

Roundtable on Sustainable Palm Oil Certification R S P O

[✓] Surveillance

Name of Management Organisation : **Palm Oil Mill 7 subsidiary of PT Dharma Satya Nusantara, Tbk.**
 Plantation Name : PT Karya Prima Agro Sejahtera (Long Teman Estate)
 Location : Miau Baru Village, Kongbeng Sub District, Kutai Timur District, Kalimantan Timur Province, Indonesia.
 Certificate Code : **MUTU-RSPO/156**
 Date of Certificate Issue : 02 July 2021 Date of License Issue : 02 October 2022
 Date of Certificate Expiry : 01 July 2026 Date of License Expiry : 01 July 2023

Assessment	Assessment Date	PT. Mutuagung Lestari Auditor	Reviewed by	Approved by
ASA-1	21 to 23 June 2022	Haikal Ramadhan Kharismansyah (Lead Auditor), Afiffuddin, Dwi Premadha Lestari and Mia Rahmah Qadryani.	Ardiansyah	Leonada

Assessment	Approved by MUTUAGUNG LESTARI on:
ASA-1	29 September 2022

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Figure 1. Location Map of POM 7 – PT Dharma Satya Nusantara, Tbk

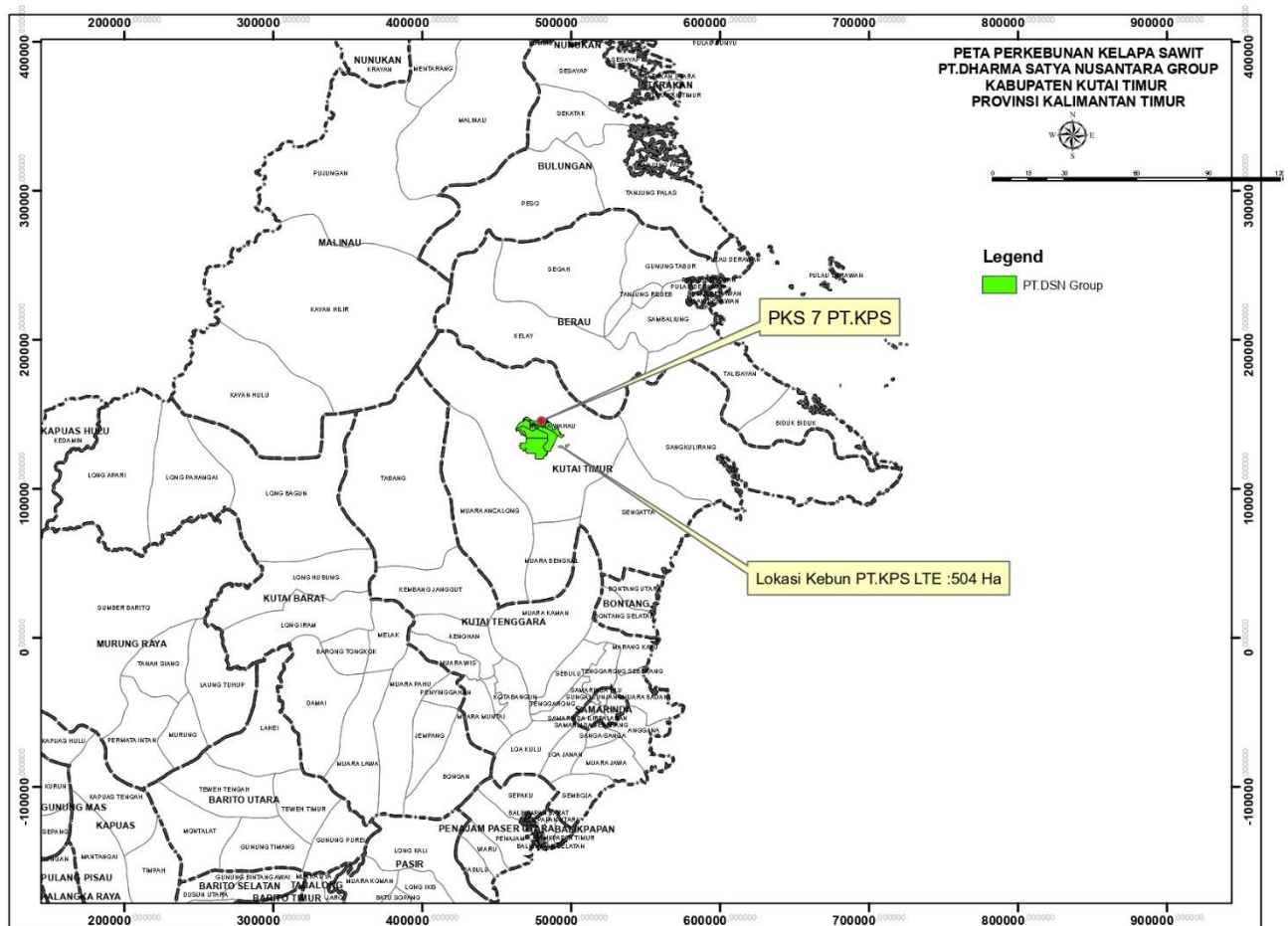


Figure 2. Operational Map of POM 7 – PT Dharma Satya Nusantara, Tbk

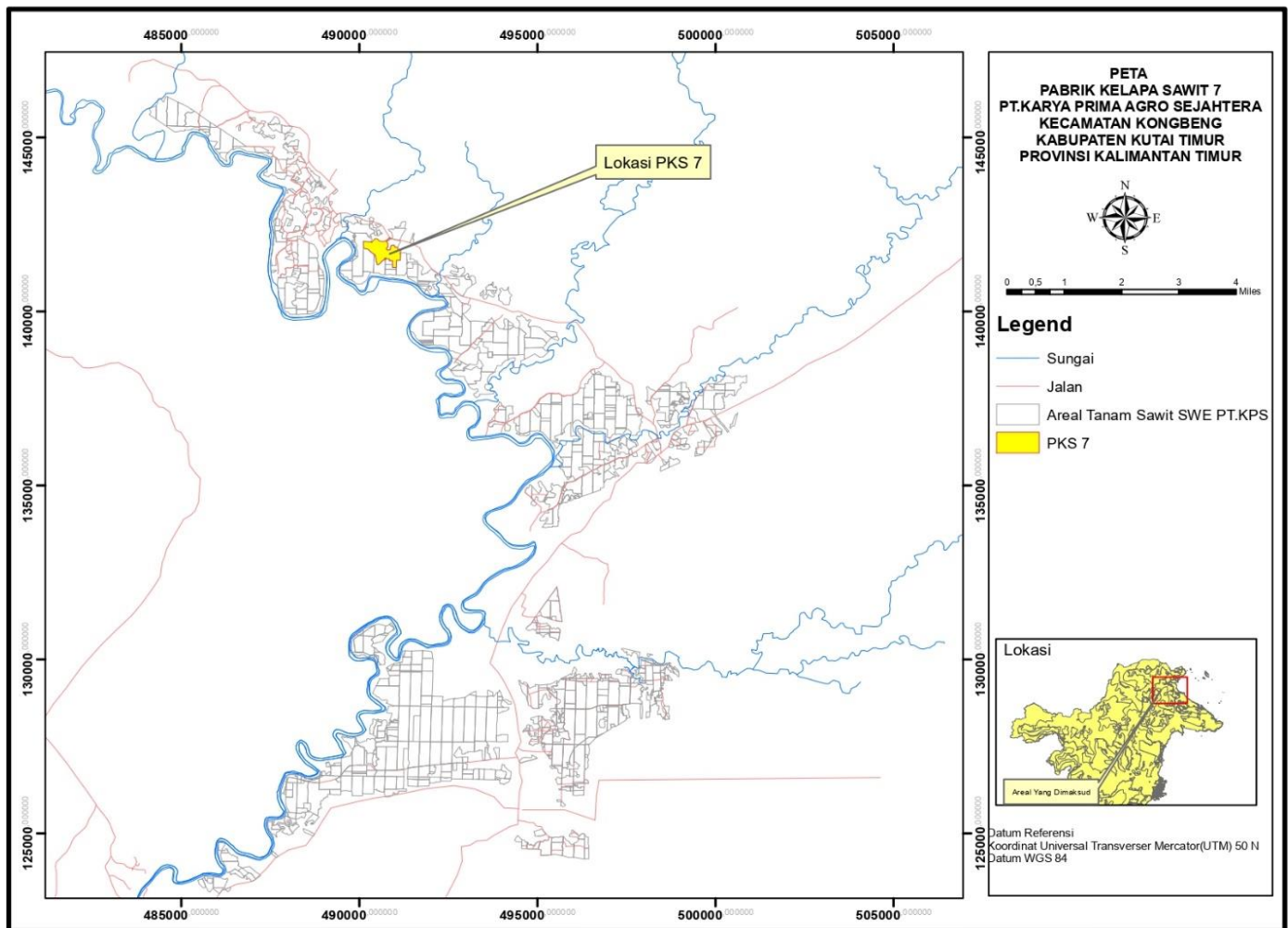


Figure 3. Operational Map of Long Teman Estate - PT Karya Prima Agro Sejahtera.

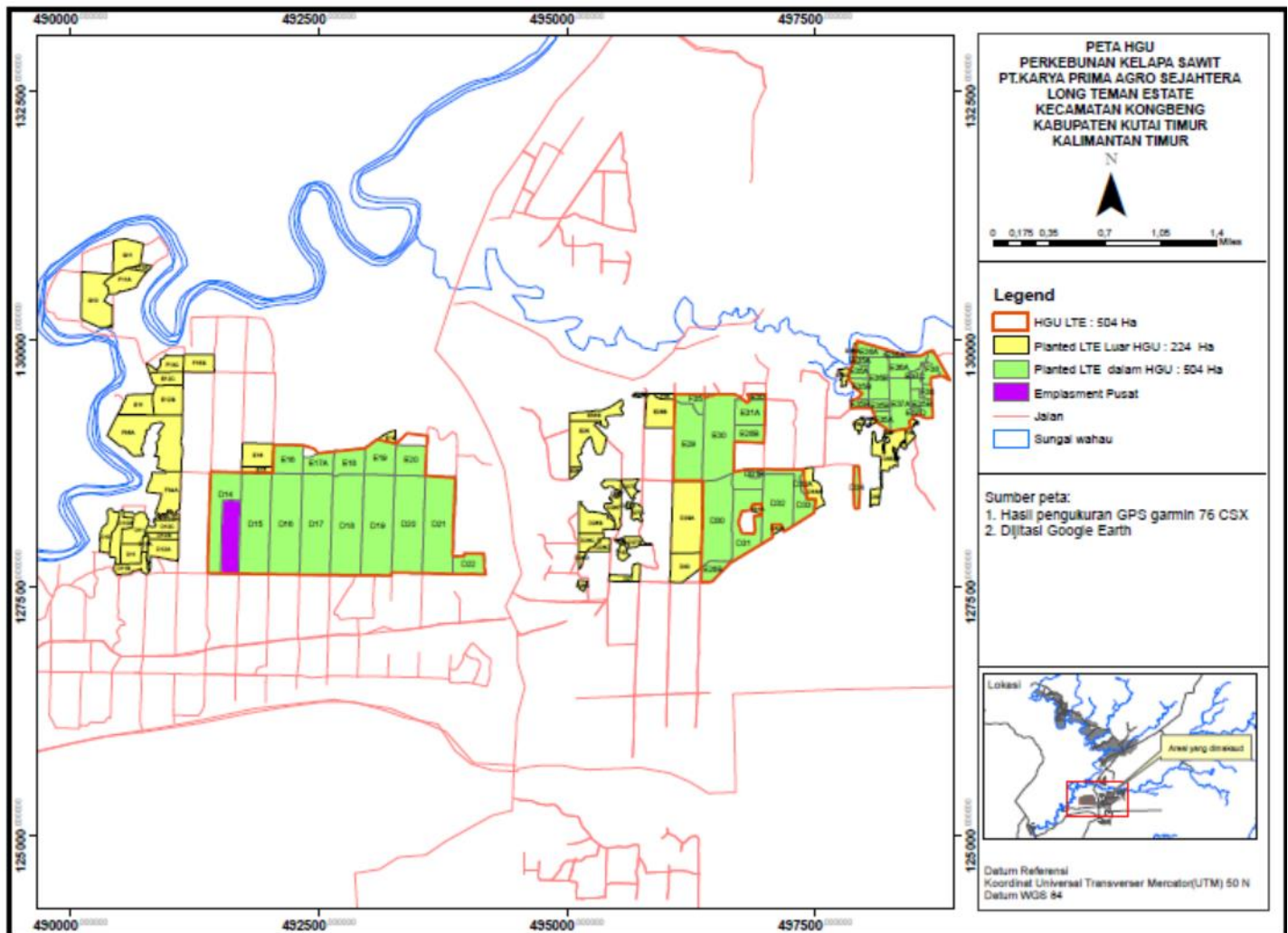
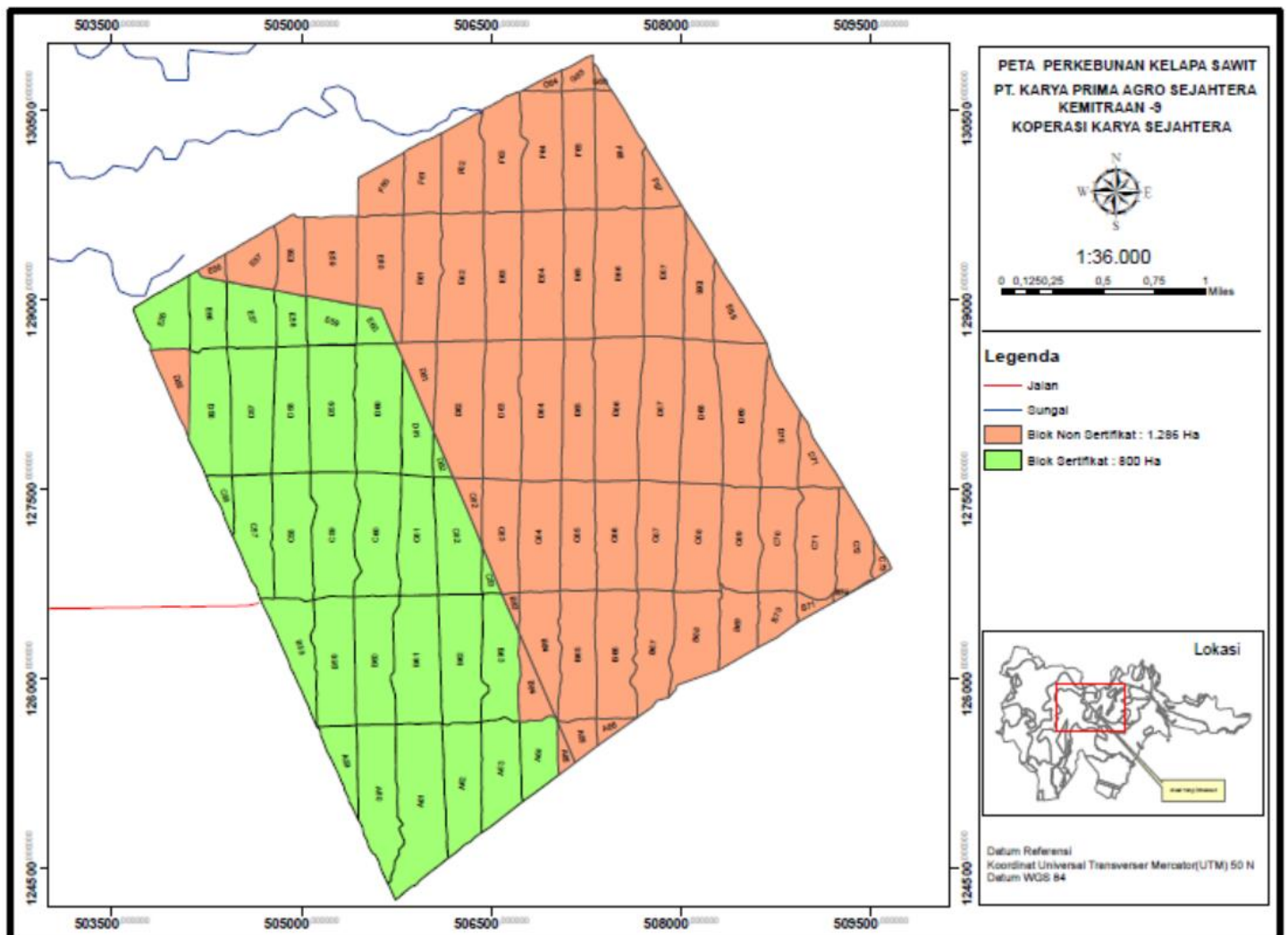


Figure 4. Operational Map of Kemitraan 9



Abbreviations Used

AMDAL	:	Analisis Mengenai Dampak Lingkungan
BOD	:	Biological Oxygen Demand
BPHTB	:	<i>Bea Perolehan Hak Atas Tanah dan Bangunan</i>
BPJS	:	<i>Badan Penyelenggara Jaminan Sosial</i>
CH	:	Certification Holder
CPO	:	Crude Palm Oil
CSPK	:	Certified Sustainable Palm Kernel
CSPO	:	Certified Sustainable Palm Oil
CSR	:	Corporate Social Responsibility
DLH	:	Dinas Lingkungan Hidup
DPLH	:	<i>Dokumen Pengelolaan Lingkungan Hidup</i>
DSN	:	Dharma Satya Nusantara
EFB	:	Empty Fruit Bunch
EIA	:	Environmental Impact Assessment
FFB	:	Fresh Fruit Bunch
FPIC	:	Free Prior Inform and Consent
FR	:	Frequency Rate
GHG	:	Green House Gas
HCV	:	High Conservation Value
HGB	:	<i>Hak Guna Bangunan / Building Title</i>
HGU	:	<i>Hak Guna Usaha / Land Use Title</i>
HIRAC	:	Hazard Identification Risk Assessment and Control
IPM	:	Integrated Pest Management
ISCC	:	International Sustainability & Carbon Certification
IUCN	:	International Union for Conservation of Nature and Natural Resources
KKPA	:	<i>Koperasi Kredit Primer Anggota</i>
KM 9	:	Kemitraan 9
KPAS	:	Karya Prima Agro Sejahtera
KT	:	<i>Kelompok Tani / Farmer Group</i>
KUD	:	<i>Koperasi Unit Desa / Cooperative Village Unit</i>
LSU	:	Leaf Sampling Unit
LTE	:	Long Teman Estate
LUC	:	Land Use Change
MSDS	:	Material Safety Data Sheet
OER	:	Oil Extraction Rate
OFI	:	Opportunity for improvement
OHS	:	Occupational Health and Safety
P & C	:	Principle & Criteria
P2K3	:	<i>Panitia Pembina Keselamatan dan Kesehatan Kerja/OHS Committee</i>
PIC	:	Person In Charge
PK	:	Palm Kernel
PKB	:	<i>Perjanjian Kerja Bersama (Collective Labor Agreement)</i>
PMPTSP	:	<i>Penanaman Modal & Pelayanan Terpadu Satu Pintu</i>
POM	:	Palm Oil Mill
POME	:	Palm Oil Mill Effluent
PPE	:	Personnel Protective Equipment
PT	:	<i>Pekerja Tetap (Permanent Worker)</i>
RKL RPL	:	<i>Rencana Pengelolaan Lingkungan – Rencana Pemantauan Lingkungan (Environment Management and Monitoring Plan)</i>

RSPO	:	Roundtable on Sustainable Palm Oil
RTE	:	Rare, Threatened, Endangered
RTRWP	:	<i>Rencana Tata Ruang Wilayah Provinsi</i> / Province Spatial Plan
SBU	:	Strategic Business Unit
SCCS	:	Supply Chain Certification System
SEIA	:	Social & Environmental Impact Assessment
SHM	:	<i>Sertifikat Hak Milik</i>
SIA	:	Social Impact Assessment
SKU	:	<i>Syarat Kerja Umum</i> / Permanent Workers
SOP	:	Standard Operational Procedure
SPO	:	Sustainable Palm Oil
SR	:	Severity Rate
SSU	:	Soil Sampling Unit
TBP	:	Time Bound Plan
UoC	:	Unit of certification
WTP	:	Water Treatment Plant
WWTP	:	Waste Water Treatment Plant

1.0	SCOPE OF THE CERTIFICATION ASSESSMENT		
1.1	Assessment Standard Used		
		<ul style="list-style-type: none">• 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	POM 7 subsidiary of PT Dharma Satya Nusantara, Tbk	
1.2.2	Contact person	Agustinus Triwibowo	
1.2.3	Organisation address and site address	Central Office register at RSPO: Jl. Rawa Gelam V Kav. OR/3B, Kawasan Industri Pulo Gadung, Jakarta, Indonesia	
1.2.4	Telephone	+62-21-4618135	
1.2.5	Fax	+62-21-46834865	
1.2.6	E-mail	agustinus.triwibowo@dsn.co.id	
1.2.7	Web page address	www.dsn.co.id	
1.2.8	Management Representative who completed the application for certification	Agustinus Triwibowo	
1.2.9	Registered as RSPO member	1-0135-12-000-00 dated on 2 Juli 2008	
1.3	Type of Assessment		
1.3.1	Scope of Assessment and Number of Management Unit	1 POM (POM 7) with 2 supply bases: Long Teman Estate and Kemitraan 9 <i>Note: In this assessment there is a ext.scope in the supply base of POM 7 i.e Kemitraan 9. Kemitraan 9 has been previously RSPO certified by being the scope of certification (supply based) POM 1 PT Swakarsa Sinar Sentosa.</i>	
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)
	POM 7	Miau Baru Village, Kongbeng Sub District, Kutai Timur District, Kalimantan Timur Province, Indonesia	N 01° 17' 5" E 116° 55' 1"
1.4.2	Location of Certification Scope of Supply Base		
	Name of Supply Base	Location	Coordinate
			Latitude (S)Longitude (E)
	Long Teman Estate	Miau Baru Village, Kongbeng Sub District, Kutai Timur District, Kalimantan Timur	N 01° 10' 53" E 116° 49' 44"

		Province, Indonesia					
	Kemitraan 9 (1,000 members)	Miau Baru Village, Kongbeng Sub District, Kutai Timur District, Kalimantan Timur Province, Indonesia		N 01° 09' 21"		E 116° 55' 27"	
1.5	Description of Area Statement						
1.5.1	Tenure						
	• State						
	- HGU			504.50	Ha		
	- HGB			2.80	Ha		
	• Community			Ha			
	- SHM			800	Ha		
	Total			Ha			
1.5.2	Area Statement						
	Description		Long Teman Estate	Kemitraan 9	TOTAL		
	Total area		507.30	800.00	1,307.30	Ha	
	Mature Area		477.00	800.00	1,277.00	Ha	
	Mill		2.80	-	2.80	Ha	
	Housing and Infrastructure		25.30	-	25.30	Ha	
	HCV		2.20	-	2.20	Ha	
1.6	Planting Year and Cycles						
1.6.1	Age profile of planting year						
	Planting Year	Hectarage (Ha)		Total (Ha)			
		Long Teman Estate	Kemitraan 9				
	2007	-	286.00	286.00			
	2008	299.00	454.00	753.00			
	2009	109.00	60.00	169.00			
	2010	46.00	-	46.00			
	2011	2.00	-	2.00			
	2012	17.00	-	17.00			
	2014	2.00	-	2.00			
	2015	2.00	-	2.00			
	TOTAL	477.00	800.00	1,277.00			
1.6.2	New Planting area after January 2010			69 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 (%)
	POM 7	60	262,018.01	62,369.23	23.80	10,858.82	4.14
	*Production data source from 12 months before assessment (July 2021 – May 2022)						
1.7.2	Description of Certification Scope of Supply Base						
	Name of Estate	Total Area	Production	FFB	Yield	Supplied to Mill	

		(Ha)	Area (Ha)	(ton/year)	(ton/ha/ year)	FFB (ton/year)	%
	Long Teman Estate	507.30	477.00	10,650.80	22.33	10,650.80	100
	Kemitraan 9	800.00	800.00	14,033.79	17.54	14,033.79	100
	TOTAL	1,307.30	1,277.00	24,684.59	19.33	24,684.59	100
	*Production data source from 12 months before assessment (June 2021 to May 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						
	ME 4 (PT DWT)	Group of PT DSN			12,345.83		
	LK 3 (PT DIN)	Group of PT DSN			53.52		
	KM5	Scheme smallholder			4,160.07		
	KM11	Scheme smallholder			7,444.76		
	KM12	Scheme smallholder			5,326.69		
	Sub Total					29,330.87	
	SUNGAI WAHAU ESTATE (PT KPS)	Group of PT DSN			10,320.38		
	LONG TEMAN ESTATE (PT KPS) – Non HGU	Group of PT DSN			3,632.51		
	KMT-7	Scheme smallholder			3,464.04		
	KMT-9	Scheme smallholder			36,069.69		
	KMT-13	Scheme smallholder			18,165.50		
	KMT-14	Scheme smallholder			7,931.14		
	KMT-15	Scheme smallholder			1,332.35		
	KMT-16	Scheme smallholder			10,943.63		
	KMT-17	Scheme smallholder			905.06		
	KMT-18	Scheme smallholder			3,192.30		
	KMT-19	Scheme smallholder			4,402.48		
	KMT-20	Scheme smallholder			4,448.11		
	KOPERASI JASA DAUN HIJAU	Independent Smallholders	111		5,749.34		
	KOPERASI SSWJ	Independent Smallholders	2,298		39,443.55		
	KSU SUTS (LONG BAU)	Independent Smallholders	325		8,732.34		
	KSU KEL'EAN BLOM KEJAH	Independent Smallholders	119		1,596.60		
	KOPERASI UTLJ	Independent Smallholders	182		973.88		
	KOPERASI KPWS NEHAS LAIH BING	Independent Smallholders	233		3,021.73		
	KSU SELEQ SEJAHTERA BERSAMA	Independent Smallholders	23		451.08		
	KOPERASI SERBA USAHA HARAPAN BARU	Independent Smallholders	253		1,802.40		
	KOPERASI KARYA SEJAHTERA	Independent Smallholders			481.06		
	PT RONI PUTRA ABADI	Outgrowers			505.78		
	PT TEPIAN BORNEO	Outgrowers			365.43		

SEJAHTERA				
PT GLOBAL DUTA ABADI	Outgrowers			866.59
CV THREE PUTRA	Outgrowers			33,586.88
PT BERAU KARETINDO LESTARI	Outgrowers			9,044.97
PT WEJAS IMANUEL	Outgrowers			10,295.85
Sub Total				221,724.67
Total				251,055.54

**Production data source from 12 months before assessment (June 2021 to May 2022)*

1.7.4	Product categories	FFB, CPO, PK
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1.8 Tonnage of Product

1.8.1	Past Annual Claim Certified Product	Last Year Projected Certified Volume (MT) July 2021 – October 2022	Last Year Actual Certified (MT) July 2021 – May 2022
	FFB Processed	82,909	54,014.87
	CPO Production	18,216	10,759.06
	Palm Kernel (PK) Production	3,291	1,867.90

1.8.2	Product selling	Actual selling product for last year (July 2021 to May 2022) (MT)
	Type of selling product	
	CSPO sold as RSPO certified product	10,697.79
	CSPK sold as RSPO certified product	0
	CSPO sold under another scheme	0
	CSPK sold under another scheme	0
	CSPO sold as conventional	0
	CSPK sold as conventional	1,854.71

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)
	Long Teman Estate	507.30	477.00	11,200	23.48
	Kemitraan 9	800.00	800.00	14,800	18.50
	TOTAL	1,307.30	1,277.00	26,000	20.36

**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 (%)	
	POM 7	60	26.000	5.500	21.12	1.200	4.40	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				
	POM 1 (PT SWA)	June 2012	Jabdan 2 (PT SWA)	2012	Kutai Timur District, Kalimantan Timur Province	Certified
			Smallholder (KM 5.9)	2015		Certified
			Smallholder (KM 3,6,11,12)	2017		Certified
	POM 2 (PT DSN)	June 2013	Puhus 1 (PT DIN)	2013	Kutai Timur District, Kalimantan Timur Province	Certified
			Puhus 2 (PT DIN)	2013		Certified
			Puhus 3 (PT DIN)	2013		Certified
	POM 3 (PT DSN)	August 2013	Long Kejiak 1 (PT DSN)	2013	Kutai Timur District, Kalimantan Timur Province	Certified
			Long Kejiak 2 (PT DSN)	2013		Certified
			Long Kejiak 3 (PT DSN)	2013		Certified
	POM 4 (PT DSN)	Nov 2014	Jabdan 1 (PT DSN)	2015	Kutai Timur District, Kalimantan Timur Province	Certified
			Long Jenew 1 (PT SWA)			Certified
			Long Jenew 2 (PT SWA)			Certified
			Smallholder	2022		Waiting RaCP
	POM 5 (PT DSN)	2020	Bukit Pandunlangan 1 (PT Pilar Wanapersada)	2020	Lamandau District, Kalimantan Tengah Province	-
			Bukit Pandunlangan 2 (PT Pilar Wanapersada)	2020		-
			Bukit Pandunlangan 3 (PT Pilar Wanapersada)	2020		-
			Smallholder	2023		-
	POM 6 (PT DSN)	2019	Melenyu 1 (PT DWT)	2019	Kutai Timur District, Kalimantan Timur Province	Certified
			Melenyu 2 (PT DWT)	2019		Certified
			Melenyu 3 (PT DWT)	2019		Certified
			Smallholder	2022		-
	POM 7 (PT DSN)	2019	Melenyu 4 (PT DWT)	2019	Kutai Timur District, Kalimantan Timur Province	Certified
			PT Karya Prima Agro Sejahtera	2020		NPP & RaCP Process RSPO
			Smallholder (KM 9)	2015		Certified
	-	-	PT Dharma Intisawit Lestari	2020	Bulungan District, Kalimantan Timur	-

					Province	
-	-	PT Karya Prima Agro Sejahtera	2020	Kutai Timur District, Kalimantan Timur Province	-	
		Smallholder	2023		-	
-	-	PT Putra Utama Lestari	2020	Kutai Barat District, Kalimantan Timur Province	-	
		Smallholder	2023		-	
-	-	PT Agro Andalan	2020	Sekadau District, Kalimantan Barat Province	-	
		Smallholder	2023		-	
-	-	PT Kencana Alam Permai	2020	Sintang District, Kalimantan Barat Province	-	
		Smallholder	2023		-	
-	-	PT Prima Sawit Andalan	2020	Sintang District, Kalimantan Barat Province	-	
		Smallholder	2023			
-	-	PT Dharma Persada Sejahtera	2020	Sintang District, Kalimantan Barat Province	-	
		Smallholder	2023		-	
PKS Tepian Langsat	2021	PT Bima Palma Nugraha	2021	Bengalon District, Kalimantan Timur Province	-	
		Smallholder	2024		-	
PKS Muara Bulan	2021	PT Bima Agri Sawit	2021	Karangan District, Kalimantan Timur Province	-	
		Smallholder	2024		-	
PT Dharma Satya Nusantara has committed to obtain RSPO Certificate to all management unit in accordance with TBP that has been set. MUTU has considered that PT Dharma Satya Nusantara is complied with the RSPO requirement for Time Bound Plan. The Time Bound Plan was revised and declared by PT Dharma Satya Nusantara on 12 January 2022 and signed by Head of Sustainability.						
1.10.2	Progress of Associated Smallholders and Out growers for Certifiable Standard					
All smallholder under DSN group planned to be certified in 2023						

2.0	ASSESSMENT PROCESS
2.1	Assessment Team
ASA-1	<p>1. Haikal Ramadhan Kharismansyah (Lead Auditor). Indonesian citizen, Bachelor of Agriculture department of plant and pest disease (Agrotechnology). He has 3 years' experience as an Agronomy Staff in private oil palm plantation in Indonesia. Training which had attended including Basic Management Development Program Agronomy, Integrated Urban Pest Management, Integrated Pest Management, ISO 9001:2015, Auditor ISPO, RSPO Lead Auditor Training, ISO 22000 awareness, RSPO SCCS, and Social Auditing by WIRE. Did some audit SPO scheme with aspects best management practices, SCCS, Legal, Social, and worker welfare. During this assessment, he verified Legal, FPIC, SCCS, Time Bound Plan & Partial Certification</p> <p>2. 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 19011-2015) 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 Environment, HCV, Social, and GHG Aspects.</p> <p>3. Dwi Premadha Lestari (Auditor). Bachelor of Forestry from Bogor Agricultural University. Has 3 years experience in forestry, 2 years in social sector because he has worked for 5 years in social NGO. Has completed ISO 9001 training, RSPO Lead Auditor Training and ISPO. I am a qualified RSPO and ISPO auditor and have been involved in a number of ISPO and RSPO audits on oil palm plantations in Indonesia. During this assessment verify BMP and OHS aspect</p> <p>4. Mia Rahmah Qadryani (Trainee Auditor). Indonesian citizen. Bachelor of Agriculture Majoring in Pest and Plant Disease, Universitas Padjadjaran. The training she has followed namely: Lead Auditor ISO 9001, ISO 19011 Auditor ISPO, Awareness ISO 17021, Awareness ISO 17065, Awareness ISO 9001, Awareness ISO 14001, Awareness ISO 45001, and Awareness ISO 19011. She has participated in several audit simulation activities related to the social and worker welfare. During this audit, she verified Worker Welfare and Transparencies supervised by Lead Auditor.</p> <p>Curriculum vitae (CV) of the members and the assessment team is available at the PT Mutuagung Lestari office.</p>
2.2	Assessment Methodology, Assessment Process and Locations of Assessment
2.2.1	Figure of person days to implement assessment
ASA-1	<p>Number of auditors: 3 auditor and 1 trainee auditor</p> <p>Number of days for ASA-1 audit: 3 days</p> <p>Number of working days for audit: 9 Working days</p>
2.2.2	Assessment Process
ASA-1	<p>The assessment was conducted by measuring the implementation of certification system and standard conducted by PT Dharma Satya Nusantara, POM 7 based on:</p> <ul style="list-style-type: none"> • RSPO Principles and Criteria for Sustainable Palm Oil Production 2018, The Indonesian National Interpretation, Endorsed by the RSPO Board of Governors on 20th April 2020 • RSPO Certification Systems for Principles & Criteria and RSPO Independent Smallholder Standard, Endorsed by the RSPO Board of Governors on 12 November 2020 <p>The scope of certification of consist of one mill (POM 7) and two estates (Long Teman Estate and Kemitraan 9).</p> <p>The audit program is included as in 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.</p>

The assessment was conducted in three methods: (1) document review, aiming to observe the sufficiency of types or substances from required documents; (2) interview, aiming to obtain more detailed information and cross check the information; and (3) field observation, aiming to observe directly the sufficiency of implementation on site. Some opportunities for improvement of the results ASA-1 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 Initial Certification 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.

The opening meeting was held on 21 June 2022. As for the participants who attended the opening meeting included Estate and Mill Managers, Support Team from Jakarta and other staffs. Closing meeting was held on 23 June 2022 attended by the same participants as the opening meeting. Management PT Dharma Satya Nusantara accept all the ASA-1 audit results.

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

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

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

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

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

The assessment program please find Appendix 2.

2.2.3	Locations of Assessment
ASA-1	<p>The sampling location consider the issue arise from the review documents and stakeholder's consultation that are fundamental and crucial. On this assessment sample locations that visited and respondent that interviewed by team auditor are:</p> <p>POM 7</p> <ul style="list-style-type: none"> • Hazardous Waste Temporary Warehouse. Field observations and interview related hazardous waste management, OHS and environmental aspect. • Chemical warehouse. Field observations and interview related chemical management, OHS, and environmental aspect. • Fuel warehouse. Field observations and interview related chemical management, OHS, and environmental aspect. • Workshop. Field observations and interview related workshop activity, OHS, environmental and worker welfare aspect.

- **General warehouse.** Field observations and interview related warehouse management, OHS, and environmental aspect.
- **Weightbridge.** Observation and interview related supply chain, FFB sources, Worker welfare aspect and OHS aspect
- **Security.** Observation and interview related supply chain, FFB sources, Worker welfare aspect and OHS aspect
- **Boiler.** Observation and interview related best practices, Worker welfare aspect and OHS aspect
- **Engine room.** Observation and interview related best practices, Worker welfare aspect and OHS aspect
- **WTP.** Observation and interview related use of water, worker welfare aspect, and OHS aspect
- **Sortation and Grading.** Observation and interview related best practices, Worker welfare aspect and OHS aspect
- **CPO Tank Storage.** Observation related CPO storage tank capacity
- **Kernel Storage.** Observation related kernel storage
- **WWTP.** Observation related management of POM liquid waste, OHS aspect, and worker welfare aspect.

Long Teman Estate

- **Spare part warehouse.** Field observations and interview related warehouse management, OHS, and environmental aspect.
- **Fuel Tank.** Observation of OHS, environment aspect, emergency response and fire facilities.
- **Oil and Agrochemicals Warehouse.** Observation related to management of oil and agrochemical material and waste, MSDS, emergency response facilities and the types of pesticides used.
- **Hazardous Waste Temporary Warehouse.** Field observations and interview related hazardous waste management, OHS and environmental aspect.
- **Workshop.** Observations and interviews related to wages and overtime, waste management activities, OHS implementations and health inspections.
- **Fertilizer warehouse.** Observation related to management of agrochemical material and waste, MSDS, emergency response facilities and the types of fertilizer used.
- **Generator House.** Observation for waste management, and interviews related to workers facility, electricity, domestic waste, sources of fresh water, socialization of company policy and complaint mechanism.
- **Housing Complex.** Observation and interview with residents about housing facilities, domestic waste management, and complaint mechanism.
- **Daycare.** Observation and interview with worker related labor aspect and OHS.
- **Pesticide mixing area.** Observation related pesticide mixing area and safety aspect.
- **Rinse house and PPE Storage.** Observation related pesticide mixing area, PPE storage, safety aspect.
- **Clinic.** Observations and interviews of health, environmental, training, and employment facilities.
- **Pesap river bufferzone. Block E35B.** Observation and interview related management of HCV.
- **Boundary pole KPAS 1039. Block D34.** Observation related maintenance of boundary area.
- **Boundary pole KPAS 1093. Block E35 B.** Observation related maintenance of boundary area.
- **Boundary pole KPAS 1086. Block D31.** Observation related maintenance of boundary area.
- **Enclave area. Block D31.** Observation related the landscape of enclave area.
- **Circle and Path Spraying.** Observation and interview related best management practice, OHS aspect, environmental aspect, and worker welfare aspect.
- **Manuring.** Observation and interview related best management practice, OHS aspect, environmental aspect, and worker welfare aspect
- **Harvesting.** Observation and interview related best management practice, OHS aspect, environmental aspect, and worker welfare aspect

Kemitraan 9

- **Circle and Path Spraying.** Observation and interview related best management practice, OHS aspect, environmental aspect, and worker welfare aspect.
- **Manuring.** Observation and interview related best management practice, OHS aspect, environmental aspect, and worker welfare aspect
- **Harvesting.** Observation and interview related best management practice, OHS aspect, environmental aspect,

	and worker welfare aspect
	<ul style="list-style-type: none"> • Boundary Pole number 3 block E58. Observation and interview related the maintenance of boundary area. • Boundary Pole number 4 block E58. Observation and interview related the maintenance of boundary area. • Boundary pole number 5 block E 60. Observation and interview related the maintenance of boundary area.
2.3	Stakeholder Consultation and Stakeholders Contacted
2.3.1	Summary of stakeholder consultation process.
ASA-1	<p>Summary of stakeholder consultation process for PT DSN POM 7 and PT Karya Prima Agro Sejahtera was held by:</p> <ul style="list-style-type: none"> • Public Notification on website on MUTU Website on 6 June 2022 • Public consultation with NGOs (by email) such as WALHI, AMAN, and Sawit Watch on 14 June 2022. • Public consultation meeting with government institution on 21 to 22 June 2022. • Public consultation meeting with communities on 21 June 2022. • Public consultation meeting with internal stakeholders on 21 to 22 June 2022. <p>Numbers of input from stakeholders were clarified by PT DSN POM 7</p>
2.3.2	Stakeholder contacted
	Please find appendix 1
2.4	Determining Next Assessment
	The next visit (Surveillance-2) will be conducted eight (9) months to twelve (12) months after July 2023

3.0 ASSESSMENT FINDINGS

3.1 Summary of Assessment Report of the RSPO Certification

MUTUAGUNG LESTARI has conducted an assessment of Palm Oil Mill 7 (POM-7) – PT Dharma Satya Nusantara operation consisting of one (1) mill and two (2) oil palm estates.

During the assessment, there were *One (1)* Nonconformities were assigned against Major Compliance Indicator; *One (1)* nonconformity(s) were assigned against Minor raised to Major Compliance Indicators; and *zero (0)* nonconformance were assigned against Minor Compliance Indicators and *three (3)* opportunity(s) for improvement were identified.

Further explanation of the non-conformities raised and corrective actions taken by the company are provided in section 3.5. The company has already prepared and implemented the corrective action(s) that had been reviewed and accepted by Auditor(s) in form of documentation evidence(s) e.g. (*document record/photographic/etc.*). Those corrective action(s) taken that consist of *One (1)* Major non-conformity(s) and *One (1)* Minor non-conformity raised to Major had been closed out shall be verified during next assessment.

MUTUAGUNG LESTARI found that *POM 7 – PT Dharma Satya Nusantara Tbk* complied with the requirements of **RSPO Certifications Systems for Principles & Criteria and RSPO Independent Smallholders Standard (Endorsed by RSPO Board of Governors on 12 November 2020) and 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.**

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	Unit of certification showed SOP of communication and handling external grievance (SOP-AGR-044-R02) validated on 14 October 2019 which explains the types of document which are publicly accessible such as vision and mission, company policies, AMDAL documents, HGU permits, company regulations, plantation maps, etc. These documents can be accessed by sending information request to the management.	
	Based on the interview with both internal and external stakeholders, it's known that the information and communication access of the UoC provided easily accessible via phone, email, fax, and mobile application.	
1.1.2	UoC also showed the mandatory report submitted related to worker welfare in accordance with its period, here as follows:	
	<ul style="list-style-type: none"> Reporting of Employment Report for PT DSN via online in 2021 on 6 December 2021 and must be reporting back on 06 December 2022. Reporting of Employment Report for PT KPAS via online in 2021 on 6 December 2021 and must be reporting back on 06 December 2022. Reporting report P2K3 PT. KPAS quarter 1 2022 to the Department of Manpower and Transmigration of Kalimantan Timur Province on 26 April 2022. Reporting report P2K3 PT. DSN – POM 7 quarter 1 to the Manpower and Transmigration Office of Kalimantan Timur Province on 26 April 2022. Report on investment activities for the first quarter of 2022 through SPPISE dated April 8, 2022 to the Regional Investment Office 	

of Kutai Timur District with report number 1437914 (PT DSN)

- Report on investment activities for the first quarter of 2022 through SPPISE on 08 April 2022 to the Regional Investment Office of Kutai Timur District with report number 1440516 (PT KPS)
- HGU utilization report to the Kutai Timur District Land Agency for the period 2021 which is reported in March 2022
- Electronic receipt of the UKL-UPL POM 7 Semester 1 2021 Report to the Kutai Timur District Environmental Service on September 24, 2021.
- Electronic receipt of the UKL-UPL POM 7 Semester 2 Year 2021 Report to the Kutai Timur District Environmental Service on 11 February 2022.
- Receipt of the PT KPS Semester I 2021 RKL-RPL Report document to the Kalimantan Timur Provincial Environmental Service, dated August 26, 2021.
- Receipt of PT KPS Semester II 2021 RKL-RPL Report document to the Kalimantan Timur Provincial Environmental Service, dated January 21, 2022.
- Receipt of PT DSN POM 7 Quarter 2 year 2021 Hazardous and Toxic Waste Management Report document to the Kalimantan Timur Provincial Environment Service on 26 August 2021.
- Receipt of PT DSN POM 7 Quarter 2 year 2021 Hazardous and Toxic Materials Management Report document to the Kalimantan Timur Provincial Environmental Service on 26 August 2021.
- Receipt of the POME and Solid Waste Management Report document of PT DSN POM 7 Quarter 2 of 2021 to the Kalimantan Timur Provincial Environment Service on 26 August 2021.
- Receipt of PT DSN POM 7 Quarter 2 2021 Environmental Monitoring Results Report document to the Kalimantan Timur Provincial Environmental Service on 26 August 2021.
- Receipt of PT DSN POM 7's UKL – UPL Report for the first semester of 2021 to the Kalimantan Timur Provincial Environmental Service on 26 August 2021.
- Receipt of the PT DSN POM 7 Quarter 4 year 2021 Hazardous and Toxic Waste Management Report document to the Kalimantan Timur Provincial Environmental Service on January 21, 2022.
- Receipt of the PT DSN POM 7 Hazardous and Toxic Materials Management Report document 7 Quarter 4 of 2021 to the Environmental Service of Kalimantan Timur Province on January 21, 2022.
- Receipt of the POME and Solid Waste Management Report document of PT DSN POM 7 Quarter 4 of 2021 to the Environmental Service of Kalimantan Timur Province on January 21, 2022
- Receipt of PT DSN POM 7 Environmental Monitoring Results Report document for the fourth quarter of 2021 to the Kalimantan Timur Provincial Environmental Service on January 21, 2022.
- Receipt of PT DSN POM 7's Semester II 2021 UKL – UPL Report document to the Kalimantan Timur Provincial Environmental Service on January 21, 2022.
- Receipt of PT KPS Semester II 2021 DPLH Report document to the Environmental Service of Kalimantan Timur Province on January 21, 2022.
- Receipt of PT KPS Semester I 2021 DPLH Report document to the Kalimantan Timur Provincial Environmental Service on 26 August 2021.

Based on the document review, all documents and information which are publicly accessible (mentioned in 1.1.1) are provided in Bahasa and understandable by each stakeholder.

1.1.3

Unit of certification showed SOP of communication and handling external grievance (SOP-AGR-044-R02) validated on 14 October 2019 which explains the PIC of handling information, publicly accessible documents, the flow of handling information requests, and the maximum time limit of responding to the information request. The maximum time limit of responding the information request is 14 days.

UoC had recorded every requested information on a logbook of incoming and outgoing letters. Based on document verification, it was found that during 2021-2022 all incoming letters are requests for funds and meeting invitation. UoC also has responded to the fund request, for example the fund request for tribal council of Miau Baru village on 19 June 2022.

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

1.1.4

UoC also showed the record of the socialization regarding the SOP mentioned in 1.1.1 on 11 December 2021 attended by every stakeholders such as: contractor workers, smallholder workers, and communities. In addition, based on the interviews with the villagers, labor union and gender committee, it is known that they had a good understanding of communication and consultation procedures.

1.1.5

UoC showed the current list of stakeholders which informed the internal and external stakeholders updated on 1 June 2022. The stakeholders include the government agencies, heads of the community, cooperatives, local suppliers, contractors, community organizations, labor union organizations, non-governmental organizations, communities around operational areas, media, etc. In the current list of stakeholders, it was also explained the names, agencies/positions, addresses, categories and contact person numbers.

During the assessment, auditor has verified the list of stakeholder by calling the contact person randomly to ensure the validity of its contact person put in the list of stakeholder.

Status: Comply

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

1.2.1

Unit of certification had a policy concerning on code of integrity and ethical behavior in all operational activities and transactions. This policy stated in the DSN Group quality guideline document No PDM-AGR-R06 validated on 01 January 2020 approved by the Managing Director. It's specifically explained in clause 7.5 regarding Ethical Conduct in all business transactions and operations, stated as follows:

- Every activity must reflect the compliance towards reasonable business practice.
- Prohibit all workers from corruption, bribery and fraudulent use of funds and resources.
- Provide information in accordance with all applicable laws and palm oil industry practices.

The policy describes respect for fair business conduct, prohibition of all forms of corruption, bribery and fraudulent use of funds and resources and appropriate disclosure of information in accordance with applicable regulations and accepted industry practices.

The policy is documented and communicated to all levels of the workforce and operations, including contracted third parties. This is conveyed through socialization. Available dissemination evidence such as attendance lists and pictures. Socialization and communication is carried out in the appropriate language (Indonesian). Interviews with workers proved that they had been disseminated and there were no problems about illegal payments (bribes) when they were recruited.

1.2.2

UoC showed SOPs related to monitor the compliance and implementation of ethical business practices, here as follows:

- SOP of recruitment (No. SOP-AGR-012-R03) validated on 01 December 2019 which stated that there were no cost in recruitment process. The company had guaranteed the cost of recruitment if there were any migrant worker.
- SOP of handling employee grievance (No. SOP-AGR-054-R03) validated on 30 October 2020 which stated that the company guaranteed the freedom of speech by keeping the identity of the employee confidentially.

And for monitor compliance and implementation of policies and overall ethical business practices stated in procedure related to employee grievance at No. SOP-AGR-054-R03 validated on 30 October 2020. Based on the management review and internal audit document, there were no violation against the UoC's ethical codes.

Status: Comply

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

2.1.1

UoC showed evidence of compliance with the regulations that have been set in Indonesia, here are some examples for each aspect:

Manpower Aspect:

- UoC has implemented a minimum wage and the fulfillment of overtime wages

- UoC already has and implements the pay scale structure
- There was no illegal labor, underage labor and forced labor systems.
- All workers were permanent workers.
- Mandatory report of manpower has been reported according to its period.

BMP

Compliance with certification units in the use of pesticides that have been registered with the Pesticide Commission, such as Kleenup (RI Registration Number 0103011989819 which is valid until 03 September 2023) and Metaprima (RI Registration Number 01030120031897 which is valid until 03 September 2023).

OHS

The company has established a P2K3 structure for plantations and factories that have been registered with the relevant agencies. OHS experts in plantations and factories also have certificates and SK OHS Expert from the Minister of Manpower. Appointment of OHS Expert PT. KPAS with SK number 5/1902/AS.02.04/IX/2019 which is valid until September 15, 2022. Application for submission of OHS Expert training PT. DSN-PSK7 with number 003/FPP/DSN-PSK7/VI/2022 on 20 June 2022. Based on document review and interview with the Assistant, it is known UoC have operators with active licenses, for a sampel:

LTE:

- Certificate of operator tractor No. 5/5441/AS.02.00/III/2020 dated March 6, 2020; Lift and transport aircraft OHS license No. 167852-OPK3-LT/PAA/III/2020 valid until March 6 2025.
- Certificate of farm tractor operator certificate No. Ser.13.9435-OPK3-PAA/IX/2013 dated September 2, 2013; Lift and transport aircraft OHS license No. P.13.9435-OPK3-LT/PAA/IX/2018 valid until September 24, 2023.

KM9:

- Certificate of farm tractor operator certificate No. Ser.26500/OPK3/PAA-LT/XI/2018 dated November 23, 2018; Lift and transport aircraft OHS license No. 129935-OPK3-LT/PAA/XI/2018 valid until November 23, 2023.

POM:

- Certificate of Operator of diesel motor class 1 No. Ser.701/OPM.K3/PTP/V/2019 dated 10 May 2019; Aircraft and power production OHS license No 6254/PM/PTP/V/2019 valid until 10 may 2024.
- Certificate of K3 operator of class 1 steam aircraft No Ser.543/OPK3/B.I/V/2019 dated 16 June 2017; Steam operator OHS license No 15102.OPK3-PUBT-B.I/V/2019 valid until 10 May 2024.

Doctor:

- Doctor's practice license no. 503/028/DPMPTSP-PPNP/SDMNAKES-SIPD/IV/2022 and Doctor Registration Certificate No. 3111100421006461 on behalf of SS which is valid until January 1, 2027
- Doctor's practice license No. 4503/104/DPMPTSP-PPNP/SDMNAKES-SIPD/X/2019 which is valid until October 2022 and Doctor's Registration Certificate No. 1811100221165364 on behalf of THB which is valid until 28 December 2026

Legal Aspect

The company has HGU of 504.50 Ha for Long Teman Estate, HGB of 2.80 Ha for POM 7 and SHM of 800 Ha for KM9. In addition, it has a Plantation Business Permit for POM 7 with a capacity of 60 Tons FFB/Hour and a Plantation Business Permit for PT KPS covering an area of \pm 5,000 Ha.

Environmental aspect, for example:

- Extension of permit for temporary storage of hazardous and toxic waste. The company can show the Decree of the Kutai Timur Regent Number: 503/09/DPMPTSP-PPNP/TPS-LB3/IV/2021 regarding the extension of the permit for the temporary storage of PT KPAS hazardous and toxic waste in Kongbeng Sub District, Kutai Timur District on 26 April 2021 with validity period of 5 years.
- Granting permits for temporary storage of hazardous and toxic waste. The company can show the Decree of the Regent of Kutai Timur Number: 660/K.503/2017 regarding the granting of a permit for temporary storage of hazardous and toxic waste to PT DSN POM 7 in Miau Baru Village, Kongbeng Sub District, Kutai Timur District on July 4, 2017 with validity period of 5 years.
- Kutai Timur Regent Decree about Environmental Permit number 660.5/K.188/2015 dated 19 March 2015 with area \pm 2,563 Hectare, on Miau Baru Village, Kongbeng Sub District, Kutai Timur District, Kalimantan Timur Province.
- Environment License from Indonesia Government with number 8120002900875 dated 19 March 2015 with area 6,109 Hectare, on Miau Baru Village, Kongbeng Sub District and Kutai Timur District, Kalimantan Timur Province.

- District of Kutai Timur District Investment and One Stop Service Decree Number 503/09/DPMPTSP-PPNP/REK.UKL-UPL/V/2019 dated 14 May 2019 about Recommendation of Environment Management and Monitoring Plan (UKL-UPL) for Palm Oil Mill 7 with capacity 60 MT/hours on the area \pm 40 Hectare PT Dharma Satya Nusantara, Tbk (PT DSN) on Miau Baru Village, Kongbeng Sub District and Kutai Timur District, Kalimantan Timur Province.
- Office of Investment and One Stop Services District of Kutai Timur Decree Number 503/10/DPMPTSP-PPNP/L.A/IV/2020 dated 15 April 2020 about Extension of Land Application License from POM 7 PT DSN to the land of PT Karya Prima Agro Sejahtera (PT KPAS) on Kongbeng Sub District, Kutai Timur District. Validity period for 5 years with area 3344.67 Ha, Block L48, L49, L50, L50A, L51A, L51B, L52B, L52C, M47, M48, M50A, M51A, M52, M52A, M52B, M53, M54, M55, N33, N34A, N40A, N40, N42A, N44A, N44B, N44C, N45, N46, N47, and M49A with volume of effluent: 157,500 m³/years.
- Technical Approval for Utilization of Wastewater for Application to Soil from the Environmental Service of Kutai Timur District, number 660/1940/5-DLH/XII/2021, 20 December 2021, with 30 points and locations for the use of wastewater namely
- Public Works and Public Housing Minister Decree number 767/KPTS/M/2017 dated 2 October 2017 about surface water utilization for PT DSN in Wahau River. Water utilization with volume: 45,036 m³/month; the water intake coordinate is 01° 16' 53.58" N and 116° 54' 28.8" E. validity period of this license is 5 years.
- Environmental Management Document (DPLH) for the Cooperative Karya Sejahtera Cooperative Palm Oil Plantation in partnership with PT KPAS covering an area of 2,100 hectares, located in Miau Baru Village, Kongbeng Sub District, Kutai Timur District, Kalimantan Timur Province, 2011.
- Ratified by the Head of the Environmental Agency of Kutai Timur District, September 22, 2011, number 660/1204/3-BLH/IX/2011.

2.1.2

The mechanism to ensure the updating of any changes to legal regulations is stated in the SOP document for legal identification and other legal requirements, document no. SOP-AGR-024-R01 issued September 8, 2014. In this procedure, it is explained that updating of regulations is carried out every 6 months.

The unit of certification has a list of legal regulations contained in the Summary and Review of Conformity with Regulations and Legislations and Other Requirements. The regulations cover aspects of agribusiness, employment, environment, and other regulations related to the company operational activities i.e:

- PP No. 35 of 2021 concerning Specific Time Work Agreements, outsourcing, working hours, rest periods, and layoffs
- PP No 36 of 2021 concerning Wages
- PP No 37 of 2021 concerning Job Loss Guarantee
- PermenLHK Number P.12 of 2020 concerning Storage of Hazardous and Toxic Waste
- Regulation of the Minister of Manpower number 4 of 2022 concerning payment procedures and terms for "*Jaminan Hari Tua*"

Evaluation of law registers for contractors is explained in more detail in 2.2.2. In addition, an internal RSPO audit has also been carried out to ensure contractor compliance with regulations on August 2021

2.1.3

Procedure of legal boundary pole monitoring and maintenance is presented in document No. IK-AGR-OLP-33-R01 dated 1 February 2019. Procedure mentioned that maintenance was carried out by officer appointed by Plantation Head. Monitoring the boundaries of the HGU is carried out every 6 months. Based on the field observation to HGU pole No. 3, 4 and 5 blocks E58, E59. And E60 KM9 and HGU pole KPAS1086, KPAS 1039, and KPAS 010 are known HGU pole are in good condition according to what is written in the monitoring results.

Status: Comply

2.2

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

2.2.1

In monitoring the existence of contractors for plantation and mill activities, UoC had well-documented the list of contractors, type of business, contact persons, work agreements, and ensuring other matters related to compliance with laws and regulations in Indonesia. The contractors collaborate in the activities of operational vehicles rental such as CPO and FFB transport, kernel transport, operational transport, etc, here as follows:

- DSN POM 7: In cooperation with 26 contractors, for instance namely CV Anugrah Mulia Abadi, PT Roni Putra Abadi, and CV Three Putra.

- Kemitraan 9 Estate: In cooperation with 5 contractors, for instance namely CV Bahtera Mandiri and PT Nova Bersaudara Jaya.
- Long Teman Estate: In cooperation with 3 contractors, for instance namely Koperasi Kongbeng Lestari and Furkani.

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

- Work Agreement of CV Anugrah Mulia Abadi (No. 003/DSN/DIS/2022) for CPO transport in POM 7 dated on 1 January 2022 which is valid for a year (1 January 2022 to 31 December 2022).
- Work Agreement of CV Bahtera Mandiri (No. 005/KPS/KM9/2022) for FFB transport in Kemitraan 9 Estate dated on 1 January 2022 which is valid for a year (1 January 2022 to 31 December 2022).
- Work Agreement of PT Roni Putra Abadi (No. 014/DSN/DIS/2022) for CPO transport in POM 7 dated on 1 January 2022 which is valid for a year (1 January 2022 to 31 December 2022).

The contractor list has been in-line with the information in stakeholder list. Auditor has verified by calling the contractor by the contact number put in stakeholder list. The explanation above can be concluded that the UoC has managed and documented the list of contractors along with its supporting documents.

2.2.2

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

Regarding the non-conformity in Initial Certification, UoC has carried out an evaluation of each contractor to see the performance of the contractors and the compliance of the contractors to the existing regulation, for example the evaluation of CV Anugrah Mulia Abadi and PT Roni Putra Abadi period of 2021. There were several important indicators in the evaluation including work quality, punctuality, respond of the grievance, vehicle monthly service, and compliance with regulations and laws (BPJS, provision of minimum wages, implementation of OHS, and work equipment).

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

- Proof of payment of wages period of May 2022 for CV Anugrah Mulia Abadi workers in POM 7 on behalf of TM and NN (initial) who received wages above the minimum wage.
- BPJS (Social Security Insurance) payments for all contractor workers in POM 7, have been completely fulfilled and the last proof of payment is on 7 June 2022 for period of May 2022.

Based on the interview, it's known that the UoC paid for contractor workers' social security insurance but the contractor refused to register their workers in social health insurance. UoC then showed the record of their meeting regarding the socialization of the mandatory to register the contractor workers' in social health insurance on 13 December 2019 which was attended by the representative of BPJS Kesehatan in Kutai Timur District and all contractors in PT. DSN and PT. KPAS. The result of this meeting was the contractor refused to register their workers in social health insurance due to all contractor worker's already registered in social health insurance independently.

2.2.3

UoC showed that on each work agreement between the unit of certification and the contractor, there were clauses related to fulfilling legal obligations in Indonesia as one of the obligations that must be fulfilled by the contractors. Some of these obligations are related to UoC's commitment against forced labour, underage worker, and not to employ workers from human trafficking. To ensure compliance with these clauses, the company always requests the requirements for the completeness before the contractor does work.

UoC also showed the socialization records of UoC's policies and commitment against forced labour, underage worker, and company's ethical codes for example which was held on 14 March 2022 attended by 5 contractor workers. Based on the document review and the field observation, it revealed that there were no workers under the age of 18 and the work provided was in accordance with the

agreement when the initial worker worked.

Based on the interviews with contractor, contractor workers, and documents verification, it revealed that they had a good understanding related to the minimum age of worker, the prohibition of forced labor and the human trafficking.

Status: Comply

2.3

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

2.3.1 and 2.3.2

Based on the recap of POM 7 FFB receipts for the period 2021 and 2022, it is known that the factory processes FFB from both direct and indirect suppliers with the following details:

- FFB direct supplier :
 - Koperasi Semoga Sawit Wahau Jaya
 - Koperasi Usaha Tani Lestari
 - Koperasi Karya Prima Wehea Sejahtera
 - KSU Harapan Baru (Muara Wahau)
 - KSU Seleq Sejahtera Bersama (Miau Baru)
 - Koperasi Karya Sejahtera
 - Koperasi Usaha Tani Sejahtera (Long Bau)
 - KSU Kel'Ean Blom Kejah (Nehes Liah Bing)
- FFB indirect supplier :
 - PT Roni Putra Abadi
 - CV Three Putra
 - PT Berau Karetindo Lestari
 - PT Wejas Immanuel
 - PT Tepian Borneo Sejahtera
 - CV Nitirotha Perintis
 - Koperasi Jasa Daun Hijau (Miau Baru)

The identity of the direct or indirect FFB suppliers has been shown, for example the direct FFB suppliers of the Sawit Usaha Tani Sejahtera Cooperative with 139 members and an area of 389.20 Ha located in Long Bau Hamlet, Nehes Liah Bing Village, Muara Wahau District.

Meanwhile, for indirect FFB suppliers, for example, CV Three Putra already has a list of farmers supplying 49 plots of land. The information listed includes the following:

1. Farmer name : Miraldus Nainggolan 1
Village : Tepian Baru
Coordinates : 0°46.7520'N; 117°14.9720'E; 2009 planting year
2. Name of farmer : Mr. Anton (Ex Mr. Mamin)
Village : Tepian Langsat SP2
Coordinates : 0°42.2810'N; 117°17.1710'E

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

Certification Unit has shown Projections, Work Plans and Budgets for 2022 - 2026. The parameters listed in the management plan include income and income, projected crop production (FFB yield trends), CPO and PK extraction rates (Estimated production up to 2026), harvest, FFB and CPO processing. The information in the document consists of the Plantation's operational activities and budget plans (land clearing, planting, maintenance and harvesting), as well as POM 7 (FFB) operations. Process, OER, KER, CPO & PK Produced and FFA), sales projections, CSR programs, and environmental programs. For example, projections for 2024,

processed FFB 306,000 tons, CPO 72,376 tons, kernels 4.50%, FFA 2.6%, plantation budget 72.445 billion, POM 7 budget 678.499 billion, projected revenue 944,459 billion, net balance 161.563 billion.

The company shown the system/MOM to improve practices in line with new information and techniques through continuous improvement. All staff can propose continuous improvement. Continuous improvement is communicated to all unit management. Minutes of Meeting (MoM) Performance Review Q1 2022

3.1.2

The replanting plan will be evaluated for implementation in a Business Progress Report which is prepared annually. The rejuvenation program was evaluated based on SOP No. AA-APM-OP-1100.20-R8 by considering crop production, company finances, plant height and plant population. Based on field observations and interviews, it is known that autumn has never happened. conducted. The management representative explained that the yield/ha is still high at an average of 26.8 tons/ha in 2020 and 24.5 tons/ha in 2021. This has become management's consideration for delaying replanting.

3.1.3

Certificate Unit explained the evaluation related to the Business Plan has been carried out every 3 months. He showed the Minutes of the Q1 Performance Review Meeting which was held on 21-22 April 2022 through a virtual Googlemeet, which was attended by the Regional Head, Plantation Head, Plantation Head, Factory Head, Replanting Team, Engineering, Sustainability, Project, and CSR. The document discusses problems in each PT/unit, PIC, related parties, follow-up, and types of discussion. Some of the issues discussed included company costs, factory performance, losses, increasing FFB quality and quantity, peak season, project costs, and replanting.

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 has monitored and reviewed their performance and taken actions of continuous improvement towards worker welfare aspects, here as follows:

- Unit of certification committed to improving work efficiency and improving the workers' quality by giving training and identify each worker training needs.
- Unit of certification committed to provide complaints report that is filled out by internal and external parties if they have any complaint against the company.
- Unit of certification committed to provide rules and regulations that are always updated if there were any updates, such as worker minimum wage based on the stipulation of minimum wages by the Governor of Kalimantan Timur and other labor regulations.
- Unit of certification facilitates workers with adequate housing, electricity facilities, and availability of clean water in every publicly available housing.
- Unit of certification is also committed to avoiding acts of discrimination, sexual harassment, child labor, or acts of human rights violations in the work environment by giving socialization and provide grievance mechanism of any discrimination and sexual harassment.
- Unit of certification committed to provide worker's welfare by giving rice supply allowance each working days excluding the monthly basic wage.
- Unit of certification committed no longer uses pesticides with the active ingredient paraquat, with a memorandum on the prohibition of the use of paraquat number 001/S&I/I/2020 since January 14, 2020.
- Unit of certification committed has implemented biological pest control in this case by using host plants and owls to reduce the use of pesticides, especially insecticides and rodenticides, by showing owl monitoring maps in almost all LTE and KM 9 plantation blocks.
- Unit of certification committed to monitoring of fires in the company's border areas that are beneficial to the community.

3.2.2

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

- Name of RSPO Member: PT Dharma Satya Nusantara
- RSPO Membership Number: 1-0135-12-000-00

- Name of Certified Audit: PT Dharma Satya Nusantara (POM 7)
- Name of Certification Body: PT Mutu Agung Lestari
- RSPO Palm Trace ID Number: RSPO_PO100001024
- Supply Chain model: Mess Balance (MB)
- Number of Mill: 1
- Number of Certified Estate: 2
- HCV Area: 2.20 Ha.

The company shows the RSPO Metric Template on the last day of the audit. Based on the Guidance For the 2018 RSPO Principles and Criteria Metric Template it is explained that "The Metric Template needs to be filled out by the Certification Unit before carrying out RSPO certification, Recertification, and annual supervisory audits". Thus, the certification unit has the opportunity to re-assure the delivery time of the metric template to the Certification Body. (OFI).

Status: Comply

3.3

Operating procedures are appropriately documented, consistently implemented and monitored.

3.3.1

From the list of SOPs provided by the company and employee interviews, there were no changes to the SOPs. All these management procedures are available in each office and documented in Indonesian. The procedure has been periodically disseminated to all employees of the plantation and mill through routine training and morning briefings. Interviews with employees showed a satisfactory level of understanding and implementation in relation to their respective job functions.

Representatives of the certification holder have demonstrated that the operating procedures, set out in the Work Instructions (WI), are well documented, consistently implemented and monitored. The Work Instruction has covered all operations of the Plantation, starting from land clearing, maintenance, pest management, harvesting, FFB transportation, replanting, delivery to the POM. Meanwhile, the Factory Work Instructions cover aspects of FFB acceptance, grading, processing, purification, delivery, supply chain, and quality/laboratory. Each Work Instruction includes OHS and environmental aspects. However, there are also special documents that regulate OHS and the environment in the Safety and Environmental Management Work Instructions, as well as Hazard Identification Risk Assessment and Control (HIRAC).

Based on field observations, samples of plantation operations were taken during the harvesting process at Block E59 KM9, Block E19 LTE and spraying pesticides at Block D20 LTE. The operation of the POM 7 mill is carried out starting from the loading ramp to the delivery of CPO including the supporting processes, eg. grading, boiler and Kernel. It can be seen that all activities have been carried out according to procedures.

3.3.2

The company has a system that ensures consistency in the implementation of its SOP such as a check or inspection of the quality of work (operational audit of plantations and mills), ISPO and RSPO internal audits that check whether procedures in the company have been implemented by the company unit and financial audits carried out by external parties to ensure the usage or fees used are in accordance with the rules set by the company. Daily internal supervision is carried out by the supervisory level starting from the Foreman, Division Assistant, Assistant Head, to the Plantation Manager. Operational audits are conducted once a month. Operational audits evaluate the operational and administrative performance of plantations and mills. Meanwhile, the RSPO internal audit is conducted every 6 months to evaluate the implementation of sustainability procedures in plantations and mills. Public accountant financial audit is conducted once a year. Furthermore, management representatives (related Assistants, Managers and Bosses) regularly make inspectorate visits to control the implementation of procedures

3.3.3

The company shows the documents of the results of the internal audit for the plantation (Mill and LTE) unit which was carried out on February 10 – 13 August 2021, while for the KM9 it was carried out on March 23 – 25 August 2021 by the internal auditor. Based on the audit results, it is known that there are several findings where these findings have been followed up and declared fulfilled by the internal auditor. The unit certification has also conducted evaluation of contractor performance to compliance with CH procedure before the payment. The contract payment will be conducted after *Berita Acara Pemeriksaan Pekerjaan*.

Based on field observations and interviews with harvesting supervisors show that they also record all operational activities in the

Supervisor Daily Report and submit these reports every day. Daily reports describe the type of work, number of workers, use of materials, and individual employee achievements. Furthermore, all company operational activities are recorded in the form of Monthly Reports for oil palm plantations and mills. The operational activity report is a recap of daily activities. The evaluation mechanism for all operational activities, both plantations and mills, is carried out by managers.

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 & 3.4.2

There is no additional scope of certification carried out by the company. The company has several documents related to social and environmental impact studies that are carried out independently and participatively by involving affected stakeholders. Some of the documents owned by the company include:

Environmental Aspect

POM 7 already has environmental documents in the form of UKL/UPL for the construction of a palm oil mill with a capacity of 60 tons of FFB/hour in Miau Baru Village, Kongbeng District, Kutai Timur District. This environmental document has been approved by the Investment and One Stop Service Office of Kutai Timur District on May 14, 2019 under Number 503/09/DPMPSTP-PPNP/REK.UKL-UPL/V/2019.

AMDAL document with a scope in accordance with the Decree of the Regent of Kutai Timur Number: 188.4.45/514/HK/2008 dated 17 October 2008 concerning the Granting of Location Permits for the development of an oil palm plantation of PT KPAS covering an area of ± 5,000 hectares located in Miau Baru Village, Kongbeng Sub District, Kutai Timur District with the construction of a palm oil plantation and mill with a capacity of 30 Ton FFB/Hour.

Environmental Management Document (DPLH) for Oil Palm Plantation Activities of Karya Sejahtera Cooperative Partnering with PT KPAS covering an area of 2,100 hectares, located in Miau Baru Village, Kongbeng Sub District, Kutai Timur District, Kalimantan Timur Province, 2011.

Ratified by the Head of the Environmental Agency of Kutai Timur District, September 22, 2011, number 660/1204/3-BLH/IX/2011.

Based on document verification, it is known that the scope of the environmental impact assessment has covered all the plantations that are the scope of certification. In addition, the location of the factory and the processing capacity of the factory have been included and are in accordance with the scope of the study of the environmental documents owned.

Social Aspect

The Social Impact Assessment Report was prepared in June 2013, the assessment was carried out in a participatory manner involving internal and external stakeholders on 22-24 May 2013. The study area was Miau Baru and Nehas Lias Bing villages with a focus on social impacts as follows: Population relocation and land acquisition, access to resources, risk of accidents and health, community perception, employment opportunities, marginalization of minor groups, social conflicts, increased income, increased capacity of human resources, organizational strengthening, changes in environmental habits.

The document has explained the social impacts that must be monitored and managed, consisting of: Land Clearing and Acquisition, Accident Risks and Health, Public Perceptions, Public Health, Employment, Marginalization of Minor Groups, Social Conflicts, Increased Income, Capacity Building for Human Resources, Organizational Strengthening, Changing Habits and the Environment, and Development of Plasma plantations.

The unit of certification shows documentation of meetings with stakeholders consisting of community representatives, formal leaders (village heads) and informal leaders (community leaders and customary heads). The documentation includes: Attendance list for social impact discussion on 22 May 2013 which was attended by 18 people from Miau Baru Village, 23 May 2013 which was attended by 22 people from Long Sep Hamlet, Miau Baru Village, 23 May 2013 which was attended by 17 residents of Nehes Liah Bing Village, on 22 May 2013 was attended by 9 residents of Long Ba Hamlet, Nehes Village, Liah Bing.

Based on the Review of Social Impact Management Program 1 – 2 January 2021, it is known that social impacts are still relevant.

3.4.3**Environmental Aspect****PT KPAS**

The company has implemented an environmental management and monitoring plan for the 1st and 2nd semesters of 2021. The environmental management and monitoring plan is in accordance with its environmental documents. The results of the verification of the implementation of the environmental management and monitoring plan for semesters 1 and 2 of 2021 are in accordance with the directions of the environmental documents owned. In general, the results of environmental management and monitoring are in accordance with the provisions. The company has also conducted evaluations such as trend evaluation, critical level evaluation and compliance level evaluation. In environmental management, it is also stated that PT. KPAS will use fertilizers according to the dose, minimize the use of pesticides with IPM, use pesticides registered according to the green book of the ministry of agriculture, send hazardous waste to licensed hazardous waste temporary warehouse, not wash sprayers in river bodies and report the types of pesticides used.

Activities that have been running in plantation operations to reduce the burden of pollution are riverbank areas of several palm trees which are directly adjacent to the application of herbicides and fertilization.

POM 7

The company has implemented an environmental management and monitoring plan for the 1st and 2nd semesters of 2021. The environmental management and monitoring plan is in accordance with its environmental documents. The results of the verification of the implementation of the environmental management and monitoring plan for semesters 1 and 2 of 2021 are in accordance with the directions of the environmental documents owned. In general, the results of environmental management and monitoring are in accordance with the provisions. The company has also conducted evaluations such as trend evaluation, critical level evaluation, and compliance evaluation.

Based on the results of environmental monitoring, for example those conducted on 17 May 2021 and 14 July 2021, it is known that there are no discrepancies arising from the monitoring results, for example in the Pesab river border area there are no illegal logging activities, hunting disturbances and no disturbances in conservation attributes.

Social Aspect

The company has implemented the SIA management and monitoring plan (Social Management Plan and Social Monitoring Plan) for the period 2021 (by Kaltim Area 1 CSR). The implementation is carried out as follows:

- Land clearing and acquisition
- Accident and health risks
- Public perception by transparently informing the partnership agreement or company assistance through letters and other documents.
- Public health by providing treatment for the community
- Jobs
- Marginalization of minor groups
- Social conflict
- Increased revenue
- Human resource capacity building
- Organizational strengthening
- Changes in habits and environment
- Development of plasma plantations.

From the document monitoring the progress of PT KPAS's social impact management plan for 2021, the Company has managed social impacts in accordance with the predetermined plan.

Regarding the implementation results in 2021 and the social impact management plan for 2022, the company has carried out a joint review with the community as indicated by the Minutes of Public Consultation Review on the Implementation of Management and Monitoring of Social Impacts (review of SIA in 2021) on December 28, 2021. This event was attended by several community representatives (Muspika Muara Wahau & Kongbeng Sub District, Village Apparatus, Head of BPD, Customary Chair and Management of Partner Cooperatives and other Stakeholders) from Benhes Village, Deabeq, Diak Lay, Muara Wahau, Nehas Liah Bing, Jabdan, Long Bau, Longsep, Wanasari, Wahau Baru, Miau Baru and Karya Bakti Villages.

Based on the implementation of these activities, it is known that the response from the community is more about handling complaints in the field and suggestions for companies to continue to improve communication procedures based on the results of implementation in the field.

The community accepts the realization of the SIA for the 2021 period and the RKS-RPS for the SIA program for the 2022 period with input on continuing the partnership program that is already running and training for partner/self-help smallholders.

Status: Comply

3.5

A system for managing human resources is in place.

3.5.1

UoC had procedures related to recruitment, appraisal, promotion, remuneration, and termination of employment which are generally described in the Company Regulation period of 2022 to 2024 written in *Bahasa*. The company regulation in PT. DSN and PT. KPAS has been registered in manpower agency of Kalimantan Timur for example by decree No. KEP.560/1138/B.PHI&JAMSOSTEK/2022. In general, these procedures describe:

- Recruitment of workers is based on the company's needs.
- The minimum age of workers is 18 years old.
- The workers who have been accepted will through three months of probation.
- Promotion of workers is based on needs, period of work, expertise, and assessment of workers for the last 6 months.
- The company is authorized to carry out the placement, transfer, and promotion of workers by applicable regulations.

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

- SOP No. SOP-AGR-012-R03 dated on 01 December 2019 concerning on Recruitment.
- SOP No. SOP-AGR-014-R00 dated on 15 February 2013 concerning on Worker's Appraisal.
- SOP No. SOP-AGR-017-R01 dated on 19 October 2015 concerning on Worker's Promotion and Mutation.
- SOP No. SOP-AGR-013-R00 dated on 15 February 2013 concerning on Worker's Placement and Orientation

Based on the interviews with workers (harvesters, pesticide sprayers, and mill operators), workers had a sufficient understanding of the procedures related to recruitment, promotion, and termination of employment. The types of workers exist in the company are permanent workers in probation and permanent workers. Workers explained that the recruitment process carried out by the company was in accordance with the terms according to ability, promotion is based on an assessment of the performance of each employee each year, and termination of employment can occur if the worker has committed a serious violation and other causes of termination as in existing government regulation. All labor procedures has been in accordance with the applicable regulation.

3.5.2

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

- Recruitment document in accordance with the recruitment requirements such as employment request form, application letter, statement of police report, identity card (KTP), family identity card (KK), the result of written test, the result of interview test, the result of medical test, employee candidate statement letter, and work agreement letter. For example, a worker on behalf of RS (initial) who started working with three months of probation on 7 February 2022 and had been promoted as a permanent worker on 6 May 2022.
- Promotion documents such as management decree for worker's promotion. For example, a worker on behalf of IW (initial) who had a promotion based on worker's appraisal, from 3 months probation worker to permanent worker as the personalia clerk on 7 May 2022.

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

Status: Comply

3.6

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

3.6.1

Unit certification unit has also established a procedure for mitigating K3L DSN Group problems with the number SOP-AGR-037-R01 dated November 01, 2013, the procedure includes risk identification, risk assessment and control in the risk assessment matrix, safety induction/orientation, OHS inspection schedule, initial accident and non-conformance reports, investigations, accident and incident reports, work permits, etc.

The certificate unit has also carried out a risk assessment to identify Occupational Health & Safety issues for PT. KPAS and PT DSN (POM 7). The document contains identification of each type of activity, source of hazard, risk/impact, risk assessment, operational control, type of control, and risk evaluation. This assessment covers all hazards and risks in the plantation, such as land clearing, manual plant care, plant pests and diseases, harvesting and transportation, mechanical harvesting, FFB transport by grabber, manual fertilization, mechanical fertilization, pesticide application, land application, etc.

Risk Assessment for each type of work is well defined and documented by the company. As a sample:

- Hazard identification & Risk Assessment and Control (HIRAC) Estate (LTE and KM9 Estate): Harvesting, Spraying, Selective Weeding, Fertilizing, Workshop, Monitoring, Storage, WTP, etc updated on 21 January 2022
- Hazard Identification & Risk Assessment and Control (HIRAC) Factory Covering Activities at POM 7 Parking FFB, WB, Grading, Loading Ramp, Sterilizer, Tripler, Press, Press, Boiler, etc. updated on January 21, 2022

Based on field observations and interviews with pesticide workers, and operators at POM 7, it is known that the officers have understood the potential work risks and how to minimize these risks.

3.6.2

Based on employee verification and interviews, that there is no change in either the SOP and the Policy. The company has an OHS policy which was established on December 1, 2010 by CE AGRO in Jakarta. The company also pointed out the procedures for Occupational Safety and Health and the Environment (K3L) of the Group DSN (SOP-AGR-037-R01) dated November 1, 2013 which was approved by the Executive Director of SBU Agro I.

Unit certification has established a P2K3 organization with a management structure that has been approved by the Department of Manpower and Transmigration of Kalimantan Timur Province in accordance with Decree no. KEP.566/158/P2K3/PPK/DTKT/2022 dated April 19, 2022 for PT. KPAS and No. KEEP. 566/2669/P2K3/PPK/DTKT/2021 dated November 10, 2021.

Unit certification shows the hazard identification document and estate risk assessment and POM 7 prepared by the OHS Expert. The document describes the type of activity, identification of hazards, risks/impacts, conditions, risk assessment, risk control, and information. The company also directs regular general and special examinations conducted by company doctors in June 2021, March 2022 and April 2022. Unit certification has reporting of the OHS program in the P2K3 report that has been reported by the Department of Manpower and Transmigration of Kalimantan Timur Province, both for estate and mill periode 2022.

Status: Comply

3.7

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

3.7.1 and 3.7.2

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

- Training of water treatment for WTP officers in mill.
- Training of light and heavy equipment maintenance for electrical and maintenance assistant in mill.
- Training of first aid for all foremen, clerks, mechanic workers, and security officers.

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

- Training of handling hazardous waste in KM 9 Estate which was held on 18 February 2022 attended by 3 participants consisting of genset operators.
- Training of child care in KM 9 which was held on 5 to 6 April 2022 which was attended by 4 daycare workers.

- Training of negotiation skill and mediation for CSR Department which was held on 17 March 2022 which was attended by security officers.

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

3.7.3

The company showed footage of the product traceability training that was held on April 26, 2022, with participants from grading officers, weighing clerks, security guards, and laboratory officers. Based on the results of interviews with POM 7, it is known that workers have been able to explain their job responsibilities well and know about how to record certified and uncertified FFB

Status: Comply

3.8

Supply Chain Requirements for Mills

3.8.1 and 3.8.2

Based on the field observation to POM 7, the results of a review of FFB receipt documents, and interviews with officers receiving FFB, it is known that the sources of fruit processed by POM 7 are from certified areas and non-certified areas so that the module used is Mass Balance.

3.8.3

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

Product	Estimate Production period of 02 July 2021 – 01 October 2022	Actual Production (MT) of previous audit July 2021 – May 2022	Estimate Production of 12 month (MT) further
FFB	82,909	54,014.87	56,800
CSPO	18,216	10,759.06	12,000
CSPK	3,291	1,867.90	2,500

*Production estimation based on actual achievements 12 months before audit activities are carried out (June 2021 – May 2022)

3.8.4

POM 7 has registered in RSPO IT platform for license period (10 August 2020 – 09 August 2022) with information i.e :

License ID : CB121744
 Member Name : Dharma Satya Nusantara_PKS7
 Member ID : RSPO_PO1000010240
 RSPO Membership Number : 1-0135-12-000-00 (PT Dharma Satya Nusantara)
 Issued On : 11/07/2021
 Issued By : PT Mutuagung Lestari
 Start Date : 02/07/2021
 End Date : 01/10/2022

3.8.5

The Mill has had procedures related supply chain, such as Work Instruction of Traceability of CPO, PK and PKO in MB Model (No. IK-AGR-MS-04-R12 dated 1 March 2021). These procedures have referred to the latest RSPO Supply Chain System. The procedure has covered all aspects in SCCS MB model, such as receiving and recording that identify the traceability of RSPO certified and uncertified source and products, FFB processing, the announcement in RSPO Palmtrace, key persons such as security, weight bridge clerk, dispatch/kernel officer, production clerk, Administration Head, as well as the training. Based on interviews in POM 7 note that the weightbridge operators understands the supply chain management system. It also known that training and refreshment (awareness) of supply chain management system were carried out annually.

3.8.6

The procedure for internal audit for SCCS mentioned in Work Instruction of Traceability of CPO, PK and PKO in MB Model (No. IK-

AGR-MS-04-R12 dated 1 March 2021). Based on that procedure internal audit carry out minimum once a year. Based on document review, the company show the record evidence regarding internal audit of RSPO SCCS that conducted on August 23, 2021. Based on result of internal audit, there is no non conformity regarding SCCS indicators and complied with RSPO Supply Chain requirements for mills and the RSPO Rules on Market Communications and Claims. Management Review of RSPO SCCS implementation conducted on 28 August 2021. The management review discussion has covered the input from internal audit result, correction and corrective action, process performa and product compliance, follow up of previous management review, and recommendation for improvement.

3.8.7

POM 7 has maintain the record of FFB and its product shown as follows :

Product	Estimate Production period of 02 July 2021 – 01 October 2022	Actual Production (MT) of previous audit (July 2021 - May 2022)
FFB	82,909	54,014.87
CSPO	18,216	10,759.06
CSPK	3,291	1,867.90

Based on the table above, it is known that there has been no overproduction between the license quota and the actual production.

In the SCCS manual it is mentioned that the handling of nonconforming products is as follows:

- If the validity of the certificate has expired, the Commercial Dept. The head will clarify the certificate owner, and if there is no proof of extension of the validity period, then the product is treated as a non-Certified product
- Regarding external FFB products if the quality of the products sent is below the standard that has been determined, then the provisions of deductions (fines) for external FFB refer to IK-AGR-LAB-01 regarding grading.

3.8.8

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

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

Based on document verification and interview with management representative obtained information in last 10 months before audit (July 2021 – May 2022) it was known if the certified product sold under RSPO as described in the table below :

	Dispatch period (MT)
	July 2021 – May 2022 Total
CSPO sold under RSPO Scheme	10,697.79
CSPO sold under other scheme	-
CSPO sold as conventional	-
CSPK sold under RSPO Scheme	-
CSPK sold under other scheme	-
CSPK sold as conventional	1,854.71

Product	Estimate Production period of 02 July 2021 – 01 October 2022	Actual Production (MT) of previous audit (July 2021 - May 2022)
FFB	82,909	54,014.87
CSPO	18,216	10,759.06
CSPK	3,291	1,867.90

Based on the data, there is no over sales of certified products or any non-certified products that are claimed to be certified products.

3.8.9

The outsourcing activity carried out is in the field of transporting CPO and PK to KCP belonging to the group of companies. The Cooperation Association has been stated in the work agreement letter, which is shown in the following documents:

- Work Agreement of CV Anugrah Mulia Abadi (No. 003/DSN/DIS/2022) for CPO transport in POM 7 dated on 1 January 2022 which is valid for a year (1 January 2022 to 31 December 2022).
- Work Agreement of PT Roni Putra Abadi (No. 014/DSN/DIS/2022) for CPO transport in POM 7 dated on 1 January 2022 which is valid for a year (1 January 2022 to 31 December 2022).

In article 4 point R both agreements have stated the willingness of third parties to provide full access to CB in the event that an audit is required.

3.8.10

Based on the document review, it is known that there are 2 third parties who collaborate for handling kernels and 20 third parties as CPO transporters. The company has shown detailed information for each of these third parties, for example for the PT Trans Tri Jaya CPO transporter No SPK 018/DSN/DIS/2022 agreement period 01 January – 31 December 2022 and Jordan Irang as the party handling the kernel with No SPK 013/DSN /KCP/2022

3.8.11

Based on the document review and interviews with management representatives, it was found that there were no additional contractors from the previous assessment

3.8.12

POM 7 has record of all Certified FFB, CSPO and CSPK as presented in the table below :

FFB

FFB production (July 2021 – May 2022) : 45,060.12 MT

CSPO

Period	CPO production (MT)		Total	Cert CPO Dispatch (MT)			Total	Stok CPO	
	Cert	Non Cert		RSPO	Other scheme	Non Cert		Certified	Non Certified
Jul 21 – May 22	10,759.07	51,489.56	62,248.64	10,697.79	-	51,384.58	62,082.36	61.29	104.99

CSPK

Period	PK production (MT)		Total	Cert PK Dispatch (MT)			Total	Stok PK	
	Cert	Non Cert		RSPO	Other scheme	Non Cert		Certified	Non Cert
Jul 21 – May 22	1,867.91	8,970.39	10,838.31	1,854.71	-	8,827.06	10,681.77	13.20	143.33

Based on the data above, it can be seen that the production of certified products is more than sales so that the stock is in a positive condition

3.8.13; 3.8.14; 3.8.15

The conversion rate of production of CPO (OER) and PK (KER) were based on actual production. Then the management will monitor if the rate reasonable. Based on production data 12 months previous audit the certified products average OER is 23.81 %, while KER is 4.13 %.

3.8.16

Based on document verification and interview with management representative obtained information in last 10 months before audit (July 2021 – May 2022) it was known if the certified product sold under RSPO as described in the table below :

	Dispatch period (MT)
	July 2021 – May 2022 Total
CSPK sold under RSPO Scheme	10,697.79

CSPO sold under other scheme	-
CSPO sold as conventional	-
CSPK sold under RSPO Scheme	-
CSPK sold under other scheme	-
CSPK sold as conventional	1,854.71

Examples of shipping documentation among them for Transaction ID: TR-e810ef45-89f8 are as follows:

- Seller member name : Dharma Satya Nusantara_PKS7
- Buyer member name : PT Dharma Satya Nusantara, Tbk (Kernel Crushing Plant)
- Product name : CSPK
- Volume : 311.78 MT
- Shipping/BL Date : 28/02/2022
- Creation date : 04/03/2022
- Confirmation date : 04/03/2022

3.8.17

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

Status: Comply

PRINCIPLE #4 RESPECT COMMUNITY AND HUMAN RIGHTS AND DELIVER BENEFITS

4.1

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

4.1.1

The unit of certification demonstrates their commitment to respecting human rights as stated in the DSN Group quality guidance document No PDM-AGR-R06 which was passed on January 01, 2020, approved by the Managing Director. In addition, it is also stated in the Internal UoC Memo No. 0017/HCO/IM/III/2016 related to the declaration of recognition of human rights. Both explained that DSN Group is committed to respecting and protecting human rights in order to create security for all workers, including not discriminating, providing freedom of belief, respecting and upholding human rights. The company's commitments to the main aspects of human rights are as follows:

- Workplace Rights
 - forced labor
 - Child Protection and Compulsory Education
 - Discrimination
 - Freedom of Association
 - Health and safety
 - Working Conditions
- Community Rights
 - Stakeholder Engagement
 - Economic and Social Development
 - Health, Safety and Environment
 - Security
 - Complaints and Whistleblowing

The document has been communicated to all levels of workforce and operations based on public consultation with trade unions, workers and gender committees on 13 January 2022.

4.1.2

There is no evidence that the company uses mercenaries and/or paramilitaries in its operations. Based on interviews with stakeholders (i.e. Government Agencies, Village Representatives, Trade Unions & Labor Unions) as well as online searches revealed that the company does not incite violence or use any form of harassment, including the use of mercenaries and paramilitaries in their operations

Status: Comply
4.2

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

4.2.1

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

- SOP No. SOP-AGR-054-R03 dated on 30 October 2020 concerning in handling any grievances. The policy explained activities of handling grievances related to manpower or non-manpower (e.g: facilities, etc). HR team are responsible in receiving complaints.
- SOP No. SOP-AGR-044-R02 dated on 14 October 2019 concerning in communication and handling external grievance. The policy explained the mechanism of external communication (e.g: contractors, suppliers, government agency, residents, and NGO) including the mechanism if there were any grievances. This policy also explained that the company can be brought the complaints to the RSPO complaint system if there wasn't any solution yet and protected the identity of the whistleblower if needed.
- SOP No. 042/DSN/CHC/III/2021 dated on 18 March 2021 concerning whistleblowing system policy. The policy explained the company regulation in reporting violation complaints and protecting and providing security for whistleblowers or witnesses in DSN group work.

Based on the interviews with the surrounding communities, occupants, and workers (harvesters and mill operators), the workers had a good understanding of the communication procedures and personnel who served as communicators between the company and the community so that illiterate people can be informed by the related communicators.

4.2.2

Unit of certification showed SOP No. SOP-AGR-054-R03 dated on 30 October 2020 concerning handling any grievance. The policy explained activities of handling grievances related to manpower or non-manpower (e.g: facilities, etc). In the general mechanism of handling grievance, is stated as follows:

- The company's commitment to protect the anonymity of whistleblowers.
- Submission verbally or in writing to the contact person of the company or through labor union.
- Responses will be given at a maximum of 4 working days.

In addition, UoC also has SOP No. SOP-AGR-044-R02 dated on 14 October 2019 concerning communication and handling external grievance. This policy explained that all complaints will be summarized by Legal Department or CSR Operation Department Head and recorded in the List of External Complaint Monitoring. However, illiterate people can submit their complaints through the village head or another representative from the stakeholder and also recorded in the External Complaint Logbook.

Based on interviews with workers and external or internal stakeholders, it's known that they have understood the person responsible and the grievance mechanism in which the complainant's identity is protected. Based on the interview with both internal and external stakeholders, they informed that there were no complaints or grievances against the UoC. Based on the document review of external grievance, there was a grievance from *Pemuda* Muara Wahau on 2 February 2021 related to the community job opportunities which took too long. UoC then responded to the grievance by socialized UoC's recruitment mechanism, announce the job vacancy to the village heads, and called the job applicants to do the psychological test.

4.2.3

Based on the document review of external grievance, there was a grievance from *Pemuda* Muara Wahau on 2 February 2021 related to the community employment opportunities which took too long. UoC then responded to the grievance by socialized UoC's recruitment mechanism, announce the job vacancy to the village heads, and called the job applicants to do the psychological test. UoC also informed the Village Head of Muara Wahau on 16 February 2021 related to the grievance and UoC's process on responding the grievance.

Based on the documents review of the worker's grievance logbook period of 2021 to 2022, it is known that the complaints received by the company are related to facilities. UoC then showed the compliance of these complaints, for example the worker's grievance on behalf of SP (initial) regarding the damage of bathroom floor on 23 December 2021. This grievance has been responded on the

same day as the grievance received.

Based on the interviews with government agencies, surrounding communities, gender committees, labor unions and workers, it's known that there were no further complaints against the unit of certification.

4.2.4

UoC showed the SOP No. SOP-AGR-054-R03 dated on 30 October 2020 concerning in handling grievance and SOP No. SOP-AGR-044-R02 dated on 14 October 2019 concerning in communication and handling external grievance. These policies explained the mechanism of handling any grievances and access to the Manpower Agency (tripartite) and RSPO complaint system if the grievance didn't meet any solution.

In addition, UoC also showed the company's socialization using poster for all workers and external stakeholders posted in strategic spots e.g in front of the estate office. This poster explained the mechanism of all grievances through the labor union or each worker's supervision and will be recorded in the grievance logbook. However, illiterate people can submit their complaints through the village head, CSR Department, or another representative from the stakeholder and also recorded in the grievance logbook.

Status: Comply

4.3

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

4.3.1

The 2021 CSR program compiled by the company is carried out based on the results of routine social visits by the company, for example on 20 July 2021 in Miau Baru Village and 27 September 2021 in Nehas Liang Bing Village. The following are CSR programs for the period 2021-2022 PT Dharma Satya Nusantara including POM 7 such as in the fields of education, Community Economy, cultural preservation, residential environment, and infrastructure.

Companies can also show a recording of the realization of CSR programs carried out, for example as follows:

- Fund assistance for the construction of the Nehas Liah Bing Village Church on March 19, 2022.
- Participation in Village Development Planning Deliberations on February 4, 2022 in Miau Baru and Nehes Liah Bing Villages
- Child protection training and socialization conducted on 9 February 2022 in Miau Baru Village

Based on the results of interviews with representatives of Miau Baru Village, Nehes Liah Bing Village and the Wehea Traditional Head, it is known that the company has realized CSR very well. The surrounding community felt helped by the company because of the assistance from the company such as the opportunity to try to become a contractor, work in the company, education for children and repairing village access roads including the partnership plantation program which has been running well so far.

Status: Comply

4.4

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

4.4.1

The total of scope certification is 1,307.30 Ha and no difference with area that managed by the company with the following detail HGU of 504.50 Ha for Long Teman Estate, HGB of 2.80 Ha for POM 7 and SHM of 800 Ha for KM9. In addition, it has a Plantation Business Permit for POM 7 with a capacity of 60 Tons FFB/Hour and a Plantation Business Permit for PT KPS covering an area of ± 5,000 Ha. Based on the interviews with representatives of the Nehes Liah Bing Head Village Head, Miau Baru Village, and the traditional head of the Wehea, it is known that the company has never had land problems with the surrounding community, including with customary rights. The legal rights of the company are known and recognized by the parties.

4.4.2; 4.4.3; 4.4.4; 4.4.5; 4.4.6

Nehes Liah Bing Village Representative, Miau Baru Village and the Wehea Traditional Head the land release process by the community had been carried out according to the agreement of both parties and there was never any coercion from any party. The management of the plantation was deemed to have developed quite well after the DSN Group took over PT KPS around 2012. After the take over the company re-identified the GRTT process that had not been completed and carried out a complete completion.

Examples of documentation shown relating to the release of land rights, for example, for previous land owner Usman as follows:

- Minutes of *Tali asih* Number : /KPS-LTE/TA/2015 dated 28 October 2015 for arable land and growing crops based on legality and custom for an area of 10.8 Ha. With this handover, the main plantation pattern: Kemitraan (30 : 70) will be developed. The funds paid are for 30% of the land area plus the 10.8 Ha Slashing Fund
- Payment receipt signed by Usman
- Letter of willingness to partner and build a partnership plantation
- Minutes of Land Measurement
- Land clearing approval
- Non-dispute statement
- Declaration of ownership. land tenure
- Identity of land owner

The signing of these documents was witnessed by parties such as customary heads, village heads, land owners, company representatives and the sub-district head of Muara Wahau. Thus, it can be concluded that the land release process was based on an agreement, witnessed by the parties and applied the principle of FPIC. Based on the interviews with representatives of Nehes Liah Bing Village, Customary Head of Dayak Wehea and Miau Baru Village who know the history of land acquisition, it is known that its process had been carried out according to the agreement of both parties and there was never any coercion from any party. The management of the plantation was deemed to have developed quite well after the DSN Group took over PT KPAS around 2012. After the take over the company re-identified the *GRTT* process that had not been completed and carried out a complete completion.

Status: Comply

4.5

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

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

Based on the results of document review and interviews with relevant stakeholders such as management representatives, the Wehea Traditional Head, Miau Baru Village Head, and Nehes Liah Bing Village Head, it is known that the acquisition of land for Long Teman Estate was initially take over from another company while KM9 was owned by land. the community facilitated by the company to plant oil palm, the results of which are intended for the welfare of the surrounding community.

Land clearing was carried out in the period 2008 – 2014 and since then there has been no expansion of the company's operational area. The title of PT KPS Long Teman Estate is HGU for an area of 504 Ha, while KM9, which is managed under the Karya Sejahtera Cooperative, has a right of title in the form of SHM with an area of 800 Ha.

Village representatives and customary heads said that the process of releasing land by the community had been carried out according to the agreement of both parties and there was never any coercion from any party. The management of the plantation was deemed to have developed quite well after the DSN Group took over PT KPS around 2012. After the take over the company re-identified the *GRTT* process that had not been completed and carried out a complete completion.

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 and 4.6.2

The company showed the communication and consultation procedure number 0215B / SWA-CSR-WHU / VI / 2012RI dated June 7, 2012. This procedure was agreed upon by the representatives of Benhes Village, Diak Lay Village, Deabeq Village and Nehas Liah Bing Village. This procedure explains and regulates the procedures for the company and the surrounding community, NGOs and other local organizations consulting regarding common interests and problems so that good & acceptable results of dialogue, discussion, deliberation can be achieved. The scope of procedures includes:

1. Request for information
2. Complaints / dissatisfaction.
3. Conflict
4. Demands for compensation
5. Violence

6. Consultation.

The procedure does not discriminate gender and provides equal treatment for both women and men. Based on document verification, interview with Head of Village Nehes Lias Bing and Miau Baru also Traditional Leader from community of Dayak Wehea and field observation there is no conflict, claim and land dispute. The company been acquired the land from owners with FPIC.

4.6.3

Both women and men have equal opportunities to own land rights for plantation. This is consistent with the results of interviews with the Miau Baru Village Head, Nehes Liah Bing Village Head, and the Wehea Traditional Head who stated that there was never a difference in opportunity based on gender. In addition, it can also be proven from the ownership of the partnership plantation where both men and women have equal rights

4.6.4

Nehes Liah Bing Village Representative, Miau Baru Village and the Wehea Traditional Head the land release process by the community had been carried out according to the agreement of both parties and there was never any coercion from any party. The management of the plantation was deemed to have developed quite well after the DSN Group took over PT KPS around 2012. After the take over the company re-identified the GRTT process that had not been completed and carried out a complete completion.

Examples of documentation shown relating to the release of land rights, for example, for previous land owner Usman as follows:

- Minutes of *Tali asih* Number : /KPS-LTE/TA/2015 dated 28 October 2015 for arable land and growing crops based on legality and custom for an area of 10.8 Ha. With this handover, the main plantation pattern: Kemitraan (30 : 70) will be developed. The funds paid are for 30% of the land area plus the 10.8 Ha Slashing Fund
- Payment receipt signed by Usman
- Letter of willingness to partner and build a partnership plantation
- Minutes of Land Measurement
- Land clearing approval
- Non-dispute statement
- Declaration of ownership. land tenure
- Identity of land owner

The signing of these documents was witnessed by parties such as customary heads, village heads, land owners, company representatives and the sub-district head of Muara Wahau. Thus, it can be concluded that the land release process was based on an agreement, witnessed by the parties and applied the principle of FPIC

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 showed the communication and consultation procedure number 0215B / SWA-CSR-WHU / VI / 2012RI dated June 7, 2012. This procedure was agreed upon by the representatives of Benhes Village, Diak Lay Village, Deabeq Village and Nehas Liah Bing Village. This procedure explains and regulates the procedures for the company and the surrounding community, NGOs and other local organizations consulting regarding common interests and problems so that good & acceptable results of dialogue, discussion, deliberation can be achieved

Based on interview with Head of Village Nehes Lias Bing and Miau Baru, Traditional Leader from Dayak Wehea and Board of Karya Sejahtera Cooperative they have been known related people entitled to compensation identification method.

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; 4.8.4

Based on the interviews with Wehea Traditional Head , the Head of Miau Baru Village, the Head of Nehes Liah Bing Village and the Head of the Karya Sejahtera Cooperative, so far there have been no land disputes. The informant said that in the process there were compensation activities carried out on the basis of the agreement of both parties so that both the community and the company had

understood their respective ownership rights.

In addition, based on the results of field visits to the company's operational areas, such as Block D31 LTE and Block E58 – E60 KM9, it is known that there are no indications of land disputes or other problems. Similar information was also obtained from the results of public consultations with representatives of the National Land Agency of Kutai Timur District who stated that until now there had been no reports or information received regarding the existence of land disputes in PT KPS.

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
PT KPAS has a “Kemitraan 9” program which has fully managed but has delivered its FFB to POM-7 of PT DSN. Agreement with smallholder is shown through Memorandum of Understanding (MoU) as follows:

- MoU with Cooperative of Karya Sejahtera from Village of Miao Baru, Sub District of Kongbeng No. 177/KPAS-LGL-JKT/IV/2015 dated 02 April 2015. Total managed area is + 2,000 ha (scope of certification only 800 ha)

The company can show the Minutes (Number 525/2934/BU) of the Meeting to Determine the Purchase Price of FFB for Palm Oil Production by Partnering Planters in Kalimantan Timur Province, for example for the period of May 2022. The prices for the FFB are as follows:

- Age 3 years: IDR 2,954.32
- Age 4 years: IDR 3,150.40
- Age 5 years: IDR 3,169.64
- Age 6 years: IDR 3,203.82
- Age 7 years: IDR 3,223.24
- Age 8 years: IDR 3,247.39
- Age 9 years: IDR 3,315.95
- Age 10 years: IDR 3,354.87

Based on the results of interviews with the Chair and Treasurer of the Karya Sejahtera Cooperative, it is known that the price of FFB used so far is the price set by the Kalimantan Timur Plantation Service and there are no complaints regarding the price and payment.

5.1.2 & 5.1.3

The determination of the price of FFB to plasma farmers is carried out by referring to the price set by the Plantation Service of the Province of Kalimantan Timur. Based on the results of interviews with management representatives, the FFB price set to plasma farmers is the FFB price set by the Plantation Service. Likewise with the results of interviews with the chairman and treasurer of the Karya Sejahtera Cooperative, which stated that the FFB price was set by the Kalimantan Timur Plantation Service and not set by the company.

5.1.4
Based on the results of interviews with the chairman and treasurer of the Karya Sejahtera Cooperative, it is known that the cooperative has understood the contract/Mou with the company and there is no coercion from the company. So far, the cooperation with the company has been going well and the cooperative has the authority to make decisions. In addition, there are savings funds carried out by cooperatives and companies for future replanting needs.

5.1.5
PT KPAS has a fully managed farmer “Kemitraan” program but has sent its FFB to POM-7 PT DSN. Agreements with smallholders are shown through a Memorandum of Understanding (MoU) as follows:

- MoU with Cooperative of Karya Sejahtera from Village of Miao Baru, Sub District of Kongbeng No. 177/KPAS-LGL-JKT/IV/2015 dated 02 April 2015. Total managed area is + 2,000 ha (scope of certification only 800 ha)
- MoU with Cooperative of Karya Sejahtera from Village of Miao Baru, Sub District of Kongbeng No. 269/KPAS-LGL-JKT/VII/2021

dated 01 July 2021. Total managed area is + 2,000 ha (scope of certification only 800 ha)

Based on document verification, it is known that the MoU has complied with the provisions as evidenced by the agreement between both parties, has a timeframe, is transparent, and has been known by the Regional Government. Based on the results of interviews with the chairman and treasurer of the Karya Sejahtera Cooperative, it is known that the MoU with the company has been mutually agreed upon between the cooperative and the company as evidenced by having been signed by both parties and has been known by the Head of the Kutai Timur District Plantation Service.

5.1.6

The company can show proof of payment of FFB to Partner Farmers, for example to the Karya Sejahtera Cooperative for the period of May 2022 on June 21, 2022. Based on the verification results of the document verification of the Recap of the FFB Sales Event for KM 9 2022, it is known that the amount of FFB from the Karya Sejahtera Cooperative for the period of May 2022 is 2,969.30 tons with the price used because the age of the plant is more than 10 years then Rp. 3,354.87/kg (according to the price set by the Plantation Service for the period of May 2022). In addition, there are also discounts such as PPN, PPH, and Management Fee.

Based on the results of interviews with the Chair and Treasurer of the Karya Sejahtera Cooperative, it is known that so far there have been no complaints related to FFB payments. The price of FFB given is in accordance with the price from the Plantation Service and there have been no complaints of late payments made by the company.

5.1.7

Regarding the expiration date of the calibration results owned by the company (20 April 2019), until the ASA 1 assessment is carried out, the company has not been able to show the latest calibration results. Related to this, the company showed a letter from the Industry and Trade Office of the Kutai Timur District Government Number 510/186/INDAG-SEK/IX/2021 dated 24 September 2021 to the Legal Department Head of PT DSN stating that until now the circular letter from the Mayor of Samarinda No. 440/0407/013.01 dated March 23, 2020 regarding the precautionary measures to prevent the Corona Virus in Samarinda City, it is still valid/has not been revoked so that the Samarinda City Metrology UPT recalibration service is still temporarily closed until further notice from the Samarinda City Government. The letter from the Kutai Timur District Industry and Trade Office also stated that the validity period of the certificate of test results at PT DSN (including POM 7) was stated to be still valid until there was an inspection of the equipment to be determined later.

Then there is a letter from the Industry and Trade Office of Kutai Timur District Number B-510.35/209-Disperindag-PKTN//I/2022 on January 20, 2022 to the Legal Department Head of PT DSN stating that the Industry and Trade Office of Kutai Timur District has not been able to implement Weighbridge measurement is due to still waiting for the calibration mark which has been ordered but has not been completed and it is estimated that the calibration mark will be completed around the 2nd week of February 2022 so that the re-calibration of the electronic weighbridge is scheduled no later than the 2nd week of March 2022. This becomes OFI.

The company calibrates internally.

The company shows an Internal Calibration Minutes document, for example dated January 3, 2022, which explains that an internal calibration of the POM 7 weighbridge with a wheel loader for 2 WB has been carried out.

5.1.8

Companies can show the minutes of socialization of the RSPO certification program to Smallholders around the company which are carried out on:

- April 20, 2022 (8 people). This activity was carried out for independent smallholders, namely the Sawit Usaha Tani Sejahtera Cooperative, Long Bau. The socialization materials provided were: introduction to RSPO certification, land legality, FFB traceability and others.
- April 20, 2022 (9 people). This activity is carried out for independent smallholders, namely the Prosperous Farmers' Cooperative. The socialization materials provided were: introduction to RSPO certification, land legality, FFB traceability, application of OHS and others.
- April 20, 2022 (5 people). This activity was carried out for independent smallholders, namely CV Three Putra, Miau Baru. The socialization materials provided were: introduction to RSPO certification, land legality, FFB traceability and others.
- April 19, 2022 (11 people). This activity was carried out for independent smallholders, namely the Sumber Rejeki Cooperative, Karya Bhakti. The socialization materials provided were: introduction to RSPO certification, land legality, FFB traceability and

others.

- April 19, 2022 (12 people). This activity is carried out for independent smallholders, namely the Makarti Cooperative. The socialization materials provided were: introduction to RSPO certification, land legality, FFB traceability and others.
- April 19, 2022 (9 people). This activity was carried out for independent smallholders, namely the Serba Usaha Harapan Baru Cooperative, Muara Wahau. The socialization materials provided were: introduction to RSPO certification, land legality, FFB traceability and others.

5.1.9

The handling of complaints from farmers/external parties has been regulated in the SOP document number SOP-AGR-044-R02 dated October 14, 2019 regarding the Communication and Handling External Complaints procedure. no later than 4 working days after a written request for information/complaint is received. Complaints are resolved as quickly as possible, depending on the type of complaint.

Status: Comply

5.2

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

5.2.1, 5.2.2, 5.2.3

Companies can show the minutes of socialization of the RSPO certification program to Smallholders around the company which are carried out on:

- April 20, 2022 (8 people). This activity was carried out for independent smallholders, namely the Sawit Usaha Tani Sejahtera Cooperative, Long Bau. The socialization materials provided were: introduction to RSPO certification, land legality, FFB traceability and others.
- April 20, 2022 (9 people). This activity is carried out for independent smallholders, namely the Usaha Tani Sejahtera Cooperative. The socialization materials provided were: introduction to RSPO certification, land legality, FFB traceability, application of OHS and others.
- April 20, 2022 (5 people). This activity was carried out for independent smallholders, namely CV Three Putra, Miao Baru. The socialization materials provided were: introduction to RSPO certification, land legality, FFB traceability and others.
- April 19, 2022 (11 people). This activity was carried out for independent smallholders, namely the Sumber Rejeki Cooperative, Karya Bhakti. The socialization materials provided were: introduction to RSPO certification, land legality, FFB traceability and others.
- April 19, 2022 (12 people). This activity is carried out for independent smallholders, namely the Makarti Cooperative. The socialization materials provided were: introduction to RSPO certification, land legality, FFB traceability and others.
- April 19, 2022 (9 people). This activity was carried out for independent smallholders, namely the Serba Usaha Harapan Baru Cooperative, Muara Wahau. The socialization materials provided were: introduction to RSPO certification, land legality, FFB traceability and others.

Based on the results of interviews with the Chair and Treasurer of the Karya Sejahtera Cooperative, it is known that the company has conducted socialization related to RSPO, conducted trainings for cooperatives such as cooperative managerial training, harvest training, fertilizer, HPT, etc.

5.2.4

There is evidence that the certification unit provides training on pesticide handling to plasma farmers, which was shown in the Nufarm Pesticide Training, on 22 February 2022, which was attended by 12 representatives of chemists from plasma plantations.

5.2.5

The company has reported the progress of the plasma farmer program in the Plantation Business Development Report which is reported to the government of Kutai Timur District.

Status: Comply

PRINCIPLE #6 RESPECT WORKERS' RIGHTS AND CONDITIONS

6.1

Any form of discrimination is prohibited.
6.1.1

UoC had a Policy concerning on recognition of human rights No 0017/HCO/IM/III/2016 dated on 14 March 2016. This policy applies to all operational areas of PT. Dharma Satya Nusantara. The group aims to provide fair and equal opportunities to all its workers. The company seeks to prevent discrimination in the workplace, specifically as follows:

- The company is committed to respecting each employee's human right as regulated by applicable regulations.
- In employing all employees, the company committed to the principle of equality and would not discriminate or restrict, harassment or exclusion based on human distinctions or the basis of religion, ethnicity, race, ethnicity, group, class, social status, economic status, gender, language, political beliefs.
- The company also committed to not discriminating in recruiting employees. The recruitment process would be in accordance with the fields of expertise, so there wouldn't be any forced labor system that could lead to human rights violations and inconvenience of employees.
- Every employee who works in the company is recognized as a person who has the freedom of beliefs, thoughts, opinions, and respect to use their conscience with human dignity in accordance with company regulations and applicable laws.

UoC also showed the record of the company's socialization for instance the socialization which was conducted on 9 February 2022 for all workers in POM 7. Based on the workers' recruitment document and interviews with the workers, UoC had provided equal opportunities in recruitment and operational activities. In addition, in job vacancies that have been published by the company, there were no requirements that discriminated against gender, race or ethnicity, disability, sexual orientation, age, or belief.

Based on the interviews with the gender committee, female workers are given equal rights, wages and opportunities to get promotions with male workers of the same type of work. UoC also showed that the amount of female workers and male workers aren't significantly different.

6.1.2

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

Based on the interviews with the manpower agency, gender committee, labor unions, and workers (harvesters and mill operators) at POM 7, Long Teman Estate, and Kemitraan 9 Estate, it is known that there were no migrant workers. They also stated that they have never feel discriminated in UoC's any operational activities. It was explained that all activities from recruitment, performance appraisal, and promotion were given equal opportunity regardless of ethnicity, caste, nationality, religion, disability, gender, sexual orientation, gender identity, membership in labor unions, politics, or age. There was no difference in the communication between superiors and workers because of the things mentioned above, so the workers did not feel isolated or discriminated against by the superiors. The company also didn't request for any payment during the recruitment process.

6.1.3

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

- Recruitment document in accordance with the recruitment requirements such as employment request form, application letter, statement of police report, identity card, family identity card (KK), the result of written test, the result of interview test, the result of medical test, employee candidate statement letter, and work agreement letter. For example, a worker on behalf of RS (initial) who started working with three months of probation on 7 February 2022 and had been promoted as a permanent worker on 6 May 2022.
- Promotion documents such as management decree for worker's promotion. For example, a worker on behalf of IW (initial) who had a promotion based on worker's appraisal, from 3 months of probation worker to permanent worker as the personalia clerk on 7 May 2022.

6.1.4

Based on the field observation, interviews with the management and workers, it is known that there were no discriminatory in pregnancy testing given by the company. The pregnancy test conducted only to ensure that no pregnant workers in any agrochemical works such as pesticide application and fertilizing activities proven by there was no requirement regarding pregnancy test in recruitment SOP, job hiring announcement, and medical test during recruitment. UoC also showed the list of pregnant women which informed all pregnant workers are placed in non-agrochemical works such as day care officer, teacher, and housing maintenance worker.

Based on the interview with women workers in field, there was no pregnancy test during recruitment process.

6.1.5

Gender committees had been formed and still active until today in PT. DSN POM 7 and PT. KPAS which are chaired by the coordinator along with the head of gender committee. The structure of the gender committee consists of only female workers supervised by the male worker as the coordinator. The main objective of forming a gender committee is to provide a forum that can accommodate the aspirations or complaints of workers (especially women).

UoC informed that they also handling complaints related to male workers' sexual harassment or violence as stated on SOP No. SOP-AGR-049-R01 dated on 1 November 2013. This procedure stated that if there were any violence or harassment, male workers can communicate to the supervisor or human capital team and it will be directly handle by the Estate or Mill Head.

Based on the interviews with several workers, they also knew of the existence of the gender committee because it had been routinely socialized by the management. The last socialization related to the sexual harassment and domestic violence against women was held in March 2022 attended by female workers and housing residents. The results of this socialization can be seen by the absence of sexual harassment in company operational activities and the workers given equal opportunities for all genders (male or female).

6.1.6

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

Based on the interviews with workers (harvesters, maintenance workers, and mill operators), the workers already know that there was a wage scale structure for each level of workers and this has been proven by the difference in the monthly wage income presented on the pay slip. Based on the document review of worker's pay slip in both gender for the same type of work, it's known that the monthly wages received are in accordance with the grade owned by each worker, for example: the pay slip of female worker in nursery activity on behalf of MFM (initial) and male worker on behalf of MF (initial) received the same amount of basic salary as their grade.

Status: Comply

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

6.2.1

UoC had procedures related to recruitment, selection, remuneration, promotion, retirement and termination of employment which are generally described in the Company Regulation period 2022 to 2024 written in *Bahasa*. The company regulation in PT. DSN and PT. KPAS has been registered in manpower agency of Kalimantan Timur for example by decree No. KEP.560/1138/B.PHI&JAMSOSTEK/2022. This company regulation explained the working conditions and rights / obligations of workers such as recruitment, selection, transfer, promotion, performance appraisal, remuneration, discipline, overtime, and other provisions. The company regulation applied to all workers and had been routinely disseminated by the certification unit to all employees for example during the morning briefing before work.

Based on the interviews with workers (harvesters, pesticide application workers, and mill operators) and labor union representatives, it concluded that workers have a sufficient understanding of their rights (wages, overtime, incentives, etc.) listed in the company regulation and in accordance with routine socialization provided by the certification unit. Workers' wages in 2022 have been above the minimum wage set by the government. Wage based on years of service, ability, attendance and job performance (structure and scale wage) and there were no late payments every month.

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

6.2.2

UoC has company regulation period 2022 to 2024 provided in *Bahasa* that explains the working conditions and rights / obligations of workers such as recruitment, selection, transfer, promotion, performance appraisal, working hours, remuneration, discipline, deduction, overtime, sick leaves, holiday entitlement, maternity leave, and other provisions. These all stated in each worker's work agreement. Explanations related to the contents of the company regulation, including:

- Article 6 concerning working time which explains that there are 2 types of working time in the company, namely by working 8 hours per day or 5 working days in a week (head office) and 7 hours per day or 6 working days in a week (palm oil estate and mill), in which the total working hours are 40 hours in a week.
- Article 13 concerning wages which explains that the lowest wage of worker couldn't be lower than the minimum wage set by the government every year.

In addition, remuneration is generally stated in company regulation, and specifically stated in a decree explaining these matters, as follows:

- Decree of the Governor of Kalimantan Timur No. 561/K.599/2021 concerning the minimum wage of Kutai Timur District in Kalimantan Timur period of 2022 is Rp. 3,175,427.45/month.
- Management Decree No. 032/DIR/XII/2021 concerning the minimum wage of PT. DSN in 2022 is Rp. 3,175,450.-/month determined based on Minimum Wage Determination in 2022. Besides basic wage, workers also received rice allowance 0.5 Kg/day, 0.3 Kg/day for unworking spouse, and 0.25 Kg/day for maximum dependents according to its total working days.
- Management Decree No. 036/DIR/XII/2021 concerning the minimum wage of PT. KPAS in 2022 is Rp. 3,175,450.-/month determined based on Minimum Wage Determination in 2022. Besides basic wage, workers also received rice allowance 0.5 Kg/day, 0.3 Kg/day for unworking spouse, and 0.25 Kg/day for maximum dependents according to its total working days.
- Structure and Scale of Wage of DSN Group updated on 1 January 2022. It's known that workers with the lowest wages are employees with 0-1 year of work period, and the highest wages for workers with 30 years of work period (Rp. 4,756,470).
- Management decree No. 49/DIR/JKT/V/2017 regarding the harvesting incentive, over basic wages, and harvesting slasher usage incentive validated on 31 May 2017 by the Executive Director. This document stated that the harvesting daily output target defined by the age of the palm oil trees and fruit bunches weight average.

UoC showed overtime payment in April to May 2022 that has been in accordance with applicable laws for workers on behalf of RA and AP (initial) as boiler operator, DW (initial) as engine room operator, and AP and SYM (initial) as security officer. In the pay slip document, it's known that the nominal of the worker's overtime wages has in accordance with the overtime calculation.

A review of payslip document (harvester, maintenance worker, security, and mill operators) for April to May 2022, proved that the wages received are above the minimum wage and in accordance with the wage scale structure determined by the certification unit for 2022. For example, workers' wages on behalf of IM (initial), MM (initial), RA (initial), AP (initial), and SYM (initial) have a different wage based on wage scale structure in 2022 and all wages above the minimum wage. Payslip document gives accurate information on compensation consist of basic wage, allowance, overtime payment, working days and deduction.

UoC also showed paid leave letter which showed that maternity leave was given 3 months of paid leave. For example, the paid leave letter on behalf of KK (initial), who had given 3 months and had been approved by the supervisor on 1 March 2022.

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

6.2.3

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6.2.4

UoC has provided welfare facilities to occupants in the form of housing, water supply, educational facilities, masjid, school transportation and other facilities in each unit. Based on the field visit in the housing area, it revealed that workers were provided with adequate housing facilities with and there was daycare for children. The house is inhabited by 1 family.

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

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

6.2.5

UoC has provided accessible food sources by providing small cafeteria in the workers' area for lunch. Based on interviews with workers (harvesters and mill operators), labor unions and gender committees, it's known that workers have no difficulty in getting food sources because the company has provided cooperatives that sell daily necessities. In addition, workers can buy these needs to the markets around the company's area without any difficulties.

Based on the field observation in housing areas of each units, it's known that there were also workers who open small business stalls to sell daily necessities in each housing.

6.2.6

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

UoC has the determination of assessment prevailing wage and all kinds of benefit for DLW simulation in 2022 has been included in the calculation of food costs, housing facility costs, transportation, educational cost, daycare facility, sport facility, health cost, electricity, and water costs. The results of these calculations are known that the standard of prevailing wage currently given / simulated by the certification unit is above the stipulation of the minimum wage (Rp. 3,175,450) as much as:

- Rp. 8,315,720.26 per month for unmarried worker.
- Rp. 8,627,538.53 per month for married worker with no child dependent.

- Rp. 8,777,538.53 per month for married worker with 1 to 3 child dependents.

Based on interview with works and document verification, the calculation data of prevailing wages is rational in accordance with the local price.

6.2.7

During the assessment, there were no workers with contract status/daily workers. The current employee status are permanent workers and permanent workers with 3 months probation. The number of workers currently owned by the certification unit is mentioned as follows:

- POM 7: 102 workers.
- Kemitraan 9 Estate: 265 workers.
- Long Teman Estate: 68 workers.

Status: Comply

6.3

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

6.3.1

UoC had a policy concerning on the freedom of association (No. 0014/HCO/M/V/2016) validated on 12 May 2016. This policy applies to all operational areas of DSN Group. It stated that the group respects workers' rights to freedom of association and association with other individuals and collectively expresses, encourages, pursues, and defends the common interest. The policy was published in Bahasa which can be understood by all employees.

Based on the interviews with labor union representatives, it explained that the company had given freedom of association and labor unions have been formed. The establishment of the union was in accordance with the applicable laws and regulations and has been recorded in Manpower Agency of Kutai Timur District, as follows:

- The Registration Number. 07/02/SP-SB/Nakertrans-HIJ/I/2013 of DSN Labor union on 30 January 2013.
- The Registration Number. 05/02/SP-SB/Disnakertrans-HIJ/I/2020 of KPAS Labor union on 30 January 2020.

UoC gave the freedom for worker to express their aspiration democratically and there was no intervention against labor union activity. Based on the document review, it's known that the UoC also documented the number of labor union operating in UoC operations area and its members' number, for instance: Labor Union of DSN POM 7 with 60 total members and Labor Union of KPAS with 382 total members (including the members exclude the scope of certification).

6.3.2

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

- The meeting between the labor union (DSN POM 7) and management representative on 14 February 2022 to discuss about the gender committee program in 2022 and housing residents contribution related to social activities attended by 18 participants.
- The meeting between the labor union (KPAS) with management representative on 28 January 2022 regarding the standardization of labor union activities attended by 20 persons.

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

6.3.3

Based on the interviews with the labor union representatives, there was no interference in the selection or labor union operational activities. All processes of selecting, decisions making and planning activities, members' aspirations to their representatives proceed democratically. The worker who is currently placed as the Chairman of the Labor Union in each unit is a worker at mill and estate, then there will be no conflict of interest that occurs with the company because there were no workers who have the authority as

decision-makers (staff class and above). UoC also involved the labor union in drafted company regulation.

The establishment of the union was in accordance with the applicable laws and regulations and has been recorded at the Manpower Agency. Unit of certification was giving freedom for workers to express their aspirations and did not give any intervention related to labor union activity. Based on the interview with workers, it's known that there were no mandatory to be the member of labor union. The membership of labor union is voluntary.

Status: Comply

6.4

Children are not employed or exploited.

6.4.1

UoC had a policy concerning on children/underage worker protection (No. 055/DIR/XII/2016) validated on 1 December 2021. This policy applies to all operational areas of DSN Group. It stated that the group prohibited to recruit employees under the age of 18 years old and prohibited the workers to bring children along in doing work (moreover to help the workers doing their work). Uoc also showed the statement letter signed by Human Capital Section Head of PT. DSN which stated that they do not employ under-age worker.

UoC then showed that they had socialized the policy to all parties including smallholders and contractors for instance the socialization held on 14 March 2022 to all smallholders and contractors' workers.

6.4.2

UoC then showed the recruitment document in accordance with the recruitment requirements of worker on behalf of RS (initial) such as statement of police report, identity card, family identity card which stated that the worker is above the minimum age of worker.

UoC had socialized the policy to all parties including smallholders and contractors for instance the socialization held on 3 November 2021 to 19 participants consist of smallholder workers, contractors, and communities. Based on documents verification and field observation, there were no workers under the age of 18 and there was no child around the work area. In addition, UoC also includes clauses on child protection and prohibitions on hiring workers under the age of 18 in any agreements.

6.4.3

Based on documents verification and field observation, there were no workers under the age of 18 and there was no child around the work area. UoC also did not employ young worker and there were no internship program during the audit.

6.4.4

UoC had socialized the policy to all parties including smallholders and contractors for instance the socialization held on 3 November 2021 to 19 participants consist of smallholder workers, contractors, and communities. Based on documents verification and field observation, there were no workers under the age of 18 and there was no child around the work area. In addition, UoC also includes clauses on child protection and prohibitions on hiring workers under the age of 18 in any agreements.

Status: Comply

6.5

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

6.5.1 and 6.5.2

UoC had a policy concerning on reproductive rights (Internal memo No. 0011/HCO/M/III/2016) and the prevention of sexual harassment and violence (No. SOP-AGR-049-R01). Each policy applies to all operational areas of DSN Group. The documents stated generally as follows:

- The company would assign pregnant and breastfeeding workers in no danger work (away from chemical contacts).
- The company would guarantee that pregnant workers did not having contacts with chemical stuff by doing pregnancy test once a month.
- The company would provide certain place for breastfeeding.
- Every worker is entitled to receive protection against sexual harassment in the workplace and if convicted of sexual abuse, there will be penalized in accordance with applicable regulations.

UoC also showed the record of the company's socialization using the poster posted in UoC's strategic spots. This poster explained the mechanism of all grievances including violence and sexual harassment. However, illiterate people can submit their complaints through the village head or another representative from the stakeholder (gender committee and labor union).

Based on the documents review and interviews with workers (harvesters, maintenance workers, and mill operators), disallowance of sexual harassment and violence had been routinely socialized by the management, one of the socialization was carried out on 9 February 2022.

Based on the interviews with the gender committee and daycare officer, the company had given around 30 minutes for breastfeeding woman and provided certain place for breastfeeding. There was no grievance or complaint related to sexual harassment during 2021 to 2022.

6.5.3

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

UoC also showed that they had well-evaluate the needs of pregnant women by giving some pregnant women class (counseling). The class explained some discussion including the result of pregnancy medical check up, pregnancy hygiene, the right method in breastfeeding, the importance of nutrition food for pregnant women, and many more.

UoC also showed the result of new mother's needs identification attended by new mother on behalf of SR (initial) and the paramedics on 22 October 2021. This document informed the needs of new mother during before the give birth and after give birth, as follows: pregnant women class, daycare, and breastfeeding room. UoC also showed the record of pregnant women medical check up as the identification needs before the give birth.

6.5.4

UoC showed the procedure to accommodate complaints and grievance from employees specifically in sexual harassment and violence (No. SOP-AGR-049-R01). In the procedure described that if requested, the company guarantees the confidentiality of the reporting identity and the disclosure of disgrace or incident (whistleblower). UoC also provided whistleblowing by email, company website, and letter to complaint reporting unit for any confidentiality grievance.

Based on the interviews with workers it's known that the workers already have sufficient understanding of the grievance mechanism. Related complaints of sexual harassment (women's issues) can be submitted to the gender committee. In the last year period, there was no complaint related to sexual harassment, violence at work/reproductive rights.

Status: Comply

6.6

No forms of forced or trafficked labour are used.

6.6.1

UoC had a policy concerning on force-labor ban stated in company guidance (No. PDM-AGR-R06) validated on 1 January 2020. This policy applies to all operational areas of DSN Group. The policy stated that the company respecting human rights by referring to the Declaration United Nations concerning on human rights and respecting employee rights such as the elimination of discrimination, the prohibition of forced and child labor, fair wage provisions, upholding the principle of gender equality in accordance with legal norms, and respecting the freedom of labor union.

UoC also showed the SOP of recruitment (No. SOP-AGR-012-R03) validated on 1 December 2019 which informed that workers do not take any recruitment fees at any stage of the recruitment process, and no retention of passports/identity documents. UoC then showed that on each work agreement between the certification unit and the contractor/supplier, there were clauses related to fulfilling legal obligations in Indonesia as one of the obligations that must be fulfilled by the contractors.

Based on the interviews with manpower agency, gender committee, labor union, and workers at Mill and Estates, it's known that workers have never felt discriminated and forced to work by the company. There were no significant obstacles related to employment or violations of company regulations. UoC provided output targets that can be obtained in less than 7 hours of work. If the harvester obtains more output within or more than 7 working hours, then the harvester will get the incentive payment. No penalty was given to the harvester if it does not get output due to natural factors such as rain. Based on pay slip document and foreman notes of harvesters daily output, the harvesters have earned more than daily output target and the wages the harvesters received was above the minimum

wage.

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

6.6.2

Based on documents review and interviews with the manpower agency, gender committee, labor union, and workers at POM 7, Long Teman Estate, and Kemitraan 9 Estate, it's known that there were no contract workers and migrant worker in all units.

Status: Comply

6.7

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

6.7.1

OHS

The company has established a P2K3 structure for plantations and factories that have been registered with the relevant agencies. OHS experts in plantations and factories also have certificates and SK OHS Expert from the Minister of Manpower. Appointment of OHS Expert PT. KPAS with SK number 5/1902/AS.02.04/IX/2019 which is valid until September 15, 2022. Application for submission of OHS Expert training PT. DSN-PSK7 with number 003/FPP/DSN-PSK7/VI/2022 on 20 June 2022. Both structures have been approved by the Kalimantan Timur Provincial Manpower Office, as follows:

LTE

- Operator Tractor : Certificate No. 5/5441/AS.02.00/III/2020 dated March 6, 2020; Lift and Transport Aircraft OHS License No. 167852-OPK3-LT/PAA/III/2020 valid until March 6, 2025.
- Operator Tractor : Certificate No. Ser.13.9435-OPK3-PAA/IX/2013 dated September 2, 2013; Lift and Transport Aircraft OHS License No. P.13.9435-OPK3-LT/PAA/IX/2018 valid until September 24, 2023.

KM9 Estate

Agricultural Tractor Operator Certificate No. Ser.26500/OPK3/PAA-LT/XI/2018 dated November 23, 2018; Lift and Transport Aircraft OHS License No. 129935-OPK3-LT/PAA/XI/2018 valid until 23 November 2023.

POM 7

- Certificate of Operator of diesel motor class 1 No.Ser.701/OPM.K3/PTP/V/2019 dated 10 May 2019;operator of aircraft and power production OHS License No 6254/PM/PTP/V/2019 valid until 10 May 2024.
- Class 1 Steam Aircraft Operator Certificate No. Ser.543/OPK3/B.I/V/2019 dated 16 June 2017; Steam operator OHS license No 15102.OPK3-PUBT-B.I/V/2019 valid until 10 May 2024.

Doctor

- Doctor's practice license no. 503/028/DPMPTSP-PPNP/SDMNAKES-SIPD/IV/2022 and Doctor's Registration Certificate No. 3111100421006461 on behalf of SS which is valid until January 1, 2027.
- Doctor's practice license No. 4503/104/DPMPTSP-PPNP/SDMNAKES-SIPD/X/2019 which is valid until October 2022 and Doctor's Registration Certificate No. 1811100221165364 on behalf of THB which is valid until 28 December 2026

The company also shows HIRAC and risk control for the 2022 period as well as work accident reports for the 2021 - 2022 period which are listed in the P2K3 report for the first quarter of 2022. Based on document verification and interviews with harvest workers, fertilizers in KM9 as well as harvesters and sprayers in LTE and operators in POM 7 submitted until the audit took place there were no work accidents that caused the absence of workers, there were only 14 minor work accidents and all handlers used first aid.

6.7.2

Based on document verification and employee interviews submitted by the company, the company is still using the DSN Group's Occupational Safety and Health and Environment (K3L) procedure (SOP-AGR-037-R01) dated November 1, 2013 approved by the Executive Director of SBU Agro I and a Memorandum regarding the submission of PPE and equipment procurement First aid kit with number 030/SHE/JKT/X/27 which explains the submission and procurement of PPE and first aid divided into the period January – February and July – August.

Also unit of certification shown the organizational structure of the Emergency Preparedness and Response Team (TKTD) of PT. KPAS

which consists of the TKTD commander, secretary, fire patrol task force, firefighting task force, equipment task force and training and simulation task force, for each section there is already a chairman and member and the company also shows DAMKAR infrastructure in accordance with PERMENTAN standards No. 5 Years 2018 which was created and monitored by the Secretary of TKTD for both LTE and KM9.

And based on the results of a field visit in Block D20, the LTE plantation, it was found that the spray foreman did not carry a first aid bag, and there were several first aid kits whose equipment had expired. In POM 7, it was also found that the contents of the first aid kit have expired since March 2022 such as povidone iodine and aquades (3 locations) but routine first aid checks have been carried out until June 2022. And the company has shown corrections from the results of field visits, for example replacing expired first aid box contents. however, the cause of the problem has not yet been identified and how to ensure future follow-up.

Based on the above evidence, the Company has not been able to show sufficient evidence that the person in charge of the first aid kit in the field has a good understanding of the use/function of the first aid item, and the company has not been able to show sufficient evidence that the first aid equipment available in the workplace is in a condition ready to be used **NCR No. 2022.01 Minor raised to Major.**

Mill and office (estate/mill) have evacuation routes indicated by warnings indicating evacuation routes and assembly points. For example, an evacuation route that is installed in the mill meeting room and leads to the assembly point area including the visitor route and the evacuation route marked by painting on the mill floor.

6.7.3

All workers involved in operations have been properly trained in safe work practices/basic safety training. The training is carried out by safety officers who have been qualified as safety officers by the government. Adequate and appropriate protective equipment is available to all workers in the workplace to cover all potentially hazardous operations, such as pesticide application, machine operation, and land preparation, harvesting and, if used, burning. The need for PPE is determined from the HIRAC document or SOP for related activities.

- Standard for Personal Protective Equipment for Plantation Employees (Document No. DK-SHE-140-R04) dated October 1, 2018 and among others states:
 - Safety shoes: 7 inch PVC boots with pulls
 - Hand protection: 5 piles cloth gloves
- SOP-AGR-072-R00 dated September 1, 2016 regarding PPE, for example for harvesters, are as follows:
 - Head protection and eye protection: Helmet and Goggles
 - Gloves: Cotton gloves
 - Shoes: 10" PVC Boots
 - Protective spine: Break support belt
- The results of the field visit found the following facts:

KM 9 Estate:

- When checking the HGU stake (Block E60) it was found that there was 1 harvester wearing gambir shoes
- Block E19 afdeling1 KM 9 two harvesters do not use cotton gloves

LTE:

- When checking the HGU stakes, it was found that 1 harvester and 1 FFB loader were wearing gambir shoes.

Personal protective equipment in accordance with established procedures and standards has actually been given to every employee, for example the handover of PPE for the period March 2022.

The company also showed the socialization of the use of PPE on June 22, 2022 which was carried out in the LTE Meeting Room and was attended by 12 people. Documentation of job descriptions for the 1st afdeling foreman, harvesting foreman and foreman of care, one of which explains ensuring that the PPE provided by the company has been used properly by its workers.

Based on this evidence, it is known that the Company has not been able to show sufficient evidence that all workers have used the PPE that has been provided. **NCR No. 2022.02 with Major category**

There is no claim for work accident as stated in 6.7.5 with editorial "based on the results of the FRSR calculations for both POM 7, LTE and KM9 for the 2022 period, it is known that there were no serious work accidents/resulting in the loss of working days, there were only 14 minor work accidents and all handlers used first aid."

Based on the results of the document review, it is known that all workers have been covered in the BPJS Ketenagakerjaan program

as evidenced by payments for 102 POM workers, 265 KM9 workers and 68 Long Teman Estate workers for the period of May 2022.

- Payment number 000001309088 for LTE on 07 June 2022
- Payment number 0000009114 for KM9 on 07 June 2022
- Payment number 000001309226 for POM7 on 07 June 2022

6.7.5

Work accidents are recorded and reported in the company's P2K3 report. And based on the results of the FRSR calculations for both POM 7, LTE and KM9 for the 2022 period, it is known that there were no serious work accidents/resulting in the loss of working days, there were only 14 minor work accidents and all handlers used first aid.

Based on the verification of work accident documents in 2022, as of April 2022, it is known that there were no work accidents that resulted in death or serious injury either at POM 7 locations or in plantations. Based on interviews with OHS experts, it was revealed that work accidents occurred only in the minor category with first aid kit control so that no workdays were lost.

6.7.2 Status: NCR No. 2022.01 Minor raised to Major

6.7.3 Status: NCR No. 2022.02 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

Based on document verification and interviews during the field audit, it is known that there has been no revision of the IPM Control Work Instructions. The company is still using IK-AGR-OLP-13-R00 regarding OPT Early Detection and IK-AGR-OLP-14-R00 regarding Disease Control. The procedure for developing an early warning system is routine enumeration of potential pests and diseases, with an emphasis on mechanical and biological control, such as planting beneficial plants (*Turnera subulata* and *Antigonon leptopus*) to anticipate caterpillars, as well as installation and monitoring of BOB (Barn Owl Box) to anticipate mouse attack. The procedure also establishes an economic threshold for each pest and disease, that chemical control is only carried out if the attack is above the economic threshold.

The company shows a map of the distribution of KM9 and LTE gupons with a scale of 1:29,000 which describes 33 locations of gupons in the KM 9 Estate area with a total of 800 and 22 locations in the LTE area with a total of 431. From the monitoring results from January to April 2022, owl nests show that In addition, the results of field observations in Block D20 Afdeling 1 LTE revealed that the condition of the Barn Owl Box in an active condition was marked by feather marks and the remains of food bones.

The company has conducted a pest and disease census on a monthly basis. The company shows the results of the census of fire caterpillars, bagworms, and mice for the period January - April 2022. And the results of the review of the census documents for the period January - April 2022 for both LTE and KM9, there were no attacks by termites, caterpillars, and mice that exceeded the threshold. As a sample:

- Mice attack on afdeling 1 on LTE with a detection percentage of 0.9% in April and 0.7% in May 2022.
- Rat attacks on afdeling 2 on LTE with a detection percentage of 0.5% in April and 0.4% in May 2022.
-

Based on observations filed also shown that in LTE and in KM9, *Turnera subulata* has been planted in both afdeling 1 LTE and KM9, *Antigonon leptopus* has been planted in the corner of the block. The results of field observations in pest and disease detection activities in Block 20 Afdeling 1 LTE, it is known that officers already know how to understand pests and comply with procedures. The results of field observations and interviews with harvesting, spraying, and maintenance activities did not reveal any signs of pest and disease attacks.

7.1.2

Certificate of unit has a list of invasive species specified in the unit's operational area of certification, which refers to the Regulation of the Minister of Environment and Forestry (PermenLHK) No. 94 of 2016. Based on the list of invasive species, it is known that the company uses *Turnera ulmivolia* to control the caterpillar pest population. Based on field observations, it is known that almost every Highway and Transport Road has been planted with *Turnera ulmivolia* in a very well-maintained condition.

In addition to plants, the Company uses *Tyto Alba* with a distribution of 33 gupon locations in the KM 9 Estate area and 22 locations

in the LTE area. From the monitoring results from January to April 2022, it shows that the owl's nest is active, in addition to the results of field observations at Block D20 Afdeling 1 LTE, it is known that the condition of the Barn Owl Box is in an active condition marked by feather marks and the remains of food bones.

7.1.3

Based on field observation and interview with IPM assistant of PT KPAS and KM9 as well as document reviews, it is known that there is no use of fire for pest control. The company uses Tyto Alba with 33 gupon locations in the KM 9 Estate area and 22 locations in the LTE area. From the monitoring results from January to April 2022, it shows that the owl's nest is active, in addition to the results of field observations in Block D20 Afdeling 1 LTE, it is known that the condition of the Barn Owl Box is in an active condition marked by feather marks and the remains of food bones.

Status: Comply

7.2

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

7.2.1

The company has a pesticide application procedure which is presented in the document:

- Work Instruction No. IK-AGR-OLP-15-R02 dated November 3, 2014 regarding weed management in Mature and Immature areas,
- Work Instruction No. IK-AGR-OLP-16-R02 dated September 28th 2015 regarding pesticide dosage and applicator considerations
- Work Instruction No. IK-AGR-OLP-17-R01 dated February 1, 2012 regarding the handling of pesticides.
- Internal Correspondence no 0091/OPS/XXI/2012 from Region Kaltim Head 1 & 2 to all Plantation Heads and Estate Heads on November 30, 2012 regarding the use of paraquat chemicals which were eliminated per year 2013.

The Department of Agronomy Support has confirmed the pesticides to be used annually. Herbicides on LTE and KM9 in 2021-2022. One of the methods used in justifying pesticides is by referring to the green book on permitted pesticides published by the Ministry of Agriculture and the www.pestisida.co.id. Pesticide trials are carried out for new types and labels on the first use of pesticides.

Based on field observations and interviews with pesticide applicators during spraying activities in Block D20 Afdeling 1 LTE, the herbicides used were glyphosate and methyl metsulfuron. From the interview it was also known that they no longer use paraquat.

7.2.2

Unit certificate shows the results of monitoring or recording usage records for all pesticides used in LTE and KM9 Estate for the period January 01 - December 31, 2021 and January 22 - May 22 (including active ingredients used and LD50 dose, area of pesticide use, amount of active ingredient used). used per hectare, and the amount of active ingredient used per hectare). For example, the pesticides used, such as Kleen up 480 with the active ingredient isopropyl amine glyphosate, have an LD 50 of 3,715 mg/kg; application area of 4.022 ha; with active ingredients per area of 0.419 liters/ha.

7.2.3

The company shows records of pesticide use from 2019 – 2022. The company no longer uses pesticides with the active ingredient paraquat, with a memorandum on the prohibition of the use of paraquat number 001/S&I/I/2020 since January 14, 2020, to minimize the use of pesticides in the context of implementing IPM, in this case the company uses natural predators such as owls (Tyto alba) to control rat pests. The company shows monitoring of gupon checks in KM9 and LTE which explains 33 gupon locations in the KM 9 Estate area with a total of 800 and 22 locations in the LTE area with a total of 431. From the monitoring results from January to April 2022, it shows an active owl nest. The results of field observations in Block D20 Afdeling 1 LTE revealed that the condition of the Barn Owl Box was in an active condition marked by feather marks and the remains of food bones.

7.2.4

The results of document verification, field observations and interviews with operational employees revealed that the Company no longer uses pesticides with the active ingredient paraquat, with a memorandum on the prohibition of the use of paraquat numbered 001/S&I/I/2020 since January 14, 2020, to minimize the use of pesticides in the context of implementing IPM, in this case the company uses natural predators such as owls (Tyto alba) to control rat pests. The company shows monitoring of gupon checks in KM9 and LTE which explains 33 gupon locations in the KM 9 Estate area with a total of 800 and 22 locations in the LTE area with a total of 431. From the monitoring results from January to April 2022, it shows an active owl nest. The results of field observations in Block D20 Afdeling 1 LTE revealed that the condition of the Barn Owl Box was in an active condition marked by feather marks and the remains of food bones.

7.2.5

Based on the review of the pesticide use document in 2021 and until May 2022, it is known that the active ingredients of the pesticides used are methyl metsulfuron, glyphosate, fluroxipir, and triclopyr which are identified in WHO pesticides class U, class II, and class III. During inspections to company facilities, pesticides are stored in permanent warehouses equipped with emergency response facilities, such as: fire extinguishers, first aid kits. The pesticide storage area is a locked area with limited access. Ventilated storage via cross-flow ventilation. MSDS and hazard symbol labels are provided near pesticides. Emergency showers and eye washers are also provided to anticipate chemical handling emergencies. The chemical handling PPE provided includes boots, aprons, safety glasses, respiratory masks, and gloves. The possible spill has been managed. The pesticide container quantity record is clearly visible. Liquid waste from pesticides is reused for subsequent spraying applications. There are also some used jerry cans which can be reused for field applications.

7.2.6

The company has a Pesticide Handling Work Instruction (which is an elaboration of the SOP) number IK-AGR-OLP-17-R01. Effective from February 1, 2012 and approved by the Divisions Head. Training and socialization of work instructions including the risks and impacts of pesticide application have been carried out by the organization on a regular basis. Based on field observations and interviews with pesticide applicators during spraying activities in Block D20 Afdeling 1 LTE, that the company always provides training on the use and handling of pesticides at work, workers can also explain if after spraying, PPE and work tools are cleaned in the wash house and dried/ stored there. The results of the Observation of the Wash House facility in the Estate, it is known that the Wash House has been functioning properly. The company also carries out a risk analysis in applying pesticides and considerations on product labels at HIRAC 2021 - 2022. Including the application of spray PPE according to the MSDS, namely masks, face shields, rubber gloves, aprons, boots and the foreman (Supervisor) as the person in charge of checking usage. Appropriate PPE by workers.

7.2.7

During inspections to company facilities, pesticides are stored in permanent warehouses equipped with emergency response facilities, such as: fire extinguishers, first aid kits. The pesticide storage area is a locked area with limited access. Ventilated storage via cross-flow ventilation. MSDS and hazard symbol labels are provided near pesticides with the caption "Hazardous and Toxic Substances in the Herbicide Warehouse". Emergency showers and eye washers are also provided to anticipate chemical handling emergencies. The chemical handling PPE provided includes boots, aprons, safety glasses, respiratory masks, and gloves. The possible spill has been managed. The pesticide container quantity record is clearly visible. Liquid waste from pesticides is reused for subsequent spraying applications. There are also some used jerry cans which can be reused for field applications.

7.2.8

Based on the results of field observations to the pesticide warehouse, hazardous waste temporary warehouse in KM9 and interviews with warehouse officers at KM9 and herbicide applicators at LTE, it is known that all pesticide containers that are not used are sent to the warehouse, then the warehouse will move them to hazardous waste temporary warehouse. Based on the results of field observations in housing, there was no other use of used pesticide containers.

Management is carried out in accordance with applicable regulations, namely after being collected at a licensed hazardous waste temporary warehouse, it will be transported by a licensed carrier. An example is shown as follows:

POM 7 (8 March 2022) PT Sumber Rezeki Abadi Jaya

1. Used filters from air pollution control facilities as much as 0.002 Tons with Manifest KLHK-1651913033
2. 0.646 Tons of used hazardous material packaging with KLHK Manifest- 1651913200
3. Electronic waste including cathode ray tube (CRT), TL lamp, printed circuit board (PCB), wire rubber as much as 0.002 Tons with KLHK Manifest- 1651913476
4. Used rags and the like are 0.106 Tons with KLHK Manifest- 1651913681
5. Used lubricating oil includes used lubricating oil for hydraulics, engines, gears, lubrication, insulation, heat transmission, grit chambers, separators and/or mixtures of 2,633 tons with Manifest KLHK-1651914067

POM 7 (8 June 2022) PT Sinar Bintang Albar

1. Used Majun as much as 0.232 Ton with Manifest KLHK-1657428505
2. Used filter as much as 0.007 Ton with Manifest KLHK-1657428744
3. Tube Luminescent lamp as much as 0.031 Ton with Manifest KLHK-1657428937

4. Used hazardous material Packaging as much as 0.573 Tons with KLHK Manifest-1657429112
5. Used oil as much as 0.843 Tons with Manifest KLHK-1657429397

PT KPAS (7 March 2022) PT Sumber Rezeki Abadi Jaya

1. Used packaging of hazardous material as much as 0.2342 Tons with Manifest KLHK-1651912716
2. Used filters from air pollution control facilities as much as 0.0229 Tons with KLHK Manifest- 1651912977
3. Used rags and the like as much as 0.01 Tons with KLHK Manifest- 1651912509
4. Used lubricating oil includes used lubricating oil for hydraulics, engines, gears, lubrication, insulation, heat transmission, grit chambers, separators and/or mixtures thereof as much as 0.7156 Tons with KLHK Manifest-1656249683

PT KPAS (16 June 2022) PT Sumber Rezeki Abadi Jaya

1. Used hazardous material packaging as much as 0.0814 Tons with KLHK Manifest-1657808921
2. Used filters from air pollution control facilities as much as 0.0129 Tons with KLHK Manifest- 1657809111
3. Used lubricating oil includes used lubricating oil for hydraulics, engines, gears, lubrication, insulation, heat transmission, grit chambers, separators and/or mixtures thereof as much as 0.5544 Tons with Manifest KLHK-1657809795

7.2.9

Based on interviews with company representatives, they also explained that airborne pesticides were not applied. Pesticide application using a sprayer, according to the results of the pest and disease census. The results of field observations did not find the application of pesticides through the air.

7.2.10

Based on the review of the latest cholinesterase inspection document, the pesticide handling workers carried out in June 2021, were not found to be below the normal threshold. Based on interviews with workers in the field, it is known that they have carried out health checks.

7.2.11

The company presented memorandum No. 0011/HCO/M/III/2016 dated March 14, 2016 regarding pregnant and lactating workers. The memo states that the company places female workers who are pregnant or breastfeeding their babies up to the age of 9 months, in areas that do not endanger the health of the mother and baby. It is forbidden to work on work related to chemicals (chemicals).

Based on a field visit to LTE Afdeling 1 block D20 for spray workers, all of whom are women, it is known that none of the workers are pregnant, and the workers already know about policies for pregnant or lactating workers, such as for pregnancy check-ups where only women who do not use contraception and done once a month.

Status: Comply

7.3

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

7.3.1

The Company has identified waste in factories and plantations including the type of waste (Hazardous waste, domestic waste, infectious waste, and solid waste), the source of the waste, and the actions taken to reduce waste. The waste management plan has considered the types of waste such as solid waste/by-products from factories that are collected and reused.

Solid waste

The waste generated by the company is shells, fiber and EFB. The management plan is carried out by reusing solid waste such as shells and fiber to be reused as boiler fuel. Meanwhile, solid waste such as EFB is reused by applying it to plantation areas.

Palm Oil Mill Effluent

Liquid waste generated from the factory is reused for Land Applications. Before being channeled to Land Application, the liquid waste is first managed at the WWTP with the aim that the quality of the liquid waste flowing to LA is in accordance with the provisions.

Domestic Waste

Domestic waste generated from housing and offices will be disposed of in Landfills.

Hazardous waste

Hazardous Waste generated by the Estate and Factory will be stored in the Temporary Storage of Hazardous Waste owned, then it will be transported by a licensed third party which will then be handed over to the hazardous waste manager whose license the company already has a permit for Temporary Storage of Hazardous Waste, that is:

1. Extension of permit for temporary storage of hazardous and toxic waste. The company can show the Decree of the Kutai Timur Regent Number: 503/09/DPMTSP-PPNP/TPS-LB3/IV/2021 regarding the extension of the permit for the temporary storage of PT KPAS hazardous and toxic waste in Kongbeng Sub District, Kutai Timur District on 26 April 2021 with validity period of 5 years.
2. Granting a permit for a temporary storage place for hazardous and toxic waste. The company can show the Decree of the Regent of Kutai Timur Number: 660/K.503/2017 regarding the granting of a permit for temporary storage of hazardous and toxic waste to PT DSN Perkebunan Kelapa Sawit 7 in Miau Baru Village, Kongbeng Sub District, Kutai Timur District on July 4, 2017 with validity period of 5 years.

In terms of carrying out the transportation of hazardous waste, the company (KPS) cooperates with the licensed hazardous waste carrier, namely PT Sumber Rezeki Abadi Jaya. The company can show the SPK with PT Sumber Rezeki Abadi Jaya with Number 008/KPS/JKT/2022 on January 3, 2022 with a validity period until December 31, 2023. For PT DSN in collaboration with a licensed Hazardous Waste Transporter, namely PT Sinar Bintang Albar. The company can show SPK with PT Sinar Bintang Albar with Number 298/DSN/JKT/2022 on 20 April 2022 with a validity period until 31 December 2023.

7.3.2

Based on interviews with company management and the Head of the Hazardous and Toxic Waste Warehouse of POM and Estate, it is known that they have understood the handling of waste disposal, especially hazardous and toxic waste and non-hazardous and toxic waste in accordance with the procedures owned by the management unit. Based on the results of field observations in residential areas, it is known that there is no use of hazardous and toxic waste as water reservoirs. In addition, domestic waste management is in accordance with company procedures.

7.3.3

Based on the results of field observations to employee housing and warehouse areas, both estates and factories, it is known that there are no burning or open burning for waste destruction. Each housing has provided a trash can for domestic waste such as organic and inorganic. Hazardous and toxic waste will be collected in a temporary storage area for Hazardous and Toxic Waste.

Status: Comply

7.4

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

7.4.1

The company has Work Instructions in managing soil fertility which are described in:

- IK-AGR-OLP-09-R03 dated November 3, 2014 regarding fertilization
- IK-AGR-OLP-10-R02 October 2014 regarding POME applications in the field
- IK-AGR-OLP-11-R02 dated November 3, 2014 regarding the EFB application
- IK-AGR-OLP-25-R01) dated February 1, 2014. About soil and leaf sampling

These procedures define multiple strategies to maintain and improve long-term fertility, combining efficient and scalable organic fertilization, taking into account the age of the oil palm and soil nutrients by conducting leaf and soil sampling.

7.4.2

The company routinely conducts regular soil and leaf analysis, routine soil analysis is carried out every 6 years by measuring the following parameters; texture, acidity (pH), content of C, N, P, K, Mg, Ca, Na, BS, CEC, Al and H. And for Leaf Analysis to monitor and manage plant health by testing and certificates, as follows:

- Test Result Report by the Central Plantation Service Laboratory of PT. Central Alam Resources Lestari with number 10/KPS-KM/RA/IV/2022 dated 27 April 2022 with 15 samples for LTE - PT. KPAS.
- Certificate of Plant Tissue Testing (Leaf) with the number 0683/CPS/IV/2022 dated 27 April 2022 with a total sample of 15
- Test Result Report by the Central Plantation Service Laboratory of PT. Central Alam Resources Lestari with number 16/KPS-KM9/RA/IV/2022 dated 30 May 2022 with 7 samples for KM9 - PT. KPAS.
- Certificate of Plant Tissue Testing (Leaves) with the number 0777/CPS/V/2022 dated 30 May 2022 with a total sample of 7.
- Test Result Report by the Central Plantation Service Laboratory of PT. Central Alam Resources Lestari with number 15/KPS-LTE/RA/IV/2022 dated 30 May 2022 with 5 samples for LTE - PT. KPAS.
- Certificate of Plant Tissue Testing (Leaves) with the number 0777/CPS/V/2022 dated 30 May 2022 with a total sample of 5.

7.4.3

Efficient and moderate inorganic fertilization is very important to maintain soil structure and texture, combined with fertilization with POME land application and EFB mulch application. Fertilization is carried out mainly on land with low nutrient properties, to improve soil structure and texture, and minimize inorganic fertilization if possible. No replanting activities have yet been carried out, but procedures stipulate that the biomass in replanting will return to the soil for the nutrient cycling strategy. For example, a by-product application is presented.

The company shows that the application for jankos until December 2021 is 293 Ha with a total of 22,583 MT. Based on field observations in Block E19 Afdeling 1 KM19, it is known that the EFB application is carried out by forming the letter U around the palm and has applied POME and nothing flows into the environment.

7.4.4

Based on document review and interviews, it is known that the company has fertilizer recommendations for 2021 and 2022. In the records of fertilization records for 2021 at KM9 Estate and LTE it is known that it is 100% known that the fertilizer recommendations have been realized by the company, although in the third round such as Hikay fertilizer 316,539 tons for 831 ha have been realized as much as 233,421 tons or 74%. Changes in dosage were made on the advice of the Research department.

Status: Comply

7.5

Practices minimize and control erosion and degradation of soils.

7.5.1

Unit certification has a detailed soil survey document in 2013 prepared by the DSN Group Agro Research and Development Department. Soil and land suitability classes are listed in the document and mapped on a 1:70,000 scale. The conclusion section states that there is no peat, fragile soil or marginal soil in the operation area. The main soil type is alluvial soil with good drainage with class S2 (Enough Appropriate) at PT. DSN,

From the results of a land survey conducted by R&E Agro 1 DSN Group, that the distribution of land in PT KPAS is dominated by the Order of Ultisols (with Sub Groups Typic Kanhapluduts, Typic Kandudults and Plinthic Kandudults). Most of the soil characteristics in the PT KPAS area have deep soil solum, clay texture, good drainage and low soil fertility, and the land class in the PT KPAS area is mostly in the S2 land class. And based on observations field at the KM9 Estate and LTE Plantation, it is known that the plantation area is relatively flat.

7.5.2, 7.5.3

Unit certification has a detailed soil survey document in 2013 prepared by the DSN Group Agro Research and Development Department. Soil and land suitability classes are listed in the document and mapped on a 1:70,000 scale. The conclusion section states that there is no peat, fragile soil or marginal soil in the operation area. The main soil type is alluvial soil with good drainage with class S2 (Enough Appropriate) at PT. DSN,

From the results of a land survey conducted by R&E Agro 1 DSN Group, that the distribution of land in PT KPAS is dominated by the Order of Ultisols (with Sub Groups Typic Kanhapluduts, Typic Kandudults and Plinthic Kandudults). Most of the soil characteristics in the PT KPAS area have deep soil solum, clay texture, good drainage and low soil fertility, and the land class in the PT KPAS area is mostly in the S2 land class.

And based on field observations at the KM9 Estate and LTE Plantation, it is known that the plantation area is relatively flat. Based on the document, it is known that the oldest planting year in the company's area was TT 2008 (13 years) while the youngest was TT 2015 (7 years) so that at the time of the audit, the company had not carried out any replanting activities.

Status: Comply

7.6

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

7.6.1, 7.6.2, 7.6.3

Unit certification has a detailed soil survey document in 2013 prepared by the DSN Group Agro Research and Development Department. Soil and land suitability classes are listed in the document and mapped on a 1:70,000 scale. The conclusion section states that there is no peat, fragile soil or marginal soil in the operation area. The main soil type is alluvial soil with good drainage with grade S2 (Enough Appropriate) at PT. DSN,

From the results of a land survey conducted by R&E Agro 1 DSN Group, that the distribution of land in PT KPAS is dominated by the Order of Ultisols (with Sub Groups Typic Kanhappluduts, Typic Kandudults and Plinthic Kandudults). Most of the soil characteristics in the PT KPAS area have deep soil solum, clay texture, good drainage and low soil fertility, and the land class in the PT KPAS area is mostly in the S2 land class.

And based on field observations at the KM9 Estate and LTE Plantation, it is known that the plantation area is relatively flat. Based on the document, it is known that the oldest planting year in the company's area is TT 2008 (13 years) while the youngest is TT 2015 (7 years), so there are no plants with new plant categories.

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

Unit certification has a detailed soil survey document in 2013 prepared by the DSN Group Agro Research and Development Department. Soil and land suitability classes are listed in the document and mapped on a 1:70,000 scale. The conclusion section states that there is no peat, fragile soil or marginal soil in the operation area. The main soil type is alluvial soil with good drainage with class S2 (Enough Appropriate) at PT. DSN,

From the results of a land survey conducted by R&E Agro 1 DSN Group, that the distribution of land in PT KPAS is dominated by the Order of Ultisols (with Sub Groups Typic Kanhappluduts, Typic Kandudults and Plinthic Kandudults). Most of the soil characteristics in the PT KPAS area have deep soil solum, clay texture, good drainage and low soil fertility, and the land class in the PT KPAS area is mostly in the S2 land class. And based on field observations at the KM9 Estate and LTE Plantation, it is known that the plantation area is relatively flat.

Status: Comply

7.8

Practices maintain the quality and availability of surface and ground water

7.8.1

The company already has a water management plan and has implemented the water management plan which consists of:

- Prohibit throwing garbage/waste in drainage
- Making oil traps at workshop locations and hazardous waste storage areas
- Cementing the workshop floor
- Socialization to employees and the public regarding the management of hazardous waste
- Management of conservation areas and enrichment of plant species
- Protecting water catchment areas
- Using fertilizer according to the dose
- Minimize the use of pesticides with IPM
- Use of pesticides registered according to the green book of the ministry of agriculture
- Sending hazardous waste to a licensed hazardous material
- Do not wash the sprayer in the river body
- Report the type of pesticide used
- Conduct river water sampling

Environmental monitoring efforts to reduce and prevent negative impacts on water quality degradation in the second semester of 2021 at PT. KPAS has carried out monitoring of the water of the Wahau River and the Pesab River in August and November 2021 in collaboration with PT. Sucofindo. The test results are as follows:

Parameter	Standard	Wahau River on August		Wahau River on November	
		Upstream	Downstream	Upstream	Downstream

BOD ₅ (mg/l)	3	2.80	2.82	2.21	3.39
COD (mg/l)	25	18.51	18.75	21.33	22.50
Total Suspended Solid (mg/l)	50	8	4	29	40
Oil dan Grease	1	< 0.01	< 0.01	< 0.01	< 0.01
pH	6 - 9	5.37	5.73	6.74	7.10

Parameter	Standard	Pesab River on August		Pesab River on November	
		Upstream	Downstream	Upstream	Downstream
BOD ₅ (mg/l)	3	2.90	3.05	2.95	2.89
COD (mg/l)	25	19.23	20.06	19.67	19.84
Total Suspended Solid (mg/l)	50	5	3	26	30
Oil dan Grease	1	< 0.01	< 0.01	< 0.01	< 0.01
pH	6 - 9	5.67	5.59	6.66	7.54

Quality standards: Kalimantan Timur Regional Regulation No. 02 of 2011 concerning Water Quality

Based on the results of the tests carried out, all parameters are still below the specified quality standard, namely the Kalimantan Timur Regional Regulation No. 02 of 2011 concerning Water Quality.

LTE, it is known that the river border is protected by the company. Some of the activities carried out by the company are by placing signs as limits for chemical application and planting woody plants.

7.8.2

Programs for the protection of water bodies, wetlands, including river borders are recorded in the River Border Work Instruction document IK-AGR-SHE-06-R01) dated 11 January 2018. Based on the document, protection for water bodies such as making signs, determining areas river borders, placing signs on river border lines, and determining activities related to river boundaries (weed control should not be carried out with agrochemicals, plates are cleaned manually, fertilization is done by planting), in riverside areas planting types of plants that can be used must be planted. cover the ground (cover crop) such as vertiver grass.

Wet streams in the company area are protected by the company. This is evidenced by the results of field observations on the Pesab Block E35B LTE river border, it is known that the river border is protected by the company. Some of the activities carried out by the company are by placing signs as limits for chemical application and planting woody plants.

7.8.3

The company has conducted monthly wastewater quality testing in collaboration with an accredited laboratory. Based on the document review, during the second semester of 2021, the test results are known to have complied with the established quality standards. Here are the test results for the July – November 2021 (outlet) period:

Parameter	Standard	July	August	September	October	November
BOD ₅ (mg/l)	5,000	486.10	1,073.59	428.36	594.14	618.63
COD (mg/l)	-	1670	3068	1361	1696	1765
pH	6.00 – 9.00	7.86	7.42	7.41	7.88	7.70
Oil dan Grease (mg/l)	-	0.68	0.88	0.17	0.73	0.21

7.8.4

Companies can show records of water use for palm oil processing, for example as follows:

Period	FFB Process (Ton)	Water used for Process (m ³)	Budget (m ³)
January 2022	19,986.30	24,720	45,036
February 2022	22,157.46	24,050	45,036
March 2022	24,165.34	26,730	45,036
April 2022	24,694.72	26,800	45,036
May 2022	28,036.82	25,230	45,036

Pekerjaan Umum dan Perumahan Rakyat Minister Decree number 767/KPTS/M/2017 dated 2 October 2017 about surface water utilization for PT DSN in Wahau River. Water utilization with volume: 45,036 m3/month; the water intake coordinate is 01° 16' 53.58" N and 116° 54' 28.8" E. validity period of this license is 5 years.

Status: Comply

7.9

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

7.9.1

POM 7 has an Energy efficiency document in 2021 for the use of fossil fuels or the use of renewable fuels. The calculation of efficiency with the use of fossil fuels during 2021 (January-December) is concluded as follows:

FFB Processed during 2021 is 298,442.22 tons using renewable fuels such as shells of 8,224,549 Kg and Fiber of 36,670,087 kg.

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 company also has conducted GHG emission calculations period 2021 use of Calculator Palm GHG version 4.0.

Summary of Net GHG Emissions

Emmission per product	tCO2e/tProduct
CPO	0.06
PK	0.06
PKO	0.00
PKE	0.00

Extraction	%
OER	23.49
KER	4.07

Land use	Ha
Planted area on mineral	14884.17
Planted on peat	0
Total area planted	14884.17
Conservation Area (Forested)	0
Conservation Area (Non-Forested)	1574.30
FFB Production per hectarage	26.59

Summary of field emission and Sinks

Description	Own crop		Group		Total
Emissions Sources	tCO2e	tCO2e/ tFFB	tCO2e	tCO2e/ tFFB	
Land conversion	61784.19	0.48	9661.07	0.33	71446.27
CO2 emissions from fertilizer	7303.76	0.06	3576.66	0.12	10880.42
N2O emissions from peat	0.00	0.00	0.00	0.00	0.00
N2O emissions from Fertilizer	4638.62	0.04	1024.41	0.03	5663.03
Fuel consumption	1934.22	0.02	545.75	0.02	2479.97

Summary Oil Mill Emissions and Credits

Remarks	tCO2e	tCO2e/t FFB
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Emissions sources		
POME	0.00	0.00
Fuel consumption	530.88	0.00
Grid electricity	0.00	0.00
Credits		
Export of excess electricity to housing & grid	0.00	0.00
Sales of PKS	0.00	0.00
Sales of EFB	0.00	0.00
Total	530.88	0.00

7.10.2

LTE

Based on the results of the document review, it is known that there were plantings above 2010, where the certification unit has verified the NPP with the scope of IUP No. 500/136/EKO.2/II/2009 covering an area of $\pm 5,000$ Ha. Document verification was carried out on 10-12 February 2016 and a field visit on 21-22 March 2016. While the Notification was uploaded on 3 April 2016. Verification of the NPP is still using the 2010 NPP procedure, so there is no RSPO Greenhouse Gas assessment for new developments in 2015.

KM 9

Based on document review and interviews with company representatives, it is known that there have been no new developments since 2014 in the KM 9 area.

7.10.3

Other significant pollutant identification results are available, which are shown in the PT DSN – POM Pollution Source Identification and Management Plan document, for the period January – December 2021. Based on the document, information about types of pollution, sources of pollution, management programs and information, some of which are shown as follows:

1. Type of pollution: Air Pollution

- Source of pollution: Boiler Chimney
- Management program: Use of Dust Collector, monitor boiler emission and maintenance of Trembesi trees.
- Note: Monitoring of boiler emissions by Sucofindo.
- Source of pollution: Genset Chimney
- Management program: Genset engine maintenance, generator emission monitor and Trembesi tree maintenance.
- Notes: Monitoring of genset emissions by Sucofindo.
- Source of pollution: Dust from production machines
- Management program: Provide respiratory protection for production employees and spirometry test for production employees once a year.
- Source of pollution: Smell of Wastewater
- Management program: Monitoring the level of odor and ambient in air every 6 months at the Front Office and Housing.
- Description: Monitoring of ambient air and odor by Sucofindo.
- Source of pollution: Boiler Chimney
- Management program: Use of Dust Collector, monitor boiler emission and maintenance of Trembesi trees.
- Note: Monitoring of boiler emissions by Sucofindo.

2. Type of pollution: Noise

- Source of pollution: VFD production machine

- Management program: maintenance of production machines, monitoring of noise levels every 6 months, providing ear protection PPE to employees exposed to noise > 85 dBA, performing audiometry checks for employees who are exposed.
- Note: Noise monitoring by Sucofindo.

3. Type of pollution: Wastewater

- Source of pollution: Liquid Waste
- Management program: Monitoring the level of liquid waste and applying liquid waste (Palm Oil Mill Effluent) to land applications in the estate
- Description: Analysis of WWTP inlet and outlet by Sucofindo and monitoring of production data and liquid waste applications

4. Type of pollution: Solid waste

- Source of pollution: Empty Fruit Bunch
- Management program: applied to the estate
- Description: Monitoring production data and empty applications
- Source of pollution: Shell
- Management program: used as boiler fuel
- Description: Monitoring production data and shell application
- Source of pollution: Fiber
- Management program: used as boiler fuel
- Description: Monitoring of fiber production and application data

5. Type of pollution: Hazardous waste

- Source of pollution: POM Operation and Maintenance
- Management program: Sending Hazardous Waste to Hazardous Waste Temporary Warehouse POM
- Description: Hazardous Waste Balance Sheet

Trees were planted around WWTP POM 7, where based on the FM SHE 39 ROO Inventory of February 2022 Vegetation Tally Sheet document, it was found that 179 plants had been planted from 2017 to 2021.

Status: Comply

7.11

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

7.11.1

UoC has a land clearing mechanism stated in the Work Instructions for land clearing number IK-AGR-OLP-01-R04 dated on 1 October 2019 which explains that land clearing is carried out with zero burning.

Based on the document verification and the field observation during the audit activity, it was found that there were no new land clearing and replanting activities carried out by the company. In addition, there were no traces of burning on the plantation areas and there was a warning board which stated the prohibition to use fire in preparing land or any activities.

7.11.2

As the prevention method of land fire, the UoC had carried out several activities, as follows:

- Fire emergency response simulation training for employees, for example on which was held on 2 May 2022 which was attended by the management trainees.
- UoC has an emergency team to handle fire emergencies in each unit (mill and estates).
- UoC provided facilities and infrastructure for emergency response prevention and management of land fires.

UoC also held fire fight simulations during the audit activity. Based on the simulation held by the UoC, it's known that the company's

fire fighter team did the simulation well and fire fighting equipment can be used properly any time.

7.11.3

UoC also involved stakeholders around the plantation areas in land fire prevention by conducting socialization of land fire control to the communities, for instance which was held on 6 February 2021 in Miau Baru Village. Based on the interviews with village community representatives, it's known that the company had socialized land fire control to the community. In addition, UoC also put the signboard which stated the prohibition of land burning activities and the danger of land fire.

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; 7.12.8

- The certification unit has reported PT KPAS's LUCA on September 13, 2016 where the total area of raw liability: 646.26 Ha; Total Area of Conservation Liability: 0.0 Ha with Result of LUC Analysis methodology review: Pass. While the notification email from the RSPO on December 2, 2016.
- The certification unit has reported the LUCA Karya Sejahtera Cooperative (KM 9) on 22 May 2020 where the total area of raw liability: 2,079.67 Ha; Total Area of Conservation Liability: 0.0 Ha with Result of LUC Analysis methodology review: Pass. While the notification email from the RSPO is on 30 July 2020.

7.12.2

The certification unit has conducted HCV identification on 2013 by RSPO approved assessor. The scope of assessment in accordance to Location Permit number 122/02.188.45/HK/III/2007 with area 7,000 Ha. Potential HCV on this assessment are 817 Ha with item HCV as below:

- HCV1.1: Wahau, Sinteang, Matuai, Mejiang, Pesap, Miau Rivers.
- HCV1.3: Wahau, Sinteang, Matuai, Mejiang, Pesap, Miau Rivers.
- HCV3: Wahau, Sinteang, Matuai, Mejiang, Pesap, Miau Rivers.
- HCV4.1: Wahau, Metuah, Miau, Mejiang, Sinteang Rivers.
- HCV4.2: Wahau, Sinteang, Matuai, Mejiang, Pesap, Miau Rivers.
- HCV5: Wahau, Sinteang, Matuai, Mejiang, Pesap, Miau Rivers.
- HCV6: *Hutan Lindung Desa Miau Baru, Hutan Adat Wehea*

Based on interview with management of PT KPAS sighted that currently HCV6 outside of HGU or cadastral area. The management unit has determined the HCV area as below:

No	Estate	Year of Planted	Block	Division	Area (Hectare)
1	LTE	2012	E35B	2	2.2
2	KM 14	2015	F36A	2	1.4
3	SWE	2011	N40	1	3.1
4	SWE	2014	L49	2	23.7
5	SWE	2013	N47	2	3.8
6	SWE	2015	N44C	2	5.8
7	SWE	2015	M48D	2	3.1
8	SWE	2014	L52A	2	10.2
9	SWE	2014	L51A	2	13.2
10	SWE	2014	J58A	2	7.7
11	SWE	2014	L50A	2	3.7
12	SWE	2014	K65C	3	4.6
13	SWE	2014	J58B	2	2.5
14	SWE	2014	I58A	3	5.1
15	SWE	2013	J60A	3	9.9
16	SWE	2013	J60B	3	4.2
17	SWE	2013	K63A	3	3.5

18	SWE	2014	J64D	3	3.7
Total					111.5

Based on above table sighted that the HCV area on this certification scope is 2.2 Hectare in Division 2, Block E35B, Pesap River bufferzone. Based on field observation to that area sighted that the HCV on good condition and well managed. Based on document verification sighted that there were no new planting after November 2015, so the HCS assessment not applicable for this assessment.

Based on a review of the HCV Assessment document conducted in 2016 and field observations in KM9, it is known that there is no HCV in KM9.

7.12.3

Based on the notice on the RSPO website it is known that the High Forest Cover Landscapes and High Forest Cover Countries have not been established by the RSPO. So that this standard has not yet been assessed.

7.12.4

The certification unit has conducted HCV identification on 2013 by RSPO approved assessor. The scope of assessment in accordance to Location Permit number 122/02.188.45/HK/III/2007 with area 7,000 Ha. Potential HCV on this assessment are 817 Ha with item HCV as below:

- HCV1.1: Wahau, Sinteang, Matuai, Mejiang, Pesap, Miao Rivers.
- HCV1.3: Wahau, Sinteang, Matuai, Mejiang, Pesap, Miao Rivers.
- HCV3: Wahau, Sinteang, Matuai, Mejiang, Pesap, Miao Rivers.
- HCV4.1: Wahau, Metuah, Miao, Mejiang, Sinteang Rivers.
- HCV4.2: Wahau, Sinteang, Matuai, Mejiang, Pesap, Miao Rivers.
- HCV5: Wahau, Sinteang, Matuai, Mejiang, Pesap, Miao Rivers.
- HCV6: *Hutan Lindung Desa Miao Baru, Hutan Adat Wehea*

Currently the certification unit has HCV management and monitoring plan, such as:

- Flora and fauna monitoring on Miao River, Mejiang River, Matuai River, Wahau River, POM 7 water pond.
- Routinely patrol
- HCV signboard monitoring
- Bufferzone monitoring
- HCV socialization to the communities
- HCV awareness to all workers

Based on document verification sighted that the HCV identification in accordance to Location Permit scope, while actual HCV management by the company in accordance to HGU area. There are variance between HCV identified area with HCV management area. For example: HCV 6 currently exclude from HCV management. However, currently the certification unit has not been able to show the participatory evaluation with the relevant stakeholders. While based on field observation result to the Pesap River riparian zone on Division 2, Block E35B, LTE sighted that there are signboard which inform as swamp area. In addition, there are no marking of chemical application limit on the oil palm in accordance to the procedure number IK-AGR-STD-00 dated January 1st, 2013.

The integrated management plan including through consultation with stakeholders, which was carried out during the February 2021 socialization activity in Benhes Village, March and April 2021 in Nehas Liah Bing Village

7.12.5

Based on HCV identification document there are customary rights categorized as HCV6, such as: *Hutan Lindung Miao Baru and Hutan Adat Wehea*. Currently that area are outside the area management (HGU and cadastral area). Based on interview with management, it was explained that the area would not be managed by the company. In addition, based on interview with traditional leader from Miao Baru Village and Nehes Lias Bing Village sighted that the customary forest were outside the company.

7.12.6

The certification unit has a regular training program every year to educate all workers regarding to HCV and RTE species. Due to Covid-19 prevention, the training activities had not been carried out until this assessment conducted. The latest training were

conducted on September 9, 2019.

Based on field observation to the POM 7 and LTE housing complex sighted that there are no workers who kept the RTE species. In addition, based on interview with several spraying workers sighted that they had understand of HCV and RTE species.

7.12.7

The certification unit has monitor and manage the HCV area and evaluated that result, in generally there are several points:

- Biodiversity: the type of fauna in 2019 included macaca sp, *cekaka*, *raja udang*. The type of flora found on the riparian zone as follows: *Simpur*, *Bayur* and *Jambu Hutan*. Decreased of species, it cause there are community plantation on surrounding of management unit. And also the observation method are not maximal. The certification unit has mad evaluation and preventif action on the HCV management and monitoring plan year of 2020.
- The company shows the 2022 Annual Training Schedule document, which among other things describes the conservation training plan for the security team commander and its members in February and March 2022 and has been realized on March 5, 2022.
- The company has also provided socialization related to conservation which has been carried out in Benhes Village in March 2021, Nehas Liah Bing Village and Diak Lay Village in April 2021.
- The company also shows the document of the Program and Monthly Work Realization of Conservation Management of PT Karya Prima Agro Sejahtera in 2022, which among other things explains the plan for awareness/socialization activities about Biodiversity to External Parties (Communities around the plantation or the government).

Status: Comply

7.12 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	POM 7 of PT Dharma Satya Nusantara did not use RSPO Trademark and CB Logo on its product (on-product) and non-product (off-product).	✓
	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	POM 7 of PT Dharma Satya Nusantara did not use RSPO Trademark and CB Logo on its product (on-product) and non-product (off-product).	✓
	Status: Comply	
3.	Implementation of Certificate and Trademark is not used on product	X or ✓
ASA-1	POM 7 of PT Dharma Satya Nusantara did not use RSPO Trademark and CB Logo on its product (on-product) and non-product (off-product).	✓
	Status: Comply	
4.	Controlling of Certificate and Trademark, including withdrawing inappropriate trademark.	X or ✓
ASA-1	POM 7 of PT Dharma Satya Nusantara did not use RSPO Trademark and CB Logo on its product (on-product) and non-product (off-product).	✓
	Status: Comply	

7.13 Summary of RSPO Partial Certification.

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

PT Dharma Satya Nusantara Time Bound Plan is explained in table 1.10. PT Dharma Satya Nusantara has sixteen (16) management units with ten (10) mills. PT Dharma Satya Nusantara has informed the Time Bound Plan progress, MUTU has considered that PT Dharma Satya Nusantara is complied with the RSPO requirement for Time Bound Plan. The Time Bound Plan was revised and declared by PT Dharma Satya Nusantara on 27 December 2021 and signed by Head of Sustainability.

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

MUTU Auditor has verified company partial certification and concludes that:

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

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
2.1.1	Did the company conduct an internal audit? If so, has a positive assurance statement been produced?	PT Dharma Satya Nusantara Tbk has carried out self-assessment (e.g., internal audit) against uncertified management units and submitted self-assessment reports year 2021. Self-assessment against uncertified management units as fol- low: PT Karya Prima Agro Sejahtera on 2 – 4 June 2021, PT Mitra Nusa Sarana on 7 – 10 June 2021, PT Bima Palma Nugraha on 10 – 12 June 2021, PT Bima Agri Sawit on 14 – 16 June 2021, PT Dharma Inti Sawit Lestari on 15 – 18 June 2021, PT Dharma Persada Sejahtera on 14 – 16 June 2021, PT Kencana Alam Permai on 21 – 23 June 2021, PT Prima Sawit Andalan on 21 – 23 June 2021, PT Pilar Wanapersada on 21 – 23 June 2021 and PT Putra Utama Lestari on 18 – 20 November 2021.
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>The entire companies under PT Dharma Satya Nusantara Tbk (DSN Group) have conducted HCV assessment. Uncertified management units have conducted HCV assessment and HCS assessment such as:</p> <ul style="list-style-type: none"> - PT Dharma Persada Sejahtera located in Sintang District, Kalimantan Barat Province has HCV assessment on March 2012 by PT Sonokeling Akreditas Nusantara - PT Dharma Intisawit Lestari located in Bulungan District, North Kalimantan Province has HCV assessment on January 2013 by PT Daemeter Consulting

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<ul style="list-style-type: none"> - PT Karya Prima Agro Sejahtera located in Kutai Timur District; Kalimantan Timur Province has HCV assessment on July 2013 by PT Daemeter Consulting - PT Agro Andalan located in Sekadau District, West Kalimantan Province has HCV assessment on July 2017 by Remark Asia - PT Bima Palma Nugraha located in Kutai Timur District; Kalimantan Timur Province has HCV – HCS assessment on February 2021 by PT Gagag Dinamiga Aksenta - PT Bima Agri Sawit located in Kutai Timur District, East Kalimantan Province has HCV – HCS assessment on July 2020 by PT Gagag Dinamiga Aksenta - PT Kencana Alam Permai located in Sintang District; Kalimantan Barat Province has HCV assessment on September 2011 by PT Sonokeling Akreditasi Nusantara - PT Mitra Nusa Sarana located in Sintang District; Kalimantan Barat Province has HCV assessment on December 2017 by Remark Asia - PT Prima Sawit Andalan located in Sintang District, Kalimantan Barat Province has HCV assessment on January 2012 by PT Sonokeling Akreditasi Nusantara - PT Pilar Wanapersada located in Lamandau District, Central Kalimantan Province has HCV assessment on February 2013 by PT Daemeter Consulting - PT Putra Utama Lestari located in Mahakam Hulu and West Kutai District, Kalimantan Timur Province has HCV assessment on February 2014 by PT Gagag Dinamiga Aksenta - PT Mitra Nusa Sarana (MNS) located in Sintang District; Kalimantan Barat Province has HCS assessment report on March 2018 by PT Ata Marie (Ata Marie). The Assessment has been carried out following the 2015 HCSA toolkit (v1) - PT Agro Andalan (AAN) located in Sekadau District, Kalimantan Barat Province has HCS assessment report on February 2018 by PT Ata Marie (Ata Marie). The Assessment has been carried out following the 2015 HCSA toolkit (v1) - PT Pilar Wanapersada located in Lamandau District, Central Kalimantan Province has Carbon Stock Assessment report on October 2015 by PT Gagag Dinamiga Aksenta <p>Some uncertified management units have carried out land clearing activities since November 2005 without preceded by HCV identification/assessment. Based on RaCP tracker per December 2021 on the RSPO website that the RaCP tracker is</p>

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<p>being upgraded and is currently in the BETA testing phase (https://rspo.org/certification/remediation-and-compensation/racp-tracker). Information of LUCA for some uncertified management units as follow:</p> <ul style="list-style-type: none"> - PT Karya Prima Agro Sejahtera located in Kutai Timur District, Kalimantan Timur Province: LUCA and disclosure of non-compliant land clearing was available, and it had been submitted to RSPO secretariat and LUCA has passed with the result of liability assessment is zero. - PT Bima Palma Nugraha located in Kutai Timur District, Kalimantan Timur Province: LUCA and disclosure of non-compliant land clearing was available, and it had been submitted to RSPO secretariat year 2020 and LUCA has passed. Concept note is on process. - PT Bima Agri Sawit located in Kutai Timur District, Kalimantan Timur Province: LUCA and disclosure of non-compliant land clearing was available, and it had been submitted to RSPO secretariat year 2020 and LUCA has passed. Concept note is on process. - PT Dharma Intisawit Lestari located in Bulungan District, North Kalimantan Province: LUCA and disclosure of non-compliant land clearing was available, and it had been submitted to RSPO secretariat and LUCA has passed with the result of liability assessment is 79.60 ha. It has been implemented. - PT Putra Utama Lestari located in Mahakam Hulu and West Kutai District, Kalimantan Timur Province: LUCA and disclosure of non-compliant land clearing was available and it had been submitted to RSPO secretariat and LUCA has passed with liability 3 ha. Concept note is on process. - PT Pilar Wanapersada located in Lamandau District, Central Kalimantan Province: LUCA and disclosure of non-compliant land clearing was available, and it had been submitted to RSPO secretariat and LUCA has passed with liability 1,483.50 ha. Concept note is on process. - PT Agro Andalan (AAN) located in Sekadai District, Kalimantan Barat Province: LUCA and disclosure of non-compliant land clearing was available, and it had been submitted to RSPO secretariat and LUCA has passed with liability 46.10 ha. Concept note is on process. - PT Dharma Persada Sejahtera located in Sintang District, Kalimantan Barat Province: LUCA and disclosure of non-compliant land clearing was available, and it had been sub-

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<p>mitted to RSPO secretariat year 2020 with the result of liability assessment is zero.</p> <ul style="list-style-type: none"> - PT Prima Sawit Andalan located in Sintang District, Kalimantan Barat Province: LUCA and disclosure of non-compliant land clearing was available, and it had been submitted to RSPO secretariat year 2020 with the result of liability assessment is zero. - PT Kencana Alam Permai located in Sintang District, Kalimantan Barat Province: LUCA and disclosure of non-compliant land clearing was available, and it had been submitted to RSPO secretariat year 2020 with the result of liability assessment is zero. - PT Mitra Nusa Sarana (MNS) located in Sintang District, Kalimantan Barat Province: LUCA and disclosure of non-compliant land clearing was available, and it had been submitted to RSPO secretariat year 2020 and still on RSPO review.
2.1.3	Any new plantings since January 1 st 2010 must comply with the RSPO New Plantings Procedure.	<p>Based on auditor verification, not all uncertified unit conduct new clearing after January 2010 but for all uncertified unit with land clearing after January 2010 has follow NPP. Detail information of uncertified unit are:</p> <ul style="list-style-type: none"> • PT Bima Agri Sawit (PT BAS), PT Mitra Nusa Sarana (PTMNS), PT Agro Andalan (PT AAN) and PT Bima Palma Nugraha (PT BPN) have conducted NPP verification by CB. Result of NPP verification can be seen on RSPO website • PT Dharma Satya Nusantara Tbk has proposed a new development plan for its concession that covers an area of 742.39 ha located inside its operational area in PT Bima Agri Sawit (PT BAS) management unit. The plantation properties are in the Desa Baay and Karangan Seberang, Karangan Subdistrict, Kutai Timur District, Kalimantan Timur Province, Indonesia. The NPP verification of PT BAS was conducted by PT TUV Rheinland auditors through document verification and an on-site visit. A preliminary document review was conducted on 14 October 2020 remotely followed by field verification on 4 December 2020. The Summary report of this area is now undergoing 30 days of public notification as required by the RSPO New Planting Procedure 2015 beginning from 25th May 2021 - 24th June 2021. (https://www.rspo.org/certification/new-planting-procedure/public-consultations/pt-dharma-satya-nusantara-pt-bima-agri-sawit-pt-bas)

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<ul style="list-style-type: none"> PT Dharma Satya Nusantara has proposed a new development plan for its concession that covers an area of 7,392 ha located inside its operational area in PT Mitra Nusa Sarana (PT MNS) management unit. The plantation properties are in the Ketungau Hulu and Central Ketungau Sub District, Sintang District, Kalimantan Barat Province, Indonesia. The NPP verification of PT MNS was conducted through document and field verification. TUV Rheinland auditor conducted a preliminary document review on 30 March 2020. This was followed up with a field verification visit to the proposed new planting area on 27-28 July 2020. The Summary report of this area is now undergoing the 30 days public notification as required by the RSPO New Planting Procedure 2015. (https://www.rspo.org/certification/new-planting-procedure/public-consultations/pt-dharma-satya-nusantara-pt-mitra-nusa-sarana-pt-mns) PT Dharma Satya Nusantara has proposed a new planting area located in Tapang Perodah, Nanga Pemubuh, Setawar, Boti, Sungai Sambang, Mondri, and Nanga Menterap village, Sekadau Hulu subdistrict, Sekadau district, Kalimantan Barat Province, Indonesia. The summary report of PT Agro Andalan (PT AAN) New Planting Assessment is now open for Public comments for 30 days as required by the RSPO New Planting Procedure 2015. (https://rspo.org/certification/newplanting-procedure/public-consultations/pt-dharma-satya-nusantara-ptagro-andalan-pt-aan) PT Dharma Satya Nusantara has proposed a new development plan for its concession that covers an area of 286 ha located inside its operational area in the PT Bima Palma Nugraha (PT BPN) management unit. The plantation properties are located in the Desa Tepian Langsat, Desa Tebangan Lembak, Desa Tepian Indah and Desa Tepian Raya, Benganlon subdistrict, Kutai Timur district, Kalimantan Timur province, Indonesia. The NPP verification of PT BPN was conducted through document verification and on-site visit. TUV Rheinland auditor conducted a preliminary document reviewed on 08 February 2021 by remote (virtual process). This is followed up with onsite visit verification to the proposed area for a new planting site

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<p>on 28-29 April 2021. The Summary report of this area is now undergoing 30 days of public notification as required by the RSPO New Planting Procedure 2015 beginning from 16th June 2021 until 15th July 2021. (https://rspo.org/certification/new-planting-procedure/public-consultations/pt-dharma-satyanusantara-pt-bima-palma-nugraha-pt-bpn)</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>Uncertified management units have procedure for land conflict No. SOP-AGR-058-R03 (Prosedur Ganti Rugi Lahan) and No. SOP-AGR-007-R00 (Prosedur Penanganan Konflik).</p> <p>Based on self-assessment there is no land conflict in the location of uncertified management units. Uncertified management units (PT Mitra Nusa Sarana, PT Dharma Persada Nusantara and PT Agro Andalan) provided evidence related land compensation process such as:</p> <ul style="list-style-type: none"> - ID card - Document of land ownership - Statement letter about right of land - Map of land compensation - Minute of land checking - Agreement of land compensation (GRTT) price - Agreement of land compensation - Agreement of land clearance - Statement letter of hand over of land compensation - Payment slip - Documentation of hand over of land compensation (photo-graph). <p>Based on status of complaints on the RSPO website (https://askrspo.force.com/Complaint/s/casetracker) there is no complaint for PT Dharma Satya Nusantara Tbk (DSN Group).</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>Based on self-assessment of uncertified management units (PT Karya Prima Agro Sejahtera, PT Mitra Nusa Sarana, PT Bima Palma Nugraha, PT Bima Agri Sawit, PT Dharma Inti Sawit Lestari, PT Dharma Persada Sejahtera, PT Kencana Alam Permai, PT Prima Sawit Andalan, PT Pilar Wanapersada and PT Putra Utama Lestari), and desk study on internet that there is no labour dispute issue since last year period until the partial audit conducted on 8 – 9 December 2021.</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>Uncertified management units have list of legal and other requirements presented in list of regulation and law covering plantation, OSH, labor, and environmental sections. The law and regulation is including relevant laws, government regulations,</p>

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<p>Instruction of President, Minister Regulations, Local Regulations, and Governor Regulations etc. All copies of law and regulations are available and maintained. Uncertified management unit has a record of list and regulation document, already mentioned regulation and law should to be fulfilled by management unit.</p> <p>There is a procedure of identification of laws and other legal requirements, No. SOP-AGR-024-R01. The procedure mentioned identification, source of information, personnel in charge and distribution of legal requirement.</p> <p>Uncertified management units have established a system for tracking any changes in the law. In Procedure of identification of laws and other legal requirements mentioned that SHE/HCD/HCO/Legal department head/legal department conduct updating requirement every 6 months. The source of the information is internet, newspaper and government agencies. Implementation of this procedure is mentioned in report of Summary of Evaluation of Compliance against Laws and Regulations (<i>Ringkasan Evaluasi Kepatuhan terhadap Peraturan Perundangan</i>), document No DK-MS-01A-R01, issued on January 2021.</p> <p>Evidence of regulation compliance from uncertified units such as land use right/ land title, environmental permit, business plantation permit, report of environmental management & monitoring plan year 2021 which has been submitted to government agency etc.</p> <p>Based on self-assessment reports that some of PT Dharma Satya Nusantara's uncertified management units have not comply with legal requirement relates of Land Use Right (HGU) on behalf PT Karya Prima Agro Sejahtera (Kalimantan Timur Province), PT Putra Utama Lestari (Kalimantan Timur Province), PT Dharma Persada Sejahtera (West Kalimantan Province), PT Prima Sawit Andalan (West Kalimantan Province) and PT Mitra Nusa Sarana (West Kalimantan Province) where the current status is on process at Land Agency (BPN).</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 Opportunity for Improvement and Noteworthy Positive Components at Initial Certification

NCR No.	:	2020.1	Issued by	:	Brigitta Prita
Date Issued	:	19 November 2020	Time Limit	:	Surveillance 1
NC Grade	:	Minor/Non-critical	Date of Closing	:	-
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 company showed documents such as:					
<ul style="list-style-type: none">• The list of FFB suppliers for 2020 period are 14 External FFB suppliers consists of the Harapan Sawit Wahau Jaya Cooperative, Daun Hijau Jaya Cooperative, Lestari Jaya Tani Cooperative, Karya Prima Wehea Sejahtera Cooperative, KSU Harapan Baru, KSU Seleq Sejahtera Bersama, Sawit Usaha Sejahtera Cooperative , KSU Kean Blom Kerjah, PT Roni Putra Abadi, PT Global Duta Abadi and others.• Available purchase orders (PO) for example:<ul style="list-style-type: none">- Lestari Jaya Tani Cooperative, PO No. 1044002147, date of PO April 30, 2020, located at POM 7, delivery period 1 - 30 April 2020. The PO explains the terms of acceptance and payment terms.- PT Global Duta Abadi, PO No. 1044002155, PO date 1-30 September 2020 located at POM 7. The PO explains the terms of acceptance and payment terms.• The PO has not yet explained a separate clause regarding and fulfillment of relevant legal obligations and can be proven by the third party concerned but not limited to the application of the Wage according to the Regency Minimum Wage, fulfillment of BPJS TK & KES, fulfillment of PPE and others.• The list of contractors at Long Teman Estate and POM 7 for 2020 period consists of 5 contractors in LTE, 20 CPO Transporter, 2 Palm Kernel Transporter and 3 vehicle contractors (Dump Truck, light unit rental and bus unit rental).• There is a work order with number 011 / KPS / LTE / 2020 for bulk transport activities of FFB from Long Teman Estate to POM 7 between the company and Kombeng Lestari Cooperative from January 2, 2020 – June 30, 2020. CLA extension (Addendum I) dated from July 01, 2020 – December 31, 2020.• Work order Number 009 / KPS / LTE / 2020 between the company and PT Nova Bersaudara Jaya (LTE) regarding the provision of cars (Mitsubishi FE 84 GBC School Bus) January 2, 2020 - December 31, 2022.• Work order letter number 006 / DSN / DIS / 2020 for CPO transportation of PT Roni Putra Abadi (POM 7) dated from January 2, 2020 - June 30, 2020. Attachment to CLA extension (Addendum I) for 6 months starting July 1, 2020 - 31 December 2020.• Work order letter number 012 / DSN / KCP / 2020 for kernels transportation between the company and Sandi Amdia dated January 02, 2020 – June 30, 2020. Attachments for CLA extension (Addendum I) for 6 months starting from July 1, 2020 – December 31, 2020.• In the work order letter above Article 4 of the parties obligations. .<ul style="list-style-type: none">- Providing workers and the necessary facilities / infrastructure including but not limited to accommodation, meals and other s necessary for continuity work.- To involve workers in the BPJS Employment and Health program if the second party does not participate in the program, the responsibility for all risks that may occur in the future will be the responsibility of the first party.- Comply with laws and regulations governing employment, occupational safety, road traffic, transportation and aspects of environmental impacts but not limited to:					

- Giving wages according to the *minimum wages of City or Regency* for the workers.
- Provide the necessary PPE.
- Provide drivers who have a valid license.
- The company shows evidence of payment for *BPJS TK, KES* & wage slips for contractors at Long Teman Estate, such as:
 - Salary slip for contractor workers with the initials H. The basic salary earned is IDR 3,140,098 plus *BPJS KES IDR 125,604* and *JHT IDR 116,184*. Deduction (*JKK, JKM, JHT, BPJS KES*) of IDR 385,290, - the total earned is IDR 2,996,596.
 - Evidence of payment of *BPJS KES* in October 2020 for 26 workers and 14 amenability of IDR 4,764,000, - dated October 23, 2020 via Electronic Payment Bank BRI.
 - Evidence of payment of *BPJS TK* for 26 employees in October 2020 to IDR 4,715,247, - November 10, 2020 through Bank BRI E-Payment.
- POM 7 has not been able to show evidence of payment of *BPJS TK & KES*, payment of contractor workers wages and others.

Non-Conformance Description:

- Based on the description above, the company has not been able to show separate clauses regarding the fulfillment of relevant legal obligations and can be proven by the third party concerned, but not limited to the application of wages according to the Regency Minimum Wage, Fulfillment of *BPJS TK & KES* and for External TBS supplier.
- POM 7 has not been able to show evidence of compliance with relevant laws that can be proven by third parties (CPO & PK transporter).

Root Cause Analysis (*filled by organization audited*):

The company doesn't make an agreement with RSPO requirement and only use purchase order (PO), to make it easier.

Correction (*filled by organization audited*):

Revised the PO of 14 external FFB suppliers consisting of the *Koperasi Semoga Sawit Wahau Jaya, Koperasi Jasa Daun Hijau, Koperasi Usaha Tani Lestari Jaya, Koperasi Karya Prima Wehea Sejahtera, KSU Harapan Baru, KSU Seleg Sejahtera Bersama, Koperasi Sawit Usaha Tani Sejahtera, KSU Kelean Blom Kerjah, PT Roni Putra Abadi, PT Global Duta Abadi* and others with including the regulation requirement, minimum wage, social insurance, PPE's, and others.

Corrective Action (*filled by organization audited*):

Making monitoring of old and new PO's related to the addition of separate clauses regarding to legal obligations and can be proven by the third parties.

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

Verification on 27 April 2021

The unit of certification showing list of contractor period of 2021 which inform FFB PO numbers, name of company, type of activity, and period. There are 50 contractor (FFB suppliers, transporters and heavy equipment) on POM 7. For example:

1. CV Three Putra with PO number 1044002237 dated 1-28 February 2021 for FFB buying with amount 7,000 ton.
2. Koperasi Daun Hijau with PO number 1044002175 dated 1-31 December 2021 for FFB buying with amount 1,500 ton.
3. Koperasi Karyawan Prima Wehea Sejahtera with PO number 1044002217 dated 28 February 2021 for FFB buying with amount 1,000 ton.

It the above agreement were explained several point, such as:

- a. The second party is obliged to involve its workforce in the social insurance program.
- b. The second party complies with the prevailing laws and regulations in Indonesia, such as: manpower, occupational safety and health, environment, road transportation and traffic, sustainability & NDPE policies, no child worker, doesn't practical of forced labor and human trafficked.
- c. The second party provides the adequate PPE and requires & guarantee that workers use PPE's (helmets, safety shoes and masks).

Based on above description, there has not been shown evidence of additional clauses on the agreement of CPO & PK

transporter. For example the CPO transporter by PT Roni Putra Abadi (POM 7) and the PK transporter by Sandi Amdia. The unit of certification also has not been able to show evidence of compliance with the relevant law. It has not been fulfilled.

Verification on 24 May 2021

The unit of certification were shown several evidences, such as:

1. Work order letter number 014/DSN/KCP/2021 dated December 28, 2020 with Sandi Amdia, the validity period of the agreement is January 1st to June 30th, 2021 for PK transport activities from POM 7 to the KCP PKS 4 (Long Jenew). The agreement has stated the rights and obligations of both parties, including provisions of the minimum wage, no forced labor, child labor and human trafficking; as well as clauses according to the RSPO requirements.
2. Work order letter number 006/DSN/DIS/2021 dated December 28, 2020 with PT Roni Putra Abadi, the validity period of the agreement is January 1st to June 30th, 2021 for CPO transport activities from POM 7 to the Bulking Labanan. The agreement has stated the rights and obligations of both parties, including provisions of the minimum wage, no forced labor, child labor and human trafficking; as well as clauses according to the RSPO requirements.
3. Evidences of Social Insurance (worker insurance) registration dated 11 May 2021 with initial RSL, SLS, TLB, SNR, STR, IWN.

However the unit of certification has not been able to shown membership number of each workers, pay slip is in accordance to minimum wage regulation (CV Three Putra, Koperasi Daun Hijau, Koperasi Karyawan Prima Wehea Sejahtera, Sandi Amdia and PT Roni Putra Abadi workers. It's not been fulfilled.

Verified by : **Brigitta P & Trismadi N**

NCR No.	:	2020.2	Issued by	:	Brigitta Prita
Date Issued	:	19 November 2020	Time Limit	:	Surveillance 1
NC Grade	:	Minor/Non-critical	Date of Closing	:	24 May 2021
Standard Ref. & Requirement	:	2.2.3. All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour.			
The company showed documents such as:					
<ul style="list-style-type: none">• The list of FFB suppliers for 2020 period is 14 External FFB suppliers consisting of the Harapan Sawit Wahau Jaya Cooperative, Daun Hijau Services Cooperative, Lestari Jaya Farmers Cooperative, Karya Prima Wehea Sejahtera Cooperative, KSU Harapan Baru, KSU Seleq Sejahtera Bersama, Koperasi Sawit Usaha Sejahtera , KSU Kelean Blom Kerjah, PT Roni Putra Abadi, PT Global Duta Abadi and so on.• The list of contractors at Long Teman Estate and POM 7 for the period 2020 consists of 5 contractors in LTE, 20 CPO Transporter, 2 Palm Kernel Transporter and 3 vehicle contractors (Dump Truck, light unit rental and bus unit rental).• Work order Number 009 / KPS / LTE / 2020 between the company and PT Nova Bersaudara Jaya (LTE) regarding the provision of cars (Mitsubishi FE 84 GBC School Bus) January 2, 2020 - December 31, 2022.• Work order letter number 006 / DSN / DIS / 2020 for CPO transportation of PT Roni Putra Abadi (POM 7) dated from January 2, 2020 - June 30, 2020. Attachment to CLA extension (Addendum I) for 6 months starting July 1, 2020 - 31 December 2020.• Work order letter number 012 / DSN / KCP / 2020 for kernels transportation between the company and Sandi Amdia dated January 02, 2020 – June 30, 2020. Attachments for CLA extension (Addendum I) for 6 months starting from July 1, 2020 – December 31, 2020.• Available purchase orders (PO) for example:<ul style="list-style-type: none">- Lestari Jaya Tani Cooperative, PO No. 1044002147, date of PO April 30, 2020, located at POM 7, delivery period 1 - 30 April 2020. The PO explains the terms of acceptance and payment terms.					

- PT Global Duta Abadi, PO No. 1044002155, PO date 1-30 September 2020 located at POM 7. The PO explains the terms of acceptance and payment terms.

Non-Conformance Description:

Based on the description above, the company has not been able to show evidence of a separate clause that prohibits the practice of involving child labor, forced labor and workers from human trafficking. **This is non-conformity of No.2020.02 with the Minor category.**

Root Cause Analysis (filled by organization audited):

In the agreement stated that there is an obligation to comply with law that are general, it have not specified the prohibition against practices involving child labor, forced labor, and human trafficking.

Correction (filled by organization audited):

Revised the PO of 14 external FFB suppliers consisting of the *Koperasi Semoga Sawit Wahau Jaya, Koperasi Jasa Daun Hijau, Koperasi Usaha Tani Lestari Jaya, Koperasi Karya Prima Wehea Sejahtera, KSU Harapan Baru, KSU Seleg Sejahtera Bersama, Koperasi Sawit Usaha Tani Sejahtera, KSU Kelean Blom Kerjah, PT Roni Putra Abadi, PT Global Duta Abadi* and others with including the regulation requirement, minimum wage, social insurance, PPE's, and others.

Corrective Action (filled by organization audited):

Making monitoring of old and new PO's related to the addition of separate clauses regarding to prohibition of child labor, forced labor, and human trafficking.

Assessor Evaluation and Conclusion (filled by auditor):

Verification on 27 April 2021

The unit of certification showing list of contractor period of 2021 which inform FFB PO numbers, name of company, type of activity, and period. There are 50 contractor (FFB suppliers, transporters and heavy equipment) on POM 7. For example:

1. CV Three Putra with PO number 1044002237 dated 1-28 February 2021 for FFB buying with amount 7,000 ton.
2. Koperasi Daun Hijau with PO number 1044002175 dated 1-31 December 2021 for FFB buying with amount 1,500 ton.
3. Koperasi Karyawan Prima Wehea Sejahtera with PO number 1044002217 dated 28 February 2021 for FFB buying with amount 1,000 ton.

It the above agreement were explained several point, such as:

- a. The second party complies with the prevailing laws and regulations in Indonesia, such as: manpower, occupational safety and health, environment, road transportation and traffic, sustainability & NDPE policies, no child worker, doesn't practical of forced labor and human trafficked.

Based on above description, there has not been shown evidence of additional clauses on the agreement of CPO & PK transporter. For example the CPO transporter by PT Roni Putra Abadi (POM 7) and the PK transporter by Sandi Amdia. It's not been fulfilled.

Verification on 24 May 2021

The unit of certification were shown several evidences, such as:

1. Work order letter number 014/DSN/KCP/2021 dated December 28, 2020 with Sandi Amdia, the validity period of the agreement is January 1st to June 30th, 2021 for PK transport activities from POM 7 to the KCP PKS 4 (Long Jenew). The agreement has stated the rights and obligations of both parties, including provisions of the minimum wage, no forced labor, child labor and human trafficking; as well as clauses according to the RSPO requirements.
2. Work order letter number 006/DSN/DIS/2021 dated December 28, 2020 with PT Roni Putra Abadi, the validity period of the agreement is January 1st to June 30th, 2021 for CPO transport activities from POM 7 to the Bulking Labanan. The agreement has stated the rights and obligations of both parties, including provisions of the minimum wage, no forced labor, child labor and human trafficking; as well as clauses according to the RSPO requirements.

Based on above explanation this nonconformity has been fulfilled.

Verified by : **Brigitta P & Trismadi N**

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NCR No.	:	2020.3	Issued by	:	Trismadi N
Date Issued	:	19 November 2020	Time Limit	:	Before Certificate Issued (12 month)
NC Grade	:	Major/Critical	Date of Closing	:	24 May 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 showing the documents of environment management and monitoring realization as follows:
POM 7
RKL-RPL semester 1st, 2020 been monitor and manage several parameter's:

- Decreased of air quality
- Increased of noise level
- Decreased of water quality
- Hazardous waste
- Solid waste

However, the evaluation chapter has not yet referred to the Environment Minister Decree number 45 of 2005. For example: the trend evaluation not comparing test result of previous semester.

PT KPAS
RKL-RPL semester 1st, 2020 been monitor and manage several parameter's:

- Ambient air quality in workshop area and Miau Baru Village
- Increased of noise in workshop area
- Quality of surface water (inlet & outlet of Wahau River & Pesap River)
- Job opportunities in Miau Baru Village
- Community in Miau Baru Village
- Public health in Polyclinic and *Puskesmas*
- Aquatic biota (inlet & outlet of Wahau River & Pesap River)
- Effluent quality on the outlet ponds
- Soil fertility on several sampling point
- Anxiety and conflict of interest in Miau Baru Village
- Improvement of infrastructure in Miau Baru Village
- Increased of human resources in Miau Baru Village

However, there are some non conformities, for example:

- There are no explanation of road damage monitoring and management parameter
- There is no explanation of ground traffic disruption
- There is no explanation of environment quality test result for Q3 and Q4 of 2019. Even though were also not reported on the Semester 2nd, 2019.

In addition, the evaluation chapter has not yet referred to the Environment Minister Decree number 45 of 2005. For example: the trend evaluation not comparing test result of previous semester.

Non-Conformance Description:
The certification unit has not been able to show evidence that the SEIA management and monitoring plan been implemented, monitored and updated regularly

Root Cause Analysis (filled by organization audited):
Lack of understanding of the compilers of the RKL-RPL report in POM 7 and LTE (PT KPS) regarding to Environment Minister Decree number 45 year of 2005.

Correction (filled by organization audited):
PT DSN-POM 7

1. Revised the RKL-RPL report in the evaluation chapter that has not yet referred to KepMenLH number 45 of 2005. For example: but not limited to (trend evaluation) with comparing the test result with the previous semester.

PT KPAS-LTE:

1. Revised the RKL-RPL report such as:
 - a. Including all parameters in the AMDAL matrix (examples of parameters that have not been included the realization of RKL-RPL; parameters of road damage every day during operation, traffic disturbances every day during operation).
 - b. Including the results of environmental quality testing for the 3rd & 4th quarters of 2019.
 - c. Revised the evaluation chapter that has not yet referred to the KepMenLH No 45 of 2005. For example: but not limited to (trend evaluation) comparing the test result with the previous semester.

Corrective Action (filled by organization audited):

Internal training for the preparation of RKL-RPL documents for EHS Assistant on POM 7 and LTE.

Assessor Evaluation and Conclusion (filled by auditor):
Verification on 27 April 2021

The unit of certification were shown several evidences:

1. UKL-UPL realization report on Semester I & Semester II year of 2020 for PT DSN-POM 7. However the trend evaluation were explaining about compliance evaluation. There was no explanation regarding the trend of the actual semester test result compared to the previous semester period; critical level evaluation has not been explained; and evaluation of the level of compliance has not been explained in accordance to KepMenLH number 45 of 2005.
2. RKL-RPL realization report on Semester I year of 2020 for PT KPS in the document has discussed the management and monitoring of the impact of road damage (repairs were carried out in Block C19A, C20A, Afdeling III on May 5, 2020); impact of land traffic disruption (no land traffic congestion); it has attached the results of the environmental tests carried out on March 9, 2020.
3. RKL-RPL realization report on Semester II year of 2020 for PT KPS in the document has discussed the management and monitoring of the impact of road damage (repairs were carried out in Block C19A, C20A, Afdeling III on May 5, 2020); impact of land traffic disruption (no land traffic congestion); it has attached the results of the environmental tests carried out on September 22, 2020. However the realization of road maintenance on estate is still the same as the data for the previous semester.
4. Attendance list for training on making RKL-RPL report dated 7 December 2020 were attended by 11 participants from each plantation unit and Mill on PT DSN.

Verification on 24 May 2021

The unit of certification was shown several evidence:

1. UKL-UPL realization report on Semester I & Semester II year of 2020 for PT DSN-POM 7. It has been complied with Kepmen LH number 45 year of 2005, such as: trend evaluation with compare the quality test Semester I year of 2020 and Semester II year of 2020. Critical evaluation and compliance evaluation in accordance to the relevant regulations.
2. RKL-RPL realization report on Semester II year of 2020 for PT KPAS, it has included the road maintenance dated 23 October 2020 on Afdeling III, Block C22A (along 183 m) and Block C22C (along 676 m).

Based on above explanation, this nonconformity has been fulfilled.

Verified by

: **Trismadi N**

NCR No.	: 2020.4	Issued by	: Trismadi Nurbayuto
Date Issued	: 19 November 2020	Time Limit	: Before Certificate Issued (12

			month)
NC Grade	:	Major/Critical	Date of Closing : 27 April 2021
Standard Ref. & Requirement	:	3.7.1 A documented programme that provides training is in place, which is accessible to all staff, workers, sceme smallholders, and ouutggrowers taking into account gender-specific needs, and which covers applicable of P&C principles, in a form they understand and includes assessment of the training.	
Evidence observed (filled by auditor): 1. The company already has training program in 2020, covering best cultivation technique, administration, and general human resources. However, there is no training program for electric OHS experts and sterilizer operator certification for POM. 2. Result of field observation known that : a. The company has generator machine with capacity 500 kVA / 536,19 HP and turbine machine with capacity 1000 kW / 1250 kVA b. The company has 3 sterilizers with capacity 60 tons/hour 3. Result of interview with : a. 2 sterilizer operators known that they have no licence yet b. The management representative known that they have no lisenced electric OHS expert yet 4. Result of internal review semester 1 in 2020 on March 26-28, 2020 found that they have no certification of expert (AK3L) at POM 7. They has coordinated with plantation head and sibmitted a training application form for OHS expert certification 5. Permenaker No 12 of 2015 Article 7 states that for companies that have power plants of more than 200 (two hundred) kilo Volt-Ampere are required to have OHS expert in electrical. 6. Permenaker No. 1 of 1988 annex 1 explains that a company that has a steam engine with a capacity of >40 tons/hour to <60 tons/hour is required to have 1 operator class I and 2 operators class II.			
Non-Conformance Description (filled by auditor): The company has not been able to show evidence that it has identified the training needs for all employees according to the RSPO principles and criteria.			
Root Cause Analysis (filled by organization audited): There is no understanding related to the Sterilizer Operator License and Electrician expert.			
Correction (filled by organization audited): POM 7 propose the sterilizer operator license and electrician expert to head office, and the head office will be arrange that training.			
Corrective Action (filled by organization audited): POM 7 will be monitor the validity period of operator licenses.			
Assessor Evaluation and Conclusion (filled by auditor): Verification on 27 April 2021 The unit of certification were shown several evidences, such as: 1. Minute of Sterilizer Operator training dated 5-10 April 2021 by the provider PT Derap Pembangunan Inspektindo with members 26 person. Member from POM 7 with initial HRD and MYD. 2. Minute of Sterilizer Operator training dated 22-27 February 2021 by the provider PT Derap Pembangunan Inspektindo with members 39 person. Member from POM 7 with initial DNG, ALM, LWJ, RHM, RHA, & EDA. 3. Training proposed with initial FAZ (Electrician Assistant) dated 3 December 2020 approved by Plantation Head. 4. Electrician Expert confirmation letter from PT Indotrain Consultant dated 10 March 2021, the training will be conducted on 12 – 30 April 2021. 5. SIO monitoring form on POM 7 which inform: operator name, certificate name, classification, validity period, and regulation references. Based on above explanation, this nonconformity has been fulfilled.			

Verified by	:	Trismadi N
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NCR No.	:	2020.5	Issued by	:	Trismadi Nurbayuto
Date Issued	:	19 November 2020	Time Limit	:	Surveillance-1
NC Grade	:	Minor/Non Critical	Date of Closing	:	27 April 2021
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. Firs aid equipment is available at worksites. Records of all accidents are kept and periodically reviewd.			
Evidence observed (filled by auditor): 1. Result of field observation in fire extinguisher simulation at Hydrant no 6 (close to boiler) known that it can not be used properly due to the hose was leaking and the spare did not fit properly. 2. Document verification of Hydrant inspection from January to first week of November 2020 known that the Hydrant and its equipmments were in good condition and ready to use. 3. Procedure of occupational health and safety No SOP-AGR-037-R01, one of emergency condition is boiler explotion.					
Non-Conformance Description (filled by auditor): The company has not been able to show that fire control facility is available in accordance with the applicable regulation.					
Root Cause Analysis (filled by organization audited): There is a replacement hydrant without checking beforehand.					
Correction (filled by organization audited): 1. Order the appropriate hose hydrant (hose hydrant order proof). 2. Test the new hose hydrant (documentation).					
Corrective Action (filled by organization audited): 1. Regularly hydrant monitoring (monitoring record) 2. Periodicaly of hydrant simulation and testing (documentation)					
Assessor Evaluation and Conclusion (filled by auditor): Verification on 27 April 2021 The unit of certification was shown several evidence, such as: 1. Hydrant inspection record on 9 March 2021 where the hydrant pressure, hose and nozzle on good conditions. 2. Hydrant check form number FM-SHE-34-FOO from July to December 2020 for hydrant number 2 (workshop) and number 6 (solar tank). Some of the points that are monitored include: hydrant box, hydrant kit box, alarm button, nozzle, hose, water faucet, door box, faucet lock, and emergency generator. 3. Good receipt report number 4908555082 dated 22 February 2021 in the form of 6 rollers of 2.5 hydrant hoses with a length of @ 30 meters and 6 pcs hydrant hose nozzels.					
Based on above explanation, this noncofimity has been fulfilled.					
Verified by	:	Trismadi N			

NCR No.	:	2020.6	Issued by	:	Trismadi N
Date Issued	:	19 November 2020	Time Limit	:	Before Certificate Issued (12 month)

NC Grade	:	Major/Critical	Date of Closing	:	27 April 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): The certification unit has conducted HCV identification on 2013 by RSPO approved assessor. The scope of assessment in accordance to Location Permit number 122/02.188.45/HK/III/2007 with area 7,000 Ha. Potential HCV on this assessment are 817 Ha with item HCV as below: <ul style="list-style-type: none">- HCV1.1: Wahau, Sinteang, Matuai, Mejiang, Pesap, Miao Rivers.- HCV1.3: Wahau, Sinteang, Matuai, Mejiang, Pesap, Miao Rivers.- HCV3: Wahau, Sinteang, Matuai, Mejiang, Pesap, Miao Rivers.- HCV4.1: Wahau, Metuah, Miao, Mejiang, Sinteang Rivers.- HCV4.2: Wahau, Sinteang, Matuai, Mejiang, Pesap, Miao Rivers.- HCV5: Wahau, Sinteang, Matuai, Mejiang, Pesap, Miao Rivers.- HCV6: <i>Hutan Lindung Desa Miao Baru, Hutan Adat Wehea</i> Currently the certification unit has HCV management and monitoring plan, such as: <ul style="list-style-type: none">- Flora and fauna monitoring on Miao River, Mejiang River, Matuai River, Wahau River, POM 7 water pond.- Routinely patrol- HCV signboard monitoring- Bufferzone monitoring- HCV socialization to the communities- HCV awareness to all workers Based on document verification sighted that the HCV identification in accordance to Location Permit scope, while actual HCV management by the company in accordance to HGU area. There are variance between HCV identified area with HCV management area. For example: HCV 6 currently exclude from HCV management. However, currently the certification unit has not been able to show the participatory evaluation with the relevant stakeholders. While based on field observation result to the Pesap River riparian zone on Division 2, Block E35B, LTE sighted that there are signboard which inform as swamp area. In addition, there are no marking of chemical application limit on the oil palm in accordance to the procedure number IK-AGR-STD-00 dated January 1 st , 2013.					
Non-Conformance Description: The certification unit has not been able to show that been conducted an evaluation of the HCV management & monitoring plan was developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations.					
Root Cause Analysis (filled by organization audited): Lack of understanding regarding HCV planning and monitoring in consultation with relevant stakeholders.					
Correction (filled by organization audited): <ol style="list-style-type: none">1. Identification of relevant staekeholders.2. Stakeholder's consultation regarding the direct managed HCV management and monitoring plan and considering management at the wider landscap level.					

Corrective Action *(filled by organization audited):*

Prepare an annual work plan related to the preparation of an HCV management and monitoring plan in consultation with relevant stakeholders.

Assessor Evaluation and Conclusion *(filled by auditor):*
Verification 27 April 2021

The unit of certification shown several evidences, such as:

1. List of stakeholders of PT KPS consists of 28 people from Miao Baru Village government, 12 community leaders from Miao Baru Village, 4 cooperative administrators, 8 suppliers, 9 contractors, 7 religious institutions, 35 people from Nehas Liah Bing Village Government, Cooperative & suppliers: 9 people; local residents: 7 people; NGO: 1 person, 7 contractors, 4 religious organizations, 1 labor organization, 10 head of worker unions, 2 NGOs.
2. Record of socialization of fire control and biodiversity at the Secretariat of the Nehas Lias Bing Village Traditional Institution on January 28, 2021 with 30 participants. There were also a presentation material for the socialization.
3. Sample of questionnaire to the communities on January 28, 2021.
4. Program & realization of Conservation Area 1 Site Wahau management in 2021, including: Biodiversity management, protecting conservation areas, enrichment of conservation areas, restoration riparian area, conservation area socialization, wildlife conflicts, conservation management reports.

Based on above explanation, this nonconformity has been fulfilled. The implementation of HCV management and monitoring will be evaluated on the next assessment.

Verified by
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Trismadi N

3.4.2. Identification of Findings, Corrective Actions and Opportunity for Improvement and Noteworthy Positive Components at ASA-1

NCR No.	:	2022.01	Issued by	:	Dwi Premadha Lestari
Date Issued	:	23 Juni 2022	Time Limit	:	21 September 2022
NC Grade	:	Minor raised to Major	Date of Closing	:	20 September 2022
Standard Ref. & Requirement	:	6.7.2 There are procedures for emergency response and work accidents in Indonesian which are clearly understood by all workers. There are workers assigned to the field and other work locations and have received First Aid training in Accidents (P3K). First aid kits are available in the workplace. Records of all work accidents are kept and reviewed regularly.			
Evidence observed (filled by auditor): <ul style="list-style-type: none">The company has procedures that regulate the provision of first aid in the workplace, for example in SOP-AGR-037-R01 November 2013 concerning Occupational Health and Safety.Based on the results of the field visit, the following facts were found:<ul style="list-style-type: none">POM 7: It was found that the contents of the first aid kit had expired since March 2022, such as povion iodine and aquades (3 locations)LTE : The foreman of the spray team does not carry a first aid bagRegular first aid checks have been carried out until June 2022The results of the interview with the person in charge of the first aid kit in question did not understand well about the function of the first aid items, such as alcohol and Povion Iodine, which were mentioned to wash the eyes or the safety pins which were mentioned to take thorns.It has been shown that corrections from the results of field visits, such as replacing expired first aid kits, but have not identified the cause of the problem and how to ensure future follow-up					
Non-Conformance Description (filled by auditor): <ol style="list-style-type: none">The company has not been able to show sufficient evidence that the person in charge of first aid in the field has a good understanding of the use/function of first aid itemsThe company has not been able to show sufficient evidence that the first aid kits available at the workplace are in a ready-to-use condition					
Root Cause Analysis (filled by organization audited): <ol style="list-style-type: none">Lack of socialization to the person in charge of first aid regarding the use/function of first aid itemsImplementing the monitoring of first aid equipment is less thorough, so that checking the expiration date is missed, and is only carried out on the completeness of the item.					
Correction (filled by organization audited): <ol style="list-style-type: none">Re-socialize the person in charge of the first aid kit regarding the use/function of the first aid item regarding the use/function of the first aid itemEvaluate the understanding of the person in charge of the first aid kit regarding the use/function of the first aid itemReplace expired first aid items and increase the number of missing first aid items					
Corrective Action (filled by organization audited): <ol style="list-style-type: none">Make a schedule & conduct periodic socialization to the person in charge of First AidMake an inspection checklist that includes first aid monitoring including the type, amount and expiration date/condition.Monitoring first aid equipment regularly, using a checklist.					

4. Doing first aid checks brought by the foreman during the morning circle

Assessor Evaluation and Conclusion (filled by auditor):
Verification on 20 September 2022

The company shows some evidence of improvement as follows, including:

1. Periodic socialization to the person in charge of first aid holders, the last time was on July 08, 2022 for LTE PT. KPAS attended by 18 employees (consisting of Foreman, Assistant, Officer and Medical), July 07 2022 for KM9 Estate attended by 19 employees (consisting of Foreman, Assistant, officers and Medical), and July 05 2022 for POM 7 PT. DSN was attended by 24 employees (consisting of Foreman, Assistant, Officer and Medical).
2. Evaluating the understanding of the person in charge of the function/usage of the First Aid Items carried out by the Medical Officer of each division of the company which was carried out on 05, 07 and 08 July 2022.
3. Monitoring the contents of the first aid kit every month (which has been done in June – July 2022), to ensure the expiration period of each first aid item.
4. The latest first-aid program training schedule per 27 June 2022 for all employees, consisting of:
 - Periodic socialization of PIC P3K POM 7 and KM9 Estate
 - Evaluation of Understanding the Uses/functions of P3K POM 7 and KM9 Estate
5. Monitoring the contents of the Foreman's First Aid bag every day during morning apples, and reported to the Garden Manager every month (which has been carried out in June – July 2022)

Auditor conclusion :

Based on the proof of repair that has been sent, this discrepancy has been fulfilled. The implementation of the first aid monitoring program and understanding of the use of first aid will be re-evaluated in the next assessment.

Verified by : **Dwi Premadha Lestari**

NCR No.	:	2022.02	Issued by	:	Dwi Premadha Lestari
Date Issued	:	23 Juni 2022	Time Limit	:	21 September 2022
NC Grade	:	Major	Date of Closing	:	02 August 2022
Standard Ref. & Requirement	:	6.7.3 Workers use appropriate Personal Protective Equipment (PPE), and it is provided free of charge to all workers in the workplace, as protection in all operations that have potential hazards, such as pesticide application, machine operation, land preparation, and harvesting. Sanitation facilities are available for workers who use pesticides so that workers can remove PPE, clean themselves and put on their personal clothes.			
Evidence observed (filled by auditor): <ul style="list-style-type: none">Standard for Personal Protective Equipment for Plantation Employees (Document No. DK-SHE-140-R04) dated October 1, 2018 and among others states:<ul style="list-style-type: none">Toe protection: 7 inch PVC boots with pullHand protection: 5 piles cloth glovesSOP-AGR-072-R00 dated September 1, 2016 regarding PPE, for example for harvesters, are as follows:<ul style="list-style-type: none">Head protection and eye protection: Helmet and GogglesGloves: Cotton glovesShoes : 10" PVC BootsSpinal guard: Break support belt<ul style="list-style-type: none">The results of the field visit found the following facts:					

- KM 9 :
 - When checking the HGU stake (Block E60) it was found that there was 1 harvester who was wearing gambir shoes
 - Block E19 afdeling1 KM 9 two harvesters do not use cotton gloves
- LTE :
 - When checking the HGU stakes, it was found that 1 harvester and 1 FFB loader were wearing gambir shoes
 - Personal protective equipment in accordance with established procedures and standards has actually been given to every employee, for example the handover of PPE for the period March 2022
- Socialization on the use of PPE on June 22, 2022 which was held in the LTE Meeting Room and was attended by 12 people. Documentation of job descriptions for the 1st afdeling foreman, harvesting foreman and foreman of care, one of which explains ensuring that the PPE provided by the company has been used properly by its workers.

Non-Conformance Description (filled by auditor):

The company has not been able to show sufficient evidence that all workers have used the PPE that has been provided

Root Cause Analysis (filled by organization audited):

Harvest workers do not fully understand the PPE standards set by the company.

Correction (filled by organization audited):

Conducting re-socialization to harvest workers regarding PPE standards

Corrective Action (filled by organization audited):

1. Monitoring the use of standard PPE during the morning circle
2. Conduct patrols for compliance with the use of standard PPE for harvest workers

Assessor Evaluation and Conclusion (filled by auditor):
Verification on 02 August 2022

The company shows some evidence of improvement as follows, including:

1. The company re-socializes harvest workers regarding PT. KPAS which was held on 28 June 2022 at KM9 Estate and attended by 27 employees, and 29 June 2022 at LTE and attended by 38 employees.
2. The KM9 foreman monitors PPE during the morning call at PT. KPAS Afd 3 KM9 Estate on 28, 29, 30 June and 1 July 2022, the LTE garden foreman monitored PPE during the morning meeting at Afd 2 LTE on 28 and 29 June 2022.
3. The company shows monitoring of violations of the use of PPE for the period June – July 2022 carried out by the K3L assistant on KM9 Estate and LTE, based on document verification, it is known that the use of PPE is complete, monitoring is reported every month and checked by the Plantation Head

Kesimpulan Auditor:

Based on the proof of repair that has been sent, this discrepancy has been fulfilled. The implementation of the monitoring program for the use of PPE will continue and will be re-evaluated in the next assessment.

Verified by	:	Dwi Premadha Lestari
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3.4.3. Opportunity for Improvement

No	Ref. Std.	Description
1	2.1.1	<p>The unit of certification complies with all relevant laws and regulations.</p> <p>The company has the opportunity to confirm the process of extending the permit for hazardous waste temporary warehouse PT DSN POM 7, given that the permit will expire on July 4, 2022.</p>
2	3.2.2	<p>As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat by Certification Body during Annual Surveillance Assessment by using the RSPO metrics template.</p> <p>UoC showed the RSPO Metric Template on the last day of the audit. Based on the Guidance For the 2018 RSPO Principles and Criteria Metric Template it is explained that "The Metric Template needs to be filled out by the Certification Unit before carrying out RSPO certification, Recertification, and annual supervisory audits".</p> <p>Based on the statement above, the certification unit has the opportunity to re-assure the time in showing the metric template to the Certification Body.</p>
3	5.1.7	<p>Weighing Equipment is periodically verified by an independent third party</p> <p>Regarding the expiration date of the calibration results owned by the company (20 April 2019), until the ASA 1 assessment is carried out, the company has not been able to show the latest calibration results. Related to this, the company showed a letter from the Industry and Trade Office of the Kutai Timur District Government Number 510/186/INDAG-SEK/IX/2021 dated 24 September 2021 to the Legal Department Head of PT DSN stating that until now the circular letter from the Mayor of Samarinda No. 440/0407/013.01 dated March 23, 2020 regarding the precautionary measures to prevent the Corona Virus in Samarinda City, it is still valid/has not been revoked so that the Samarinda City Metrology UPT recalibration service is still temporarily closed until further notice from the Samarinda City Government. The letter from the Kutai Timur District Industry and Trade Office also stated that the validity period of the certificate of test results at PT DSN (including POM 7) was stated to be still valid until there was an inspection of the equipment to be determined later.</p> <p>Then there is a letter from the Industry and Trade Office of Kutai Timur District Number B-510.35/209-Disperindag-PKTN//2022 on January 20, 2022 to the Legal Department Head of PT DSN stating that the Industry and Trade Office of Kutai Timur District has not been able to implement Weighbridge measurement is due to still waiting for the calibration mark paint (CTT) which has been ordered but has not been completed and it is estimated that the calibration mark (CTT) will be completed around the 2nd week of February 2022 so that the re-calibration of the electronic weighbridge is scheduled no later than the 2nd week of March 2022.</p>

3.4.4. Noteworthy Positive Components

No	Description
1	The company's commitment to implement the principles of sustainable palm oil management
2	Good cooperation from the Personnel in Charge during the audit
3	POM 7 has obtained Green PROPERDA from Kalimantan Timur Province for the period of 2020/2021.
4	Zero work accident award for 2020.
5	The company received a grant from &Green as an implementer of empowering social activities including environmental conservation.
6	Managing organic waste with composting method in Long Teman Estate.
7	Has implemented a social responsibility program to the communities and the benefits felt by the communities.



3.5 Summary of Arising Issues from Public and Auditor Verification

Public Issues (Institution/ NGO/Community)	Auditor Verification
Manpower Agency of Kutai Timur District <ul style="list-style-type: none"> • Mandatory reports related to employment have been submitted regularly in accordance with its period. • The company has registered the Labor Union. • No complaints regarding labor issues (child labor, worker discrimination, forced labor and so on). • There were no information request or complaint from Manpower Agency of Kutai Timur District. Every communication with the company is carried out through mobile applications. • There were no complaints related to salary shortages. 	<p>There was no negative issue that need further verification.</p>
Environmental Agency of Kutai Timur District <ul style="list-style-type: none"> • The company had reported the periodic reports of environmental related to environmental regulations. • The company already has a permit of waste utilization permit (Land Application) and temporary storage of hazardous waste. • There were no issues from the community and local NGOs related to environmental pollution or conflict. • The environmental service had conducted annual monitoring routinely to ensure that environmental management has been carried out properly. • There were an aspiration from the agency to the company for enclosing HCV/HCS reports. • Environmental agency remind the UoC to integrate all the permit related to environmental aspect to environmental technical agreement. 	<p>There were no negative issues that need further clarification. Several explanations have been described in the report.</p>
Land Agency of Kutai Timur District <ul style="list-style-type: none"> • The company already had location permit, plantation business permit (IUP), land title (HGU), and has routinely sent land use reports complied with applicable regulations related to land legality. • There were no complaint from stakeholder related to land disputes. 	<p>There were no negative issue that need further verification. Based on document review and field observations, the certification unit has demonstrated legal compliance related land legality, and no indications of land disputes.</p>
Plantation Agency of Kutai Timur District <ul style="list-style-type: none"> • The company has reported its Progress Report of Plantation Business (<i>Laporan Perkembangan Usaha Perkebunan/ LPUP</i>) quarterly. • Fire facilities are sufficient in accordance with the regulation. • CSR activities have been conducted for the surrounding villages and had been reported to the agency. • There were no fire incident occurred in the company's operational area both in Mill and Estates 	<p>There were no negative issue that need further verification. Based on document review and field observations, the company has demonstrated legal compliance regarding plantation legality, and no indications of land disputes or fire incident.</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<ul style="list-style-type: none"> The company has responded to information requests quickly and transparently. 	
Gender Committee Interviewee: <ul style="list-style-type: none"> Gender Committee Head of DSN POM 7 Gender Committee Head of PT. KPAS <ul style="list-style-type: none"> There were no complaints regarding issues related to sexual harassment and violence against women. All woman in pesticides applicator worker and others work which related to chemical material if reported pregnant, the worker would be transferred to non-agrochemical work (e.g.: daycare officer). The gender committee had socialized some policies related to sexual harassment, and child protection. The company has had a policy to protect female workers from sexual harassment in the workplace as well as a grievance mechanism. The company also implemented some regulations related to reproductive rights such as menstruation leave and maternity paid leave. 	<p>There were no negative issues related to gender discrimination that need any further verification. The explanation regarding the interview output had been explained specifically in summary report.</p>
Labor union Interviewee: Labor union's head of SPDSN POM 7 (DSN Workers Association) <ul style="list-style-type: none"> Bipartite meetings of labor union were held whenever it's needed and if there were any cases or grievances. There were no contract / temporary workers in mill and estates of PT. KPAS, all workers were permanent. The wages applied by the company were in accordance with the applicable minimum wage. The company supports union activities by providing secretarial building. There were no labor-related issues happened in all units. There were no fatal working accidents in 2021-2022. The company had provided accessible restaurants in plantation area. 	<p>There were no negative issues related to worker union that need any further verification. The explanation regarding the interview output had been explained specifically in summary report.</p>
Karya Sejahtera Cooperative The cooperation that exists with the company is very good because until now the cooperative business field under the guidance of DSN Group is not only buying and selling FFB but has grown to include heavy equipment rental (TLB), transportation of FFB and JJK, to leasing operational vehicles. The company also provides regular training to the management and admin of cooperatives, such as training on taxation and cooperative administration. The management of the partnership plantation is carried out in a	<p>In general there are no negative issues that require further verification. Explanation on FFB payments and Cooperation Agreements with plasma have been discussed on related indicators</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<p>transparent manner. The cooperative is given access to view the monthly report on the management of the plantation, which contains the actual production costs and overall income so that the net income is known each month. Profit sharing is given equally to each member. The FFB payment price follows the price set by the Plantation Service</p> <p>The basis of the rights owned by the land owner is SHM. The management area of the plantation reaches $\pm 1,029$ Ha with 1000 farmers</p>	
<p>Village Head of Nehes Liah Bing</p> <p>The positive impacts of the existence of the company include the realization of partnership plantation and employment as well as the implementation of social responsibility programs to the community.</p> <p>So far, the company has always participated in the MUSRENBANGDES, one of which discussed synergizing the village development program with the company's community development program.</p> <p>Social responsibility programs that have been running so far include:</p> <ul style="list-style-type: none"> • Guidance and support for the management of the tourist village and the Nehes Liah Bing Conservation Village • Providing scholarships to the community to be able to study at the University • Village infrastructure development • Empowerment of farmer groups and livestock groups by bringing in extension workers and seed assistance <p>So far, there have been no issues regarding land disputes and land fires. There was once an issue regarding environmental pollution related to the management of factory effluent but for now there is none. From the CCTV results, it can be seen that there was a leak because the embankment was deliberately damaged by an irresponsible party</p>	<p>Overall there are no negative issues that require further verification. The discussion on CSR is explained in more detail in the related indicators</p>
<p>Customary Head of Dayak Wehea</p> <p>The company has a high concern for the village community, especially in terms of preserving customs and cultural arts. Always actively involved in activities and give maximum attention.</p> <p>A clear example of the company concern is participating in maintaining and providing support for the Wehea customary protected forest as evidenced by logistical support and security teams for forest patrols. The protected forest has now been designated as part of the Nehes Liah Bing Tourism Village and Conservation Village by the Kutai Timur Regent since 2008.</p> <p>Once provided assistance to the community in the form of calf and chick, but people are not used to it because the livestock that are usually kept are pigs, including for traditional events.</p>	<p>Overall there are no negative issues that require further verification.</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<p>Village Head of Miau Baru</p> <p>The existence of the company was felt very positively during the ± 6 months as village head, for example, such as absorbing labor and managing the village treasury plantation. The company is also active in the MUSRENBANGDES activity which was last held in March 2022. Among these activities include synergies in village development plans.</p> <p>The form of the company's attention in developing the village community, for example, is evidenced by the support in the management of the Miau Baru Tourism Village. Which is managed by the village community and initially fostered by the company. In addition, the company also provides guidance to BUMDES, one of which is the procurement of 9 tons of rice for employees. It is hoped that these initial activities can run on a regular basis.</p> <p>There was once an issue regarding environmental pollution, namely POM liquid waste that entered the river but there has been no evidence shown by the community and the village has never carried out field verification. In addition, there was once an issue of land disputes, but the dispute was between the community and the cooperative, not the company</p>	<p>Overall there are no negative issues that require further verification. The discussion on CSR is explained in more detail in the related indicators</p>

4.0	CERTIFIED ORGANISATION'S ACKNOWLEDGEMENT OF INTERNAL RESPONSIBILITY
4.1	Formal Sign-off of Assessment Findings
	<p>Hereunder sign by management representative from inspected company to acknowledge a field assessment and agree for all content explained in this assessment report, included of non-compliance findings.</p> <p style="text-align: center;">Signed on behalf of:</p> <div style="display: flex; justify-content: space-around; align-items: flex-end; margin-top: 100px;"> <div style="text-align: center;"> <p>POM 7, PT. Dharma Satya Nusantara Management Representative</p>  <p><u>Agustinus Triwibowo</u> Tuesday, 20 September 2022</p> </div> <div style="text-align: center;"> <p>Mutuagung Lestari Lead Auditor</p>  <p><u>Haikal Ramadhan Kharismansyah</u> Tuesday, 20 September 2022</p> </div> </div>

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

No	Institution/ NGO/ Community	Address	Phone/ Email	Form of Communication	Date of Contact	Response	
						Yes	No
1	Environmental Agency	Kutai Timur District	-	Via phone	21 June 2022	✓	
2	Manpower Agency	Kutai Timur District	-	Via phone	21 June 2022	✓	
3	Plantation Agency	Kutai Timur District	-	Via Phone	22 June 2022	✓	
4	Land Office	Kutai Timur District	-	Via Phone	21 June 2022	✓	
5	Miau Baru Village	Kutai Timur District	-	Direct interview	21 June 2022	✓	
6	Nehes Liah Bing Village	Kutai Timur District	-	Direct interview	21 June 2022	✓	
7	Customary Head of Dayak Wehea	Kutai Timur District	-	Direct interview	21 June 2022	✓	
8	Karya Sejahtera Cooperative	Kutai Timur District	-	Direct interview	21 June 2022	✓	
9	Contractor of CPO transport – PT. Roni Putra Abadi	Kutai Timur District	-	Via phone	21 to 22 June 2022		✓
10	Contractor of CPO transport – CV. Anugrah Mulia Abadi	Kutai Timur District	-	Via phone	21 to 22 June 2022		✓
11	Labor Union in Mill	Kutai Timur District	-	Direct interview	21 June 2022	✓	
12	Gender Committee in Mill	Kutai Timur District	-	Direct interview	21 June 2022	✓	
13	Gender Committee in Estate	Kutai Timur District	-	Direct interview	22 June 2022	✓	
14	POM 7 • 1 warehouse officer • 2 mechanical workers	Kutai Timur District	-	Direct interview	21 June 2022	✓	
15	Long Teman Estate • 1 warehouse officer • 1 mechanical officer • 1 generator operator • 1 occupant in housing area • 1 paramedic officer • 2 daycare officers	Kutai Timur District	-	Direct interview	22 June 2022	✓	
16	Aliansi Masyarakat Adat Nusantara	Jakarta	rumahaman@cbn.net.id	Via email	10 May 2022		✓
17	Wahana Lingkungan Hidup Indonesia	Jakarta	informasi@walhi.or.id	Via email	10 May 2022		✓
18	World Wide Fund	Jakarta	www- indonesia@wwf.or.id	Via email	10 May 2022		✓
19	Sawit Watch	Bogor	info@sawitwatch.or.id	Via email	10 May 2022		✓

Appendix 2. Assessment Program

DATE	20 – 24 June 2022	
PLANNED TIME	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
Monday, 20 June 2022		
05.00 – 12.45 13.00 – 18.00	<ul style="list-style-type: none"> Jakarta → Samarinda → Berau Berau → Site 	All Auditor
Tuesday, 21 June 2022		
08.00 – 09.00	Opening meeting <ul style="list-style-type: none"> Auditee Speech (Introduction of PIC, Profile of Certified Management Unit) Auditor Team Speech (Introduction, Audit Objective, Audit Scope, Audit Plan Discussion, Determine of Audit Sample, Transparency and Confidentiality Clarification) Document review Verification of Basic Information Mill and Estate 	All Auditor
09.00 – 12.00	Public Consultation : <ul style="list-style-type: none"> Governement Agency of Kutai Timur (by phone) Gender Committee, Contractor, Worker Union, Village Representatif, Previous Land Owner, etc FFB Supplier, Scheme smallholder 	HRK/MRH
09.00 – 12.00	Field Observation to Kemitraan 9 Aspect to be verified : <ul style="list-style-type: none"> Implementation of Legal Aspect (Land Ownership, Legal Boundaries); Implementation of Agronomy Aspect (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application) Implementation of Environmental, Conservation/HCV and Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management) Implementation of Occupational Health & Safety Aspect Implementation of Employment Procedure and Mechanism Aspect Observation of Workers Facilities (Housing, School, Worship Place). 	AFF/DPL
12.00 – 14.00	Break	All Auditor
14.00 – 16.00	Field observation to Palm Oil Mill 7 <ul style="list-style-type: none"> Supply Chain verification (FFB Receiving, Weighbridge, FFB Sorting, Processing Activity, Despatch CPO) Occupational Health & Safety Aspect (Inspection to Chemical Storage, Hazardous Waste Storage, Fire Control Simulation, POME Pond) Implementation of Employment Procedure and Mechanism Aspect 	All Auditor
16.00 – 16.30	Presentation of Daily Progress	All Auditor
Wednesday, 22 June 2022		
08.00 – 12.00	Field Observation to Long Teman Estate Aspect to be verified : <ul style="list-style-type: none"> Implementation of Legal Aspect (Land Ownership, Legal Boundaries); 	All Auditor

DATE	20 – 24 June 2022	
PLANNED TIME	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
	<ul style="list-style-type: none"> - Implementation of Agronomy Aspect (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application) - Implementation of Environmental, Conservation/HCV and Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management) - Implementation of Occupational Health & Safety Aspect - Implementation of Employment Procedure and Mechanism Aspect - Observation of Workers Facilities (Housing, School, Worship Place). 	
12.00 – 14.00	• Break	All Auditor
14.00 – 16.00	<ul style="list-style-type: none"> • Document review and completing audit checklist. • Verification of stakeholder consultation result and field visit. 	All Auditor
16.00 – 16.30	• Presentation of Daily Progress	All Auditor
Thursday, 23 June 2022		
08.00 – 12.00	<ul style="list-style-type: none"> • Document review and completing audit checklist. • Continuing public consultation (If needed) • Verification of stakeholder consultation result and field visit. 	All Auditor
12.00 – 14.00	Break	All Auditor
15.00 – 16.00	Internal Meeting Auditor Team	All Auditor
16.00 – 17.00	Closing Meeting	All Auditor
Friday, 24 June 2022		
05.00 – 11.00 13.05 – 14.25	Site → Berau Berau → Balikpapan → Jakarta	All Auditor