak perusahaan BGA group. Dalam area yang beririsan tersebut tidak dapat dipastikan buah uncertified dan buah certified tidak bercampur pada TPH yang sama pada saat proses pemanenan karena tidak ada identitas yang jelas terkait dengan hal tersebut.- BMKM : Dalam penginputan TBS di Weight Bridge belum dijelaskan mengenai pemisahan produk bersertifikat dan tidak bersertifikat. Belum ditunjukkan administrasi pemisahan produk TBS bersertifikat dan tidak bersertifikat. Meskipun SPB telah dicap dengan TBS bersertifikat namun ketika penginputan di Weight Bridge data yang diinput adalah blok, estate, dan divisi.			
Non-Conformance Description (filled by auditor): <ol style="list-style-type: none">1. Perusahaan belum dapat menunjukkan cukup bukti adanya SOP/Instruksi kerja yang telah mencakup elemen dalam implementasi supply chain secara menyeluruh.2. Belum dapat ditunjukkan implementasi secara detail terkait dengan pemisahan TBS bersertifikat dan tidak bersertifikat mulai dari lapangan hingga pemisahan di PKS			
Root Cause Analysis (filled by organization audited) Belum adanya program monitoring untuk pemeliharaan tanda pemisahan TBS Bersertifikat dan non sertifikat dan juga belum			

adanya PIC khusus yang bertugas memonitoring pemisahan SPB TBS Bersertifikat dan non sertifikat

Correction (filled by organization audited):

1. Menunjukkan SOP yang mengatur tentang tanda batas fisik patok HGU yang memisahkan antara area bersertifikat, non sertifikat PT TTL dan non sertifikat plasma
2. Melakukan identifikasi ulang seluruh tanda batas fisik patok HGU di BMKE dan BKCE (berapa yang sudah ada, berapa yang belum ada)
3. Melakukan pengecatan tanda batas fisik patok HGU pada pokok di BMKE dan BKCE
4. Melakukan pemisahan TPH antara buah bersertifikat dengan buah non sertifikat di BMKE dan BKCE
5. Membuat program monitoring dan dilengkapi penunjukkan PIC yang bertanggung jawab melakukan monitoring secara khusus di BMKM

Corrective Action (filled by organization audited):

Melakukan monitoring pemeliharaan tanda pemisahan secara berkala dan dievaluasi pemenuhannya melalui mekanisme internal audit dan juga rapat tinjauan manajemen secara berkala

Assessor Evaluation and Conclusion (filled by auditor):
Verifikasi tanggal 05 Juni 2022

Perusahaan menunjukkan bukti perbaikan berupa :

1. Laporan pemantauan batas blok dan pemisahan TPH bersertifikat dan tidak bersertifikat. Dalam laporan tersebut terdapat identifikasi blok yang beririsan/tidak beririsan antara area bersertifikat dan area tidak bersertifikat (BKCE) sbb :

No	Kode Patok	Hari/Tanggal Pemantauan	Blok Yang Berbatasan			Keterangan
			PT.KMB	PT.TTL	Plasma	
1	BT70	Senin, 04 April 2022	Y01a	-	-	Tidak Beririsan
2	BT69	Senin, 04 April 2022	W02a	-	-	Tidak Beririsan
3	BT68	Senin, 04 April 2022	W02a	-	-	Tidak Beririsan
4	BT67	Senin, 04 April 2022	W01a	-	-	Tidak Beririsan
5	BT66	Selasa, 05 April 2022	V01a	-	-	Tidak Beririsan
6	BT65	Selasa, 05 April 2022	S01a	-	-	Tidak Beririsan
7	BT64	Selasa, 05 April 2022	P01a	-	-	Tidak Beririsan
8	BT63	Selasa, 05 April 2022	M01a	-	-	Tidak Beririsan
9	BT62	Selasa, 05 April 2022	J01a	-	-	Tidak Beririsan
10	BT61	Rabu, 06 April 2022	F01a	-	-	Tidak Beririsan
11	BT60	Rabu, 06 April 2022	C01a	-	-	Tidak Beririsan
12	BT59	Rabu, 06 April 2022	A01a	-	T19b	Blok terpisah oleh jalan koleksi, TPH terpisah
13	BT56	Kamis, 07 April 2022	K01a	-	T13c	Blok terpisah oleh jalan koleksi, TPH terpisah
14	BT55	Kamis, 07 April 2022	G01a	G12y	-	Blok Beririsan
15	BT54	Kamis, 07 April 2022	F01a	F12z	-	Blok Beririsan
16	BT53	Kamis, 07 April 2022	C01a	D12z	-	Blok Beririsan
17	BT52	Jumat, 08 April 2022	A01a	-	-	Tidak Beririsan
18	BT51	Jumat, 08 April 2022	A01a	R01z	-	Blok Beririsan

19	BT50	Jumat, 08 April 2022	A02a	R02z	-	Blok Beririsan
20	BT49	Jumat, 08 April 2022	A04a	R03z	-	Blok Beririsan
21	BT48	Sabtu, 09 April 2022	A06a	R06z	-	Blok Beririsan
22	BT47	Sabtu, 09 April 2022	A08a	R08z	-	Blok Beririsan
23	BT46	Sabtu, 09 April 2022	A09a	R08z	-	Blok Beririsan
24	BT45	Sabtu, 09 April 2022	J02a	I02z	-	Blok Beririsan

2. Memo No 002/Mentaya/V/2022 tanggal 01 April 2022 tentang Penunjukan Petugas Pemisahan TBS sertifikat dan Non sertifikat di BMKM yakni operator WB dan Admin Tanam Produksi. Dalam surat tersebut juga dijelaskan penginpiutan di sistem Weight Bridge yakni melakukan ceklist pada kolokm RSPO berdasarkan SPB dan dicocokkan dengan daftar blok cert dan non cert. Admin Tanam Produksi bertugas memastikan rekap harian dan bulanan laporan produksi dengan penambahan pemisahan TBS cert dan Non Cert
3. Program identifikasi dan perawatan patok HGU tahun 2022

Namun demikian belum menunjukkan :

1. Program pemantauan dan perawatan patok/ tanda batas antara area bersertifikat dan tidak bersertifikat

2. Hasil monitoring pemeliharaan tanda pemisahan secara berkala

Note : Dalam bukti perbaikan yang ditunjukkan adalah program identifikasi dan perawatan patok HGU

Kesimpulan Auditor :

Ketidaksesuaian dinyatakan belum terpenuhi

Verifikasi tanggal 20 Juni 2022

Perusahaan menunjukkan tambahan bukti perbaikan berupa :

1. Program pemantauan dan perawatan patok/ tanda batas antara area bersertifikat dan tidak bersertifikat PT KMB untuk periode tahun 2022 yang dilaksanakan setiap 4 bulan
2. Laporan pelaksanaan program identifikasi dan perawatan patok HGU, Patok bantu, dan tanda batas HGU BKCE/BMKE → Perawatan patok HGU dan patok bantu juga merupakan salah satu bagian pelaksanaan perawatan tanda batas area certified dan non certified

Kesimpulan Auditor

Berdasarkan analisa akar masalah, koreksi, dan tindakan korektif ketidaksesuaian dinyatakan terpenuhi

Verified by : **Haikal Ramadhan Kharismansyah**

NCR No.	:	2022.07	Issued by	:	Afiffuddin
Date Issued	:	01 April 2022	Time Limit	:	30 Juni 2022
NC Grade	:	Major	Date of Closing	:	22 Juni 2022
Standard Ref. & Requirement	:	6.2.3 Tersedia bukti kepatuhan legal untuk jam kerja reguler, potongan, lembur, cuti sakit, hak mendapatkan libur, cuti melahirkan, alasan pemberhentian, masa pemberitahuan sebelum pemberhentian kerja, dan ketentuan ketenagakerjaan lainnya.			

Evidence observed (filled by auditor):

- Peraturan Perusahaan 2021 – 2023 PT BGA diantaranya menjelaskan tentang ketentuan istirahat dan kerja lembur sbb :
 - Pasal 8.1c, yang diantaranya menjelaskan bahwa waktu kerja dan jam istirahat di site/kebun/pabrik/bulking dapat disesuaikan dengan situasi dan kondisi setempat , dengan tetap berpedoman pada peraturan perusahaan dan sesuai dengan ketentuan perundang-undangan yang berlaku mengenai jam kerja
 - Pasal 8.1e, yang diantaranya menjelaskan bahwa untuk tugas dan pekerjaan tertentu/ khusus dapat ditetapkan waktu kerja tersendiri dengan tetap berpedoman pada peraturan perusahaan dan ketentuan perundang-undangan yang berlaku mengenai waktu/ jam kerja, jam kerja tersebut diberitahukan pada pekerja secara tertulis untuk diketahui dan dilaksanakan.
 - Pasal 9.2, yang diantaranya menjelaskan bahwa kerja lembur hanya dianggap sah apabila ada perintah tertulis dari atasan langsung.
 - Pasal 9.4, yang diantaranya menjelaskan bahwa setiap kerja lembur harus disertai dengan surat perintah kerja lembur yang memuat alasan kerja lembur dan waktu dimulai dan diakhirinya kerja lembur serta wajib ditandatangani oleh pekerja dan atasannya.
 - Pasal 9.6, yang diantaranya menjelaskan bahwa ketentuan mengenai perhitungan upah lembur berpedoman kepada peraturan perundang-undangan yang berlaku.
- Hasil wawancara dan kajian dokumen dengan kerani timbang BMKM diperoleh informasi sbb :
 - Dalam satu bulan pekerja mendapatkan jadwal bekerja 2x di hari minggu sesuai dengan shift yang telah ditentukan
 - Pembayaran pekerjaan pada hari libur tersebut menggunakan sistem premi
 - Jam kerja pada hari minggu adalah 5 – 6 Jam

- Keputusan Menteri Tenaga Kerja dan Transmigrasi RI nomor 233 tahun 2003 tentang Jenis dan Sifat Pekerjaan yang Dijalankan Secara Terus Menerus diantaranya menjelaskan bahwa dalam keadaan tertentu pengusaha dapat mempekerjakan pekerja/buruh pada hari libur resmi berdasarkan kesepakatan antara pekerja/buruh dengan pengusaha dan pengusaha yang mempekerjakan pekerja/buruh pada hari libur resmi wajib membayar upah kerja lembur kepada pekerja/buruh.
- Monitoring Premi dan Lembur kerani timbang inisial MS didapatkan hasil sbb :
 - Sejak tanggal 21 sampai dengan 29 Januari 2022 (9 hari) dan tanggal 07 sampai dengan 13 Februari 2022 (7 hari), yang bersangkutan bekerja secara terus menerus tanpa ada hari istirahat.
 - Pekerja yang bersangkutan bekerja pada hari libur resmi (Minggu dan Imlek), yakni tanggal 23 Januari 2022, tanggal 01 Februari 2022 dan 13 Februari 2022, namun tidak dapat ditunjukkan kesepakatan antara pekerja/ buruh dengan pengusaha.
 - Pada hari libur resmi tersebut di atas pekerja yang bersangkutan tidak dibayar sebagaimana upah kerja lembur. Sesuai dengan ketentuan premi tahun 2017 BGA yang berlaku disebutkan premi operator krani timbang untuk hari minggu/ libur sebesar Rp. 80.000 sedangkan upah yang seharusnya dibayar jika pekerja bekerja selama 5 jam kerja adalah Rp 174.262.00. (Hasil wawancara pekerja pada hari minggu/libur mendapatkan 1 HK atau setara Rp 120.589,30 namun dasar penetapan premi belum ditunjukkan)

Non-Conformance Description (filled by auditor):

Perusahaan belum dapat menunjukkan cukup bukti telah sepenuhnya konsisten dalam menerapkan bukti kepatuhan legal seperti jam kerja reguler, lembur, hak mendapatkan libur, sesuai dengan ketentuan ketenagakerjaan lain yang berlaku

Root Cause Analysis (filled by organization audited):

- Lack knowledge admin payroll mengenai perhitungan upah dan premi karyawan terkait sistem BPS
- Perusahaan telah melakukan sosialisasi kepada admin payroll, namun karena ada pergantian kasie (Kepala Administrasi BMKM) yang sebelumnya resign dari perusahaan dan digantikan oleh kasie dari kebun/ estate maka memang perlu dilakukan sosialisasi kembali kepada kasie BMKM juga all kasie KMB dan juga admin payroll

Correction (filled by organization audited):

- Menunjukkan Surat Perintah Lembur (SPL) karyawan bersangkutan yang ditandatangani pekerja dengan pengusaha
- Membuat penjelasan perhitungan upah/premi kerani timbang inisial MS bulan Januari dan Februari 2022
- Membayar kekurangan upah/premi kerani timbang inisial MS bulan Januari dan Februari 2022
- Memberikan training mengenai perhitungan upah dan premi karyawan serta pengaturan hari libur kepada admin payroll BMKM
- Intern Office Memo nomor 174/IOM/ED-BGA/VIII/2020, tanggal 09 September 2020, dari Estate Development & Services Departmen, yang menjelaskan Kebijakan Pembatasan Penginputan Maksimal Niali Premi Karyawan di Payroll BPS.
- Berita Acara Sosialisasi Kebijakan Pembatasan Penginputan Maksimal Nila Premi Karyawan di Patroll BPS (Intern Office Memo nomor 174/IOM/ED-BGA/VIII/2020), yang dilakukan tanggal 19 April 2022, kepada Kasie masing-masing unit manajemen.
- Kwitansi pembayaran kekurangan lembur krani timbang
- Laporan bulanan absensi – status (periode 21 Januari 2022 s.d. 20 Februari 2022)
- Memo nomor 005/RH-Mentaya/IV/2022, tanggal 07 April 2022 tentang Pelaksanaan Kebijakan IOM nomor 174/IOM/ED-BGA/VII/2020, dari RH Mentaya, yang diantaranya menjelaskan mengatur karyawan lembur agar tidak melebihi batas kerja lembur 4 jam sehari dan 18 jam seminggu dan membuat surat perintah kerja lembur dengan memuat alasan kerjalembur, waktu kerja embu mulai dan berakhir, lokasi lembur dan ditandatangani oleh atasan langsung dan pekerja.
- Surat Perintah Lembur tanggal 23 Januari 2022, atas nama MS (operator WB) yang melaksanakan lembur dari pukul 12.00 – 17.00 untuk penerimaan TBS dan loading CPO, ditandatangani oleh pekerja dan atasan pekerja.
- Surat Perintah Lembur tanggal 01 Februari 2022, atas nama MS (operator WB) yang melaksanakan lembur dari pukul 09.00 – 15.00 untuk loading CPO, ditandatangani oleh pekerja dan atasan pekerja.
- Surat Perintah Lembur tanggal 13 Februari 2022, atas nama MS (operator WB) yang melaksanakan lembur dari pukul 12.00 – 16.00 untuk penerimaan TBS, ditandatangani oleh pekerja dan atasan pekerja.
- Surat Perintah Lembur tanggal 30 Januari 2022, atas nama VY (operator WB) yang melaksanakan lembur dari pukul 10.00 – 15.00 untuk penerimaan TBS dan loading CPO, ditandatangani oleh pekerja dan atasan pekerja.

14. Surat Perintah Lembur tanggal 13 Februari 2022, atas nama PP (operator WB) yang melaksanakan lembur dari pukul 16.00 – 20.00 untuk penerimaan TBS, ditandatangani oleh pekerja dan atasan pekerja.
15. Surat Perintah Lembur tanggal 20 Februari 2022, atas nama PP (operator WB) yang melaksanakan lembur dari pukul 09.00 – 15.00 untuk penerimaan TBS dan loading CPO, ditandatangani oleh pekerja dan atasan pekerja.
16. Surat Perintah Lembur tanggal 30 Januari 2022, atas nama NM (operator WB) yang melaksanakan lembur dari pukul 16.00 – 20.00 untuk penerimaan TBS dan loading CPO, ditandatangani oleh pekerja dan atasan pekerja.
17. Surat Perintah Lembur tanggal 13 Februari 2022, atas nama NM (operator WB) yang melaksanakan lembur dari pukul 09.00 – 14.00 untuk penerimaan TBS, ditandatangani oleh pekerja dan atasan pekerja.

Corrective Action (filled by organization audited):

1. Melakukan monitoring terkait perhitungan upah, premi, libur kerja dan lembur seluruh karyawan di BMKM setiap bulan
2. Dilakukan monitoring secara bertingkat mulai dari Kasie hingga KTU untuk memastikan IOM 174 telah dijalankan sesuai ketentuan melalui Memo 005/RH-Mentaya/IV/ 2022 dari RH (terlampir)
3. PIC yang melaksanakan pengupahan adalah admin payroll yang kemudian dimonitoring oleh kasie unit dan KTU untuk memastikan pelaksanaannya sudah sesuai setiap bulannya
4. Pelaksanaan PP 2021-2023 PT BGA dilaksanakan mengacu pada IOM 174 dan Memo 005/RH-Mentaya/IV/ 2022 dimana untuk pekerjaan lembur harus ada kesepakatan antara pekerja dan pengusaha serta harus ada SPL nya dan kemudian pembayaran sesuai dengan ketentuan perhitungan upah lembur berpedoman kepada peraturan perundangan yang berlaku

Assessor Evaluation and Conclusion (filled by auditor):

Verifikasi bukti perbaikan tanggal 01 Juni 2022

Perusahaan menunjukkan bukti perbaikan sebagai berikut:

1. Memo nomor 003/-Mentaya/IV/2022 dari Mill Manager, tanggal 01 April 2022, perihal Berita Acara Penjelasan Kekurangan Premi/ Upah Kerani Timbang. Berdasarkan dokumen tersebut, secara ringkas dijelaskan bahwa:
 - Penginputan premi karyawan kerani non timbang masih menggunakan IOM lama nomor Khs-001/HOK-RH/XII/2017 tentang premi tahun 2017, yang seharusnya menggunakan IOM nomor 174/IOM/ED-BGA/VII/2020, sehingga terdapat selisih pembayaran.
 - Ditunjukkan tabel pembayaran premi kerani timbang menggunakan IOM tahun 2017 dan IOM tahun 2020.
2. Memo nomor 003/RH-Mentaya/IV/2022 dari HR Mentaya, tanggal 07 April 2022, perihal Permohonan Pembayaran Kekurangan Upah Lembur Krani Timbang.
3. Memo nomor 003/-Mentaya/IV/2022 dari Mill Manager, tanggal 01 Mei 2022, perihal Berita Acara Training Perhitungan Upah/ Premi Non Panen kepada bagian Pengupahan (Admin Operasional, Logistik dan Personalia). Juga disampaikan bahwa dasar penginputan premi non panen tidak lagi mengacu kepada IOM tahun 2017 melainkan mengacu pada IOM tahun 2020.

Kesimpulan Auditor :

Analisa Akar Masalah, Tindakan Perbaikan dan Tindakan Korektif yang telah ditunjukkan belum spesifik, serta dapat menjamin bahwa ketidaksesuaian ini tidak akan terulang di masa mendatang.

Berdasarkan hal tersebut di atas maka **Ketidaksesuaian pada Indikator ini Belum Terpenuhi.**

Mohon perusahaan dapat menanggapi tanggapan auditor di atas.

Verifikasi bukti perbaikan tanggal 22 Juni 2022

Perusahaan menunjukkan bukti perbaikan sebagai berikut:

1. Intern Office Memo nomor 174/IOM/ED-BGA/VIII/2020, tanggal 09 September 2020, dari Estate Development & Services Departmen, yang menjelaskan Kebijakan Pembatasan Penginputan Maksimal Niali Premi Karyawan di Payroll BPS.

2. Berita Acara Sosialisasi Kebijakan Pembatasan Penginputan Maksimal Nilai Premi Karyawan di Patroli BPS (Intern Office Memo nomor 174/IOM/ED-BGA/VIII/2020), yang dilakukan tanggal 19 April 2022, kepada Kasie masing-masing unit manajemen.
3. Kwitansi pembayaran kekurangan lembur krani timbang
4. Laporan bulanan absensi – status (periode 21 Januari 2022 s.d. 20 Februari 2022)
5. Memo nomor 005/RH-Mentaya/IV/2022, tanggal 07 April 2022 tentang Pelaksanaan Kebijakan IOM nomor 174/IOM/ED-BGA/VII/2020, dari RH Mentaya, yang diantaranya menjelaskan mengatur karyawan lembur agar tidak melebihi batas kerja lembur 4 jam sehari dan 18 jam seminggu dan membuat surat perintah kerja lembur dengan memuat alasan kerjalembur, waktu kerjal embu mulai dan berakhir, lokasi lembur dan ditandatangani oleh atasan langsung dan pekerja.
6. Surat Perintah Lembur tanggal 23 Januari 2022, atas nama MS (operator WB) yang melaksanakan lembur dari pukul 12.00 – 17.00 untuk penerimaan TBS dan loading CPO, ditandatangani oleh pekerja dan atasan pekerja.
7. Surat Perintah Lembur tanggal 01 Februari 2022, atas nama MS (operator WB) yang melaksanakan lembur dari pukul 09.00 – 15.00 untuk loading CPO, ditandatangani oleh pekerja dan atasan pekerja.
8. Surat Perintah Lembur tanggal 13 Februari 2022, atas nama MS (operator WB) yang melaksanakan lembur dari pukul 12.00 – 16.00 untuk penerimaan TBS, ditandatangani oleh pekerja dan atasan pekerja.
9. Surat Perintah Lembur tanggal 30 Januari 2022, atas nama VY (operator WB) yang melaksanakan lembur dari pukul 10.00 – 15.00 untuk penerimaan TBS dan loading CPO, ditandatangani oleh pekerja dan atasan pekerja.
10. Surat Perintah Lembur tanggal 13 Februari 2022, atas nama PP (operator WB) yang melaksanakan lembur dari pukul 16.00 – 20.00 untuk penerimaan TBS, ditandatangani oleh pekerja dan atasan pekerja.
11. Surat Perintah Lembur tanggal 20 Februari 2022, atas nama PP (operator WB) yang melaksanakan lembur dari pukul 09.00 – 15.00 untuk penerimaan TBS dan loading CPO, ditandatangani oleh pekerja dan atasan pekerja.
12. Surat Perintah Lembur tanggal 30 Januari 2022, atas nama NM (operator WB) yang melaksanakan lembur dari pukul 16.00 – 20.00 untuk penerimaan TBS dan loading CPO, ditandatangani oleh pekerja dan atasan pekerja.
13. Surat Perintah Lembur tanggal 13 Februari 2022, atas nama NM (operator WB) yang melaksanakan lembur dari pukul 09.00 – 14.00 untuk penerimaan TBS, ditandatangani oleh pekerja dan atasan pekerja.

Kesimpulan Auditor :

Analisa Akar Masalah, Tindakan Perbaikan dan Tindakan Korektif yang telah ditunjukkan telah dapat diterima. Berdasarkan hal tersebut di atas maka Ketidaksesuaian pada Indikator ini dinyatakan **Terpenuhi** dan akan diobservasi pada penilaian berikutnya.

Verified by : **Afiffuddin**

NCR No.	2022.08	Issued by	Afiffuddin
Date Issued	01 April 2022	Time Limit	30 Juni 2022
NC Grade	Major	Date of Closing	22 Juni 2022
Standard Ref. & Requirement	6.2.4 Unit sertifikasi menyediakan perumahan layak, fasilitas sanitasi, persediaan air, kebutuhan-kebutuhan medis, pendidikan dan fasilitas umum yang sesuai dengan standar nasional atau standar lebih tinggi, apabila fasilitas publik tidak tersedia atau tidak dapat diakses. Dalam hal akuisisi terhadap unit non sertifikat, maka dikembangkan rencana yang menjelaskan rinci mengenai peningkatan infrastruktur. Diberikan waktu yang wajar (5 tahun) untuk meningkatkan infrastruktur.		

Evidence observed (filled by auditor):

- Berdasarkan hasil kunjungan lapangan di Perumahan Divisi 3 Bukit Kecubung Estate, dijumpai kondisi beberapa perumahan yang *septic tank*-nya dalam kondisi rusak. Hasil wawancara dengan perwakilan manajemen dinyatakan bahwa perusahaan telah memprogramkan perbaikan perumahan termasuk fasilitas sanitasi seperti *septic tank* dan lain-lain,
- Sampai dengan kegiatan audit berakhir belum ditunjukkan program dan realisasi perbaikan fasilitas perumahan tersebut.

Non-Conformance Description (filled by auditor):

Perusahaan belum dapat menunjukkan cukup bukti bahwa fasilitas sanitasi yang disediakan telah sepenuhnya layak bagi semua pekerja

Root Cause Analysis (filled by organization audited):

Kurangnya monitoring terhadap program dan realisasi perbaikan perumahan.

Correction (filled by organization audited):

- Melakukan identifikasi kerusakan fasilitas sanitasi (*septic tank*, drainase, dll) di perumahan karyawan BKCE
- Menunjukkan program perbaikan fasilitas sanitasi di perumahan BKCE tahun 2022
- Menunjukkan realisasi perbaikan fasilitas sanitasi perumahan karyawan BKCE
- Area Controller secara khusus menunjuk PIC untuk melakukan monitoring perbaikan perumahan

Corrective Action (filled by organization audited):

- Untuk memastikan program yang telah disusun berjalan sesuai dengan jadwal maka ditunjuk PIC untuk melakukan monitoring setiap bulannya yang dilakukan oleh masing masing asisten divisi dan kasie. Kemudian kasie akan melakukan perhitungan biaya dan membuat program perbaikan serta manager unit memastikan kembali program berjalan dan memberikan persetujuan setelah melakukan review & evaluasi.
- Dilakukan monitoring juga melalui internal audit RSPO dan melalui rapat tinjauan manajemen secara berkala setiap tahunnya

Assessor Evaluation and Conclusion (filled by auditor):

Verifikasi bukti perbaikan tanggal 01 Juni 2022

Perusahaan menunjukkan bukti perbaikan sebagai berikut:

- Laporan Sensus Kebutuhan Perbaikan Perumahan Karyawan BKCE, yang dilakukan pada 24 – 29 Januari 2022, di Eplasmant Divisi III & IV Estate BKCE. Laporan tersebut menginformasikan lokasi rumah yang rusak seperti blok, type rumah, nomor rumah, nama penghuni serta kerusakan rumah yang dialami. Berdasarkan laporan tersebut, dibuatkan Program Rencana Perbaikan Fasilitas Perumahan Divisi III & IV BKCE, yang menginformasikan jadwal (bulan & tahun), jenis perbaikan, lokasi perbaikan dan keterangan. Laporan tersebut dibuat oleh Mantri EHS BKCE, diperiksa oleh Kepala Administrasi BKCE dan diketahui oleh Estate Manager BKCE.
- Berita Acara Perbaikan Drainase dan Septic Tank Perumahan Karyawan BKCE, tanggal 4 April 2022 di perumahan G6 Karyawan Divisi III & IV BKCE Kopel Blok A, B dan C. Ditunjukkan dokumentasi sebelum perbaikan, ketika sedang perbaikan dan setelah perbaikan.
Tanggal 7 April 2022 di perumahan G6 Karyawan atas nama RK (inisial), dilakukan perbaikan *septic tank*. Ditunjukkan dokumentasi sebelum perbaikan, ketika sedang perbaikan dan setelah perbaikan.

Kesimpulan Auditor :

Analisa Akar Masalah dan Tindakan Korektif yang telah ditunjukkan belum spesifik, serta dapat menjamin bahwa ketidaksesuaian ini tidak akan terulang di masa mendatang.

Berdasarkan hal tersebut di atas maka **Ketidaksesuaian pada Indikator ini Belum Terpenuhi.**

Mohon perusahaan dapat menanggapi tanggapan auditor di atas.

Verifikasi bukti perbaikan tanggal 22 Juni 2022

Perusahaan menunjukkan bukti perbaikan berupa Internal Office Memo (IOM) nomor 008/AC2/IOM/V/2022, tanggal 03 Mei 2022,

dari Area Controller 2, perihal Monitoring Pemeliharaan Infrastruktur Perumahan Karyawan. IOM tersebut diantaranya menjelaskan:

- Menetapkan petugas atau PIC untuk melakukan monitoring pemeriksaan perumahan beserta rincian tugasnya, yakni Asstant, Kasie dan Manager Unit.
- Melakukan monitoring setiap bulannya yang dilakukan oleh masing masing asisten divisi dan kasie. Kemudian kasie akan melakukan perhitungan biaya dan membuat program perbaikan serta manager unit memastikan kembali program berjalan dan memberikan persetujuan setelah melakukan review & evaluasi.

Kesimpulan Auditor :

Analisa Akar Masalah dan Tindakan Korektif yang ditunjukkan telah dapat diterima.

Berdasarkan hal tersebut di atas maka ketidaksesuaian pada indikator dinyatakan **terpenuhi** dan **akan diobservasi kembali pada penilaian berikutnya**.

Verified by : **Afiffuddin**

NCR No.	: 2022.09	Issued by	: Septian Maulana
Date Issued	: 1 April 2022	Time Limit	: 30 June 2022
NC Grade	: Minor	Date of Closing	:
Standard Ref. & Requirement	: 6.7.1	The responsible person(s) for H&S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.	
Evidence observed (filled by auditor):			
<ul style="list-style-type: none">• The company already has an OHS organization in accordance with the OHS Committee Ratification Decree PT Karya Makmur Bahagia from the Head of the Manpower and Transmigration Office of Central Kalimantan Province number: KEP.164/DISNAKERTRANS/XII/2019 dated December 23, 2019 with OHS Committee secretary on behalf of Chandra Bayu and can be shown recording of regular meetings of the OHS Committee, for example the meeting on 15 February 2022 which was attended by 11 participants.• The OHS Committee secretary on behalf of Chandra Bayu is a General OHS Expert as stated in the Decree on the Appointment of General OHS Expert number: KEP.P.2352/NAKER-BINWASK3/XI/2018 dated 30 November 2018 which is valid for 3 (three) years until 30 November 2021. However, until the audit activity is carried out, the Company has not been able to show a recording of the progress of managing the extension of the General OHS Expert Decree of the OHS Committee Secretary or the recording of the process of changing the management of the OHS Committee if there is a change in personnel.			
Non-Conformance Description (filled by auditor):			
the Company has not been able to show sufficient evidence that the person in charge of Occupational Safety and Health already has a valid OHS Decree and license			
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.	:	2022.10	Issued by	:	Septian Maulana
Date Issued	:	1 April 2022	Time Limit	:	Next Surveillance
NC Grade	:	Minor	Date of Closing	:	
Standard Ref. & Requirement	:	6.7.2 Accident and emergency procedures in Indonesian language are in place and clearly understood by all workers. Assigned operatives trained in first aid are present in both field and other operations. First aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.			

Evidence observed (filled by auditor):

Based on the results of document review, field visits and interviews, the following facts were also found:

- Based on the Estate Safety Condition (OHS Management System) Work Paper Report (Office, Housing, Harvest Team, Fertilizer Team, Spray Team) it is known that one of the indicators is to see the availability, identify, check/maintain the first aid kit.
- BMKE → Based on the results of the interview, it was conveyed that each foreman was provided with a first aid bag to handle emergencies, but the results of the field visit found that 1 (one) foreman was not ready for a first aid bag because it was brought by the clerk, in addition there were foreman who did not know the function of the contents of the first aid bag and there is no monitoring of the completeness of the contents of the first aid bag.
- BKCE → 2 (two) of the 3 (three) foremen interviewed brought a first aid bag with incomplete contents according to the list of first aid kits, for example, no Aquades and Iodine items. In addition, there are no records of item use and monitoring of its completeness.
- First aid kits → The results of the field visit revealed that there were no first aid kits available in the TPA Pondok 2 BMKE area, the BKCE division 3 generator house, and in the WWTP area, regarding this, the justification for not providing a first aid kit in the Daycare, generator house and WWTP area has not been shown.

Non-Conformance Description (filled by auditor):

Based on the explanation above, it is concluded that the Company has not been able to show sufficient evidence that the first aid kit is available at the workplace in accordance with the identification specified and the first aid kit has been understood by the assigned personnel

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.	:	2022.11	Issued by	:	Septian Maulana
Date Issued	:	1 April 2022	Time Limit	:	30 June 2022
NC Grade	:	Major	Date of Closing	:	21 Juni 2022
Standard Ref. & Requirement	:	6.7.3 Workers use appropriate personal protective equipment (PPE) which is provided free of charge to all workers in the workplace, to cover all potentially hazardous operations, such as pesticides application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.			
Evidence observed (filled by auditor):					
Provision of PPE					
Based on the results of the document review, it is known the following:					
<ul style="list-style-type: none">The Mentaya Regional HIRAC document review in 2021 explains, among others:<ul style="list-style-type: none">PPE for Harvesting Work including Boots / short rubber shoes, Gloves and Safety Helmets.PPE for the work of Berondol including Safety Helmets and Shoes.SOP for Personal Protective Equipment number: BGA-SOP-CCS-1106.1-R0 explains including:<ul style="list-style-type: none">Point 7.3.5 The amount of stock/reserve of PPE in the warehouse should not be less than 10% of the existing needs, prior orders must be made to ensure that no work is done without using PPE.Point 7.5.1 If the employee's PPE is damaged, the employee has the right to get new PPE by submitting the damaged PPE and filling in the handover proof form.Point 7.6.3 Every morning during the master morning/ morning briefing, assistants and supervisors ensure that all workers bring and use PPE according to the job, and fill out the PPE Inspection Data form.					
Based on the results of field visits and interviews, several facts were found as follows:					
<ul style="list-style-type: none">BMKE → Based on the results of interviews, it was found that 2 lose fruit picker used PPE in the form of boots and 1 harvest worker used short rubber shoes that were provided by themselves. This is because the PPE boots provided by the company were damaged.BKCE & BMKE → based on the results of interviews with harvest and lose fruit picker, it is known that PPE in the form of boots is provided by the company every 6 months, and if there is damage before the PPE distribution period, the workers replace the damaged PPE by providing their own because there is no stock available at the company where this has been reported by workers but has not been followed up.					
Non-Conformance Description (filled by auditor):					
Based on the explanation above, it is concluded that the Company has not been able to show sufficient evidence that PPE has been provided to workers in accordance with the SOPs it has, for example, having 10% stock and damaged employee PPE can be replaced even though the replacement period has not yet arrived					
Root Cause Analysis (filled by organization audited):					
<ul style="list-style-type: none">Lack of employee understanding regarding the mechanism for replacing PPE that damaged PPEWorkers who have reported but have not been followed up before due to a lack of understanding from the foreman/supervisor so that in the re-socialization (refresh) it is also conveyed to the supervisor/foreman to the assistant level and a discussion is also held at the OHS Committee Meeting to ensure the mechanism for replacing the PPE runs					
Correction (filled by organization audited):					
<ul style="list-style-type: none">Provide socialization related to compliance with the use of PPE and the mechanism for replacing PPE in PT. KMB perusahaanShows PPE stock in BMKE and BKCE warehousesShows the results of the examination of the PPE condition of BMKE and BKCE employees					

- Show proof of replacement of damaged employee PPE

Corrective Action (filled by organization audited):

Monitoring is carried out through OHS Committee meetings (results of inspections), RSPO internal audit activities and periodic management review meetings

Assessor Evaluation and Conclusion (filled by auditor):
Verify proof of repair dated June 4, 2022

The company has shown the results of the identification of root cause analysis, corrective actions and has shown evidence of improvement including:

- Minutes of inspection of PPE stock in the warehouse of BKCE and BMKE units in April 2022 which informs the amount of stock of each PPE (Boots, Safety Glasses, Face Shield, Carbon Masks, Apron, Rubber Gloves, Safety Helmets, Cloth Gloves, *Egrek* Gloves, *Dodos* holster) above the minimum stock limit of 10%.
- Minutes of replacement of PPE damaged by BKCE and BMKE units
- Minutes of the socialization of the PPE replacement mechanism, which was continued by examining the PPE of each employee in the BMKE unit (1 April 2022) and BKCE (4 April 2022), for which a new PPE application was made for the damaged employee PPE.
- Records of BMKE and BKCE PPE inspections in April 2022. The inspection form has accommodated information on the type of PPE used and a note column on the results of interviews/complaints if indiscipline/complaints on the use of PPE are found/OHS implementation.
- Minutes of the OHS Committee meeting on April 25, 2022 discussed the following:
 - Hazard identification of reservoirs and water reservoirs
 - Update on PT KMB's HIRAC for 2022
 - Installation of guardrails and warnings in the area of reservoirs and water reservoirs
 - OHSE inspection of reservoirs and water reservoirs
 - Dissemination to employees regarding potential hazards

Auditor's conclusion

Based on the assessment of the adequacy of the identification of the root cause of the problem, corrective actions and evidence of improvement that have been shown, it is still necessary to add to the root cause analysis for workers who have reported the occurrence of damaged shoes but have not been followed up so that non-conformities are declared **unfulfilled**.

Verify proof of repair dated June 21, 2022

The company shows additional root cause identification results for workers who have reported but have not been followed up previously, possibly due to a lack of understanding from the foreman/supervisor.

Auditor's conclusion

Based on this explanation, the discrepancy is declared **fulfilled**.

Verified by : **Septian Maulana**

NCR No.	:	2022.12	Issued by	:	Bayu Yogatama
Date Issued	:	1 April 2022	Time Limit	:	Next Surveillance
NC Grade	:	Minor	Date of Closing	:	
Standard Ref. & Requirement	:	7.3.2 Tersedia bukti pembuangan limbah sesuai prosedur yang sepenuhnya dipahami oleh pekerja			

	dan manajer
Evidence observed (filled by auditor): <ul style="list-style-type: none"> Unit Manajemen telah Memiliki Prosedur berkaitan dengan pengelolaan Limbah <ul style="list-style-type: none"> Pengelolaan LB3 Nomor KMB-SUST-SOP-15 revisi ke 2 tanggal 5 Agustus 2015. (Setiap LB3 harus disimpan di TPS LB3) Pengelolaan Sampah Perumahan BGA-SOP-KMB-001 tanggal 5 Juli 2012. (Semua Pekerja dan karyawan wajib membuang sampah pada tempat sampah yang telah disediakan, Pengumpulan Sampah harus Sesuai dengan jadwal dan dibuang ke TPSA yang telah ditentukan) Berdasarkan hasil kunjungan lapangan di beberapa area operasional perusahaan didapatkan fakta seperti <ul style="list-style-type: none"> Tumpukan sampah (botol dan karung) dibuang ke parit di seberang rumah genset Pondok 2 Div 3 / 4 BMKE Tumpukan sampah perumahan termasuk sampah LB3 (kemasan Oli) di area pondok Div 2 BKCE Limbah cair dari sanitasi perumahan yang sudah kurang terkendali dan tidak ada jalur khusus sehingga menimbulkan genangan. Kemasan Oli Bekas di Blok A01 Div 2 BKCE Kumpulan limbah domestik di Perumahan Div 1 / 2 BMKE (sampah menumpuk dalam BIN) Penggunaan drum bekas oli untuk tampungan air di perumahan Karyawan Pondok 1 BKCE. Hasil kunjungan lapangan di area Landfill Blok P02 div 1 BMKE diketahui kondisi Landfill dalam keadaan kosong. (landfill untuk BMKE dan BKCE) Hasil wawancara dengan pekerja di BMKE diketahui sampah dibuang di parit atau dibelakang rumah dikarenakan sudah lama sampah tidak diambil. 	
Non-Conformance Description (filled by auditor): Perusahaan belum dapat menunjukkan cukup bukti bahwa pembuangan limbah telah sesuai dengan prosedur yang dimiliki.	
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.	:	2022.13	Issued by	:	Bayu Yogatama
Date Issued	:	1 April 2022	Time Limit	:	30 Juni 2022
NC Grade	:	Major	Date of Closing	:	4 Juni 2022
Standard Ref. & Requirement	:	7.12.4 NKT dan hutan SKT setelah tanggal 15 November 2018, lahan gambut dan kawasan konservasi lainnya yang telah diidentifikasi, dilindungi dan/atau ditingkatkan. Rencana pengelolaan terintegrasi untuk melindungi dan/atau meningkatkan NKT dan hutan SKT, lahan			

gambut dan kawasan konservasi lainnya dikembangkan, dilaksanakan, dan diadaptasi jika diperlukan, dan dilengkapi dengan persyaratan-persyaratan pemantauan. Rencana pengelolaan terintegrasi tersebut ditinjau sekurang-kurangnya sekali dalam lima tahun. Rencana pengelolaan terintegrasi tersebut dikembangkan melalui konsultasi bersama para pemangku kepentingan yang relevan dan mencakup areal yang dikelola langsung dan mempertimbangkan tingkat lanskap lebih luas yang relevan (jika lanskap tersebut telah diidentifikasi).

Evidence observed (filled by auditor):

Perusahaan telah memiliki Prosedur Program manajemen HCV KMB-SUST-SOP-46 revisi Kedua tanggal 5 Agustus 2015 di dalam SOP dijelaskan untuk Tindakan Pengelolaan yang harus dilakukan di area yang memiliki fungsi bagi Kawasan lindung dan atau konservasi (HCV 1.1), kawasan atau ekosistem yang penting sebagai penyedia air dan pengendalian banjir bagi masyarakat hilir (HCV 4.1) yaitu pembuatan tanda batas sesuai peta hasil identifikasi, membuat signboard / papan informasi di area konservasi.

Kajian dokumen Rencana pengelolaan HCV tahun 2021 diantaranya penanaman pohon di areal HCV, pembuatan control buffer zone dan pemasangan signboard HCV.

Berdasarkan hasil kunjungan lapangan ke area HCV di BMKE dan BKCE diketahui beberapa kondisi sbb :

- Belum terdapat Signboard, penetapan area batas sempot, ataupun pengkayaan tanaman berkayu di area Sempadan Sungai Penyahun Blok D03/04 Divisi 2 Bukit Makmur Estate, Sempadan Sungai Penyahun Blok B01 Div 2 Bukit Kecubung Estate, Sempadan Sungai Penyahun Blok D11 Div 1 Bukit Kecubung Estate, Sempadan Sungai Hanya Blok B06 Div 1 Bukit Kecubung Estate
- HCV Bukit batu telah diinvasi oleh Mucuna dan tidak terdapat signboard ataupun amaran penanda

Non-Conformance Description (filled by auditor):

Perusahaan belum dapat menunjukkan cukup bukti rencana pengelolaan HCV telah dilaksanakan sesuai prosedur dan rencana pengelolaan yang dimiliki.

Root Cause Analysis (filled by organization audited):

Hilang atau rusaknya signboard di area HCV karena terlalu lamanya periode pemantauan

Correction (filled by organization audited):

1. Melakukan identifikasi lokasi pemasangan Signboard, patok buffer zone dan tanda batas fisik area konservasi sempadan sungai Penyahun, sungai Merayak dan sungai Hanya
2. Melakukan pemasangan Signboard, patok buffer zone dan tanda batas fisik area konservasi sempadan sungai
3. Membersihkan Mucuna di area HCV Bukit Batu estate BMKE
4. Memasang Signboard dan amaran penanda di area HCV Bukit Batu
5. Melakukan penanaman pohon hutan di sempadan sungai Penyahun, Merayak dan Hanya
6. Membuat Program Pemantauan Setiap 1 bulan sekali oleh PIC unit

Corrective Action (filled by organization audited):

Melakukan monitoring/ pemantauan area HCV setiap bulan sekali oleh PIC setiap unit (mandor EHS) dan dimonitoring melalui kegiatan internal audit dan dievaluasi melalui rapat tinjauan manajemen.

Assessor Evaluation and Conclusion (filled by auditor):

Verifikasi 4 Juni 2022

Unit manajemen menunjukkan bukti perbaikan berupa:

- Jadwal Pengelolaan dan Pemantauan area HCV, dimana dalam salah satu rencananya adalah melakukan monitoring berkala area HCV termasuk fasilitas pendukungnya setiap 1 bulan sekali.
- Berita acara perawatan area HCV Bukit Batu pada tanggal 6 April 2022?
- Berita acara pemasangan penandaan/signboard dan pengecatan pokok batas area HCV di Bukit Batu pada tanggal 4 April 2022.

- Laporan Monitoring Identifikasi Signboard, Patok Bufferzone dan tanda Batas Fisik area HCV BMKE pada tanggal 18 April 2022. Diketahui terdapat beberapa signboard yang pudar dan perlu di perbaiki seperti di blok D03 dan Q03.
- Laporan Hasil Perbaikan Signboard, Patok Bufferzone dan tanda Batas Fisik Area HCV di BMKE pada tanggal 25-26 April 2022, diantaranya di Blok D03/04 dan Q03.
- Laporan Monitoring Identifikasi Signboard, Patok Bufferzone dan tanda Batas Fisik area HCV BMKE pada tanggal 08 April 2022. Diketahui terdapat beberapa signboard yang hilang seperti di blok B01. Dan B06.
- Laporan Hasil Perbaikan Signboard, Patok Bufferzone dan tanda Batas Fisik Area HCV di BKCE pada tanggal 14-15 April 2022, diantaranya di Blok B01, R01, B06, dan D11.
- Berita Acara Penanaman Pohon berkayu di area HCV BKCE pada tanggal 23 April 2022, dijelaskan telah dilakukan penanaman pohon sebanyak 198 bibit yang tersebar di blok B01, R01, B06, dan D11 (sempadan Sungai Penyauhan Hulu, Sempadan Sungai Merayak hulu, Sempadan Sungai Hanya Hulu, Sempadan Sungai hanya Hilir)
- Berita Acara Penanaman Pohon berkayu di area HCV BMKE pada tanggal 30 April 2022, dijelaskan telah dilakukan penanaman pohon sebanyak 80 bibit yang tersebar di D03 dan R03 (sempadan Sungai Penyauhan Hilir dan Sempadan Sungai Merayak Hilir)

Berdasarkan Analisa Akar Masalah, Koreksi dan Tindakan Korektif yang disampaikan, ketidaksesuaian dinyatakan **terpenuhi**

Verified by : Bayu Yogatama

NCR No.	:	2022.14	Issued by	:	Haikal Ramadhan Kharismansyah
Date Issued	:	1 April 2022	Time Limit	:	30 Juni 2022
NC Grade	:	Major	Date of Closing	:	20 Juni 2022
Standard Ref. & Requirement	:	RSPO Certification System 5.5.2 Time-bound plan: A time-bound plan for certifying all its management units and/or entities, including the units where the organisation has management control and/or minor shareholding, is submitted to the CB during the initial certification audit. The time-bound plan shall contain a current list of all estates and mills.			
Evidence observed (filled by auditor): <ul style="list-style-type: none">- Berdasarkan hasil kajian dokumen diketahui terdapat revisi TBP terbaru untuk BGA group pertanggal 10 Januari 2022 dengan seluruh unit melaksanakan proses sertifikasi ditahun 2023.- Sesuai dengan RSPO Announcement for Time Bound Plan Revision tanggal 21 Desember 2021 diantaranya menyatakan “ As mentioned in Clause 4.5.3 of the P&C Certification System (14 June 2017) and recently revised with Clause 5.5.2 of the P&C Certification System (12 November 2020), the TBP shall contain a current list of all estates and mills and as a minimum, all estates and mills shall be certified within five (5) years after obtaining RSPO membership. Any new acquisitions shall be certified within a three-year time frame. Any deviations from these maximum periods require approval by the RSPO Secretariat “- Sampai dengan kegiatan audit dilaksanakan belum terdapat informasi mengenai komunikasi antara perusahaan dengan RSPO terkait hal tersebut termasuk pengiriman RSPO revision TBP template kepada sekretariat RSPO					
Non-Conformance Description (filled by auditor): <p>Perusahaan belum dapat menunjukkan cukup bukti bahwa telah melakukan komunikasi terhadap sekretariat RSPO mengenai revisi TBP termasuk menunjukkan progress mendapatkan approval</p>					
Root Cause Analysis (filled by organization audited): <p>Adanya perbedaan interpretasi dari announcement RSPO terkait TBP</p>					
Correction (filled by organization audited):					

Melampirkan Time Bond Plan 1 November 2021 dan menarik kembali Time Bond Plan 10 Januari 2022

Corrective Action *(filled by organization audited):*

Melakukan evaluasi Time Bond Plan kembali nantinya melalui mekanisme tinjauan manajemen pada akhir tahun

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

Verifikasi tanggal 05 Juni 2022

Perusahaan memberikan penjelasan bahwa memutuskan untuk menggunakan TBP 1 November 2021 kembali karena perusahaan menganggap target pada TBP 1 November 2021 masih sesuai dan belum perlu dilakukan perubahan target sertifikasi. Sehingga TBP 10 Januari 2022 tidak digunakan Kembali.

Dari TBP 10 November 2021 diketahui terdapat rencana sertifikasi di tahun 2023 seperti Koperasi Harapan Abadi, PT Bumitama Gunajaya Abadi, dan PT Raya Sawit Manunggal. Sebagaimana dijelaskan dalam alur flow chart TBP *"Since the RSPO Certification System document was made effective from 1 July, 2018, existing RSPO members have 5 years from this date to comply with these requirements. This means any grower member with management unit(s) that have not yet been certified will need to ensure that the uncertified management unit(s) are certified by 30 June, 2023"*

Agar dapat dijelaskan secara lebih rinci dalam TBP 10 November 2021 tersebut. Tahun 2023 yang dimaksud apakah setelah atau sebelum 30 Juni 2023.

Verifikasi tanggal 20 Juni 2022

Telah diberikan tambahan penjelasan bahwa TBP yang dimaksud adalah tidak melebihi dari 30 Juni 2023. Dengan demikian ketidaksesuaian dinyatakan terpenuhi

Verified by : **Haikal Ramadhan Kharismansyah**

3.4.4. Opportunity for Improvement

No	Ref. Std.	Description
1	3.4.3	<p>The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in participatory way.</p> <p>The management unit shows the realization of the implementation of SIA management during 2021 which is contained in various reports, such as the CSR Plan and Realization report for 2021/2022. Mapping of the enclave and occupation areas, recapitulating the GRTT program. The report on the implementation & monitoring of SIA in particular has not been carried out optimally. Companies have the opportunity to create integrated SIA management and monitoring reports.</p>
2	3.7.1	<p>A documented programme that provides training is in place, which is accessible to all staff, workers, scheme smallholders, and outgrowers taking into account genderspecific needs, and which covers applicable aspects of P&C Principles, in a form they understand and includes assessment of the training</p> <p>The unit of certification has the opportunity to ensure the effectiveness of the training provided to warehouse employees, contractor workers and others.</p>
3	6.7.4	<p>All workers are provided medical care and covered by accident insurance. Costs incurred from work related incidents, leading to injury or illness, are covered in accordance with applicable regulations or by the unit of certification if applicable regulations do not provide protection.</p> <p>Based on the results of interviews with workers, it is stated that workers have provided clinic facilities to carry out health checks if there are complaints without being charged. In addition, the company also provides BPJS Health facilities, but based on document review, the following facts are known:</p> <ul style="list-style-type: none"> • The results of the study of the labor list document as of February 2022 revealed that the total workforce of PT KMB (BKCE, BMKE and BMKM) was 802 workers. • The company shows proof of payment of BPJS Health in January 2022 for a total of 166 workers (BMKE, BKCE and BMKM). • The company shows proof of BPJS Health registration submission via email on March 26, 2022 for a total of 774 workers (BMKE, BKCE and BMKM). • The company shows a reply email from BPJS Health dated March 28, 2022 informing that feedback will be submitted after processing. <p>Berdasarkan penjelasan di atas, perusahaan memiliki peluang perbaikan dengan memastikan proses pendaftaran BPJS Kesehatan terhadap seluruh karyawan yang belum terdaftar.</p>

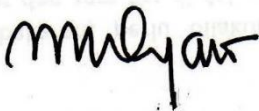

3.4.5. Noteworthy Positive Components

No	Description
1	Commitment to apply the principles of sustainable palm oil management
2	Good cooperation with the companion team
3	Has realized a social responsibility program to the surrounding community
4	Has realized a partnership garden with the surrounding community
5	Provision of Basic Food Service Unit
6	All employees are permanent workers

3.5 Summary of Arising Issues from Public and Auditor Verification

Public Issues (Institution/ NGO/Community)	Auditor Verification
Agriculture Service of Kotawaringin Timur Regency <ul style="list-style-type: none"> The company has regularly submitted mandatory reports, and the content is complete but the timeliness of reporting needs to be improved. So far there have been no complaints related to disturbances caused by the company's operational activities or fire incidents. Communication between the company and the agency has been going well and requests for information are running smoothly. In addition, the agency already knows the PIC of the company to be contacted. Regarding FFB price determination in Kota Waringin Timur Regency, it follows the price determined by the pricing team once a month. Companies need to improve their CSR programs, including in the field of Health (free treatment), Education (assistance for honorary teachers), and the field of culture. 	<p>There is no negative issue</p>
Worker Cooperation <p>The employee cooperative is no longer running and has been replaced with UPS (a staple food supply unit) but there has been no legal dissolution and only there is no longer reporting and communication to related agencies.</p>	<p>There is no longer employee cooperative, however, the basic needs of workers have been met with the existence of a basic food supply unit.</p>
Gender Committee <ul style="list-style-type: none"> The main activities of the gender committee are related to issues of harassment, discrimination and gender equality. Since the gender committee was established until the last meeting in March 2022, there have been no complaints or complaints related to this matter. Structural Gender Committee did not involve men because it was difficult to collect, but at meetings the Gender Committee involved the RSPO and HRD teams. Male and female workers are not differentiated and are given equal job opportunities, for example by having a female foreman. Female workers who are pregnant/breastfeeding are not allowed to work handling chemicals and will be transferred to other jobs. Pregnancy monitoring is also carried out through monthly H1 checks. In addition, female workers are also given the right to get H1 leave. The company has provided facilities for new mothers including maternity leave, basic breastfeeding in Daycare, time to breastfeed their children and integrated health posts. 	<p>There is no negative issue</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<ul style="list-style-type: none"> Workers are provided with housing facilities (equipped with electricity and water), sports facilities, places to sell basic needs, educational facilities, religious facilities, playgrounds. 	

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> <div style="text-align: center;">Signed on behalf of:</div> <div style="display: flex; justify-content: space-around;"> <div style="text-align: center;"> <p>PT Karya Makmur Bahagia Management Representative</p>  <p><u>Nandang Mulyana</u> Wednesday, 22 June 2022</p> </div> <div style="text-align: center;"> <p>Mutuagung Lestari Lead Auditor</p>  <p><u>Haikal Ramadhan Kharismansyah</u> Wednesday, 22 June 2022</p> </div> </div>

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

No	Institution/ NGO/ Community	Address	Phone/ Email	Form of Comm	Date of Contact	Response	
						Yes	No
1	Agriculture Service	Kotawaringin Timur Regency	-	By Phone	29 March 2022	✓	
2	Worker Cooperative	Kotawaringin Timur Regency	-	By Phone	29 March 2022	✓	
3	Gender Committee	Kotawaringin Timur Regency	-	By Phone	29 March 2022	✓	
4	Worldwide Fund	-	wwf-indonesia@wwf.or.id	Via email	21 March 2022		✓
5	Wahana Lingkungan Hidup Indonesia	-	informasi@walhi.or.id	Via email	21 March 2022		✓
6	Sawit Watch	-	info@sawitwatch.or.id	Via email	21 March 2022		✓
7	Worldwide Fund	-	wwf-indonesia@wwf.or.id	Via email	21 March 2022		✓
8	Manpower Agency	Kotawaringin Timur Regency		By phone	29 March 2022	✓	
9	Plantation Agency	Kotawaringin Timur Regency		By phone	29 March 2022	✓	
10	Land Agency (BPN)	Kotawaringin Timur Regency		By phone	29 March 2022	✓	

Appendix 2. Assessment Program
Remote Audit

Date	21 st – 22 nd January 2021	
Audit Program	Clauses To Be Audited	Auditor
Thursday, 21 January 2021		
07.30 – 08.00	Remote Opening Meeting of ASI Auditor with Mutuagung Auditor	ASI Auditor & Mutuagung Auditor
08.00 – 09.00	Remote Audit Opening Meeting of Bukit Makmur POM and the supply bases. (recorded video conference) <ul style="list-style-type: none"> Opening speech and discussion of remote audit mechanism Presentation of audit objective, audit scope, audit plan discussion, audit sample, transparency and confidentiality clarification) 	All Auditor
09.00 – 12.00	Document verification	All Auditor
12.00 – 14.00	Break	All Auditor
14.00 – 16.30 16.30 – 17.00	Document verification Daily audit progress meeting	All Auditor
Friday, 22 January 2021		
08.00 – 12.00	Document verification	All Auditor
12.00 – 16.00	Break & auditor internal discussion for closing meeting preparation	All Auditor
16.00 – 17.00	Remote Audit Closing Meeting of Bukit Makmur POM and the supply bases (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
17.00 – 18.30	Remote Closing Meeting of ASI Auditor with Mutuagung Auditor	ASI Auditor & Mutuagung Auditor

Onsite Audit

DATE	28 March – 02 April 2022	
PLANNED TIME	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
Monday, 28 March 2022		
08.45 – 10.35 11.00 – 18.00 12.00 – 18.00 19.00 – ...	Jakarta → Palangkaraya (QG-452) Palangkaraya → PT Karya Makmur Bahagia Sampit → PT Karya Makmur Bahagia PCR Test at Site	All Auditor All Auditor Afiffudin All Auditor
Tuesday, 29 March 2022		
08.30 – 09.30	OPENING MEETING (Online) <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	Public Consultation (by phone) <ul style="list-style-type: none"> Stakeholders' consultation by phone to related agencies Stakeholder consultation to affected communities surrounding the plantations, indigenous peoples, local communities and previous land owners by phone Interview by phone with Gender Committee, Worker's Union, Worker's Cooperative (if any), Local Contractor (for Mill and Estate), Smallholders, Third Party Supplier (if any), local NGO (if any) <p>Document review and completing audit checklist</p>	All Auditor
12.00 – 14.00	Break	All Auditor
14.00 – 16.15	<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	Presentation of Daily Progress	All Auditor
Wednesday, 30 March 2022		
08.00 – 12.00	Field Observation to Bukit Makmur Estate Aspect to be verified: <ul style="list-style-type: none"> Implementation of Legal Aspect (Land Ownership, Legal Boundaries), HCV; Implementation of Agronomy Aspect (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application), Implementation of Occupational Health & Safety Aspect, Implementation of Employment Procedure and Mechanism Aspect Implementation of Environmental, and Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management), Observation of Workers Facilities (Housing, School, Worship Place). 	All Auditor
12.00 – 14.00	Break	All Auditor
14.00 – 16.15	Field Observation to Bukit Makmur POM <ul style="list-style-type: none"> Supply Chain Verification (FFB Receiving, Weighbridge, FFB Sorting, Processing Activity, Despatch CPO) OHS (Inspection to Chemical Storage, Hazardous Waste Storage, Fire Control Simulation, POME Pond) Implementation of Employment Procedure and Mechanism Aspect 	All Auditor

DATE	28 March – 02 April 2022	
PLANNED TIME	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
16.15 – 17.00	Presentation of Daily Progress	All Auditor
Thursday, 31 March 2022		
08.00 – 12.00	Field Observation to Bukit Kecubung Estate Aspect to be verified: <ul style="list-style-type: none"> • Implementation of Legal Aspect (Land Ownership, Legal Boundaries), HCV; • Implementation of Agronomy Aspect (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application), Implementation of Occupational Health & Safety Aspect, Implementation of Employment Procedure and Mechanism Aspect • Implementation of Environmental, and Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management), Observation of Workers Facilities (Housing, School, Worship Place). 	All Auditor
12.00 – 14.00	Break	All Auditor
14.00 – 16.15	<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	Presentation of Daily Progress	All Auditor
Friday, 01 April 2022		
08.00 – 11.30	<ul style="list-style-type: none"> • Verification of stakeholder consultation result and field visit • Document review and completing audit checklist 	All Auditor
11.30 – 14.00	Break	All Auditor
14.00 – 16.00	Internal Meeting Auditor Team	All Auditor
16.00 – 17.00	Closing Meeting	All Auditor
19.00 – 24.00	PT Karya Makmur Bahagia → Palangkaraya	All Auditor
Saturday, 02 April 2022		
16.30 – 18.00	Palangkaraya → Jakarta (GA-533)	All Auditor