

Roundtable on Sustainable Palm Oil Certification **R S P O**

[✓] Surveillance

Name of Management Organization : Dendymarker Palm Oil Mill – PT Dendymarker Indah Lestari, Subsidiary of SIPEF GROUP
 Plantation Name : PT Dendymarker Indah Lestari – Sei Mandang Estate, Sei Liam Estate
 Location : Village of Karang Dapo 1, Sub District of Karang Dapo, District of Musi Rawas Utara, Province of Sumatera Selatan, Indonesia
 Certificate Code : **MUTU-RSPO/065**
 Date Initial Registration : 27 July 2015
 Date of Certificate Issue : 15 January 2021 Date of License Issue : 10 September 2022
 Date of Certificate Expiry : 26 July 2025 Date of License Expiry : 26 July 2023

Assessment	Assessment Date	PT. Mutuagung Lestari Auditor	Reviewed by	Approved by
ASA-1.1 (Remote Audit)	06 to 07 July 2021	Rizliani Aprianita Hsb (Lead Auditor), Moh Arif Yusni, Radytio Puspanjana, Briyogi Shadiwa	Haikal Ramadhan Kharismansyah	Leonada
ASA-1.1 & ASA-1.2 (Onsite Audit)	04 to 09 April 2022	Moh Arif Yusni (Lead Auditor), Yudhi Yuniarto Tallutondok, Radityo Puspanjana and Rindu Galih Rezza Rachmansyah		

Assessment	Approved by MUTUAGUNG LESTARI on:
ASA-1.1 & ASA-1.2	24 August 2022

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Figure 1. Location Map of PT. Dendymarker Indah Lestari

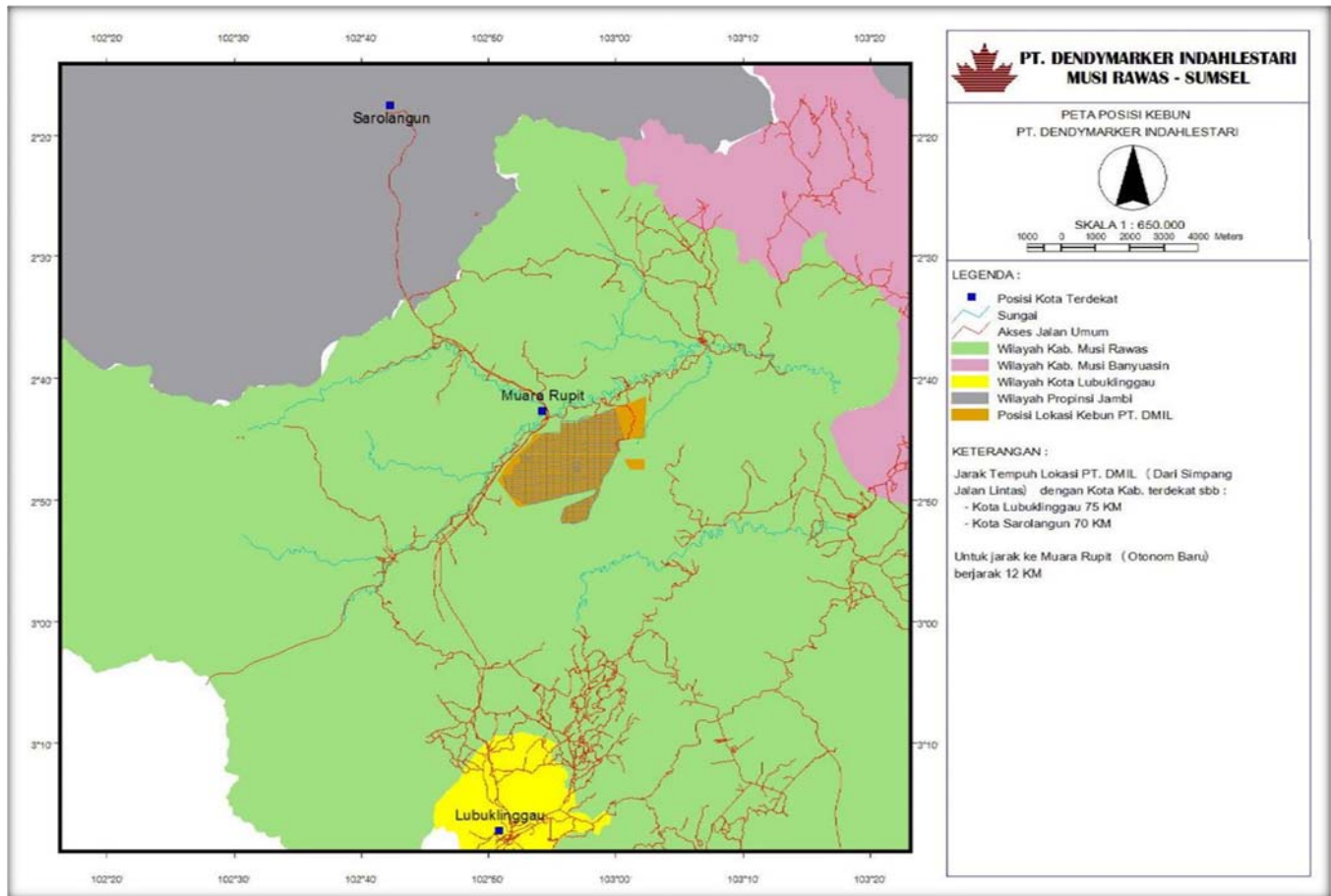
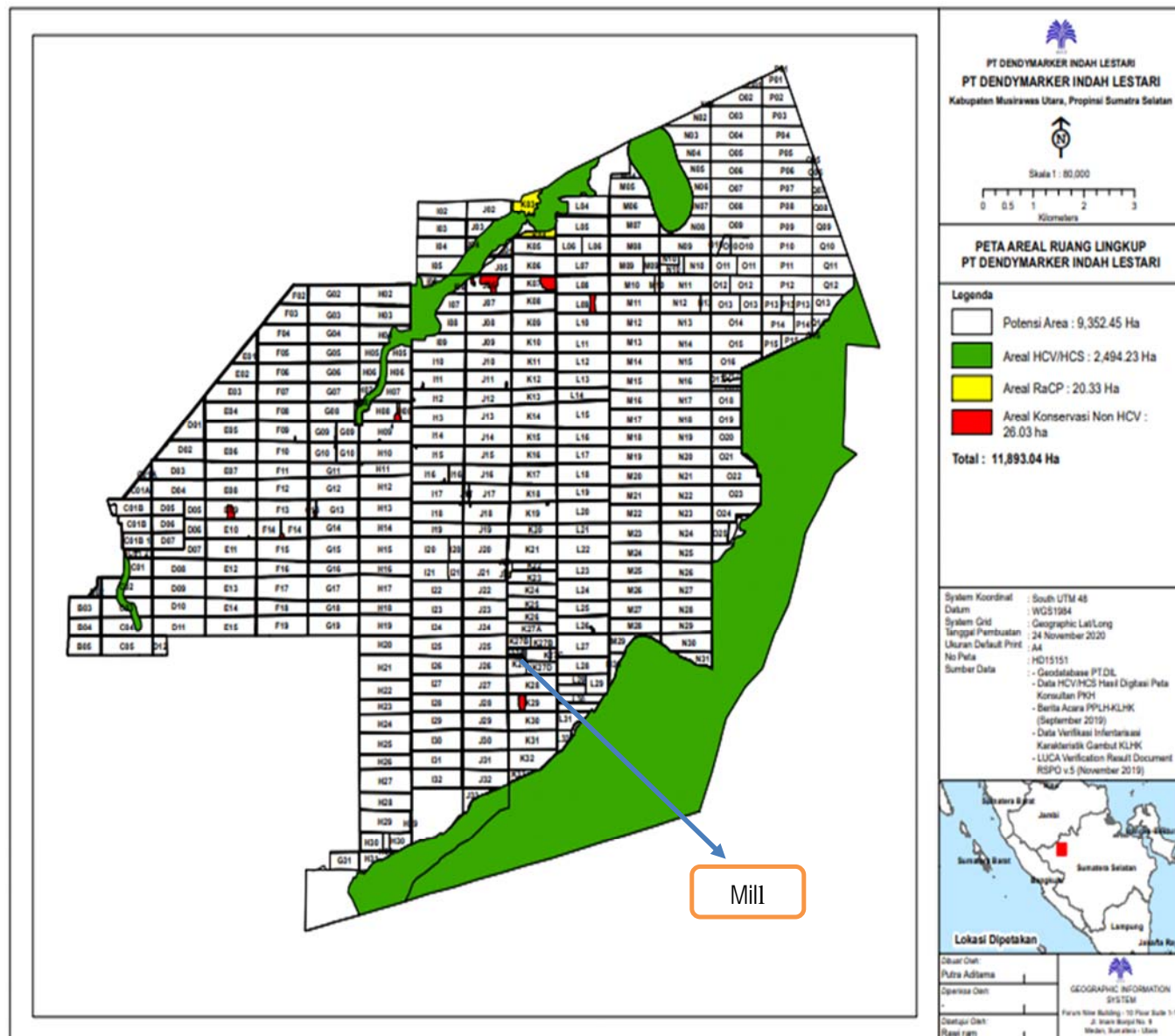


Figure 2. Operational Map of PT. Dendymarker Indah Lestari



Abbreviations Used

AKAD	:	<i>Angkatan Kerja Antar Daerah</i>
AMDAL	:	<i>Analisis Mengenai Dampak Lingkungan</i> / Environment Impact Analysis
ASA	:	Annual Surveillance Assessment
ALS	:	Assessor Licensing Scheme
ATM	:	<i>Anjungan Tunai Mandiri</i> or Automated Teller Machines
BOD	:	Biological Oxygen Demand
BPJS	:	<i>Badan Penyelenggara Jaminan Sosial</i> / Social Security Agency
CH	:	Certificate Holder
CITES	:	Convention on International Trade in Endangered Species
CLA	:	Collective Labor Agreement
CPO	:	Crude Palm Oil
CSPK	:	Certified Sustainable Palm Kernel
CSPO	:	Certified Sustainable Palm Oil
CSR	:	Corporate Social Responsibility
DIL	:	Dendymarker Indahlestari
DIL POM	:	Dendymarker Indahlestari Palm Oil Mill
DLT	:	Drainability Life Time
DLW	:	Decent Living Wage
DxP	:	Dura x Psifera
EFB	:	Empty Fruit Bunch
EIA	:	Environment Impact Assessment
FFA	:	Free Fatty Acid
FFB	:	Fresh Fruit Bunch
FPIC	:	Free Prior Informed Consent
FCL	:	Forest Cover Landscape
GHG	:	Green House Gas
GRTT	:	<i>Ganti Rugi Tanam Tumbuh</i> or Compensation for Previous Land Owner
HCV	:	High Conservation Value
H1	:	Menstrual Leave
H2	:	Maternity Leave
HCS	:	High Carbon Stock
HGU	:	<i>Hak Guna Usaha</i> (Land Use Permit)
HIRAC	:	Hazard Identification and Risk Assessment Control
IPM	:	Integrated Pest Management
IPAL	:	<i>Instalasi Pengelolaan Air Limbah</i> (Waste Water Treatment Plant)
KER	:	Kernel Extraction Rate
LD ₅₀	:	Lethal Dose 50
LUCA	:	Land Use Change Analysis
MSDS	:	Material Safety Data Sheet
NPWP	:	<i>Nomor Induk Wajib Pajak</i> or Taxpayer Identification Number
OER	:	Oil Extraction Rate
OFI	:	Opportunity for Improvement
OHS	:	Occupational Health and Safety
PIC	:	Personal In Charge
P2K3	:	<i>Panitia Pembina Keselamatan dan Kesehatan Kerja</i> / OHS Committee
PK	:	Palm Kernel
PKB	:	<i>Perjanjian Kerja Bersama</i> or Collective Labour Agreement
PKWT	:	<i>Perjanjian Kerja waktu Tertentu</i> / Specified Time Work Agreement
POM	:	Palm Oil Mill

POME	:	Palm Oil Mill Effluent
PPE	:	Personal Protective Equipment
RTE	:	Rare treat endangered
RKL-RPL	:	Environmental Management and Monitoring Plan
RSPO	:	Roundtable and Sustainable Palm Oil
SCCS	:	Supply Chain Certification System
SLME	:	Sei Liam Estate
SMGE	:	Sei Mandang Estate
SIA	:	Social Impact Assessment
SIPEF	:	Societe Internationale de Plantetion Et de Finance
SOP	:	Standard Operational Procedure
UMP	:	<i>Upah Minimum Provinsi</i> / Province Minimum Wage
WHO	:	World Health Organization
WLTK	:	<i>Wajib Lapo Tenaga Kerja</i>
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 Certification Systems for Principles & Criteria and RSPO Independent Smallholder Standard, Endorsed by the RSPO Board of Governors on 12 November 2020.• Indonesia National Interpretation of Principles and Criteria for Sustainable Palm Oil Production 2018, endorsed on 20th April 2020.	
1.2	Organization Information		
1.2.1	Organization name listed in the certificate	PT Dendymarker Indah Lestari Subsidiary of SIPEF Group	
1.2.2	Contact person	Hamdani	
1.2.3	Organization address and site address	RSPO registered company: Gedung Forum Nine F10 Suite 1 - 11, Jln. Imam Bonjol No. 9 Medan 20112, Sumatera Utara Province, Indonesia. Site Location: Karang Dapo 1 Village, Karang Dapo Sub-District, Musi Rawas District, South Sumatera Province	
1.2.4	Telephone	+62 61 415 2043	
1.2.5	Fax	+62 61 452 0908	
1.2.6	E-mail	hamdani@sipef.com	
1.2.7	Web page address	www.tolantiga.com http://www.agro-investama.com/	
1.2.8	Management Representative who completed the application for certification	Hamdani	
1.2.9	Registered as RSPO member	1-0021-05-000-00 - 7 th December 2005	
1.3	Type of Assessment		
1.3.1	Scope of Assessment and Number of Management Unit	PT Dendymarker Indah Lestari - Dendymarker POM, Sei Mandang Estate and Sei Liam Estate	
1.3.2	Type of certificate	Single	
1.4	Locations of Mill and Plantation		
1.4.1	Location of Mill		
	Name of Mill	Location	Coordinate
			Latitude (S)Longitude (E)
	Dendymarker POM	Karang Dapo Village, Karang Dapo Sub-District, Musi Rawas District, Sumatera Selatan Province, Indonesia	S 02° 47' 44"E 102° 56' 42"
1.4.2	Location of Certification Scope of Supply Base		
	Name of Supply Base	Location	Coordinate
			Latitude (S)Longitude (E)
	Sei Mandang Estate	Village of Bingin Rupit and Beringin Jaya, Muara Rupit Sub-District, Musi Rawas District, Sumatera Selatan Province, Indonesia	S 02° 46' 29"E 102° 52' 30"

	Sei Liam Estate	Village of Karang Dapo, Karang Dapo Sub-district, Musi Rawas District, Sumatera Selatan Province, Indonesia	S 02° 46' 54"	E 102° 56' 41"	
1.5	Description of Area Statement				
1.5.1	Tenure				
	• State		11,893.04 Ha		
	• Community		-		
1.5.2	Area Statement				
	Total area		11,893.04	Ha	
	Mature Area		3,314.28	Ha	
	Immature Area		3,902.50	Ha	
	Mill, Road and Housing		1,702.49	Ha	
	Occupation Area		443.40	Ha	
	Conservation Area		2,494.23	Ha	
	RACP Area		23.64	Ha	
	Conservation Area non HCV		12.50	Ha	
	There is a discrepancy in scope certification with the previous assessment covering 20.33 Ha, it's because the area was previously excluded from the scope of certification due to the RaCP Process. on this assessment the area was included in the scope of certification due to the RACP process is completed based on an email from RSPO RACP compensation panel to PT DIL On 25 August 2021 which explained that "satisfactory evaluation result of the compensation plan, the RACP process for SIPEF (PT DMIL) is now completed and can proceed with certification".				
	1.6	Planting Year and Cycles			
1.6.1	Age profile of planting year				
	Planting Year	Sei Mandang Estate SMGE) Ha	Sei Liam Estate (SLME) Ha	TOTAL (Ha)	
	1999	-	27.06	27.06	
	2000	-	262.68	262.68	
	2012	-	117.37	117.37	
	2013	-	85.96	85.96	
	2018	459.51	494.14	953.65	
	2019	1,327.84	539.72	1,867.56	
	Sub Total Mature	1,787.35	1,526.93	3,314.28	
	2020	1,366.27	466.12	1,832.39	
	2021	1,004.86	1,065.25	2,070.11	
	Sub Total Immature	2,371.13	1,531.37	3,902.50	
	TOTAL	4,158.48	3,058.3	7,216.78	
1.6.2	New Planting area after January 2010		Ha		
1.6.3	Planting Cycle		2 nd Cycle		
1.7	Description of Mill and Supply Base				
1.7.1	Description of Mill				
	Name of Mill	Capacity (tonnes/ hour)	FFB Processed (tonnes/year)	CPO Out put (tonnes) Extraction (%)	Palm Kernel Out put (tonnes) Extraction (%)
	DIL POM	20	163,266.33	32,769.26 20.07	5,062.62 3.10

*Production data source from October 2020 – March 2022							
1.7.2	Description of Certification Scope of Supply Base						
	Name of Estate	Total Area (Ha)	Production Area (Ha)	FFB (ton/year)	Yield (ton/ha/year)	Supplied to Mill	
						FFB (ton/year)	%
	Sei Mandang	5,125.67	1,787.35	8,304.97	3.10	8,304.97	100
	Sei Liam	6,767.37	1,526.93	19,610.63	8.56	19,610.63	100
	TOTAL	11,893.04	3,314.28	27,915.60	5.62	27,915.60	100
*Production data source from October 2020 – March 2022							
1.7.3	FFB description from other source						
	Name of sources/ Organization	Type of Organization	number of smallholders	Production Area (Ha)	Supplied to Mill		
					FFB (tones/year)		
	Sei Rupit Estate (SRTE) - Plasma PT.DIL	Subsidiary of SIPEF Group	2,937	2,774.62	170.29		
	Agro Kati Lama North Estate (AKLNE) - PT.AKL	Subsidiary of SIPEF	-	1,502.52	16,480.07		
	Agro Kati lama South Estate (AKLSE) - PT.AKL	Subsidiary of SIPEF		2,463.49	33,803.45		
	Agro Muara Rupit East Estate (AMREE) - PT.AMR	Subsidiary of SIPEF		2,363.45	18,659.77		
	Agro Muara Rupit West Estate (AMRWE) - PT.AMR	Subsidiary of SIPEF Group		2,644.31	12,714.45		
	Agro Rawas Ulu East Estate (ARUE) - PT.ARU	Subsidiary of SIPEF Group		1,396.70	20,801.02		
	Agro Rawas Ulu West Estate (ARUWE) - PT.ARU	Subsidiary of SIPEF Group		1,000.29	10,111.11		
	Koperasi Beringin Jaya (KBJ) - Plasma AKL	Subsidiary of SIPEF Group		601.04	8,609.57		
	Koperasi Rawas Jaya (KRJ) - Plasma ARU	Subsidiary of SIPEF Group		435.31	6,914.40		
	Koperasi Tingkip Jaya Raya (KTJR)-Plasma AMRW	Subsidiary of SIPEF Group		363.48	3,624.40		
	Koperasi Rempan Jaya (KRJA) - Plasma AMRE	Subsidiary of SIPEF Group		280.71	3,088.12		
	TOTAL				134,976.65		
*Production data source from October 2020 – March 2022							
** all FFB from outgrower are non certified							
1.7.4	Product categories			FFB, CPO, PK			
1.8	Tonnage of Product						
1.8.1	Past Annual Claim Certified Product			Last Year Projected Certified Volume (Ton)		Actual Production October 2020 – March 2022 (MT)	
	FFB Processed			36,100		27,915.60	
	CPO Production			8,217		6,911.37	
	Palm Kernel (PK) Production			1,212		1,204.15	
There are opening Stock in September 2020 Covering 75.3 CSPK and 1,820.66 CSPO							
1.8.2	Product selling						
	Type of selling product			Actual selling product for last year October 2020 – March 2022 (MT)			

	CSPO sold as RSPO certified product			7,499.40				
	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			1,273.53				
1.8.3	Estimate of Certified FFB Claim							
	Name of Estate		Total Area (Ha)	Production Area (Ha)	FFB (tones/year)	Yield (tones/ha/year)		
	Sei Mandang		5,125.67	1,787.35	11,500	6.43		
	Sei Liam		6,767.37	1,526.93	15,500	10.15		
	TOTAL		11,893.04	3,314.28	27,000	8.15		
	*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 (%)	
	DIL POM	20	27,000	5,940	22	1,080	4	MB
	*Projected CSPO & CSPK production for 12 months of certificate							
1.9	Other Certifications							
	ISO 9001:2008				-			
	ISO 14001: 2004				-			
	OHSAS 18001:2007				-			
	ISCC				-			
	Others				ISPO : MUTU-ISPO/044 valid Until 10 December 2025			
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						
	Muko Muko Mill (PT Agro Muko)	2011	Muko Muko Estate	2011	Mukomuko District, Bengkulu Province, Indonesia	Certified		
			Sei Betung Estate					
			Tanah Rekah Estate					
			Talang Petai Estate					
			Sei Kiang Estate					
			KMD					
	Bunga Tanjung Mill (PT Agro Muko)	2011	Bunga Tanjung Estate	2011	Mukomuko District, Bengkulu Province, Indonesia	Certified		
			Air Bikuk Estate					
			Air Buluh Estate					
			KMD					
			Air Majunto Estate (PT Mukomuko Agro Sejahtera)	2014		Certified		
			Malin Deman Estate Estate (PT Mukomuko Agro Sejahtera)					

		PT Asri Rimba Wirabhakti – Sei Teramang Estate	2021		Audited and awaiting for certification.
Bukit Maradja Mill (PT Tolan Tiga)	2010	Bukit Maradja Estate (PT Eastern Sumatra Indonesia)	2010	Simalungun District, Sumatera Utara Province, Indonesia	Certified May 2010
		Kerasan Estate (PT Kerasan Indonesia)			
		PT. Timbang Deli Indonesia	2018		Certified 2018
Perlabian Mill (PT Tolan Tiga)	2010	Perlabian Estate	2010	Labuhan Batu District, Sumatera Utara Province, Indonesia	Certified May 2010
		Tolan Estate			
Umbul Mas Wisesa Mill (PT Umbul Mas Wisesa)	2014	UMW South Estate	2014	Labuhan Batu Selatan District, Sumatera Utara Province, Indonesia	Certified March 2015
		UMW North Estate			
		Toton Usaha Mandiri Estate			
Hargy Mill (Hargy Oil Palm Limited (HOPL))	2009	Hargy Estate	2009	East of Bialla, West New Britain Province, Papua New Guinea	Certified April 2009
Navo Mill (Hargy Oil Palm Limited (HOPL))	2009	Navo Estate	2009	50 Kms East of Bialla, West New Britain Province, Papua New Guinea	Certified April 2009
		Bakada Estate			
		Mengen Estate			
Barema Mill (Hargy Oil Palm Limited (HOPL))	2014	Barema Estate	2014	30 Km East of Bialla, West New Britain Province, Papua New Guinea	Certified April 2014
Dendymarker Indah Lestari Mill (PT Dendymarker Indah Lestari)	2015	Sei Mandang Estate	2015	Musirawas Utara District, Sumatera Selatan Province	The Most recent acquisition was on 1 st August 2017, it has been certified on 2015
		Sei Liam Estate			
		(PT. Bandar Sumatra Indonesia) Bandar Pinang Estate	2025	Village of Kebun Bandar Pinang, Kecamatan Bintang Bayu, District of Serdang Bedagai	Rubber Plantation. NPP submitted in July 2021
		(PT. Citra Sawit Mandiri) Citra Sawit Mandiri Estate	2022	Village of Pasar Tiga, Subdistrict of Panai Tengah, District of Labuhan Batu	Certification to take place after HGU, following review by RSPO.
		(PT. Agro Muko) Sei Jerinjing Estate	2025	Talang Medan Village, Selagan Raya District, Mukomuko Regency, Bengkulu Province, Indonesia	Rubber Plantation. NPP submitted in July 2021
		(PT. Muko Muko Agro Sejahtera) Batu Kuda Estate	2024	Tunggang Village, Pondok Suguh District, Mukomuko Regency, Bengkulu Province, Indonesia	Take over 2021
		(PT. Agro Kati Lama) Agro Kati Lama North Estate	2023	Village of Durian Remuk, Subdistrict of Muara Beliti, District of Musi Rawas – Sumatera Selatan	Certification to take place after obtaining HGU.

					<p>Still developed (It has been RSPO NPP), RSPO public Notification on 31st March 2014.</p> <p>An NPP Submitted in 2019 to cover new areas licensed at the end of 2018</p>
		(PT. Agro Kati Lama) Agro Kati Lama South Estate	2023	Village of Muara Kati Lama, Subdistrict of Tiang Pumpung Kepungut, District of Musi Rawas – Sumatera Selatan	<p>Certification to take place after obtaining HGU.</p> <p>Still developed (It has been RSPO NPP), RSPO public Notification on 31st March 2014.</p> <p>An NPP Submitted in 2019 to cover new areas licensed at the end of 2018</p>
		(PT. Agro Kati Lama) Agro Kati Lama East Estate (AKL2)	2026	Urban Village of Pasar Muara Beliti, Subdistrict of Muara Beliti, District of Musi Rawas – Sumatera Selatan	<p>Certification to take place after obtaining HGU.</p> <p>Still developed (It has been RSPO NPP), RSPO public Notification on 31st March 2014.</p> <p>An NPP Submitted in 2019 to cover new areas licensed at the end of 2018</p>
		(PT. Agro Kati Lama) Koperasi Beringin Jaya (Smallholder)	2023	Village of Durian Remuk, Subdistrict of Muara Beliti, District of Musi Rawas – Sumatera Selatan	<p>Certification to take place after obtaining HGU.</p> <p>Still developed (It has been RSPO NPP), RSPO public Notification on 31st March 2014.</p> <p>An NPP Submitted in 2019 to cover new areas licensed at the end of 2018</p>

		(PT. Agro Muara Rupit) Agro Muara Rupit East Estate (AMR2&3)	2023	Village of Jadi Mulya, Subdistrict of Nibung, District of Musi Rawas Utara – Sumatera Selatan	<p>Certification to take place after obtaining HGU.</p> <p>Still developed (It has been RSPO NPP), RSPO public Notification on 31st March 2014.</p> <p>An NPP Submitted in 2019 to cover new areas licensed at the end of 2018</p>
		(PT. Agro Muara Rupit) Agro Muara Rupit West Estate (AMR 1&2)	2023	Village of Remban, Subdistrict of Rawas Ulu, District of Musi Rawas Utara – Sumatera Selatan	<p>Certification to take place after obtaining HGU.</p> <p>Still developed (It has been RSPO NPP), RSPO public Notification on 31st March 2014.</p> <p>An NPP Submitted in 2019 to cover new areas licensed at the end of 2018</p>
		(PT. Agro Muara Rupit) Agro Muara Rupit South Estate (AMR 4)	2026	Village of Beringin Sakti, Subdistrict of Rawas Ilir, District of Musi Rawas Utara – Sumatera Selatan	<p>Certification to take place after obtaining HGU.</p> <p>NPP Notification 2021</p>
		(PT. Agro Muara Rupit) Koperasi Rempan Jaya (Smallholder)	2026	Village of Jadi Mulya, Subdistrict of Nibung, District of Musi Rawas Utara – Sumatera Selatan	<p>Certification to take place after obtaining HGU.</p> <p>NPP Notification 2021</p>
		(PT. Agro Muara Rupit) Koperasi Tingkip Jaya Raya (Smallholder)	2023	Village of Remban, Subdistrict of Rawas Ulu, District of Musi Rawas Utara – Sumatera Selatan	<p>Certification to take place after obtaining HGU.</p> <p>Still developed (It has been RSPO NPP), RSPO public Notification on 31st March 2014.</p> <p>An NPP Submitted in 2019 to cover new areas licensed at the end of 2018</p>

		(PT. Agro Rawas Ulu) Agro Rawas Ulu East Estate	2023	Village of Sungai Jauh, Subdistrict of Rawas Ulu, District of Musi Rawas Utara – Sumatera Selatan	<p>Certification to take place after obtaining HGU.</p> <p>Still developed (It has been RSPO NPP), RSPO public Notification on 31st March 2014.</p> <p>An NPP Submitted in 2019 to cover new areas licensed at the end of 2018</p>
		(PT. Agro Rawas Ulu) Agro Rawas Ulu West Estate	2023	Village of Lubuk Mas, Subdistrict of Rawas Ulu, District of Musi Rawas Utara – Sumatera Selatan	<p>Certification to take place after obtaining HGU.</p> <p>Still developed (It has been RSPO NPP), RSPO public Notification on 31st March 2014.</p> <p>An NPP Submitted in 2019 to cover new areas licensed at the end of 2018</p>
		(PT. Agro Rawas Ulu) Koperasi Rawas Jaya (Smallholder)	2023	Village of Pulau Lebar, Subdistrict of Rawas Ulu, District of Musi Rawas Utara – Sumatera Selatan	<p>Certification to take place after obtaining HGU.</p> <p>Still developed (It has been RSPO NPP), RSPO public Notification on 31st March 2014.</p> <p>An NPP Submitted in 2019 to cover new areas licensed at the end of 2018</p>
<p>Time Bound Plan updated 2022</p> <p>There are several unit planned to be certified after 2023 its due to several consideration:</p> <ol style="list-style-type: none"> 1. PT. Bandar Sumatra Indonesia - Bandar Pinang Estate (2025): Rubber Plantation, NPP submitted in July 2021 2. PT. Agro Muko - Sei Jerinjing Estate (2025) : Rubber Plantation, NPP submitted in July 2021 3. PT. Muko Muko Agro Sejahtera - Batu Kuda Estate (2025) : Take over in 2021, NPP submitted in July 2021 4. PT. Agro Kati Lama) -Agro Kati Lama East Estate (AKL2) (2026, NPP Notification in June 2021 5. PT. Agro Muara Rupit - Agro Muara Rupit South Estate (2026) : NPP Notification in 2021 <p>Furthermore its has been explained in the ACOP Report for period 2021</p>					
1.10.2	Progress of Associated Smallholders and Outgrowers for Certifiable Standard				

	<p>Currently the partnership at PT DIL has carried out a contract renewal by involving all previous cooperatives. The previous agreement was deemed to have ended, as stipulated in the Copy of Notary Deed of Edna Mardiani SH MKn regarding Agreement No. 42 dated April 22, 2020 concerning the Agreement between 9 Cooperatives and PT DIL. The entire partnership area is being replanted, then the area will be fully managed by PT DIL. The progress will be verified since the smallholder starting sent FFB to Mill.</p>
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2.0	ASSESSMENT PROCESS
2.1	Assessment Team
ASA-1.1 (Remote Audit)	<ol style="list-style-type: none"> Rizliani Aprianita Hasibuan (Lead Auditor). Indonesian Citizen. Bachelor and Magister of Agribusiness, Faculty of Agriculture. She had followed training such as RSPO Lead Auditor Training, SCCS training, lead Auditor ISO 9001:2008, ISO 14001:2004, SA 8000, OHSAS 18001, social audit training by RSPO (verité), ISPO Auditor training and followed several IHT related to environment, BMP etc. She has been involved in several audit activities related to sustainable palm oil certification since 2015 covering legal, social aspect, health and safety aspect, worker welfare, waste management aspect etc. During the assessment she assigned to verify Worker Welfare, Transparency and Third parties. Briyogi Shadiwa (Auditor). Indonesian citizens. Associate Degree of Oil Palm Plantation, Bogor Agricultural University. He has work experience since 2009 in several private oil palm plantation companies in Indonesia as Assistant Agronomy and Agronomy Quality Control. The trainings that have been attended include: RSPO Lead Auditor Course by Checkmark, ISPO Auditor Training by LPP, Lead Auditor ISO 9001: 2015, RSPO Supply Chain Certification Training Course by Checkmark, Lead Auditor ISO 14001: 2015, SMK3 Awareness, OHSAS 18001 Awareness: 2007, SA 8000 Awareness, ISO 45001: 2018 Awareness and General OHS Expert Training. In this audit, he verified the Legal and SCCS aspect. Moh Arif Yusni (Auditor). Indonesian citizen. Bachelor of Agriculture, majoring in Plant Protection. Has experience as an operational staff at a private oil palm plantation company in Indonesia on 2010 to 2012. Has attended several trainings, i.e.: ISO 19011, ISO 9001; ISO 14001, SA 8000, RSPO lead auditor, ISPO lead auditor, OHS expert, OHS auditor based on National Government No. 50/2012, SCCS, etc. Has conducting ISPO, RSPO and MSPO audit as an auditor and lead auditor with expertise on best management practices for estate and mill, legality, worker welfare, safety, social, environment, conservation, transparency, long term economic management plan and supply chain for palm oil mill aspects. During the audit, he verified best management practices and Occupational Health and Safety Aspect Radytio Puspanjana (Auditor). Indonesian Citizen. Bachelor of agriculture, majoring in Soil Science. Agriculture Faculty. He was working as honorarium Officer at the Riau Province Plantation Agency in the division of huge estate for 1 year. The participated trainings are Survey and Mapping (GIS) Training which was held by National GMT, ISPO auditor training, ISO 9001/2008 auditor training, ISO 14001/2004 auditor training, IHT Geospatial Information System, IHT High Conservation Value, IHT Environmental Impact Assessment, IHT Green House Gas and RSPO Lead Auditor Course by Checkmark Training. Since 2015 has been following many audits as auditor base on Best Management Practice and Environment. During the audit, he verified SEIA, HCV, GHG.
ASA-1.1 & ASA-1.2 (Onsite Audit)	<ol style="list-style-type: none"> Moh Arif Yusni (Lead Auditor). Indonesian citizen. Bachelor of Agriculture, majoring in Plant Protection. Has experience as an operational staff at a private oil palm plantation company in Indonesia on 2010 to 2012. Has attended several trainings, i.e.: ISO 19011, ISO 9001; ISO 14001, SA 8000, RSPO lead auditor, ISPO lead auditor, OHS expert, OHS auditor based on National Government No. 50/2012, SCCS, etc. Has conducting ISPO, RSPO and MSPO audit as an auditor and lead auditor with expertise on best management practices for estate and mill, legality, worker welfare, safety, social, environment, conservation, transparency, long term economic management plan and supply chain for palm oil mill aspects. During the audit, he verified Legality, Social, TBP and Partial certification. Yudhi Yuniarto Tallutondok (Auditor). Indonesian citizen, Bachelor of Fisheries, Padjadjaran University. Have experience of working over three years since 2013 as plantation operations staff in private palm oil plantation company in Indonesia. Training have been followed including Lead Auditor of ISO 9001:2015, Lead Auditor of ISO 14001:2015, ISPO Auditor Training, RSPO P&C Lead Auditor Training Course, RSPO SCC Lead Auditor Course, Social Accountability 8000, Basic Management Development Program Agronomy, Fire Anticipation on Land and Forest, Potential Mapping and Conflict Resolution in Production Forests, Awareness of OHS aspects, ISO 45001:2018, ISO 22000:2009, ISO 19011:2011, ISO 17021:2011, dan ISO 17065:2012. Has participated in audit activities for ISPO and RSPO scheme since 2017 for BMP, OHS, labour, social and legal aspects. In this audit activity performs the assessment of best management practices, and SCCS. Radytio Puspanjana (Auditor). Indonesian Citizen. Bachelor of agriculture, majoring in Soil Science. Agriculture Faculty. He was working as honorarium Officer at the Riau Province Plantation Agency in the division of huge estate for 1 year. The participated trainings are Survey and Mapping (GIS) Training which was held by National GMT, ISPO auditor training, ISO 9001/2008 auditor training, ISO 14001/2004 auditor training, IHT Geospatial

	<p>Information System, IHT High Conservation Value, IHT Environmental Impact Assessment, IHT Green House Gas and RSPO Lead Auditor Course by Checkmark Training. Since 2015 has been following many audit as auditor base on Best Management Practice and Environment. During the audit, he verified environment aspect, waste management, GHG and conservation aspect.</p> <p>4. Rindu Galih Rezza Rachmansyah (Auditor). Indonesian citizen, Bachelor of Agriculture with major in Plant Pest and Disease. Has one year experience as Field Expert in Pesticide Company and 3 years' experience in Industrial Forest Management, Forest Rehabilitation and Reclamation on Indonesia Stated Owned Company as Assistant. Training which had attended including Lead Auditor ISO 9001, ISO 14001, ISO 17021, ISO 19011, SA 8000, Lead Auditor ISPO, Lead Auditor RSPO, RaCP & NPP Awareness and OHSAS 18001:2007. Has involved in several audit activities related to sustainable palm oil since 2017 in the aspects of Best Management Practices (BMP), social, worker welfare and OHS. During assessment, he assigned to verification towards transparency, worker welfare, and OHS aspect.</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-1.1 (Remote Audit)	<p>Number of auditors: 3 auditors & 1 auditor trainees</p> <p>Number of days for Remote ASA-1.1 at site: 2 days</p> <p>Number of working days for Remote ASA-1.1 at site: 6 Working days.</p>
ASA-1.1 & ASA-1.2 (Onsite Audit)	<p>Number of auditors: 4 auditors</p> <p>Number of days for Onsite Audit ASA-1.1 & ASA-1.2 at site: 5 days</p> <p>Number of working days for Onsite Audit ASA-1.1 & ASA-1.2 at site: 20 Working days</p>
2.2.2	Assessment Process
ASA-1.1 (Remote Audit)	<p>The assessment was conducted by measuring the sufficiency of implementation with the consistency done by the PT Dendymarker Indah Lestari to the requirements of Principles and Criteria for the Production of Sustainable Palm Oil 2018, endorsed by the RSPO Board of Governors and adopted at the 15th Annual General Assembly by RSPO Member on 15 November 2018 and RSPO Certification Systems for Principles & Criteria and RSPO Independent Smallholder Standard, Endorsed by the RSPO Board of Governors on 12 November 2020.</p> <p>For this section (Surveillance-1.1) The assessment was conducted in One method: document review, aiming to observe the sufficiency of types or substances from required documents. Improvement of findings from recertification findings were observed by auditors at this assessment. All information obtained was recorded in Check List of PT Mutuagung Lestari (MUTU) and part of this remote Audit report.</p> <p>The opening meeting was held on 6 July 2021 at 08.00 am through a teleconference (Microsoft Team). As for the participants who attended the opening meeting included the Estate Manager, Mill Manager, Support Team from sustainability department and other relevant staff. while the closing meeting will take place on 7 July 2021 at 16.00 pm. attended by the same participants as the opening meeting. The presentation of documents is presented quite well using email.</p> <p>In this assessment the audit activities were accompanied by the ASI as a witness.</p> <p>The assessment program please find Appendix 2</p>
ASA-1.1 & ASA-1.2 (Onsite Audit)	<p>The assessment was conducted by measuring the sufficiency of implementation with the consistency done by the PT. Dendymarker Indah Lestari to the requirements of :</p> <ol style="list-style-type: none"> 1. 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 2. RSPO Certification Systems for Principles & Criteria and RSPO Independent Smallholder Standard, Endorsed by the RSPO Board of Governors on 12 November 2020 <p>Additional Documents:</p>

1. RSPO Notice to CB on RSPO P&C On-site & Remote Audits, on 24th March 2020
2. Contingency RSPO Audit Procedure (This procedure is applicable when force majeure (such as pandemics, natural disasters, civil unrest, etc.) preventing the audit team from conducting field verifications) 25 August 2020
3. Contingency RSPO Audit Procedure for RSPO Principles & Criteria and Independent Smallholder Standard (Version 2) Approved by Assurance Standing Committee on 22 October 2021

The scope of certification of PT Dendymarker Indah Lestari consist of one mill (Dendymarker POM) and two (2) estate, namely Sei Mandang Estate and Sei Liam Estate

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

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

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

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

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

Some opportunities for improvement of the results ASA-1.1 & 1.2 delivered by the MUTU auditor to the management unit and the results are the subject will be verified at the next assessment phase (ASA-1.3). All information obtained was recorded in Check List of PT Mutuagung Lestari (MUTU) and part of this assessment

The assessment program please find Appendix 2.

2.2.3	Locations of Assessment
	<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 shown below.</p> <p>Dendymarker POM</p> <ul style="list-style-type: none"> • Security Post. Observation to FFB transportation and acceptance process and interview with 2 Security Officers, on their understanding towards technical, RSPO supply chain, environment, safety and manpower aspect, as well as facilities provided by mill management.

- **Weighbridge Station.** Observation and interview with Weighbridge Operators, on their understanding towards technical, supply chain, environment, safety and manpower aspect, as well as facilities provided by estate management.
- **Laboratory.** Observation to laboratory works and interview with Laboratory Officers, on his understanding towards technical, environment, safety and manpower aspect, as well as facilities provided by mill management.
- **Mill Dranage.** Observations mill effluent lines, sanitation mill and flow of leaching mill.
- **WWTP.** Observation on WWTP, indication of waste overflow, OHS implementation, and interview with worker about worker welfare, OHS, and company's policies.
- **Solid Waste.** Observation of the management of Solid waste consist of EFB, fiber and shell from the production process of mill.
- **Outlet POME.** Observations and interviews related to POME management and sampling point POME quality testing.
- **WTP.** Observations and interviews related to water management, recording of water use, health checks, PPE and waste management.
- **Sortation and Loading Ramp Station.** Observation and interview related understanding towards work instruction, OSH, worker welfare, grievance mechanism and environment aspects, as well as facilities provided by the company.
- **Sterilizer Station.** Observation and interview related understanding towards work instruction, OSH, worker welfare, grievance mechanism and environment aspects, as well as facilities provided by the company.
- **Clarification Station.** Observation and interview related understanding towards work instruction, OSH, worker welfare, grievance mechanism and environment aspects, as well as facilities provided by the company.
- **Engine Room Station.** Observation and interview related understanding towards work instruction, OSH, worker welfare, grievance mechanism and environment aspects, as well as facilities provided by the company.
- **Water Treatment Plant (WTP).** Observation and interview related understanding towards work instruction, OSH, worker welfare, grievance mechanism and environment aspects, as well as facilities provided by the company.
- **Workshop.** Observation and interview related understanding towards work instruction, OSH, worker welfare, grievance mechanism and environment aspects, as well as facilities provided by the company.
- **Chemical Warehouse.** Observation and interview related understanding towards work instruction, OSH, worker welfare, grievance mechanism and environment aspects, as well as facilities provided by the company.
- **Temporary Hazardous Waste Warehouse.** Observation and interview related understanding towards work instruction, OSH, worker welfare, grievance mechanism and environment aspects, as well as facilities provided by the company.
- **Hydrant No. 06 Simulation.** Observation and interview related to mechanism and readiness of infrastructure for emergency response.
- **Tippler, Press and Boiler Station.** At the time of the field visit, the mill was in the process of repairing and upgrading its capacity from 20 Tons of FFB/Hour to 60 Tons of FFB/Hour, so access to this location was very limited and for safety the auditors did not conduct field visits at the location.

Sei Mandang Estate

- **Immature Area, Block F11.** observation related upkeep activity.
- **Peat area, Block D03.** Observation peat area, water management, water level monitoring, piezometer monitoring and subsidence pole conditions and staff interviews on monitoring techniques.
- **Manuring Block I21.** Observation and interview regarding the implementation of fertilization procedures and safe working methods both for itself and the environment
- **Barn Owl Box.** Observation of integrated pest management
- **Harvesting Block D8.** Observation and interview regarding FFB criteria and workers' understanding of their rights and obligations
- **Water Outlet Block E6,** observation related water managements
- **Circle and Path Spraying Block G2.** Observation and interview regarding the implementation of weed control procedures and understanding in handling pesticides.
- **Weeding Manual Block I15.** Observation and interview regarding agronomy, OHS and employment aspects of contractor employees.
- **HGU stakes and land demarcation No. 146, No.147, No. 148, No. 149 and No. 150.** Observation of aspect of land demarcation and maintenance of HGU pole, and land dispute potency.

- **HCV and RACP area Mandang River Riparian, Block C3.** Observation the implementation of management in HCV of riparian area and RACP implemetation.
- **No Go Area block H31, I33 and H30.** Observation the condition of No Go area and land boundary.
- **HCV and RACP area Hitam River Riparian, Block H07.** Observation the implementation of management in HCV of riparian area and RACP implemetation.
- **Fertilizer Warehouse.** Observation and interview related understanding towards work instruction, OSH, worker welfare, grievance mechanism and environment asects, as well as facilities provided by the company.
- **Rinse House and PPE Storage.** Observation and interview related understanding towards work instruction, OSH, worker welfare, grievance mechanism and environment asects, as well as facilities provided by the company.
- **Chemical Warehouse.** Observation and interview related understanding towards work instruction, OSH, worker welfare, grievance mechanism and environment asects, as well as facilities provided by the company.
- **Logistic Warehouse.** Observation and interview related understanding towards work instruction, OSH, worker welfare, grievance mechanism and environment asects, as well as facilities provided by the company.
- **Child Daycare.** Observation and interview with residents about housing facilities, domestic waste management, and complaint mechanism.
- **Solar Tank.** Observation of OHS, environment aspect, emergency response and fire facilities.
- **Firefighting Warehouse.** Observation and interview related understanding towards work instruction, OSH, worker welfare, grievance mechanism and environment asects, as well as facilities provided by the company.
- **Central Housing Complex.** Observation and interview with residents about housing facilities, domestic waste management, and complaint mechanism.

Sei Liam Estate

- **Fire Fighting Equipment Storage.** Simulation the function of fire extinguishers and team readiness.
- **No Go Area block 022 and 019.** Observation the condition of No Go area and land boundary
- **HCV area Abang River Riparian, Block M30.** Observation the implementation of management in HCV of riparian area and RACP implemetation.
- **POME outlet disposal Block M30.** Observations of the sampling point POME quality testing
- **Workshop Central.** Observation and interview related understanding towards work instruction, OSH, worker welfare, grievance mechanism and environment asects, as well as facilities provided by the company.
- **Clinic Central.** Observation and interview related understanding towards work instruction, OSH, worker welfare, grievance mechanism and environment asects, as well as facilities provided by the company.
- **Landfill at Block L24.** Observation related the domestic waste management.
- **Fertilizer Warehouse.** Observation and interview related understanding towards work instruction, OSH, worker welfare, grievance mechanism and environment asects, as well as facilities provided by the company.
- **Rinse House and PPE Storage.** Observation and interview related understanding towards work instruction, OSH, worker welfare, grievance mechanism and environment asects, as well as facilities provided by the company.
- **Chemical Warehouse.** Observation and interview related understanding towards work instruction, OSH, worker welfare, grievance mechanism and environment asects, as well as facilities provided by the company.
- **Logistic Warehouse.** Observation and interview related understanding towards work instruction, OSH, worker welfare, grievance mechanism and environment asects, as well as facilities provided by the company.
- **Central Housing Complex.** Observation and interview with residents about housing facilities, domestic waste management, and complaint mechanism.
- **Harvesting Path Spraying at Block M23.** Observation and interview related understanding towards work instruction, OSH, worker welfare, grievance mechanism and environment asects, as well as facilities provided by the company.
- **Manuring at Block K15.** Observation and interview related understanding towards work instruction, OSH, worker welfare, grievance mechanism and environment asects, as well as facilities provided by the company.
- **Harvesting at Block Q16.** Observation and interview related understanding towards work instruction, OSH, worker welfare, grievance mechanism and environment asects, as well as facilities provided by the company.

2.3	Stakeholder Consultation and Stakeholders Contacted
2.3.1	Summary of stakeholder consultation process.
	Summary of stakeholder consultation process

	<p>Consultation of stakeholders for PT Dendymarker Indahlestari was held by:</p> <ul style="list-style-type: none"> • Public Notification in PT Mutuagung Lestari Website on 21 March 2022 • Public consultation with NGOs (by email) on 29 March 2022 • Public consultation meeting with government institution 05 April 2022 • Public consultation meeting with communities on 05 April 2022 • Public consultation meeting with internal stakeholders and contractor on 05 April 2022 <p>Numbers of input from stakeholders were clarified by PT Dendymarker Indah Lestari.</p>
2.3.2	Stakeholder contacted
	Please find appendix 1
2.4	Determining Next Assessment
	The next visit ASA-1.3 will be conducted eight (8) months to twelve (12) months after this assessment

3.0 ASSESSMENT FINDINGS

3.1 Summary of Assessment Report of the RSPO Certification

MUTUAGUNG LESTARI has assessed Dendymarker POM – PT Dendymarker Indah Lestari, SIPEF Group operation consisting of one (1) mill and two (2) oil palm estates.

During the assessment, unit management of Dendymarker POM and its supply base already comply with RSPO P&C and SCCS requirements where nil nonconformity against RSPO P&C Indicators and there are five (5) opportunities for improvement.

MUTUAGUNG LESTARI found that Dendymarker POM – PT Dendymarker Indah Lestari subsidiary of SIPEF Group complied with the requirements of Principles and Criteria for Sustainable Palm Oil Production 2018, The Indonesia National Interpretation, endorsed by the RSPO Board of Governors on 20 April 2020 and RSPO Certification System for Principles and Criteria and RSPO Independent Smallholder Standards, Endorsed by the RSPO Board of Governors on 12 November 2020.

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

Ref Std.	VERIFICATION RESULT of MUTU-Certification	
PRINCIPLE #1 BEHAVE ETHICALLY AND TRANSPARENTLY		
1.1 The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.		
1.1.1 The company has a list of publicly available documents updating January 3, 2022. The list of information for stakeholders, such as employee list, NPWP, local tax payment / levy, environmental documents, company establishment deed and amendments, production area data and fertilizer application, High Conservation Value reports, Social Impact Assessment reports, social activity documents, work accident reports, P2K3 reports, improvement program documents, RSPO audit report documents, human rights policy documents. If the information requested is not included in the list of information, it is necessary to consider top management first such as Land Titles/user Rights, Pollution Prevention and reduction Plans, Details of complaints and grievances, Negotiations Procedure.		
1.1.2 In presenting information to relevant stakeholders, the company has a response plan in an appropriate and accessible language. This is regulated in SOP Number ENC-01-11 / 04-03-2019 / Rev1 dated 18 March 2019. Based on this procedure, requests for information or communication can be submitted to the unit manager / department head or staff. Then it will be recorded in a logbook of information requests and answers with a shelf life, answers to requests for information can be responded to within a maximum of 7-25 days. Based on the results of document review and interviews with agencies, such as the Musi Rawas Regency Plantation Service, the Environment Service, Land Office and Manpower Office, it is known that the information presented by the certification unit has been presented in an appropriate language and can be accessed by the agency. The unit of certification has provided evidence that the information has been received in an appropriate form and language for the relevant stakeholders, such as reports on the implementation of environmental management and monitoring semester II of 2021 by the Environment Agency of Musi Rawas Regency on April 4, 2022.		
<u>Mandatory report for OHS and Worker Welfare Aspect.</u>		
<ul style="list-style-type: none"> Reporting on the Manpower Report of PT Dendymarker Indah Lestari for the period of February 2022 to the Manpower and Transmigration Agency of Musi Rawas Utara Regency on March 15, 2022. Reporting Mandatory Reporting Labor (WLTk) PT Dendymarker Indah Lestari with reporting No. 31658.20210824.0001 on August 24, 2021 and must report it back on August 24, 2022. Reporting P2K3 Report of PT Dendymarker Indah Lestari – Sei Mandang Estate Quarter 4 2021 dated March 2, 2022 to the Manpower and Transmigration Agency of Musi Rawas Utara Regency. 		

- Reporting P2K3 Report of PT Dendymarker Indah Lestari – Sei Liam Estate Quarter 4 2021 dated March 25, 2022 to the Manpower and Transmigration Agency of Musi Rawas Utara Regency.
- Reporting P2K3 Report of PT Dendymarker Indah Lestari – Dendymarker Indal Lestari Mill Quarter 4 2021 dated March 2, 2022 to the Manpower and Transmigration Agency of Musi Rawas Utara Regency.

Mandatory report for Environmental aspect:

- The environmental management and monitoring implementation report (semester 2 year 2021) to the Environment and Land Agency, Rawas Utara Regency dated April 4, 2022.
- The management and monitoring of the hazardous waste and POME (quarter 4 years 2021) to the Environment and Land Agency, Rawas Utara Regency dated January 18, 2022.

Mandatory report for Legal Aspect

- Mandatory Report the utilization of Land Title period of 2021 to National Land Agency of Musirawas on 18 February 2022

1.1.3

The company has documented incoming letter in the Incoming Mail Agenda that informs the date the letter was received, sender address, mailing number, and subject. The company shows an example of an incoming letter in the form of a job request form Lesung village dated 2 February, 2022. The letter has been responded to on 21 February, 2022 and the village community has worked in DIL POM.

1.1.4

The Mechanism providing information is listed in SOP of Responding to Requests for Information No. ENC-01-11/04-03-2019/Rev. signed by President Director on 18 March 2019. The procedure explain that all the information request will be responded by company in 7 – 25 days after the incoming letter. Based on the procedure, requests for information or communications can be submitted to the unit manager/department head or staff.

The procedure has been communicated to relevant stakeholders seen in the attendance list of socialization. For example, minutes of socialization dated 14 February 2022 attended by village head/officer, workers and worker union.

1.1.5

The company has a stakeholder list for 2022, updated January 3, 2022, which provides agency, name, address and contact number. The list of stakeholders for each unit is as follows:

- SMGE: there are 7 agencies, 3 District-Level Executive Conference, 9 villages, 9 assisted plasma, 1 NGO, 5 local contractors, 4 DIL managers, 1 trade union and 1 local supplier (employee cooperative).
- DIL POM: there are 6 agencies, 5 District-Level Executive Conference, 14 villages, 9 assisted plasma, 1 NGO, 6 local contractors, 4 DIL managers, 1 trade union, 2 heads of security and 3 PICs for emergency response.
- SLME: there are 7 agencies, 2 District-Level Executive Conference, 5 villages, 9 assisted plasma, 3 NGOs, 7 local contractors, 4 DIL managers, 1 trade union and 1 local supplier.

The information on some from the stakeholders, for example the company shows an example of an incoming letter in the form of a job request form Lesung village dated 2 February, 2022. The letter has been responded to on 21 February, 2022 and the village community has worked in DIL POM.

The update of this stakeholder list is carried out annually in conjunction with the RSPO internal audit process, the last being carried out on 7 – 12 March 2022. Based on the results of the verification of the stakeholder list document, it was obtained that all stakeholders had been included in the list.

Based on interviews with agencies, such as the Musi Rawas Utara Regency Plantation Service, the Environment Agency and Manpower Agency, it is known that the information presented by the certification unit has been presented in an appropriate language and can be contacted by the auditor.

Status: Comply

1.2

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

1.2.1 and 1.2.2

The company has ethics policy inside Responsible Plantation Policy that signed by Board of Director on 22 November 2019. The policy can be seen and downloaded at their website <https://www.sipec.com/hq/sustainability/policies/ethics-policy/>. In Ethics Policy stated that:

- Compliance: all relevant international and national laws will be upheld.
- Transparency: shareholders and stakeholders will be provided with all non-confidential information.
- Zero-tolerance towards bribery and corruption. Facilitation payments are actively avoided and gifts may only be given with prior approval from senior management.
- There is zero-tolerance of slavery or forced labour.
- Management and employees are prohibited from using the Group's facilities or working hours to conduct personal business.
- The individual countries have more elaborated codes of conduct that are aligned with the worldwide Sipec Group's Ethics Policy.

Mechanism of Ethical Business violation handling is using SOP whistleblowing System (SOP No. IAD-01-07/29- 03-2019/Rev. 0) dated 27 March 2019. During audit carried out to ensure the implementation of the code of ethics, the team of auditors has interviewed board of labour union and village heads around the company's operational areas. Based on the results of interviews obtained information that the employee recruitment process has been openly informed. The results of the recruitment procedure can be accessed by prospective employees and there is no charge for the whole process. Furthermore, The unit of certification has had annual internal audit program to monitor and to ensure operational activity align with the company's procedures. Furthermore, the internal audit also ensuring all business activity are comply with SIPEF ethics policy.

Based on the results of interviews with contractors, it is known that the contractors already know and understand that there are prohibitions on ethical business behavior, for example the prohibition on bribery, corruption, prohibition of child labor and forced labor. This is also evidenced by the inclusion of these clauses in the cooperation agreement between the company and the contractor.

Monitoring is carried out by the company's sustainability team by sending a monthly sustainability work report checklist form. One of the monitoring carried out is compliance with the use of PPE for contractor workers. Meanwhile, compliance with ethical business practices is monitored through an internal audit of a public accountant.

Status: Comply

PRINCIPLE #2 OPERATE LEGALLY AND RESPECT RIGHTS

2.1

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

2.1.1

During audit, the unit of certification can present the compliance towards laws and regulations and also ratified international laws, as follows:

Legal Aspect

The CH has complied with regulations in the field of plantation and land legality, such as HGU (land use title) (Certificate No. 04 of 1998 dated October 20, 1998, the Decree of the Minister of Agrarian Affairs/Head of BPN No. 38/HGU/BPN/98 dated September 21, 1998 measuring letter No. 01/MURA/1998 dated October 20, 1998 with a revised area of 13,704.91 Ha. Valid for 30 (thirty) years) and IUP (plantation business permit), as well as mandatory reports on annual land use to Land Agency.

Best Management Practice

In terms of best management practices, it is known that estate and mill management has implemented several compliances with Indonesian laws and regulations, for example not using the burning method in the land clearing process, trees planted are from seed producers (DxP) which are recognized by the Indonesian government. Each unit of the certification unit has implemented integrated pest management (IPM), biological control and only uses pesticides that are listed on the pesticide government website.

Environmental aspect

- Schedule waste storage permit by Investment and Integrated Services Office Musi Rawas Agency issued 8 December 2020 valid 5 years.
- POME disposal to watersurface permit by Investment and Integrated Services Office Musi Rawas Agency issued 20 October 2020 valid 5 years.
- Surfacewater utilized permit owned by the company based on the Decree of the Head of the Investment Service One Stop Service, North Musi Rawas Regency Number: 0540/DPMPSTSP.V/XII/2020 regarding the permit for the use of surface water PT Dendymarker

Indah Lestari dated December 17, 2020 which is valid for 2 years.

Compliance with Manpower Regulation

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

- The implementation of the minimum wage in 2022 is in accordance with the Minimum Wage Decree of the Jambi Province established by the Governor of Sumatera Selatan in 18 November 2021 (IDR. 3,144,446).
- Payment of overtime wages to workers in accordance with Decree of the Minister of Manpower No. 102 of 2004.
- Implementation of the structure and scale of wages for all levels of workers in accordance with Minister of Manpower Regulation No. 01 of 2017.

Compliance with OHS Regulation

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

- The establishment of the P2K3 (OHS Committee) for PT Dendymarker Indah Lestari (Sei Mandang Estate) which were registered / approved by the Manpower and Transmigration Agency of Sumatera Selatan Province in 15 March 2022 (Decree No. 03/KPTS-P2K3/NAKERTRANS/2022).
- The establishment of the P2K3 (OHS Committee) for PT Dendymarker Indah Lestari (Sei Liam Estate) which were registered / approved by the Manpower and Transmigration Agency of Sumatera Selatan Province in 23 March 2021 (Decree No. 04/KPTS-P2K3/NAKERTRANS/2021).
- The establishment of the P2K3 (OHS Committee) for PT Dendymarker Indah Lestari (Dendymarker Indah Lestari Mill) which were registered / approved by the Manpower and Transmigration Agency of Sumatera Selatan Province in 16 March 2022 (Decree No. 05/KPTS-P2K3/NAKERTRANS/2022).
- Provision of PPE for free to all workers and arrange the use of PPE according to the type of work based on the free predetermined HIRAC
- Have permits for all factory operating machines such as boiler and sterilizer machines that have been tested for eligibility according to applicable regulations.
- Has a license / competency for some special jobs that require more expertise such as OHS experts, hiperkes, boiler operators, diesel engine operators, welder, wheel loader operators and others in accordance with the requirements contained in the legislation.
- Has carried out a general health check (Medical Check Up) every year for all workers and special checks (cholinesterase, spirometry and audiometry) according to the level of risk / danger for certain jobs. The last periodic and special medical examination was carried out on 12-13 October 2021 in collaboration with the Anugrah Ibu Specialist Clinic.

2.1.2

Unit of Certification has established documented system for ensuring legal compliance is in procedure of changing on laws and regulation as per mention in *"Prosedur Informasi Perubahan Undang-Undang dan Peraturan Pemerintah"* dated 1 November 2011.

To tracking for any changes of law and regulation, unit of certification has implemented monitoring, evaluation and updating laws and regulations requirement that listed in the document *"Daftar Peraturan Perundang undangan yang berkaitan dengan system sustainability tahun 2022"* The document is an inventory of national and local regulations related to aspects of legal, labour, health, and safety, and environmental. To ensure compliance with law or regulations, the company conducts an internal RSPO audit. Internal audits have been conducted continuously and are documented and reviewed in the management review activities, latest internal audit carried out in February 2022. Regarding evaluation of legal compliance by third parties its became OFI in indicator 2.2.2, while the auditor considers that the company needs to re-evaluate the compliance parameters of the relevant legal regulations by adding BPJS Health compliance points, work agreements between workers and contractors, & no forced/slave labor, whereas for the certification unit can added other legal compliance that are relevant in the work agreement they have.

2.1.3

Based on document verification the company has been identifying all boundaries stone in the operational area and there is 156 boundaries stone in PT DIL. Poles monitoring has been carried out periodically every 6 months (twice a year). The company can present the result of monitoring in June 2020. Based on the result of internal monitoring it was known if the all boundaries stone are installed and well maintained. The results of field observations on the boundary pole No. 2,3,4, 5, 6, and 7 are known that the condition of the boundary poles is well maintained and in accordance with the coordinates from the National Land Agency

Status: Comply

2.2

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

2.2.1

In monitoring the use of contractors for plantation and mill activities, the certification unit has well documented the list of contractors, the number of workers they have, contact persons, work agreements, and ensuring other matters related to compliance with laws and regulations in Indonesia. At present the certification unit has list of contractors, transporters and suppliers. These third parties collaborate in the activities of operational activity in company. For example, when there are 8 contractors working with the company, namely CV Rizkia, CV Acan Brothers, CV Tamras Indah, CV Wijaya and CV Razqa Jaya Mandiri.

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

- Work Agreement No. 03/SEI MANDANG ESTATE/PPTK-FL/JANUARI/Tahun 2022 dated January 03, 2022 with CV Razqa Jaya Mandiri for upkeep work at Sei Mandang Estate and is valid for a year (December 31, 2022).
- Work Agreement No. 02/SEI LIAM ESTATE/PPTK-FL/JANUARI/Tahun 2022 dated January 03, 2022 with CV Tamras Indah for upkeep work at Sei Liam Estate and is valid for a year (December 31, 2022).

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

2.2.2

In each work agreement between the certification unit and the contractor, there are several separate clauses related to fulfilling legal obligations in force in Indonesia as one of the obligations that must be fulfilled by the contractor. Some of these obligations are related to the registration of workers' BPJS (Government Insurance Scheme), the provision of minimum wages, the obligation to use PPE, and others. To ensure compliance with these clauses, the certification unit always requests the requirements for the completeness before the contractor does / starts work.

The results interviews with contractor workers (CV Tamras Indah and CV Rezqa Jaya Mandiri) revealed that workers had received wages accordance the minimum wage, were registered in the BPJS program, and the worker understood about his status as a contractor worker. This result is in line with the results of the document review which proves that the wages of contractor workers are accordance with the minimum wage, have vehicle / driver license, fulfilling tax payments, BPJS payments and other requirements. For example, fulfillment includes:

- List of wages for CV Rezqa Jaya Mandiri workers in March 2022 for RSW workers (CSWNG00209) with a total of 18 working days and a wage of IDR. 2,400,366 and SRD (CSWNG00210) with a total of 17 working days and a salary of IDR. 2,274,588 (above the minimum wage or daily wage more than IDR 125,778).
- BPJS payment history for the CV Rezqa Jaya Mandiri program through the E-Dabu system for payments for the January-February 2022 period and the last payment was made on February 14, 2022.
- Monitoring the use of PPE while working for CV Rezqa Jaya Mandiri workers for the period January-March 2022, where the result is that all workers have used PPE that is in accordance with the type of work and the PPE is obtained free of charge.

Opportunity for Improvement (OFI)

The results of document verification revealed that during the audit it was found that there were 8 contractors working with the company. In relation to the relevant legal compliance obligations, an evaluation conducted by the company can be shown in the form of an **Evaluation Checklist for Compliance with the Contractor's Sustainable System Standards and a Self-Declaration Letter for the application's ability to be signed by the contractor periodically once a year.** In the Checklist, there are 11 compliance parameters that must be complied with, including work agreements (between the company and the contractor), no workers under 18 years of age, BPJS Employment, provision of minimum wages and others.

During the audit process the auditor team verified the contractors CV Razqa Jaya Mandiri and CV Tamras Indah accompanied by supporting evidence, namely proof of payment of wages in accordance with regulations, payment of BPJS (Health and Employment), no workers under 18 years old forced labor and have a copy of the work agreement (between the company and the contractor or the contractor and his workers).

However, the auditor considers that the company needs to re-evaluate the compliance parameters of the relevant legal regulations by adding BPJS Health compliance points, work agreements between workers and contractors, & no forced/slave labor, whereas for the certification unit can added other legal compliance that are relevant in the work agreement they have.

2.2.3

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

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

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

Status: Comply

2.3

All FFB supplies from outside of the unit of certification are from legal souASA-4es.

2.3.1

All entire FFB accepted in DIL POM originally from its own estate under the scope of certifications and other estates under the subsidiary of Sipef Group. Based on document review and interview with management it was known there was no FFB from out-growers or smallholders. Other sources of DIL POM are from:

- PT Agro Muara Rupit (Own Estate and their Scheme Smallholders)
- PT Agro Kati Lama (Own Estate and their Scheme Smallholders)
-

2.3.2

As mentioned in Indicator 2.3.1, DIL POM do not accepted FFB from out growers, agent or middlemen. All FFB process originally from its own estate under the scope of certifications and other estates under the subsidiary of Sipef Group

Status: Comply

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

3.1

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

3.1.1

The certification unit presented documents long-term plan contained in the Business Plan Year period of 2020 - 2025. Information in the document consists of general routine operational activities such as the target of FFB yield/ ha, plantation maintenance, harvesting, fertilize), upkeep and etc. Based on interviews with management representatives revealed that the long-term plan also includes plasma. During the audit, information was obtained that the entire plasma area was in the replanting stage starting in 2020.

Furthermore, for mill activities such as FFB processed, projected oil extraction rate (OER), and kernel extraction rate (KER), projected crude palm oil (CPO) and palm kernel (PK) production as well as total Operating Cost, gross operating cost, cost per MT CPO and cost per MT PK.

Based on document verification and interviews with the management representatives known the budget evaluated annually.

3.1.2

The certification unit has prepared a replanting plan for the period 2018-2022 where for 2022 there is a replanting plan of 796.20 hectares in Sei Liam Estate and 205.45 hectares in Sei Mandang Estate. Based on verification documents and interview with management it was known replanting program will done in 2022.

Based on interviews with management revealed that the evaluation for the realization of replanting in 2021 was carried out in January 2022.

3.1.3

Management reviews are conducted in several ways, consisting of an annual management review for the mill and a review budget meeting on the plantation. The 2020 management review was conducted on 25 June 2020 with discussion material on several issues such as monthly review of management unit reports, process performance and product conformity, action plans and corrective actions, annual internal audits and RSPO internal audits including supply chain, and external audit reviews by agencies certification. while the 2021 management review conducted in July 2021 with the main topics of discussion including: production and plants, civil engineering, division administration and evaluation report.

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

BMP

The certification unit has demonstrated the implementation of action plans for continuous improvement in the aspects of Best management practice, such as:

1. Utilization of natural enemies of oil palm pests such as owls as predators of rats and Turnera sp as a breeding ground for natural enemies of leaf-eating caterpillars, namely Sycaus sp.
2. Utilization of solid waste from palm oil processing such as EFB.

The company has taken actions for continuous improvement in environmental aspects, for example:

- Has made efficient use of fossil fuels by using renewable fuels, namely shells and fiber) as boiler fuel.
- Conducting surface water quality testing and monitoring wells every 6 months.
- Conduct air quality and emission testing every 6 months.
- Has a water filtration installation in the treatment of domestic liquid waste.
- Has a reverse osmosis installation for the supply of clean water.

Worker Welfare

- Unit certification has set minimum wage regulations for all workers based on the stipulation of minimum wages by the Governor of Sumatera Selatan for 2021 and 2022.
- Unit certification facilitates workers with adequate housing, electricity facilities, and availability of clean water in every publicly available housing.
- Unit certification is also committed to avoiding acts of discrimination, sexual harassment, child labor or acts of human rights violations in the work environment.

3.2.2

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

Status: Comply

3.3

Operating procedures are appropriately documented, consistently implemented and monitored.

3.3.1

The certification unit has plantation procedures that explain all plantation operational activities from land preparation to harvesting and replanting. In addition, the certification unit has demonstrated procedures related to the mill as stated in the Operational Best Practices Palm Oil Mill document. In the document, it is known that the procedure has covered all mill operational activities from receiving FFB to activities in bulking.

All SOP above were available in Bahasa. Master list of procedure for estate and mill were keeps by Head of Research and Development and Head of Engineering, respectively. Document control of SOP was conducted by General Manager of Administration and SOP

Management Compliance. Based on SOP document review, it could be concluded that all SOP's were still relevant with current situation and covers all aspect of best management practices in the estates and mill.

This procedure is conveyed to workers in the form of training and installation of related procedures at certain stations/locations, as well as installing processing work instructions at each mill station and installing work instructions for hazardous waste management in chemical warehouses.

Based on field observations at engine room station and block D8 (circle and path spraying), it is known if procedures have been implemented and workers can describe and demonstrate their work according to the procedures, referring to operational, safety and environmental best practices.

3.3.2

The certification unit has a system that ensures consistency in the implementation of its SOPs, such as a check or inspection of the quality of work (operational audit of plantations and mills), RSPO internal audits that check whether procedures in the certification unit have been implemented by the certification 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 certification unit. Daily internal supervision is carried out by the supervisory level starting from the Foreman, Division Assistant, Assistant Head, to the Estate 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 once a year to evaluate the implementation of sustainability procedures in estates and mill. 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.

The certification unit showed the Musi Rawas Agronomy RMO (Regional Management Office) QC document at Sei Mandang Estate which was held on 8-11 February 2022. The assessment activities covered aspects of maintenance, harvest quality, loose fruit quality, spraying and mixing of chemicals. From the results of the assessment, the following results are known:

1. Pruning needs to be done especially for insert plants
2. Picking loose fruit needs to be considered, especially in the circle area near the ditch.
3. The application of pesticide mixing was not in accordance with the procedure because it was still found that the foreman did not have a respirator mask.

3.3.3

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

Status: Comply

3.4

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

3.4.1

Environmental document.

The unit of certification has the latest Environmental Permit Documents with Number 05 / KPTS / DPM-PTSP / VII / 2020 dated July 28, 2020, which behaves regarding changes to the Environmental Permit for Oil Palm Plantation Activities Plan with an area of 17,000 Ha to 11,893.04 Ha and a Palm Oil Processing Factory with a capacity of 60 Tons / Hour, where it has covered all areas and activities within the scope of certification. The Environmental Permit is the result of an update to the previous Environmental Permit document Number 09 / KPTS / SDM-PTSP / 2017 dated 19 October 2017.

As a reference for the Environmental Permit document, the Company has an Environmental Impact Analysis Document (AMDAL) consisting of an Environmental Impact Analysis Document (ANDAL), an Environmental Management Plan Document (RKL), and an Environmental Monitoring Plan (RPL) Number: 021 / BPD / III -AMD / 99 dated 19 March 1999. The operational area covered by the ANDAL document is 17,793 ha with a mill capacity of 60 tons of FFB / hour. In addition, there is a Revised Environmental Impact Analysis document with an area of 17,793.50 Ha and a palm oil mill with a capacity of 60 tons of FFB / hour which was approved on 9 November 2004 with number 660/95 / IV / 2004. The document of the implementation/application of the results of the environmental permit is

contained in the RKL RPL report, the parameters that are managed and monitored by the company according to the matrix in the AMDAL, namely:

- Peat reduction
- Air quality and noise
- Use of raw water for palm oil mill FFB production
- Quality of liquid and solid waste
- Potential fire
- Disruption of flora and fauna
- Public unrest

Social Impact Assessment document.

The Social Impact Assessment was conducted in October 2013 in collaboration with *Sonokeling Akreditasi Nusantara* involving local communities. SIA documents have identified the positive and negative impacts of the company's operational activities. Aspects that are assessed include demographics, livelihoods, occupation and land use, income level, community economic facilities and infrastructure, education, health, religion, ethnicity and customs, kinship systems, and social organizations.

Social impact assessment has involved affected parties. This can be seen from the Minutes and attendees list at the opening meeting activities, focus group discussions, and field assessments. The focus group discussion was held on 3 - 5 November 2013 which was attended by representatives of the villages of Keratasari, Pantai, Karang Dapo, Lubuk Rumbai, Beringin Jaya, Bingin Rupit, Maur Baru, Noman Baru, Batu Gajah, and Muara Rupit.

The unit of certification has also conducted the latest social impact assessment conducted by PT Daemeter which is contained in the Social Impact Assessment document dated March 1, 2018. In this document, information on the identification of positive and negative impacts caused by PT Dendymarker Indah Lestari can be obtained. The SIA study involved several affected parties, this can be seen from the attendance list at meetings, group discussion forums and field visits. FGDs were conducted in several stakeholder from villages including Bingin Rupit, Muara Rupit, Beringin Jaya, Biaro Baru, Rantau Kadam, Kertasari, Pantai, Lubuk Rumbai, Maur Baru, Batu Gajah Baru, Noman Baru, Rompoken Sungai Liam, Lubuk Patin, and Karang Dapo.

Based on the results of stakeholder consultation, it was found that there were positive and negative impacts of the company's existence. The positive impact is in the form of employment is continuously increased by the company. In the 2017 to 2020 period, the company has made better partnerships for plasma plantations involving more local communities. Meanwhile, for the negative impact, the uncertainty of land status, the company has carried out mitigation and conflict resolution measures for the past 2 years. Currently the conflict has been largely resolved with the "*Taliash*" program.

The Social Impact Review and Update SIA in 2021 the company has developed a management plan and developed social monitoring which is outlined in the Action Plan document on the findings of PT Dendymarker's social impact assessment, the involvement of the process of preparing the document is known to have involved external and internal stakeholders.

3.4.2

The Implementation of environmental monitoring and management plan are documented on periodical report of environmental monitoring and management implementation report (RKL-RPL) report for certification unit. The company are consistently done the environmental management and monitoring as outlined in the Report of the Environmental Management and Monitoring per semester regularly. The significant impacts that are managed and monitored based on AMDAL Documents, consist of:

- Water quality
- Biota aquatic
- Public perception
- Land fire
- Peat management
- Air quality
- Animals and plants land
- Job and business opportunities.

Public consultation with Environmental agency of Musi Rawas indicate that the company has made environmental management and there is no issue of pollution caused by the company's operational activities. Based on document review, RKL-RPL semester 2 year 2021, known that the EIA documents has covered all operational area and impacts of its activities and no negative issue from operation.

As a form of social management, the company has developed/compiled by involving independent parties in conducting social impact assessments related to the company's operational activities. The first social impact assessment was carried out in 2013 by PT Sonokeling Akreditasi Nusantara. As a follow-up to the results of the assessment, there are several recommendations for managing social impacts for the company, including:

External impact

- Infrastructure development.
- Plasma plantation/partnership development.
- Employment Opportunity
- Community business opportunities
- Increasing people's income
- Environmental and community health

Internal impact

- Industrial relations
- Career path
- Salary and welfare benefits
- Employee facilities

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Internal impact

- Industrial relations
- Career path
- Salary and welfare benefits
- Employee facilities

As one of the efforts to improve and pay attention to the latest situation in December 2021 by the company's internal team, the Social Impact Review and Update was carried out due to the dynamic social situation and the seriousness of the company to build and maintain company sustainability, especially in the social aspect, so this study re-done. In the recommendation section, it is explained that a social impact study is carried out so that the management of social impacts can be mitigated both for internal and external social impacts, minimizing or eliminating negative impacts (mitigating adverse effects) and increasing positive impacts (advancing benefits) in order to achieve the company's social goals. The proposed recommendations refer to the principle of balance between the management of the social, environmental and economic aspects of the company.

As a follow-up effort to the Social Impact Review and Update of SIA in 2021, the company has developed a social management and monitoring plan that has been developed as outlined in the Action Plan document on the findings of PT Dendymarker's social impact assessment. Based on the results of the review document review, companies are encouraged to carry out a more in-depth mapping of key stakeholders, for example for external stakeholders by paying attention to women, migrants, local residents, youth leaders, contractors and for internal stakeholders by paying attention to wider representation of workers such as local workers, migrants, women, new workers including contract workers

Furthermore, the results of the document review and interviews with management and stakeholders (internal and external) revealed that the company had managed issues that could have a social impact which were carried out partially by the relevant departments but were not explained in detail in the SIA review report, for example:

- Issues related to land issues / land conflicts at PT DIL
- Issues related to Plasma dynamics at PT DIL

- Issues related to dissatisfaction with CSR and job opportunities for the surrounding community

Based on the explanation above, companies are encouraged to develop a comprehensive social management and monitoring plan by integrating between sections/departments covering all impacts and representative samples of affected parties. **OFI**

3.4.3

Based on verification, RKL-RPL report semester 2, 2021 has already contained adequate environmental management and monitoring components such as peat subsidence monitoring, quality test on effluent, surface water quality, water and noise level, the potential of land fire, and flora-fauna status. The Evaluation for environmental monitoring/management plans have been developed in January 2021 and as the feedback of review, the company has included land fires monitoring, quality test on effluent, and toxic/hazardous waste monitoring parameters since the semester 2 year 2021 monitoring report.

The impact identified in SIA has been managed and monitored through SIA Management and Monitoring Plan. The plan describes monitoring indicators, monitoring methods, PIC, and frequency. Compiled based on the results of reviews of the management plan on December 2021, which was conducted in a participatory manner. In the SIA Management and Monitoring Plan, for example:

External impact

- Community economy
- Environmental Health
- Potential for pests and diseases
- Land and forest fires

Internal impact

- Environment
- Land and forest fires
- Employee facilities
- Potential for pests and diseases

Status: Comply

3.5

A system for managing human resources is in place.

3.5.1

The certification unit has procedures related to recruitment, selection, employment, promotion, retirement and termination of employment which are generally described in the Collective Labor Agreement period 2021-2023 written in Bahasa. In general, these procedures describe:

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

In addition to being publicly listed in Collective Labor Agreement, the certification unit has other procedures in the form of Policies, SOPs, Internal Memorandums and others related to recruitment, transfer, promotion, retirement, termination of employment and others. These procedures have been documented to all workers and their representatives. For example, some procedures that are owned by the company include:

- Procedure No. HRA-01-01/01-02-2018/Rev0 concerning Employee Recruitment (permanent worker)
- Procedure No. HRA-01-03/01-02-2018/Rev.0 concerning Employee Recruitment (contract worker)
- Procedure No. 003/PTDIL-SMGE/PKWT-1/II/2020 concerning Employee Recruitment (staff worker)
- Procedure No. 06/HRAD-CIR/IV/16 regarding Employee Promotion & Transfer

The results of interviews with workers (harvesting, spraying and mill operators) in Sei Mandang Estate, Sei Liam Estate and DIL Mill note that workers have a sufficient understanding of the procedures related to recruitment, promotion, retirement and factors causing termination of employment. Workers explain that in the acceptance process carried out in accordance with the terms / conditions according to ability / expertise, promotion is based on an assessment of the performance of each employee each year, and one of the causes of

termination of employment can occur if the worker has committed a serious violation. Based on this explanation, certification unit has explicitly state the indiscriminatory policy during the recruitment selection, hiring and promotion process

The certification unit still have workers with contract status (PKWT), Regular Workers (permanent worker) and Staff. All the rights for each employment status have been distinguished. For workers with contract status (PKWT), certification unit also registered the worker with to Manpower and Transmigration Agency of Musi Rawas Utara Regency in 15 March 2022.

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

3.5.2

The certification unit always documented all labor procedures that have been carried out properly such as recruitment, promotion, performance assessment, pension and others. The following are some sample labor procedures that have been implemented and are well documented by certification unit, including:

- The certification unit has a worker recruitment document from the start until the worker becomes a permanent worker. For example, a worker with initial RDM who has recruitment documents such as a job application letter, identity card, family card, recruitment selection results, employment contract documents for contract workers (PKWT), medical check-up results and others. The worker started working as a contract worker (PKWT) on 01 August 2017, in 2020 the worker received a performance appraisal with a "Good" result and was promoted to permanent employment in accordance with Decree No. 001/DILM/MM/SKU/I/2020 on 31 January 2020.
- The certification unit has a worker recruitment document from the start until the worker becomes a permanent worker. For example, a worker with initial MJN who has recruitment documents such as a job application letter, identity card, family card, recruitment selection results, employment contract documents for contract workers (PKWT), medical check-up results and others. The worker started working as a contract worker (PKWT) on 12 April 2020, in 2021 the worker received a performance appraisal with a "Good" result and was promoted to permanent employment in accordance with Decree No. 39/PT.DMIL/IV/2021 on 12 April 2021.

The results of interviews with workers (harvesting, spraying and mill operators) in Sei Mandang Estate, Sei Liam Estate and DIL Mill note that the certification unit has carried out labor procedures starting from recruitment, selection, acceptance, promotion and retirement procedures in accordance with existing regulations, as well as all The application is assessed in accordance with the abilities and competencies of the employees. For example, workers who initially entered were selected before being accepted, workers who received promotion / class promotion had received an assessment from their superiors and workers who retired received all their rights as retirees. During 2021 until now (March 2022) there were no major labor issues that occurred at PT Dendymarker Indah Lestari, this was strengthened by the results of consultations with the Labor Union, the Manpower and Transmigration Agency of Musi Rawas Utara Regency which stated that the application of existing labor procedures is in accordance with the regulations and since 2021 until now there have been no major labor issues. The issues that exist are only related to Termination of Employment (PHK) which have been jointly resolved in a bipartite and tripartite manner without anyone entering the realm of PHI (Industrial Relations Disputes).

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

Status: Comply

3.6

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

3.6.1

The certification unit has had a policy of occupational safety and health were written in Bahasa. The policy has been legalized. This policy is designed to control hazards in every activity that is in the working environment to prevent accidents and occupational diseases. Management have work program of occupational health safety every year. Realization of the program of work will be monitored through regular meetings Guiding Committee of Occupational Safety & Health (P2K3) every month. This work program applies generally to all workers in the workplace. If the plans have been made yet on target then will be evaluated in the regular meetings to assess effectiveness.

Certification unit have document of hazard identification, risk assessment and risk control (HIRAC) which issued on 07 February 2022. It will be reviewed every year and if any occupational accident happen. The document describes the description/activity, potential hazards, risk assessment and risk control. Based on site observation at boiler and engine room in DIL Mill, harvesting and spraying activity in estate (Block D8 & G2 in Sei Mandang and Block Q16 & M23 in Sei Liam Estate) it was clearly confirmed that workers had been aware

related potential risk and hazards in the work place. Following up on this, the company has been reduce the potential risk by routine socialization about OHS, providing PPE, and OHS signboard are available in workplace.

Interviews with estate workers (harvester and sprayer) and mill workers (mill operators). Based on the results of interviews can be concluded that workers understand the OHS policy and it's recognized that every morning meeting is always affirmed about the importance of safety and the use of PPE in work. For example mill employees exposed to high noise such as boiler employees and engine rooms who have used a complete hearing protection device according to risk analysis, namely ear muff and ear plug. There is no complaints from employees exposed to high noise exposure. To ensure that every workers are in good health then certification unit do the medical check up. The results of each employee's health examination have been properly stored. Last medical checkups conducted in 12-13 October 2021. The result of medical test showed that workers were in good health and fit to work.

Opportunity for Improvement (OFI)

The company has identified sources of hazards and potential risks for the company's operational activities in plantations and factories. In general, each activity unit has been identified, analyzed and assessed for its risk prevention efforts. However, based on field observations, several isolated cases have the potential to increase the risk of OHS, for example:

- The WWTP pool is not equipped with a perimeter fence and cables hanging around the WWTP pool due to the addition of processing capacity from 20 Tons of FFB/Hour to 60 Tons of FFB/Hour.
- Supporting PPE in the form of life jackets and gloves that are not stand by at the work site.

Based on the above, the company has the opportunity to re-assure that all areas that have been identified as hazards can be managed properly.

3.6.2

Realization of the program of work will be monitored through regular meetings Guiding Committee of Occupational Safety & Health (*P2K3*) every month. This work program applies generally to all workers in the workplace. If the plans have been made yet on target then will be evaluated in the regular meetings to assess effectiveness. The following are examples of the realization by the certification unit in 2021 until March 2022 including:

- OHS inspection of PPE compliance of workers and other equipment that has been every month since 2021 until now. For example, the inspections on January until March 2022 were conducted inspection in work locations found that there were all workers whose has been using an appropriate PPE.
- Dissemination of the dangers of drugs/childe workers to workers and residents of housing by installing warnings of the dangers of drugs in every employee's housing, office and other areas.
- Identification of areas with potential emergency hazards such as areas prone to fire, explosion, land / water pollution, and workplace accidents and the results of monitoring conducted every months. The last examination was in January until March 2022.
- Inspection of the availability and condition of first aid boxes conducted since January until March 2022 (every month) with the results of all first aid boxes carried by each field foreman, first aid kit in the office and in the warehousing area are still in good condition and available in 21 types of items in accordance with applicable laws and regulations. If there is item that had not available, the first aid officer will immediately added new item.
- Unit certification always holds routine *P2K3* meetings every month to monitor and evaluate the implementation of OHS that has been carried out. The last *P2K3* Meeting in 29 March 2022 on which discussed the evaluation of the annual evaluation of OSH implementation, preparation of insection, and others attended by *P2K3* officers.
- Based on interview & Observed with pesticide applicator in Estate and process operators at Mill, certification unit has been provide adequate and appropriate protective equipment available to all workers at the place of work to cover all potentially hazardous operations. For example, Sterillizer and Bolier Operators that has been provide PPE such as safety shoes, helmet, ear plug, & gloves.
- The certification unit has carried out the socialization of OHS Anniversary (safety induction, first aid, emergency response and others) on 09 February 2021 to all workers in the plantation and mill units. In addition, there are also warnings related to safety induction in several locations of offices, mills, housing and also oral delivery during muster morning to all workers every day. Guests and outside parties (including auditors) who will visit each operational area at PT Dendymarker Indah Lestari, will be given a safety briefing and given PPE before making a visit.
- Identify and monitor the needs of workers who need special competence / expertise to operate heavy equipment or machines in the plantation or mill unit.

Based on the results of the document review, it is known that the certification unit has carried out routine annual OHS evaluations in each unit by carrying out RSPO internal audit activities in with internal audit RSPO, the result is that there are several records related to the implementation carried out in these years but in less than a months have completed those records.

Based on the results of interviews with workers (harvester, pesticide applicator, and process operator) at DIL Mill, Sei Mandang and Sei Liam Estate, it is known that every day when the morning muster is carried out, the supervisor will check the completeness of the PPE of the workers and will deliver a safety briefing. Meanwhile, every month an OHS inspection is held to see how it applies to all units.

Based on the explanation above, it can be concluded that the certification unit has monitored the effectiveness of the OHS plan to handle OHS risk in people.

Status: Comply

3.7

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

3.7.1 and 3.7.2

Certification unit has training identification and program for workers for period of 2022 for operational training, OHS training, and policy socialization. The program has been approved by the company leadership on 04 January 2022. The aspect in the training program are such as certification, internal refreshment, internal operational, and others namely:

- Training of Harvest management, harvesting techniques and FFB quality
- Training of Operation & maintenance of vehicles, heavy equipment and generators
- Training of fire fighting
- Training of Storage, mixing and application of pesticides
- Training of Integrated pest control
- Training of First aid training
- And others.

In addition, the certification unit has been giving a training/socialization for relevant stakeholders (contractors, suppliers, local communities and smallholders). These programs include the following:

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

The certification unit has properly documented every training activity and socialization that has been carried out to workers and related stakeholders. The following is an example of training/socialization documentation that has been carried out in 2021/2022, namely:

- Socialization of company policies and aspects of the RSPO on 25 May 2021 to all workers and third parties working with the company (contractors, transporters and suppliers)
- Work Instruction (WI) training on March 8-13, 2021 for all operators at DIL Mill.
- Main implementer training as local operator of turbine generator equipment on 17-19 January 2022.
- Fire and emergency response training on January 28, 2022 for all firefighters and workers.
- First aid training on February 21, 2022 for all company first aid workers.
- Harvest management training on March 24, 2022 for all company harvest workers.

Based on field observations at engine room station and block D8 (circle and path spraying), it is known that workers have understood their work in accordance with the procedures set by the company and their understanding of the duties and responsibilities for each job has been carried out quite well, because the certification unit has routinely conducted training every year according to the type of work each. Meanwhile, the results of interviews with representatives of contractors, contractor workers in field and the surrounding community revealed that they had received routine socialization related to company policies, code of conduct, PPE, communication procedures and complaints were routinely provided by the certification unit which causes stakeholders to understand the procedures and work methods that already exist in the company's operational area.

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

3.7.3

Training Program 2022 is available including RSPO Supply Chain. Actual training for RSPO Supply Chain in 2022 was conducted on 6 February 2022 with a number of participants 23 persons. The training was subjected to SOP of Supply Chain and Traceability of Palm products (MKT-03-06/04-03-2019/Rev.0). Training attended by relevant personnel including Mill Manager, Office Assistant, Field Assistant, weighbridge clerk, production clerk, and security.

During onsite visits at DIL POM and interviews with personnel who are involved in Supply Chain, they can demonstrate the effectiveness of the training by explaining in detail Supply Chain flow. Such as Weighbridge operator and Mill Manager.

Status: Comply

3.8

Supply Chain Requirements for Mills

3.8.1; 3.8.2

SCSS module that is applied in DIL POM is Mass Balance (MB) since it received and processed the FFB from certified and uncertified sources. The mill claims only the volume of oil palm products produced from certified FFB as MB

3.8.3

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

	Last Year Projected Certified Volume (Ton)	Actual Production October 2020 – March 2022 (MT)	Estimate Production next 12 months (MT)
FFB Processed	36,100	27,915.60	27,000
CPO Production	8,217	6,911.37	5,940
Palm Kernel (PK) Production	1,212	1,204.15	1,080

Since the last period of assessment, DIL POM applied scenario 4 in accordance with RSPO Contingency Audit Procedures, and there is no new license since issued after Recertification Assessment (2020) assessment. Normally ASA 1.1 onsite audit shall be conducted in early 2021 however due to Covid 19 pandemic the assessment was postponed and conducted in 2022 together with ASA 1.2. with there is no new license since the expired period, palm trace id of PT DIL extended every three months since the license expired (26 April 2021) and the volume of certified products will be added according to the request of the certification unit. During the period of 2020 and 2021 there are several additional RSPO Products as follows:

Dated	Additional Volume (MT)			
	FFB Estate	FFB scheme or associated	CSPO	CSPK
12 January 2022	6,800	-	1500	-
27 May 2022	12,300	-	2967	462

3.8.4

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

Member Information	
Member Name	PT. DENDYMARKER INDAHLESTARI
Member ID	RSPO_PO1000004127
Member Country	Indonesia
Member Category	Oil mill
Core Product	Palm Oil

License Information	
License ID	CB115228
Issued By	PT Mutuagung Lestari
Issued On	03/02/21
Start Date	02/27/2021
End Date	07/26/2022
License Status	Active

All transaction has been announced to RSPO IT Platform and confirmed shipped. During license it was known there is no product sold as RSPO certified. remove of certified stock for products sold as other scheme or as non-certified/conventional as described in indicator 3.8.8 and 3.8.16

3.8.5

The Company has a written procedures and/or work instructions for ensuring the implementation of the RSPO Supply Chain Standard. The procedure is SOP Supply Chain and Traceability of Palm Products No.MKT-03-06/04-03-2019/Rev.0 dated 18 March 2019. Procedure completed with the flow diagram of FFB receiving, processing in POM, Receiving, and shipping of CPO. The person responsible for the implementation of the RSPO Supply Chain standard at the POM is the Mill Manager. The procedure is complete and up to date covering the implementation of all elements in the supply chain requirements, such as:

- Sales process, covering from contract approval to delivery of oil palm product (CPO and PK) including information on supply chain mechanism;
- Process at the estates covers harvesting, FFB, and loose fruit delivery including harvesting record and delivery to the Palm Oil Mill;
- Process at Palm Oil Mill covers FFB and loose fruit receiving, identification, production process, delivery of the product, and recording;
- Evaluation by CB;
- Transportation records; f. Internal control;
- Contractor control

The mill has complete and up-to-date records and reports that demonstrated compliance with the Identity Preserved requirements including training records. The record has seen data of FFB received, CPO and PK stock, production, dispatch, OER, KER, refreshment training of RSPO Supply Chain on 6 February 2021, attended by relevant personnel including Mill Manager, Office Assistant, Field Assistant, weighbridge clerk, production clerk, and security.

3.8.6

The Procedure to conduct an annual internal audit is described in SOP No. SOP No. ENC-01-02/04-03-2019/Rev.2, which describes the internal audit conducted annually. Internal audit of SCCS conforms to the requirements in the RSPO SCCS and the RSPO market communications and claims documents and effectively implements and maintains the standard requirements.

The latest internal audit was carried out on 24 February 2022, against RSPO P&C 2018 Indonesia National Interpretation 2020. The internal auditor assessed Criteria 3.8 related to RSPO SCCS. Corrective action related to internal audit findings has been determined.

The latest Management Review in DIL POM was conducted on 12 March 2022. Management review has discussed:

- Results of internal audits; an internal audit on DIL POM was conducted on 24 February 2022,
- Customer feedback: Based on the review of customer feedback conducted by the Marketing Department, there is no complaint related to CPO and PK quality sold by DIL POM.
- Process performance and product conformity. FFB processed in DIL POM are coming from owned estates.
- Status of preventive and corrective actions. All findings discussed in this Management Review have been closed and attached in the minutes of the management review.
- Follow-up actions from management reviews. Results of previous management reviews were always discussed, mostly regarding performance, target achievement, and FFB quality.
- Changes that could affect the management system. There is no company policy that affects to the POM management system; based Memorandum of Engineering Department No.234/HO-ENG/2020 dated 2 December 2020 stated that starting 1 January 2021 operation of the weighbridge will be controlled by an independent laboratory and all data entry related production to lintramax system will be handled by an independent laboratory; Installation of reverse osmosis on water treatment

- recommendations for improvement

3.8.7

The mill has a record amount of FFB tonnage as follows:

1. March – December 2020			
Month	FFB (MT)		
	RSPO Certified	Non-Certified	Total
Oct-20	3,166.20	6,248.92	9,415.12
Nov-20	2,750.35	5,848.63	8,598.98
Dec-20	2,417.71	5,867.31	8,285.02
Total	8,334.26	17,964.86	26,299.12
2. January – December 2021			
Month	FFB (MT)		
	RSPO Certified	Non-Certified	Total
Jan-21	1,795.68	6,781.15	8,576.83
Feb-21	1,369.86	6,040.35	7,410.21
Mar-21	1,343.07	8,104.02	9,447.09
Apr-21	1,394.51	7,640.05	9,034.56
May-21	1,252.98	7,221.23	8,474.21
Jun-21	1,219.08	7,888.94	9,108.02
Jul-21	1,066.42	7,790.72	8,857.14
Aug-21	1,111.22	7,490.87	8,602.09
Sep-21	1,281.26	8,380.18	9,661.44
Oct-21	1,015.80	7,462.06	8,477.86
Nov-21	1,140.94	9,805.90	10,946.84
Dec-21	1,044.97	9,056.78	10,101.75
Total	15,035.79	93,662.25	108,698.04
3. January – March 2022			
Month	FFB (MT)		
	RSPO Certified	Non-Certified	Total
Jan-22	1,350.87	8,235.99	9,586.86
Feb-22	1,343.12	7,013.35	8,356.47
Mar-22	1,851.56	8,100.02	9,951.58
Total	4,545.55	23,349.36	27,894.91
Grand Total	27,915.60	134,976.47	162,892.07

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

	Last Year Projected Certified Volume (Ton)	Actual Production October 2020 – March 2022 (MT)	Estimate Production next 12 months (MT)
FFB Processed	36,100	27,915.60	27,000
CPO Production	8,217	6,911.37	5,940

Palm Kernel (PK) 1,212 1,204.15 1,080
Production

Since the last period of assessment, DIL POM applied scenario 4 in accordance with RSPO Contingency Audit Procedures, and there is no new license since issued after Recertification Assessment (2020) assessment. Normally ASA 1.1 onsite audit shall be conducted in early 2021 however due to Covid 19 pandemic the assessment was postponed and conducted in 2022 together with ASA 1.2. with there is no new license since the expired period, palm trace id of PT DIL extended every three months since the license expired (26 April 2021) and the volume of certified products will be added according to the request of the certification unit. During the period of 2020 and 2021 there are several additional RSPO Products as follows:

Dated	Additional Volume (MT)			
	FFB Estate	FFB scheme or associated	CSPO	CSPK
12 January 2022	6,800	-	1500	-
27 May 2022	12,300	-	2967	462

the mechanism of handling non-conforming oil palm products of FFB received (certified or non-certified) has describe in SOP No. DMPOM-WI/PROD/001A, which explain that non-conforming oil palm products as a false in FFB received notes (certified or non certified) and regarding of FFB received records. To handling on this non-conforming are to corrected the record base on FFB source (certified or non certified areas) and monitored by mass balance record documents.

3.8.8

Documentation for the Sustainable Certified Product (CSPO and CSPK) consists of a daily record of the FFB acceptance, a daily record of certified production, which is classified as the CSPO and CSPK, a sales record, a stock record that has been reconciled with the FFB acceptance, monthly production and sale and annual recapitulation. Based on documents verifications and interviews with management units obtained information since October 2020 to March 2022 there are 7,499.40 MT CSPO sold as certified products and for PK all certified products sold as conventional

Documents verification and interview during an audit it was known the claimed RSPO product of CSPO and CSPK is no longer than 3 months since the product delivered. Those documents cover information's of delivery date, description of product and supply chain model, product quantity, identification number, certificate number, sender's name, and address of the seller, in example Shipping Announcement for CSPO volume 500 MT dated 12 January 2022, with transaction ID TR-76e987b6-a8a6, with buyer reference shipping period in December 2021 with buyer PT Wira Inno Mas, with product RSPO MB, Certificate No MUTU-RSPO/065. Furthermore, the unit of certification can present document related claim product such as delivery order and weighbridge slip that informed CSPO products that sold.

since last onsite assessment it was known all CSPK product sold as conventional and has been removed from palm trace as described below:

Stock Transaction ID	Date	Product	Supply Chain Model	Transaction Type	Volume
ST-TR-9fc0cedc-9c6f	13-04-2021	CSPO	Mass Balance	Remove From Certified Stock	0.76
ST-TR-be0f00fd-d659	13-04-2021	CSPO	Mass Balance	Remove From Certified Stock	1.14
ST-TR-0d58f8fd-6720	10-05-2021	CSPO	Mass Balance	Remove From Certified Stock	1,500
ST-TR-b1c0ac70-acf7	10-05-2021	CSPO	Mass Balance	Remove From Certified Stock	0.89
ST-TR-1038f4c9-c737	10-05-2021	CSPK	Mass Balance	Remove From Certified Stock	116.85
ST-TR-90272999-7874	10-05-2021	CSPK	Mass Balance	Remove From Certified Stock	180.19

*Volume in MT

3.8.9; 3.8.10

DIL POM does not outsource its milling activity to any independent third party. The unit of certification only outsources the transport activity. Transport for RSPO certified sustainable CPO is managed by PT. DIL, whilst transport of RSPO certified PK are managed by the buyer.

Transport of certified CPO performed by several contractor and the company has detailed records of the contractors used, the contractors used are PT. Multi Mulia and PT. Genta Perdana Diandra with address in Padang – West Sumatera Province. During transport, legal ownership of CSPO is still under PT. DIL with agreements presented as follows:

- CPO transportation agreement with PT Mutia Mulia through Agreement No. 20198/Angkutan/CPO/DMIL/01 (Extension No.1/2020) dated 2 January 2021. Clauses that mention contractor's commitment towards several regulation compliance which required by Indonesian Laws and/or Regulations, RSPO, SCCS, and OSH system, as well as willingness to be audited by the Certificate Body appointed by company.
- CPO transportation agreement with PT Genta Perdana Diandra through Agreement No. 2020/Angkutan/CPO/DMIL/01 dated 14 May 2021. Clauses that mention contractor's commitment towards several regulation compliance which required by Indonesian Laws and/or Regulations, RSPO, SCCS, and OSH system, as well as willingness to be audited by the Certificate Body appointed by company.

3.8.11

Based on review list of transporters verified on Recertification until with this assessment there is no new contractor added. There are 2 outsourcers which physical handling of RSPO certified oil palm products. It will be verified on next surveillance if any new contractor

3.8.12

PT DIL have maintain accurate, complete and up-to-date for the FFB receives, process and CPO & PK production from its supply bases.

Mass Balance CPO

Period	CPO Production (MT)		Total	CPO Delivery (MT)	
	Certified	Uncertified		Certified (Physical)	Conventional
Opening Stock	1,820.66		1,820.66		
Oct	722.27	1,332.60	2,054.87	500	
Nov	625.88	1,239.51	1,865.40	1,000.00	
Dec	554.34	1,244.74	1,799.07	1,499.93	
Total Oct- Dec 2020	3,723.16	3,816.84	7,540.00	2,999.93	
Stock	723.23		723.23		
January	424.13	1,439.71	1,863.84	500.00	
February	318.8	1,242.36	1,561.16	499.85	
March	328.87	1,699.37	2,028.24	499.87	
Total Jan - March 2021	1,795.03	4,381.44	6,176.47	1,499.72	
Stock	295.31		295.31		
April	344.87	1,641.96	1,986.83		
May	321.43	1,608.27	1,929.70		
June	318.7	1,767.66	2,086.35		
Total April - June 2021	1,280.31	5,017.89	6,298.19	0.00	
Stock	1,280.31		1,280.31		
July	278.04	1,707.69	1,985.73	999.92	

August	280.15	1,598.56	1,878.71		
Sept	333.41	1,864.72	2,198.13		
Total July - Sept 2021	2,171.91	5,170.97	7,342.88	999.92	
Stock	1,171.99		1,171.99		
Oct	281.51	1,756.54	2,038.05	499.9	
Nov	312.83	2,218.25	2,531.08		
Dec	299.04	2,154.06	2,453.10	999.93	
Total Oct- Dec 2021	2,065.37	6,128.85	8,194.22	1,499.83	
Stock	565.54		565.54		
January	340.43	1,783.31	2,123.74	-	
February	355.47	1,638.00	1,993.47	500	
March	471.21	1,843.71	2,314.91	-	
Total Jan - March 2022	1,732.65	5,265.02	6,997.66	500	
GRAND TOTAL	8,732.04	29,781.02		7,499.40	

Mass Balance PK

Period	CSPK Production (MT)		Total	CSPK Delivery (MT)	
	Certified	Uncertified		Certified (Physical)	Conventional
Opening Stock	75.3		75.3		
Oct 2020	127.22	251.09	378.31		131.71
Nov 2020	108.31	230.32	338.63		139.07
Dec 2020	85.13	206.61	291.74		75.43
January 2021	79.36	234.92	314.28		57.21
February 2021	67.89	234.02	301.91		66.14
March 2021	70.85	313.51	384.36		82.52
April 2021	59.26	225.67	284.93		71.37
May 2021	59.09	242.8	301.89		59.58
June 2021	51.97	218.4	270.37		13.87
July 2021	48.36	223.89	272.25		78.33
August 2021	47.54	204.53	252.07		37.32
Sept 2021	56.2	241.17	297.37		95.34
Oct 2021	54.39	275	329.39		66.29
Nov 2021	55.74	290.87	346.61		47.95
Dec 2021	70.68	437.51	508.19		43.29
January 2022	52.67	265.49	318.16		51.68
February 2022	45.3	229.68	274.98		50.90
March 2022	64.19	252.41	316.6		105.53
Grand Total	1,279.45	4,577.89	5,857.34		1,273.53

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

a. Tonnage Product

Description	Volume (MT)
Certified FFB	27,915.60
CSPO Production	6,911.37
CSPK Production	1,204.15

b. Product Selling

Description	Volume (MT)
CSPO sold as RSPO certified product	7,499.40
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	1,273.53

3.8.13 & 3.8.14

Based on document verification and interview with management it was known if there is no conversion rate of production CPO and PK. The production of CPO (OER) and PK (KER) were based on actual daily, monthly, and yearly production.

3.8.15

DIL Mill has only implementing RSPO mass balance supply chain system. Separation has only conducted through administrative recording

3.8.16

Documentation for the Sustainable Certified Product (CSPO and CSPK) consists of a daily record of the FFB acceptance, a daily record of certified production, which is classified as the CSPO and CSPK, a sales record, a stock record that has been reconciled with the FFB acceptance, monthly production and sale and annual recapitulation. Based on documents verifications and interviews with management units obtained information since October 2020 to March 2022 there are 7,499.40 MT CSPO sold as certified products for CSPK sold as conventional

Documents verification and interview during an audit it was known the claimed RSPO product of CSPO and CSPK is no longer than 3 months since the product delivered. Those documents cover information's of delivery date, description of product and supply chain model, product quantity, identification number, certificate number, sender's name, and address of the seller, in example Shipping Announcement for CSPO volume 500 MT dated 12 January 2022, with transaction ID TR-76e987b6-a8a6, with buyer reference shipping period in December 2021 with buyer PT Wira Inno Mas, with product RSPO MB, Certificate No MUTU-RSPO/065. Furthermore, the unit of certification can present document related claim product such as delivery order and weighbridge slip that informed CSPO products that sold.

since last onsite assessment it was known all CSPK product sold as conventional and has been removed from palm trace as described below:

Stock Transaction ID	Date	Product	Supply Chain Model	Transaction Type	Volume
ST-TR-9fc0cedc-9c6f	13-04-2021	CSPO	Mass Balance	Remove From Certified Stock	0.76
ST-TR-be0f00fd-d659	13-04-2021	CSPO	Mass Balance	Remove From Certified Stock	1.14
ST-TR-0d58f8fd-6720	10-05-2021	CSPO	Mass Balance	Remove From Certified Stock	1,500
ST-TR-b1c0ac70-acf7	10-05-2021	CSPO	Mass Balance	Remove From Certified Stock	0.89
ST-TR-1038f4c9-c737	10-05-2021	CSPK	Mass Balance	Remove From Certified Stock	116.85
ST-TR-90272999-7874	10-05-2021	CSPK	Mass Balance	Remove From Certified Stock	180.19

*Volume in MT

3.8.17

The products are claims as mass balance. The Mill does not use RSPO trademark on product or off product. PT. DIL has not made any claim regarding the use of or support of RSPO certified oil palm products. The organization has good understanding on the RSPO Rules on Market Communications and Claims

Status: Comply

PRINCIPLE #4 RESPECT COMMUNITY AND HUMAN RIGHTS AND DELIVER BENEFITS

4.1

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

4.1.1

The unit of certification demonstrates a human rights policy that was approved by the president director on March 27, 2019. The contents of the policy include company recognition of human rights which is universal and applies to all, supports the implementation of fundamental principles and rights in the workplace which are regulations in Indonesia, and if there are violations of Human rights can result in layoffs and also legal action.

The unit of certification has also carried out socialization related to the company's policies which include Human Rights, Anti-Corruption Policy, and Supplier Integrity Policy. Examples of socialization activities that have been carried out are on 25 May 2021 for all workers and third parties (contractors, transporters and suppliers).

Based on the results of interviews with workers, representatives of worker unions and gender committees as well as with the surrounding village community, it is known that they are aware of the company's human rights policies. Workers also know their rights such as those related to minimum wages, H1 and H2 leave (for female workers), overtime, etc. The results of interviews with contractors also conveyed that the company routinely conveyed socialization related to company policies.

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

4.1.2

During the past year (2020 and 2021), The unit of certification did not have records related to the use of violence / mercenaries or paramilitaries in resolving conflicts / problems that existed between the certification unit and related stakeholders (surrounding communities, workers, or others).

Based on the results of field visits to the estate and factories, there was no visible presence of mercenaries in the company's operational areas. Based on the results of interviews with local villagers and online searches, there were no issues related to the use or violence of the use of mercenaries or paramilitaries. The results of interviews with workers and contractors also explained that there were no acts of violence committed by the company using the apparatuses, the workers had understood the company's human rights policies.

Status: Comply

4.2

There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties.
4.2.1

The unit of certification already has a mechanism for resolving disputes consisting of:

1. Land dispute refers to the mechanism of land dispute resolution as stipulated in "Land and Planting Compensation inside Location Permit of the Company" No. LCA-01-01/01-02-2018/Rev.0, dated 18 February 2018, it shows that the company has provided effective resolution of land dispute resolution as follows:
 - The company disseminates company location permits/HGU to the public.
 - If there is a claim from the community, the company will accept the claim if accompanied by proof of land ownership.
 - Verification of the land status, if proof of land ownership is acceptable, a field survey and land measurement will be carried out.
 - Field surveys and land measurements involve companies, claimants and government representatives.
 - Based on land observations and measurements, a Minutes of Land Measurement is made, covers area wide and coordinates of the land claimed and signed by the parties.
 - Final verification based on measurement results and maps to ensure that the land does not overlap with the other ownership/rights/claims.
 - If the final verification results show that the land being acquired does not overlap with other ownership/rights/claims, the company will negotiate prices for compensation.
 - If a compensation price agreed, the company will pay the compensation to the land owner.
2. Resolution of Internal Complaint refers to the Internal Grievance mechanism (HRD-04-01/01-04- 2019/Rev.1) dated 5 April 2019.
3. Resolving external complaints refers to the External Grievance mechanism (HRD-04-02/19-02-2019/Rev.0) dated 19 February 2019.
4. Whistleblowing policy refers to company policy No. QMM-40-01-P16 (Whistleblowing Policy) dated 14 January 2019.

All SOPs and Company Policies are available in two languages, English and Bahasa Indonesia, which can be understood by the parties. Based on interview with worker in POM and estate, it is known that workers understand how to deliver their complaint if any. Based on interview with surrounding community, it is known that they understand the mechanism to deliver their complaint if any

4.2.2

As explained by the management representative, a mutually agreed upon system for handling complaints will be established when a complaint is found. The reference for making procedures is the Internal and External Grievance SOP. Based on this procedure, it is known that the response period for complaints is 10 days with the person in charge is the estate manager. In those procedure also described the mechanism to ensure that the system is understood by affected parties, including by literate parties

4.2.3 & 4.2.4

Based on document verifications it was known if the unit certification has been documented all the complaint including their response. Result of documents verifications, interview with managements and public stakeholders it was knowns if the dominant existing complaints are related to problems with land or areas that have not been compensated. In relation to this, the company always communicates with the community / claimants if there are plans for land clearing or new planting. Several complaints that have been submitted are also related to overlapping land ownership in the company's HGU area. Although PT DIL has gained land rights legally but there are still many people using and cultivating in permit Area. The company has had the Area Statement map who described various land use in permit Area, included occupation area width. That's area managed by community are palm oil, rubber or horticulture.

	Status: Comply	
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4.3
The unit of certification contributes to local sustainable development as agreed by local communities.
4.3.1

Based on documents verifications and interviews with management as well as village heads obtained information if the CSR program was coordinated with local government in the form "Committee Forum of CSR Musi Rawas Utara Regency". During the audit, the company showed a letter from the regent of Musi Rawas Utara No. 005/31/BAPPEDA dated 02 February 2022 in the context of discussing the work program of the CSR committee forum Musi Rawas Utara Regency on 10 February 2022 about CSR Forum Musi Rawas Utara Regency Annual Work Meeting year of 2022

Even though the CSR program has been carried out in accordance with the provisions of the local government (CSR committee forum Musi Rawas Utara Regency), to the surrounding community, the company continues to provide assistance in the form of charity in accordance with the proposals submitted, for example:

- Purchase assistance of cement for maintenance worship in Karang Dap on 12 April 2021
- Purchase assistance of tile for islamic boarding school construction in Karang Dapo on 12 April 2021
- Assistance of worship construction in Batu gajah Village on 14 Juni 2021

Furthermore, the results of interviews with the village party showed that there was dissatisfaction related to the company's CSR program. related to this the audit team has made this an opportunity for improvement in indicator 3.4.3 which the company must manage in the management and monitoring of social impacts

Status: Comply

4.4

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

4.4.1

The scope of certification is 11,893.04 Ha in accordance with the decree from Investment Coordinating and One-Stop Permit Service Agency Musi Rawas Utara Regency No 05/KPTS/DPM-PTSP/VII/2020 dated 28 July 2020 regarding the changes to the Environmental Permit. PT Dendymarker Indahlestari owned land title based on the decree of national land agency No. 38/HGU/BPN/98 dated 26 June 1998, certified by HGU certificate No. 04 the year of 1998 dated 20 October 1998 with covering area 17,793.5 Ha, valid for 30 years and it's revised on 27 July 2016 according to national land agency letter No: 4079/23.3-400/X/2014 dated 24 October 2014 become 13,704.91 Ha.

Company area originally from Production forests that can be converted for other purposes (*HPK/hutan produksi konversi*) which has been released in accordance with decree from Ministry of Forestry on 5 January 1998 through decree No No. 3/KPTS-II/1997.

4.4.2; 4.4.4; 4.4.5; 4.4.6

PT. Dendymarker Indah Lestari already has a HGU certificate in 1998, then the company is currently part of the management of the Sipef group which was taken over in August 2017 from the PT Agro Investama Gemilang (AIG) group, so that the land acquisition documents prior to the issuance of the HGU cannot be traced. The land acquisition documents that can be submitted from PT Agro Investama Gemilang (AIG) to the Sipef group are compensation documents after the issuance of the HGU due to unfinished claims or compensation.

The certificate holder (CH) has FPIC procedure No. LCA 01-03/01-02-2019/Rev.0 regarding land and planting compensation. Based on an interview with communities is known that there are no indigenous rights or customary rights and there are no issues regarding the FPIC process. The compensation process is not diminishing the legal/customary right, landowners are given the freedom to release their land without coercion.

Since SIPEF group takeover in August 2017 from the group of PT Agro Investama Gemilang (AIG), they are planning to do replanting of the entire planting area and planting potential (HGU area controlled by the community). From the scope of certification, previously there are areas covering \pm 443.4 Ha in the permitted area that is occupied and managed by the community. Regarding these areas, the company persuasively approaches those who manage whether they are willing to do compassion. The term used by the company is compassion (*tali asih*), not compensation because the area has been legally controlled by the company since obtaining the HGU in 1998. As of April 2022, the total area for which compassion has been carried out is \pm 1,045.08 Ha and 127 people.

The results of interviews with representatives of villages surrounding the company, obtained information if the compassion process is based on consultation and negotiations are transparent and meet the demands for social justice. Until the audit was carried out, there was no written complaint from the community regarding the compassion process.

According to information gathered during stakeholder consultation with representatives of the village which include the previous landowner, it is confirmed that the land acquisition has been carried out in the early days of land clearing. Based on interviews it was known if affected local peoples (claimed) understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are based non-coercive and entered voluntarily and carried out prior to new operations

The company presented evidence of land compassion to the related parties. The sample of process land compassion presented to the landowner was sighted where the documents were made in Bahasa and known by all relevant parties. Although the legal status of the acquired land is located within the Land Use Title area of the company which is in the law the company is controlled legally. These

processes involved the landowner and are approved by the head of the village and local government. The documented process of land compensation was signed by the related party, filed in the unit of certification

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; 4.5.4; 4.5.5; 4.5.6

As mentioned in the previous criteria, although PT DIL has gained land rights legally, there are still many people using and cultivating in the permit areas. The company has had the Area Statement map who described various land use in the permit area, included occupation area width. That's areas managed by the community are palm oil, rubber, or horticulture. The company has been mapped the community who managed in the company operational area. If the area according to the company is suitable for planting oil palm and is not included in the HCS (no go area) area, the company will have compassion for those who manage the area.

The certificate holder (CH) has FPIC procedure No. LCA 01-03/01-02-2019/Rev.0 regarding land and planting compensation. Based on an interview with communities is known that there are no indigenous rights or customary rights and there are no issues regarding the FPIC process. The compensation process is not diminishing the legal/customary right, landowners are given the freedom to release their land without coercion.

Since Sipef group takeover in August 2017 from the group of PT Agro Investama Gemilang (AIG), they are planning to do replanting of the entire planting area and planting potential (HGU area controlled by the community). From the scope of certification, previously there are areas covering \pm 443.4 Ha in the permitted area that is occupied and managed by the community. Regarding these areas, the company persuasively approaches those who manage whether they are willing to do compassion. The term used by the company is compassion (*tali asih*), not compensation because the area has been legally controlled by the company since obtaining the HGU in 1998. As of April 202, the total area for which compassion has been carried out is \pm 1,045.08 Ha and 127 people.

4.5.2; 4.5.3; 4.5.7; 4.5.8

The results of interviews with representatives of villages surrounding the company, obtained information if the compassion process is based on consultation and negotiations are transparent and meet the demands for social justice. Until the audit was carried out, there was no written complaint from the community regarding the compassion process.

According to information gathered during stakeholder consultation with representatives of the village which include the previous landowner, it is confirmed that the land acquisition has been carried out in the early days of land clearing. Based on interviews it was known if affected local peoples (claimed) understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are based non-coercive and entered voluntarily and carried out prior to new operations

The company presented evidence of land compassion to the related parties. The sample of process land compassion presented to the landowner was sighted where the documents were made in Bahasa and known by all relevant parties. Although the legal status of the acquired land is located within the Land Use Title area of the company which is in the law the company is controlled legally. These processes involved the landowner and are approved by the head of the village and local government. The documented process of land compensation was signed by the related party, filed in the unit of certification

Status: Comply

4.6

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

4.6.1; 4.6.2

The mechanism for identifying legal, customary, or user rights, and a procedure for identifying people entitled to compensation are ruled in the procedure of Land Compensation (No. LCA 01-03/01-02-2019/Rev.0). The procedure has covered the process of identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation. The scope of procedure is all activities related to the compensation process for land over the land right cultivated by the Company, the purpose is to ensure the area of plantation free from others' rights. Based on an interview with communities is known that there are no indigenous rights or customary rights and there

are no issues regarding the FPIC process. The compensation process does not diminish the legal/customary right, landowners are given the freedom to release their land without coercion.

PT. Dendymarker Indah Lestari had an HGU certificate in 1998, then the company is currently part of Sipef group management because of the takeover in August 2017 from the group of PT Agro Investama Gemilang (AIG), so the land acquisition documents before the HGU issued cannot be traced. The land acquisition documents that are currently available in the company are the compensation documents after the issuance of the HGU / land title due to unresolved claims or compensation process.

Since Sipef group takeover in August 2017 from the group of PT Agro Investama Gemilang (AIG), they are planning to do replanting of the entire planting area and planting potential (HGU area controlled by the community). From the scope of certification, previously there are areas covering ± 443.4 Ha in the permitted area that is occupied and managed by the community. Regarding these areas, the company persuasively approaches those who manage whether they are willing to do compassion. The term used by the company is compassion (*tali asih*), not compensation because the area has been legally controlled by the company since obtaining the HGU in 1998. As of April 2022, the total area for which compassion has been carried out is $\pm 1,045.08$ Ha and 127 people.

4.6.3; 4.6.4

The results of interviews with representatives of villages surrounding the company, obtained information if the compassion process is based on consultation and negotiations are transparent and meet the demands for social justice. Until the audit was carried out, there was no written complaint from the community regarding the compassion process.

According to information gathered during stakeholder consultation with representatives of the village which include the previous land owner, it is confirmed that the land acquisition has been carried out in the early days of land clearing. Based on interviews it was known if affected local peoples (claimed) understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are based non-coercive and entered into voluntarily and carried out prior to new operations

The unit of certification has presented evidence of land compassion to related parties. The sample of process land compassion presented to the landowner was sighted, the copy was made in Bahasa and known by all relevant parties. Although the legal status of the acquired land is located within the Land Use Title area of the company, which is in the law the company is controlled legally. These processes involved the landowner and are approved by the head of the village and local government. The documented process of land compensation was signed by the related parties and filed in the unit of certification peoples. Negotiated agreements should be non-coercive and entered into voluntarily and carried out prior to new operations.

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; and 4.7.3

The mechanism for identifying legal, customary, or user rights, and a procedure for identifying people entitled to compensation are ruled in the procedure of Land Compensation (No. LCA 01-03/01-02-2019/Rev.0). The procedure has covered the process of identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation. The scope of procedure is all activities related to the compensation process for land over the land right cultivated by the Company, the purpose is to ensure the area of plantation free from others' rights. Based on an interview with communities is known that there are no indigenous rights or customary rights and there are no issues regarding the FPIC process. The compensation process does not diminish the legal/customary right, landowners are given the freedom to release their land without coercion.

Since Sipef group takeover in August 2017 from the group of PT Agro Investama Gemilang (AIG), they are planning to do replanting of the entire planting area and planting potential (HGU area controlled by the community). From the scope of certification, previously there are areas covering ± 443.4 Ha in the permitted area that is occupied and managed by the community. Regarding these areas, the company persuasively approaches those who manage whether they are willing to do compassion. The term used by the company is compassion (*tali asih*), not compensation because the area has been legally controlled by the company since obtaining the HGU in 1998. As of April 2022, the total area for which compassion has been carried out is $\pm 1,045.08$ Ha and 127 people.

The results of interviews with representatives of villages surrounding the company, obtained information if the compassion process is

based on consultation and negotiations are transparent and meet the demands for social justice. Until the audit was carried out, there was no written complaint from the community regarding the compassion process.

According to information gathered during stakeholder consultation with representatives of the village which include a previous land owner, it is confirmed that the land acquisition has been carried out in the early days of land clearing. Based on interviews it was known if affected local peoples (claimed) understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are based non-coercive and entered voluntarily and carried out prior to new operations.

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 and 4.8.4

the mechanism for resolving land disputes refers to the mechanism of land dispute resolution as stipulated in "Land and Planting Compensation inside Location Permit of the Company" No. LCA-01-01/01-02-2018/Rev.0, dated 18 February 2018, it shows that the company has provided effective resolution of land dispute resolution as follows:

- The company disseminates company location permits/HGU to the public.
- If there is a claim from the community, the company will accept the claim if accompanied by proof of land ownership.
- Verification of the land status, if proof of land ownership is acceptable, a field survey and land measurement will be carried out.
- Field surveys and land measurements involve companies, claims, and government representatives.
- Based on land observations and measurements, a Minutes of Land Measurement is made, covers area-wide, and coordinates of the land claimed and signed by the parties.
- Final verification based on measurement results and maps to ensure that the land does not overlap with the other ownership/rights/claims.
- If the final verification results show that the land being acquired does not overlap with other ownership/rights/claims, the company will negotiate prices for compensation.
- If a compensation price is agreed upon, the company will pay the compensation to the landowner.

As explained by the management representative, a mutually agreed-upon system for handling complaints will be established when a complaint is found. The reference for making procedures is the Internal and External Grievance SOP. Based on this procedure, it is known that the response period for complaints is 10 days with the person in charge being the manager.

Based on document verifications, interviews with management and public stakeholders including verification through the internet it was known if the dominant existing complaints are related to problems with land or areas that have not been compensated as well including as the issue of land grabbing. In relation to this, the company always communicates with the community/claimants if there are plans for land clearing or new planting. Several complaints that have been submitted are also related to overlapping land ownership in the company's HGU area. All of these conflicts are double claims where at the beginning of the plantation development GRTT has been carried out but then land claims have emerged from other parties to the same land. All of the land claims have been settled with the involvement of various parties (village parties, community leaders, police, and government). One of the considerations in adjusting the certification area and environmental permits is due to claims and overlapping land in the company's HGU area.

Furthermore there are several articles which describes the reaction of villagers to PT Dendymarker Indah Lestari (DIL) developing lands within HGU Certificate. The HGU for this Estate was first acquired in 1998 and the previous companies Bounty Crop Sdn Bhd and PT Agro Investama Semesta conducted the original plantings and were involved in clearing large areas in the North East section of DIL. This clearing is evidenced by the current scrub-type vegetation, drainage, and block lines there. In December 2017 SIPEF purchased DIL and under the new management, DIL has been progressively re-establishing its rights to utilize these HGU-certified areas. The Company has not cleared any land without first performing the correct surveys and then paying *Tali Asih* (compassion) to the squatters. All *Tali Asih* (compassion) currently conducted in DIL is clearly documented as part of the payment process and in order to show ownership. All of the compensation processes are documented and done in full consultation with the communities and village head and according to the principles of Free and Prior Informed Consent.

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

At the time of the audit activity, information was obtained for all plasma areas at the replanting stage, namely from 2020 so that currently plasma farmers receive bailout funds from the company for each plasma member, the company shows proof of payment of bailout funds to 9 plasma cooperatives, for example for the Tunas cooperative. Mekar Sempurna, which was paid on 28 February 2022 to 37 members of plasma farmers through private banks. The company has a plasma FFB sales price memorandum for the period 1 – March 15, 2022, which is determined by the regional director, the FFB price described in the memorandum refers to the results of the South Sumatra Province Plantation Office meeting on March 10, 2022.

5.1.2, 5.1.3 and 5.1.4

The pricing mechanism above has been explained and regulated in a partnership agreement with scheme smallholders. In the agreement, there is a clause that regulates that the FFB pricing follows the price set by the government. This is consistent with the results of public consultations with representatives of village communities.

The company has an agreement contract with cooperative and FFB Supplier. Each contract document, signed by both parties as evidence that a work agreement has been agreed. Contract agreement documents are kept by both parties, which will be used as legal references. The agreements explain the criteria for FFB grading, payment, and signed by both parties

At the time of the audit activity, information was obtained for all plasma areas at the replanting stage, namely from 2020 so that currently plasma farmers receive bailout funds from the company for each plasma member, the company shows proof of payment of bailout funds to 9 plasma cooperatives, for example for the Tunas cooperative. Mekar Sempurna, which was paid on 28 February 2022 to 37 members of plasma farmers through private banks. The company has a plasma FFB sales price memorandum for the period 1 – March 15, 2022, which is determined by the regional director, the FFB price described in the memorandum refers to the results of the South Sumatra Province Plantation Office meeting on March 10, 2022.

Has been observed the FFB Payment and Financial Report of May 2020, for the FFB production and pricing of May 2020. The report describes pricing and pricing periods, FFB amount, reduction/cost, and total paid. The payment was conducted within a month.

5.1.5

PT Dendymarker Indah Lestari has implemented cooperation in the development of community plantation (plasma) with a scheme with the nearest village communities. There is a letter from the Head of the Office of Industry, Trade and Cooperatives of Musi Rawas Utara Regency No. 075/KPTS-DISPERINDAGKOP/2018 dated 12 February 2018. The company has an agreement contract with cooperative and FFB Supplier Each contract document, signed by both parties as evidence that a work agreement has been agreed. Contract agreement documents are kept by both parties, which will be used as legal references. The agreements explain the criteria for FFB grading, payment, validity period, plasma construction provisions, terms of cooperation, financing, pricing, rights & obligations, sanctions to settle disputes, and are signed by both parties.

5.1.6

At the time of the audit activity, information was obtained for all plasma areas at the replanting stage, namely from 2020 so that currently plasma farmers receive bailout funds from the company for each plasma member, the company shows proof of payment of bailout funds to 9 plasma cooperatives, for example for the Tunas cooperative. Mekar Sempurna, which was paid on 28 February 2022 to 37 members of plasma farmers through private banks. The company has a plasma FFB sales price memorandum for the period 1 – March 15, 2022, which is determined by the regional director, the FFB price described in the memorandum refers to the results of the South Sumatra Province Plantation Office meeting on March 10, 2022.

5.1.7

The results of document verifications it was known that the certification unit has routinely calibrated the weighing equipment carried out by a third party. The company has also shown calibration results No 390/DIDAGRIN/IV/2021 dated December 3, 2021 for Scales Type E1205 with serial number 171050229 with a capacity of 40,000 Kg by the Department of Industry and Trade of the City Government of Lubuk Linggau with a validity period of up to November 2022.

5.1.8

Currently the partnership at PT DIL has carried out a contract renewal by involving all previous cooperatives. The previous agreement was deemed to have ended, as stipulated in the Copy of Notary Deed of Edna Mardiani SH MKn regarding Agreement No. 42 dated April 22, 2020 concerning the Agreement between 9 Cooperatives and PT DIL. The entire partnership area is being replanted, then the partnership will be fully managed by PT DIL.

5.1.9

The company has a mechanism of complaint and grievance handling in Procedure of Internal Grievance No. HRD-04-01/01-04-2019/Rev.1 and External Grievance No. HRA-04-02/01-02-2018/Rev.0. Complaint from worker complaints can be submitted to the supervisor's manager and discuss for 10 days in response to complaints. CH will protect the identity of complainant as written in Whistleblowing Policy (QMM-40-01-P16/14-01-2019/Rev.1). Based on interview with worker in POM and estate, it is known that workers understand how to deliver their complaint if any. Based on interview with representative of nearest Village, it is known that they understand the mechanism to deliver their complaint if any.

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 - 5.2.5

This indicator is not appropriate for PT. DIL because based on document review, interviews with management and the results of previous audits, it was found that the company did not get FFB from Scheme and independent smallholder, the company got it from its own plantations and other companies in the same group.

Status: Comply

PRINCIPLE #6 RESPECT WORKERS' RIGHTS AND CONDITIONS
6.1

Any form of discrimination is prohibited.

6.1.1, 6.1.2 and 6.1.3

Unit certification have Equal Employment Opportunity policy which was approved by the Board of Directors on March 27, 2019 which explained that company did not discriminate against gender, race or ethnicity, disability, sexual orientation, age, or belief. Based on the employee registration document, unit certification has provided equal opportunities and treatment in employment opportunities. In addition, in job vacancies that have been published by the company, there are no requirements that refer to discriminate against gender, race or ethnicity, disability, sexual orientation, age, or belief, so indirectly the certification unit has implemented a non-discrimination policy and also equal opportunity. This is evidenced by the diversity of ethnic accepted to work. The results of interviews with workers during field visits and interviews with labor unions and representatives of the Gender Committee also obtained information that there was no indication of acts of discrimination based on religion, ethnicity, gender and regional origin in the process of accepting work.

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

- The composition of workers consisting of various ethnic groups, religions, gender and workers' origins. The existing workers do not only come from one area but come from several areas spread throughout Indonesia such as Java, Sumatra, Kalimantan and Nusa Tenggara. During the audit, there was no information regarding AKAD workers (*Antar Kerja Antar Daerah*) in company.
- Recruitment of workers based on the results of selection, performance appraisal, ability and expertise of workers. For example, upkeep worker (initial MJN) who have received based on the results of the selection of job application files, results of health checks and results of interviews that based on procedure that certification unit owned. The worker also passed the assessment and has been accepted as permanent worker (accordance with Decree no. 39/PT.DMIL/IV/2021 on 12 April 2021).
- Worker placement and training are carried out in accordance with their expertise / type of work, such as prospective harvest workers are placed as harvest workers and receive regular harvest training.
- Women workers are given equal rights, wages and opportunities to get promotions with male workers of the same type of work, for example there are several maintenance foremen who are female workers.

Based on the results of interviews with workers (harvester, pesticide applicator, and process operator) at DIL Mill, Sei mandang and Sei Liam Estate, it is known that workers have never felt that the company has discriminated against since 2019 until now. This is because all activities from recruitment, performance appraisal, promotion, and union, each worker is given the same opportunity regardless of ethnicity, caste, nationality, religion, disability, gender, sexual orientation, gender identity, membership in worker unions, affiliations.

politics, or age. There is no difference between the communication between superior and workers because of the things mentioned above, so that the workers do not feel isolated or discriminated against by the superiors. This has resulted in the absence of discrimination issues from 2020 to the present (March 2022).

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

6.1.4

A pregnancy test for workers is carried out every month just to ensure that pregnant workers are not allowed to do work with chemicals, not as a basis for discriminating against these workers. If declared pregnant, the worker will be transferred to a safer job but still equal in terms of wages and other benefits, so that there is no discriminatory action. This is made clear by the results of interviews with women workers in the Sei Mandang and Sei Liam in spraying activities stating that female workers are required to have monthly pregnancy testing at the clinic to ensure that no female workers working with chemicals are pregnant / breastfeeding and testing the pregnancy is not a discriminatory measure given by the certification unit.

6.1.5

Gender committees have been formed and are still active until today in the certification unit which is chaired by the committee chairperson along with coordinators in several sections and there are representatives in each unit. The structure of the gender committee not only consists of female workers but also includes male workers. The unit of certification has established a gender committee with the specific objective of raising awareness, identifying and addressing issues of concern, and providing opportunities and improvements for women. The composition of the members of the gender committee includes the Chairperson, Secretary and Members. The work program of the PT DIL gender committee for 2022 includes clean houses, health counseling, and mutual cooperation for emplacement as well as regular meetings with P2K3. From this program, the gender committee can get closer to housing residents and workers and can increase awareness/opportunities for women as well as to ensure that there are no issues related to discrimination, harassment, child labor, and others.

The workers also knew of the existence of the gender committee because it had been routinely socialized by its management, the last socialization related to the gender committee (gender bias and equality) along with other policy and the activity was carried out on 25 May 2021 which was attended by female workers and housing residents. The results of this socialization can be seen with the absence of differences in company operational activities such as promotional activities, the same status of workers without gender bias because overall are given equal opportunities for all genders (male or female) in work.

The results of interviews with maintenance workers (male and female workers) and representatives of the gender committee revealed that until now there were no reports / issues / complaints related to gender reported by the workers and at the moment the activities carried out were gender meetings during children healthcare (posyandu), women recitation weekly and others. Currently the certification unit is more focused on gender bias and equality for women because the most vulnerable parties in plantation operational activities are women, but this does not mean that the company does not focus on other genders. This is evidenced by the absence of any issues or incidents related to this from 2020 until now (March 2022).

6.1.6

Equal payment of wages has been made by certification unit properly, taking into account the ability, performance, expertise, length of work and other factors as a basis for remuneration. So that the payment of wages provided is in accordance with the burden / duties / types of work respectively. For example, harvesting worker with initial IHM and MYD who get wages in February 2022 whose value is above the minimum wage, but with different amounts based on years of service, ability, attendance and job performance/productivity (total harvest in month). This is in line with statements from workers who were interviewed with types of work as harvesters and sprayers who have the same type of work but have different wage scales based on their performance, length of work in the company, productivity and other factors.

In addition, based on the results of review of structure and scale wage, it was found that the certification unit already has a wage scale structure for each worker based on position, class, work performance, and not based on gender differences or origins. Based on field observations at engine room station and block D8 (circle and path spraying), note that workers already know that there is a wage scale structure for each level of workers and this has been proven by the difference in the monthly wage income presented on the pay slip. The monthly wages received are in accordance with the grade owned by each worker and so far there have been no complaints / errors regarding this matter.

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

The certification unit has procedures related to recruitment, selection, employment, promotion, retirement and termination of employment which are generally described in the Collective Labor Agreement period 2021-2023 written in Bahasa. This Collective Labor Agreement explains the working conditions and rights / obligations of workers such as, recruitment, selection, transfer, promotion, performance appraisal, remuneration, discipline, overtime, and other provisions. The company regulation has been routinely disseminated by the certification unit to all employees, one example of the socialization that was carried out was on 25 May 2021 which is carried out in conjunction with the socialization of company policies.

The certification unit still have workers with contract status (PKWT), Regular Workers (permanent worker) and Staff. All the rights for each employment status have been distinguished. For workers with contract status (PKWT), certification unit also registered the worker with to Manpower and Transmigration Agency of Musi Rawas Utara Regency in 15 March 2022.

Based on field observations at engine room station and block D8 (circle and path spraying), known that workers have a sufficient understanding of their rights (wages, overtime, incentives, fines, etc.) listed in the Collective Labour Agreement and in accordance with routine socialization provided by the certification unit. Workers' wages have been above the minimum wage set by the government, wage based on years of service, ability, attendance and job performance and there are no late payments every month.

A review of the February 2022 wage document for harvest workers, pesticides applicator and mill operators proves that the wages received are above the minimum wage and in accordance with the related regulation determined by the certification unit for 2022. For example, workers wages with the IHM and MYD who get wages in February 2022 whose value is above the minimum wage, but with different amounts based on years of service, ability, attendance and job performance/ productivity (total harvest in month).

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

6.2.2 and 6.2.3

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

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

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

- Memorandum No. 04/MA.MR-CIR/I/2022 concerning Minimum Wage, Determination Wage for Contract and Permanent Worker in 2022 is IDR. 3,144,446 / month (minimum) determined based on Sumatera Selatan Province Minimum Wage Determination in 2022.
- Decree of the Sumatera Selatan Province established by the Governor of Sumatera Selatan in 18 November 2021 about the implementation of the minimum wage in 2022.
- Employment contract for three (3) contract workers (PKWT), which explains the hours of work, wages, BPJS, leave, overtime, and others.
- February 2022 salary slips with the workers with initial IHM and MYD have a different based on wage scale structure 2022 and all wages accordance the minimum wage.
- Overtime payment in February 2022 that has been accordance with applicable laws for workers in boiler and engine room station.
- List of women workers that has been given maternity leave and pregnant workers in 2021 and until March 2022.

- Unit certification has provisions related to deduction / penalty which have been stated in the Collective Labor Agreement and further explanation is set out in an internal memo.
- In the payroll document, there is information that states the results of the worker's wages in one month according to the work performance of each worker. Payroll has also been accurate for each worker, for example the number of days worked in a month, premium payments, fines, deductions from workers' wages and other information that is in accordance with facts in the field.
- Etc.

Since 2021-2022 there has been no change in policy, but what has changed is the decision related to the minimum wage which has changed every year following the government's decision. Regarding the change in the minimum wage decision, it has been routinely submitted annually to workers at the beginning of the year and this is reinforced by the results of interviews with field workers and trade union representatives who are clear about any changes in the minimum wage every year. Based on the description above, the certification unit has demonstrated legal compliance related to working conditions, such as compliance with minimum wage, working hours, overtime, maternity leave and other compliance.

The results of interviews with workers (harvesters, sprayers, and mill operators) and union representatives know that workers have a sufficient understanding of their rights (wages, overtime, incentives, deductive, fines, etc.) listed in the Collective Labor Agreement and in accordance with routine socialization provided by the certification unit. Workers' wages in February 2022 have been above the minimum wage set by the government and there are no late payments every month, working hours is seven (7) hour a day with 6 days in a week and for the overtime has been paid in accordance with applicable regulations.

A review of the February 2022 wage document for harvest workers, pesticides, sprayers and mill operators proves that the wages received are above the minimum wage and in accordance with the wage scale structure determined by the certification unit for 2022.

6.2.4

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

6.2.5

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

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

6.2.6

In Indonesia no living wage standard is established, so certification unit still implemented the national minimum wages for all workers. In addition to the payment of minimum wages, certification unit has been conduct 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. The certification unit has the determination of assessment prevailing wage and all kind of benefits for DLW simulation in 2022 has been included in the calculation of main wage, worker status, housing facility, education, electricity, water sources, healthcare and others. Every calculation made has been adjusted to the actual situation and the location where the certification unit is located. The results of these calculations

are known that the standard of DLW currently given / simulated by the certification unit is above the stipulation of the minimum wage (IDR 5,262,424).

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

6.2.7

The certification unit still have workers with contract status (PKWT), Regular Workers (permanent worker) and Staff. All the rights for each employment status have been distinguished. For workers with contract status (PKWT), certification unit also registered the worker with to Manpower and Transmigration Agency of Musi Rawas Utara Regency in 15 March 2022. Currently, the total number of workers available is 1.109 workers with a composition of permanent workers as much as 92.03% (1,065), contract workers (PKWT is 44 people) as much as 3.97%.

Based on the results of the review of worker list in March 2022, it is known that up to March 2022 there is no contract workers (PKWT) working in main jobs (all main jobs have all become permanent workers) and currently contract workers are only done for work that is not the main job such as upkeep activities only. However, their performance is still being monitored to be appointed as permanent workers.

The results of interviews with spray workers, harvester and mill operators' found that workers understood the recruitment system, the status of workers and the orientation period that had to be passed before the worker was appointed as a permanent worker. These processes are stated to be fair enough and provide equal opportunities to work according to the abilities, expertise and achievements of the workers during the contract period.

Status: Comply

6.3

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

6.3.1

The unit of certification has a policy regarding Freedom of Association which was ratified by the Directors of PT Dendymarker Indah Lestari on March 1, 2013, containing a company signature that gives freedom and support for every employee to establish a worker's union (unite). In addition, the Collective Labor Agreement also states the recognition of the organization and freedom of each employee to be active in activities in the labor union.

Based on interviews with labor union representatives who explained that the company had given freedom of association and at present labor unions have been formed. The establishment of the union is in accordance with the applicable laws and regulations and has been recorded at the Manpower Office. Certification unit is giving freedom for worker to express their opinion and also, certification unit did not give any intervention related to labor union activity. Labor union has registered to Manpower Agency of Musi Rawas Utara Regency in 27 December 2017 for Serikat Pekerja Mandiri (SPM).

6.3.2

The certification unit has a list of workers who have joined the union and the last update was carried out in February 2022, totaling 1,039 workers. In addition to properly documenting the list of members, the certification unit also has records of meetings between trade unions and management representatives as well as with internal unions. The following are examples of records of meetings conducted by labour unions in 2022, namely:

- Minutes of the Bipartit meeting (the SPM party with the company) on January 19, 2022 related to discussions on the provision of school buses (currently there are shuttle vehicles but not buses), provision of ATM, socialization of PKB and others. The activity was attended by 9 participants.
- Minutes of the Bipartit meeting (the SPM party with the company) on 19 February 2022 related to discussions on the provision of ambulances, doctor services at clinics, security within the company and others. The activity was attended by as many as 6 participants.

Based on the results of interviews with labor union representatives and their members who are workers in each unit, it is known that the union lobby holds meetings every month with those accommodated in Bipartite meetings between worker representatives and management representatives and since 2021 until now there has been no labor issue which still exists until now. This is also supported by the results of a review of worker complaint documents and the absence of complaints submitted to labor union representatives.

6.3.3

The absence of unit certification interference in the selection or operation of labor union activities, this is evidenced by the results of interviews with workers and union representatives stating that in the process of selecting / making decisions and planning activities, members provide input / aspirations to their representatives each to make an election / decision-making and no management has a position as staff / managerial (assistant and above). The employee who currently serves as the Chairman of the Labour Union is Backhoe Loader Operator, then there will be no conflict of interest that occurs with the company because there are no workers who have the authority as decision makers (staff class and above). The explanation has reinforced the fact that management did not interfere directly / indirectly with the taking decisions and activities carried out by labor unions.

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Status: Comply

6.4
Children are not employed or exploited.
6.4.1, 6.4.2, 6.4.3 and 6.4.4

The unit of certification has a Child Labor Policy signed by the President Director on March 27, 2019. The policies include stating that children have the right to education and a healthy and decent life so that the company is committed not to employ children under 18 years old. Policies regarding forbidden to employ child labor and under the age of 18 (eighteen) years, this is evidenced by the Identity Card (KTP) at the time of employee recruitment. The results of the verification of documents revealed that there were no workers under the age of 18. In addition to having a policy governing the minimum age for workers for workers, the certification unit also includes clauses on child protection and prohibitions on hiring workers under the age of 18 in any agreement with the contractor. The policy was socialized to workers on 25 May 2021 and to the contractor when signing the work agreement.

Based on field visits and interviews with workers in the fields of Dil Mill, Sei Mandang and Sei Liam Estate, it is known that the minimum age for work is 18 years, and no workers found below the minimum age specified. This is supported by the results of a review of company and contractor workers' document which proves that there are no workers under the age of 18 at the time of entering work, the youngest age of workers is 19 years when entering work.

Based on the results of the review of the cooperation agreement document with the contractor for the upkeep work Agreement No. 03/SEI MANDANG ESTATE/PPTK-FL/JANUARI/Tahun 2022 (Sei Mandang Estate) and No. 02/SEI LIAM ESTATE/PPTK-FL/JANUARI/Tahun 2022 (Sei Liam Estate), it is known that in The agreement has a separate clause to ensure that the contractor does not employ minors (under 18 years old) and complies with the prevailing laws and regulations in Indonesia.

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

Status: Comply

6.5
There is no harassment or abuse in the workplace, and reproductive rights are protected.
6.5.1 and 6.5.2

The policy on prevention of sexual harassment and violence has been signed by the President Director, including stating that PT Dendymarker Indah Lestari is committed to a harmonious and productive work environment for its employees. This commitment is to create a work atmosphere that is free from sexual harassment. In addition, Collective Labour Agreement also clearly states "Committing immoral acts, among others, sexual immorality, pornography, porno-action, including disseminating it through any media either to fellow workers, staff or to other parties is an act. which is prohibited "

Other than that, unit of certification has a reproductive rights protection policy that was signed by the president director on March 1, 2014. The policy explains that PT Dendymarker Indah Lestari is committed to guaranteeing workers' reproductive rights including providing reproductive health services. The implementation of this policy includes the availability of menstrual and maternal leave. In addition, women workers who are breastfeeding are given time to be able to provide breast milk for their children.

The two policies above, is explains that every worker is entitled to receive protection against sexual harassment in the workplace and reproductive rights protection. Sexual harassment is an offense and if convicted of sexual abuse offenders will be penalized in accordance with applicable regulations. The committee gender & certification unit has socialized to the employees, for example on 25 May 2021 and the representatives of the committee gender are available in each division.

Based on interview with workers and committee gender, the policy had disseminated to workers through gender committee meetings with workers and in the last year period, that hasn't any issue/incident related to sexual harassment, violence at work/reproductive rights.

6.5.3

For now, the certification unit has recorded employees who have experienced pregnancy conditions in each unit by recapitulating the total number of female workers who were pregnant and breastfeeding. Based on data in clinic 2020 until March 2022 there is no female worker that have been pregnant and breastfeeding.

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

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

6.5.4

Internal Grievance Procedure No. HRD-04-01/01-04-2019/Rev.1 which was approved by the President Director on April 5, 2019. Based on this document, complaints can be submitted to the superior manager and discussed for 10 days in response to complaints. The procedure aims to accommodate complaints and grievance from employees. In the procedure described that if requested, the company guarantees the confidentiality of the reporting identity and the disclosure of disgrace or incident (whistleblower).

The results of interviews workers for example spraying teams, warehouse officers, and weighbridge are known to be aware of the grievance mechanism. Related complaints of sexual harassment (women's issues) can be submitted to the gender committee. In the last year period, that hasn't any 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 and 6.6.2

The certification unit have policy related prohibits forced or bonded labor or debt bondage and take steps to prevent it. The procedures related to human resources management shows that every worker has a work agreement that describe specific job description. Based on employee list and observation in field known that there is no migrant workers, forced labor. Every worker has a work agreement that describe specific job description, there is no substitution of contract without prior consultation and agreement from the worker.

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

Based on employee data and interview with workers, most of the workers came from local communities. They have the recruitment process in the company and is in accordance with applicable employee acceptance procedures. Based on the results of interviews with workers in plantation and mill, it is known that currently there are no migrant workers, retention of identity, payment recruitment fees, contract substitution, involuntary overtime, lack of freedom of workers to resign, penalty for termination, debt bondage, and withholding. This is because the certification unit has carried out its operations in accordance with applicable regulations.

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

Status: Comply

6.7

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

6.7.1

The certification unit have persons that responsible for the OHS program within the organizational structure of Committee of Occupational Health and Safety (*P2K3*) established in each management unit. The *P2K3* team has received approval from the Head of Manpower and Transmigration of the Province of Jambi and the *P2K3* secretary is a certified occupational health and safety expert. This is the OHS Committee that has been ratified by related agencies:

- Approval of *P2K3* PT Dendymarker Indah Lestari – Sei Mandang Estate in accordance with Decree No. 03/KPTS-P2K3/NAKERTRANS/2022 dated March 15, 2022 from the Manpower and Transmigration Office of North Musi Rawas Regency. The Secretary of *P2K3* is a General K3 Expert of the company who has been appointed by the Ministry of Manpower of the Republic of Indonesia in accordance with the Appointment Decree No. 5/13338/AS.02.04/X/2021 dated October 29, 2021 which is valid for 3 years (Suprihatin).
- Approval of *P2K3* PT Dendymarker Indah Lestari – Sei Liam Estate in accordance with Decree No. 04/KPTS-P2K3/NAKERTRANS/2021 dated March 23, 2021 from the Manpower and Transmigration Office of North Musi Rawas Regency. The Secretary of *P2K3* is a General K3 Expert of the company who has been appointed by the Ministry of Manpower of the Republic of Indonesia in accordance with the Appointment Decree No. 5/13336/AS.02.04/X/2021 dated October 29, 2021 which is valid for 3 years (Ade Anggara Saputra).
- Ratification of *P2K3* PT Dendymarker Indah Lestari – DIL POM in accordance with Decree No. 05/KPTS-P2K3/NAKERTRANS/2022 dated March 16, 2022 from the Manpower and Transmigration Office of North Musi Rawas Regency. The Secretary of *P2K3* is a General K3 Expert of the company who has been appointed by the Ministry of Manpower of the Republic of Indonesia in accordance with the Appointment Decree No. 5/8815/AS.02.04/XII/2019 dated December 4, 2019 which is valid for 3 years (Ayu Diah Lestari).

OHS committee routinely conducts monthly meetings on OHS issues in the workplace. The documentation of the meeting was recorded and stored well. Based on interviews to workers who are members of the *P2K3* organization it is known that monthly meetings are always routinely conducted to discuss about OHS such as consistency of PPE usage, work accident analysis, report, firefighting simulation, checking of emergency response equipment, OHS sign board, safety patrol, etc. The last *P2K3* Meeting in 29 March 2022 on which discussed the evaluation of the annual evaluation of OSH implementation, preparation of insecticide, and others attended by *P2K3* officers. The certification unit has also routinely reported *P2K3* reports to relevant agencies, such as the following example:

- Reporting *P2K3* Report of PT Dendymarker Indah Lestari – Sei Mandang Estate Quarter 4 2021 dated March 2, 2022 to the Manpower and Transmigration Agency of Musi Rawas Utara Regency.
- Reporting *P2K3* Report of PT Dendymarker Indah Lestari – Sei Liam Estate Quarter 4 2021 dated March 25, 2022 to the Manpower and Transmigration Agency of Musi Rawas Utara Regency.
- Reporting *P2K3* Report of PT Dendymarker Indah Lestari – Dendymarker Indah Lestari Mill Quarter 4 2021 dated March 2, 2022 to the Manpower and Transmigration Agency of Musi Rawas Utara Regency.

6.7.2

The unit of certification has Emergency Response Procedure No. RMO-MR / EST // 170901 / Rev.0 which was ratified on September 1, 2017. In that procedure has explained the emergency response to the handling of accidents from reporting to coordination. Simulation was performed regularly to ensure the preparedness of emergency response equipment in the certification unit. The routinely emergency simulation that has been conducted by certification unit for example:

- Emergency response simulation and first aid for mill workers on 28 January 2022 which was attended by 28 participants.
- First aid training for first aid officer on 18-20 December 2021 which was attended by 68 participants.

Based on the results of field observations in the mill and plantation, it is known that the certification unit has carried out the procedures that have been well related to the emergency response, such as the evacuation route in the mill / office / housing area, the availability of first aid kits in the room or those carried by the first aid officer. in field, and every personnel that have responsibility related to this has understood well the procedures that are owned.

Based on the results of document verification, it is known that the certification unit has 18 licensed first aid officers. Furthermore, based on the P2K3 quarterly report, the OHS equipment owned by the company includes the provision of fire extinguishers and hydrants, provision of first aid kits and first aid bags, provision of PPE to employees including OHS warnings. Certification unit also has a first aid box in each unit and based on document review, it's concluded that the contents in the first aid box are sufficient (21 items). There is also a checklist of observations of the contents of first aid boxes routinely performed every month by first aid officers. There were zero accidents in PT Dendymarker Indah Lestari since January until March 2022.

Based on interviews with workers in the fields of DIL Mill, Sei Mandang and Sei Liam Estate, it is known that since January until March 2022 there has never been a work accident in all PT Dendymarker Indah Lestari units and if an accident occurs in the field, the certification unit has provided first aid services at PT Dendymarker Indah Lestari. each foreman as first aid before a follow-up examination is carried out at the nearest clinic or hospital. The first aid officer (foreman) in the field states that training has been routinely carried out by the company and there are also several officers who have received certificates as First Aid Officers from government agencies and at the time the explanation of the use of each item is quite clear.

6.7.3

Based on the results of field visits and interviews with workers (harvester, pesticide applicator and mill operators) in the DIL Mill, Sei Mandang and Sei Liam Estate, it is known that workers have received PPE for free every year according to their respective types of work and if there is PPE damaged, it can be immediately reported to the direct supervisor for replacement. At the time of the audit, all workers were seen to have used PPE in accordance with existing standards and the level of risk, such as pesticide applicators using aprons, masks, face shields, gloves, boots, and others. In addition, the certification unit also has proof of the delivery of PPE to all workers every year and replacement of PPE that is damaged, for example:

- Delivery of PPE & work tools for harvesting activities on March 1, 2021 at Sei Mandang Estate for 18 workers.
- Delivery of PPE & work tools for ablation/castration activities on January 11, 2021 at Sei Mandang Estate for 24 workers.
- Delivery of PPE for spraying workers on 01 February 2021 at Sei Mandang Estate for 11 workers.
- Delivery of PPE for spraying workers on 07 February 2022 at Sei Mandang Estate for 12 workers.
- Delivery of PPE for manuring workers on 03 February 2022 at Sei Mandang Estate for 8 workers.

Every PPE given to all workers (all level workers) is in accordance with the needs, types of work, risks and conditions of the PPE, this has been well documented from the PPE award records kept by the OHS Department. This has been regulated in the hazard identification document, risk assessment and risk control (HIRAC) as well as the PPE For Every Job Specification document.

The certification unit also has a sanitation facility for a pesticide applicator in each unit which is used as a storage, cleaning and replacement area when coming from work to home from work. This is done to ensure that workers arrive clean and come home clean without bringing hazardous chemicals to the home location. Based on the results of field visits to pesticide sanitation facilities in Sei Mandang and Sei Liam Estate, it was found that the facilities were clean, there were room which were used for bathing and cleaning PPE separately.

Opportunity for Improvement (OFI)

As a result of field visits, the company has provided sanitation facilities for workers who use chemicals, and furthermore, as part of continuous improvement, the company has plans to build sanitation and pesticide mixing facilities. In this case, the company shows a tender invitation document for the work of 1 lot chemical mixing shed capex 2022 Sei Mandang Estate. The tender document contains details of the bid price along with a plan for the construction of sanitation facilities and the mixing of pesticides. However, as a result of field visits to sanitation facilities, there are several things that need to be considered by the company, including:

- The condition of the bathroom door that doesn't work optimally
- Arrange jerry cans for mixing pesticides

Furthermore, the results of interviews with workers in one of the estates stated that PPE and work tools related to chemicals were brought home, to ensure this the auditor team made a field visit in the afternoon and it was found that PPE and work tools had been stored in the storage area.

Related to this, the company has the opportunity to ensure the implementation of the storage of PPE and work tools in a predetermined place and ensure the realization of the construction of sanitation facilities and mixing pesticides.

6.7.4

Certification unit have Collective Labor Agreement that describe about workers have the right to receive medical care and be protected by the accident insurance company. The management unit show proof of payment of BPJS. Payments are made every month by percentage according to the regulation. The last payment that has been paid by certification unit is on 23 March 2022 for "BPJS Ketenagakerjaan" period of February 2021 and on 04 March 2022 for "BPJS Kesehatan" period of March 2022. All proof of payment shown and payment details for the "BPJS Health and Employment" program for all workers and in accordance with the current actual conditions / in accordance with the number of existing workers (492 workers based on employment database on March 2022). There is no claim for work accidents because since January until March 2022 there is no accidents (zero accidents) that happen in certification unit.

Based on the interview with DIL Mill, Sei Mandang and Sei Liam Estate workers, concluded that all employees were aware of the medical service procedures in the event of an accident or illness. All employees interviewed also claimed to have a health BPJS card, if they went to a company clinic there was no fee at all. Based on interview with contractor representative, it is known that the accident insurance for contractor's workers is covered by the head of contractor itself.

6.7.5

The company is still consistent in monitoring the recording of occupational accidents by calculating the lost time accident (LTA). Recapitulation of work accidents with a formula to find the level of severity and frequency of accidents. This document informs the time period, the number of working days, the number of no effective working days, overtime, hours of work in total, the number of accidents, the number of working days lost, hours of work a year, the number of accidents a year, lost days a year. Calculation of Severity Rate and Frequency Rate is reviewed regularly and monitoring will be evaluated at the monthly meeting of Committee of Occupational Health and Safety. For examples in period of January until March 2022 certification unit have doesn't have any accident, zero lost time, Severity Rate and Frequency Rate is zero.

Status: Comply

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

7.1

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

7.1.1

The certification unit have SOP-KBN.GN-007 which was ratified on February 1, 2015. The procedure for setting up an early warning system is routine enumeration of potential pests and diseases, with emphasis on mechanical and biological control, such as planting beneficial plants (*Turnera subulata*, *Cassia cobanensis*, and *Antigonon leptopus*) to anticipate nettle caterpillars, as well as installation and monitoring of BOB (owl cages) to anticipate rat attacks. The procedure also sets an economic threshold for each pest and disease, that chemical control is only carried out if the attack is above the economic threshold.

Also available Procedures of Detection and census of Pests and Diseases for Palm Oil which aimed to ensure the pest and disease control program can be performed regularly and sustainable. In the procedure explained the description of activities, namely Detection of Pests and Diseases; Census of Pests and Diseases, planting the beneficial plants, reporting and documentation. IPM programs are conducted by the certification unit, among others Pest Detection Program carried out periodically every two months and in case of attack symptom is held every month and beneficial plant maintenance activities performed every month.

The certification unit has a good commitment to improve the use of pest natural predator as part of integrated pest control. One of natural predator development is the reproduction and the construction of barn owl box as a mechanism to control rat. The certification unit monitoring barn owl box occupation at least once a month. The monitored parameter are the existing of barn owl in the boxes, left food, and sign of reproduction such as egg or owl.

The certification unit shows the following census and plant pest and disease control documents for the period January – August 2021:

1. Census of rat on February 14, 2022 in Block M22 with an attack rate of 0.25% so that no control measures were taken.
2. Census of rat on February 15, 2022 in Block M17 with an attack rate of 0.22% so that no control measures were taken.

When compared with the results of the previous assessment, it was known that there was an attack of *Oryctes* sp in the replanting area, but in the 2022 audit activity based on observations it was found that no *Oryctes* sp attacks were identified, for example: the *Oryctes* sp census for January period in the Block M23 Sei Liam Estate with the result that there were no pest attacks.

7.1.2

Based on document verification, known that the certification unit has implemented several biological control practices to suppress pest and disease attacks such as *Tyto alba* and *Turnera subulata*. Based on attachment 1 Minister of Environment and Forestry Regulation No. P94/MENLHK/SETJEN/KUM/1/12/2016. These plants and animals are not included in the type of invasive species in Indonesia. Based on interviews with representatives of management, the plant is well managed by the certification unit, for example, there are poles at the crossroads for *Antigonon leptopus* growth.

7.1.3

Base on interview with estate worker and field observation in Sei Mandang and Sei Liam Estate known that the certification unit did not use of fire for pest control.

Status: Comply

7.2

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

7.2.1 and 7.2.5

The certification unit has shown the SOP for the Safe Use of Pesticides. The purpose of the procedure is that workers handling pesticides are always aware of the magnitude of the danger of poisoning and the level of health risk due to their work activities, in addition to carrying out safe and appropriate operational performance related to the use of pesticides in accordance with the instructions for use. The contents of the procedure include the level of material hazard based on WHO class, level of poisoning based on LD50, statement of material hazard, color and hazard symbols and danger signs.

The certification unit has shown a document listing the pesticides used in the 2020-2022 period. The document explains the name of the pesticide, active ingredient, concentration, LD50, registration number and distribution permit period, WHO class, and the purpose of using the pesticide. The examples of pesticides used are Roundup 486 SL with the active ingredient glyphosate, concentration 360 g/l, LD50 (mg/kg) 9,041, RI registration number. 01030120001560 valid until 16 April 2023, WHO class III, pesticides targeting broad leaf weed and narrow leaf weed.

Based on document's verifications known that the certification unit no longer use "direct Pesticide like paraquat that can eradicate all of the weeds. Furthermore, the results of document review it was known the unit of certification does not longer used pesticide in categories WHO 1A and 1B or paraquat. In the list of pesticides used, it was known that the pesticides used were categorized in WHO Class III and uncategorized

Based on field observation at pesticide storage and interview with management and pesticide applicator obtained information if the certification unit didn't use the pesticide that prohibited by the government as mentioned in Annex II Regulation of Ministry of Agriculture No 39 the year of 2015 about Pesticide Registration, for example, aldrin, formaldehida, monokrotofos, etc.

7.2.2

The certification unit shows a record of pesticide use for the period 2020-2022. The document explains the name of the pesticide, active ingredient, concentration, LD50, registration number and distribution permit period, WHO class, and the purpose of using the pesticide. The document explains that the certification unit uses 7 types of pesticides, including: Bionasa 480 SL, Roundup 486 SL, Garlon 670 EC, Lifeline 280 SL, Metafuron 20 WP, Regent 50C and Solusi. For example, Garlon 670 EC with the active ingredient Triclopir, concentration 480 g/l, LD50(mg/kg) 1.581, registration number RI.01030120134713 valid until April 16, 2023, WHO class III pesticide targeting woody weeds.

Described in detail in the table below:

Pesticide	Active Ingredient	LD50	Registration Number	WHO Class
Bionasa 480 SL	Isopropil amina glifosat	>5000 mg/ kg	RI. 01030120031806	III

Roundup 486 SL	Kalium glifosat	>5000 mg/ kg	RI. 032012288	III
Garlon 670 EC	Triklopir butoksi etil ester	<2000 mg/ kg	RI. 0103011984695	II
Lifeline 280 SL	Amonium glufosinat	>2000 mg/ kg	RI. 01030120175849	II
Metafuron 20 WP	Metil metsufuron	>4000 mg/ kg	RI. 01030119951224	O
Regent 50C	Fipronil	>2000 mg/ kg	RI. 01010119931131	II
Solusi	2,4-D dimetil amina	>2000 mg/ kg	RI. 01030120031931	O

7.2.3

In order to minimize the use of pesticides in IPM plans, the certification unit applies biological pest management methods such as planting beneficial plants such as *Turnera subulata*, and *Antigonon leptopus*, which attracts natural predators of leaf-eating caterpillar. Meanwhile, to prevent rats, the certification unit also uses natural enemies, *Tyto alba*.

Based on document verification of pesticide use for the period January 2019 to February 2022, it was found that the certification unit no longer used pesticides with the active ingredients of paraquat dichloride, brodifacum, coumatetralyl, and carbofuran. This shows that the certification unit has implemented a policy of limited pesticide use in accordance with the circular described above.

7.2.4

Based on document verification, field observation and interview with the worker known that there is no preventive use of pesticides for the prevention of pests and diseases. The certification unit management explained that pest and disease control should be based on census results while for mature area observations can be made based on plant figures and bite marks on FFB.

7.2.6

Based on document verification of pesticides list used by the certification unit, it is known that the certification unit does not use pesticides with the active ingredient paraquat. However, the certification unit still provides training to workers as a regular update on workers' knowledge. The training activity was carried out on March 31, 2021 located at Block L20. The training activities provided include environmental and occupational health and safety policies, MSDS of pesticides (Agrochemicals) used, prohibition of handling pesticides and their applications (pregnant and lactating women), not spraying in HCV areas and water bodies, how to handle emergency situations, handling pesticide packaging (waste), hazardous and toxic materials) and separation of organic, non-organic and hazardous and toxic materials waste. This activity was attended by 28 participants at Sei Liam Estate and 23 participants at Sei Mandang Estate.

7.2.8

The Company established procedure for Toxic and Hazardous waste handling including ex agrochemicals management listed on SOP Management of hazardous and Toxic Waste Materials Nomor ENC 01-10/04-03-2019/ Rev 1. This procedure stated that all ex-chemicals containers were kept on temporary hazardous storage at mill/estates.

The record management Hazardous Waste, included in reporting management hazardous waste quarterly to environment agency. The Training And socialization to spraying workers, about ex pesticide container disposal. All discarded containers of chemicals from by Estate and Mill, placed in hazardous waste warehouse.

Based on interview with pesticide applicator worker and Pesticide warehouse officer, they understand the mechanism well. In housing complex, ex pesticide waste has been handled well and observation on plantation block and workshop show that there is no agrochemical ex-container in the plantation working area.

7.2.9

Base on interview with estate worker and field observation in Sei Liam and Sei Mandang Estate known that the certification unit did not spray pesticides through the air.

7.2.10

The certification unit regularly have a medical examination for manuring and pesticide operator. Sei Liam and Sei mandang Estate has a list of the latest manuring and pesticide operator as many as 53 workers. All spraying workers has examined health through inspection types of medical checkup, cholinesterase and spirometri, to ascertain the condition of workers in good health. The last examination was conducted in 12-13 October 2022 for all units. Examination results stating that all manuring and pesticide operator is in a healthy condition for 49 workers and there were 4 workers whose examination results had records including poor dental conditions, high blood pressure and others. The company has carried out a re-examination and the result is that all of the workers have passed with records such as

maintaining their diet, maintaining dental hygiene and others. Auditor conduct interviews with manuring and pesticide operator in Sei Mandang and Sei Liam Estate they admit that they have not been exposed to skin disease and itches because they always use PPE while working.

7.2.11

Based on field observation and interview with pesticide operator in Sei Mandang and Sei Liam Estate, known that there was no worker age under 18 years old that worked in chemical activity. The pregnant and breastfeeding women prohibited to work in chemical. The monitoring conducted through monthly pregnancy test. If founded expectant mother, she will be transferred to light non chemical activity.

Status: Comply

7.3

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

7.3.1

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

- Estates, waste source: chemist activities, waste type: ex pesticides containers (toxic and hazardous waste), clinic waste, managed by stored in optimization store and sent to related transporters.
- Mill, waste source: FFB process, waste type: shell and fiber (non-toxic/hazardous waste), managed by renewable energy usage for boiler.
- Mill, waste source : FFB process, waste type : palm oil mill effluent, managed by the effluent pond before disposal to watersurface, accordance threshold POME quality and goverment permit.
- Estates, waste source: pruning activities, waste type: oil palm frond (organic waste), managed by frond stacking.

7.3.2

The company has identified the source of waste and pollution source and treat the identified source to reduce emission and pollution. The effort taken by the company are:

- Domestic waste: based on virtual field observation, the company has collected domestic waste periodically and dump it to the landfill and it's known that location of landfill is far away from waterways and the housing area.
- Empty fruit bunch is applied to estate plantation area to substitute chemical fertilizer. Based on virtual field visit EFB application is well managed.
- Shell and fiber are reused for engine fuel of boiler. It reduces the carbon emission from the combustion of fossil fuel.
- Mill, waste source : FFB process, waste type : palm oil mill effluent, managed by the effluent pond before disposal to watersurface, accordance threshold POME quality and goverment permit.
- The managing for clinical waste, the company also has cooperation with licensed parties such as PT Fadillah Barokah Sumut.

Base on-field visit explains results of field visit related to waste type are properly disposed of based on toxicity and hazardous characteristics.

Base on an interview with the manager related to the disposal of domestic waste, by separating organic and inorganic waste. Afterward, fiber and shell are managed by renewable energy usage for boiler and palm oil mill effluent (POME), managed by the effluent pond before disposal to water surface. Hazardous waste is transported by carriers and processors licensed by the government.

The managing for hazardous waste, the company also has cooperation with licensed parties such as PT Fadillah Barokah Sumut, perusahaan menunjukan agreement letter between PT Dendymarker Indah Lestari and PT Fadillah Barokah Sumut dated 26 April 2021 valid until 25 April 2022. The last of the transported hazardous waste dated 29 March 2022 consist of:

- Manifest number KHLK-1624088060 (oil used) weighing 0.765 ton.
- Manifest number KHLK-1624087960 (used hazardous material container) weighing 1.002 ton.
- Manifest number KHLK-1624087842 (used battery) weighing 1.002 ton.
- Manifest number KHLK-1624084919 (used filter) weighing 0.04 ton.
- Manifest number KHLK-1624021807 (medical waste) weighing 0.006 ton.
- Manifest number KHLK-1624776164 (used sack of fertilizer) weighing 1.105 ton.

7.3.3

The company does not carry out open burning for waste disposal. Based on field observation known waste separation is separated based on the type of wet and dry waste, garbage transportation is carried out routinely, waste separation organic and inorganic are adjusted to the appropriate tub then put into the final waste disposal and closed periodically. Based on the results of field visits, both on office and in housing, there was no indication of open burning of hazardous and toxic waste or domestic 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 certification unit has fertilization procedures SOP (OPM-06-01 concerning Inorganic Fertilizer, OPM-06-02 concerning Organic Fertilizer, OPM-06-03; concerning LSU and OPM-06-04 concerning SSU). The procedure regulates, among others, the main principles in the application or sowing of fertilizers, important factors in the effectiveness and efficiency of fertilization, fertilizer technical guidelines, fertilizer preparation, fertilization work organization, fertilization mechanically with Fertilizer Spreader, empty beds and the application of liquid waste/POME.

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

The certification unit shown the program and the realization of anorganic and organic fertilization application for period January until February 2022. Based on document review and interview with the staff, the realization of fertilization in Sei Liam and Sei Mandang Estate is in accordance to the program.

7.4.2

Soil Sampling Unit

Side Soil Unit for mature plants was carried out by Verdant Bioscience by taking 97 leaf samples for Sei Mandang Estate on April 18 2019. Soil sample analysis was carried out to determine pH, C-Organic, N-Total, C/N Ratio, K element content, Mg, and Ca.

Leaf Sampling Unit

Leaf Sampling Unit for mature plants was carried out by Verdant Bioscience by taking 18 leaf samples for Sei Liam Estate and 18 leaf samples in 2021 for Sei Mandang Estate. Leaf sample analysis was carried out to determine the content of elements N, P, K, Mg, Ca, B, Cu, Zn, RP, RK, RMg, and RCa.

7.4.3

The certification unit has shown documents for the utilization of waste from processing palm oil mills for the period January to February 2022 as a form of nutrient recycling strategy. The documents are as follows:

Block	EFB (MT)			
	Ha		Tonase	
	Today	Todate	Today	Todate
21D03	1.16	1.16	17,080	17,080
21D04	5.96	7.12	117,960	135,040
19C05	2.29	9.41	78,600	213,640

7.4.4

The certification unit has recorded inorganic and organic fertilizing well during 2021-2022 and recorded it in the fertilization month report. Fertilization records have been shown in the 2021-2022 fertilizer progress document, which includes fertilization programs and realization. For period 2021-2022 the certification unit used fertilizer Urea, RP, MOP, CuSO₄, and ZnSO₄, for example Urea used January until December 2021 is 309.850 MT.

The certification unit has shown the Fertilizer Application Report Period January – December 2021. The document explains the type of fertilizer, recommendations, application per month, total and ratio of fertilizer/tonne of FFB. The documents are as follows:

Plant Stage	Area (Ha)	Urea (Kg)	MOP (Kg)	RP (Kg)	Borate (Kg)	CuSO ₄ (Kg)	ZnSO ₄ (Kg)
Mature	494.14	141,700	283,300	193,900	22,575	-	-
Immature	1,005.84	168,150	240,250	140,100	9,000	-	-
New	1,472.74	21,800	16,100	-	-	15,225	15,225

Planting							
Total	2,972.72	309,850	523,150	334,000	31,575	15,225	15,225

Based on interviews with management showed that the realization of fertilization was in accordance with the recommendations given. Further explained that the evaluation related to the progress of fertilization is carried out every semester.

Status: Comply

7.5

Practices minimize and control erosion and degradation of soils.

7.5.1 and 7.5.2

The results of the document study revealed that the area of the certification unit was classified as marginal land is peat soil. The certification unit has a land distribution map which explains the distribution of peat soil and its depth with a scale of 1:50,000. Based on the soil survey map, it was informed that the slope of the land in the certification unit's operational area is in the flat category (0-2° or 0-4%). Thus, the certification unit does not have a sloping area management strategy.

Based on documents verifications the distribution of Peat soil in certification unit described in the following table:

Peat Depth	Coverage Area (Ha)
0-50 cm (Mineral)	6,448
50-100 cm	2,127
100-150 cm	2,231
150-200 cm	2,147
200-250 cm	2,201
250-300 cm	2,047
300-350 cm	118

Those table figured all area of PT DIL including smallholders' area, however the distribution peat area in the scope area are:

Estate	Mineral Area (Ha)	Peat Area (Ha)	Total (Ha)
Sei Mandang Estate	4,36.26	4,633.82	5,070.08
Sei Liam Estate	4,192.51	2,630.45	6,822.96
Total	4,628.77	7,264.27	11,893.04

7.5.3

Based on the verification of the area statement documents, interviews with management and field observations revealed that the certification unit was not carrying out new planting activities, but the certification unit was carrying out replanting activities.

Status: Comply

7.6

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

7.6.1

The results of the document study revealed that the area of certification unit was classified as marginal land is peat soil. The certification unit has a land distribution map which explains the distribution of peat soil and its depth with a scale of 1:50,000. Based on the soil survey map, it was informed that the slope of the land in the certification unit's operational area is in the flat category (0-2° or 0-4%). Thus, the certification unit does not have a sloping area management strategy.

The existence of soil map containing information on soil classification, texture, drainage, limiting factors, rocks, and suitability information for the development of oil palm plantation has helped the certification unit used by the certification unit to arrange the block, roads, drainage, bridge, etc. The certification unit also has a Road Maintenance Program equipped with the proper infrastructure and facilities to do such work. According to the result of field visit, the roads are in good condition and the FFB harvested are smoothly transported to the mill.

7.6.2 and 7.6.3

Based on verification document of the long-term plan and the latest area statement as well as interviews with the management revealed that the certification unit is not currently carrying out new plantings or has plans to carry out new plantings.

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 and 7.7.7

Based on the results of the review of the certification unit's statement of the area document, and interviews with management representatives, it was found that the certification unit did not plant new oil palm on peatlands for the purpose of developing plantations.

7.7.2

The unit of certification has carried out a peatland inventory according to the RSPO peat inventory template and the report has been sent to the RSPO secretariat as evidenced by an email to ghg@rspo.org on 30 October 2019 and received a reply from the RSPO secretariat on 28 January 2020 with the statement "We acknowledge receiving all document for peat inventory, while we are checking on the shapefile should any clarification needed, we will get back you"

7.7.3 and 7.7.4

Related peat management the unit of certification has been developed procedure water managements in peat area (OPM-09-01/19-0202918/Rev.03 dated 22 February 2019) with the aim to managed the availability of water during drain season and not flooding during rainy / wet season. On the procedure has been described water management in peat area including canal, monitoring of water level, trenches, monitoring of piezometer as well as subsidence of peat area.

As the implementation of that procedure based on documents verifications and interview with managements it was known the management in peat area succinctly described below:

a. Water level monitoring in the canal or trenches

The availability of water in the canal normally are 40 – 80 cm below the land surface. The water level monitoring performed through water level monitoring point of water levels whereas there are 13 water level monitoring point. Water level has been monitoring periodically every week and reported in documents monitoring report of water bund off. Based on documents verification it was known water level is in the range of 30 – 60 cm and during audit can be presented water level monitoring period January 2021 – February 2022.

b. Peat subsidence Monitoring

Based on documents verifications it was known there are 34 Peat subsidence poles and 1 control pole. Ground monitoring every 6 months and documented in the document monitoring form of peat subsidence. Since 2018 to 2021 it is known that the subsidence of the surface soil has reached 65.5 cm.

c. Monitoring ground water through piezometer

Based on documents verifications it was known there are 34 ground water table's measurement reference point and 1 control pole. Ground water monitoring every 2 weeks and documented in the document monitoring reports of water table. Based on documents verifications for example in Blok N21 the water table level is 35 cm form the land surface.

7.7.5

The certification unit has shown the Drainability Assessment replanting area 2020 Sei Mandang Estate document of PT Dendymarker Indah Lestari on February 4, 2020. The conclusion of the DA is "based on the results of DLT calculations in the Replanting area 2020 Sei Mandang Estate, the area is categorized as GO AREA/Area can be planting. DLT in the 2020 Sei Mandang Estate replanting area has the highest value of 236 years and the lowest of 67 years.

Based on PT DIL's communication with the RSPO secretariat is that the PT DIL Drainability Assessment Report will be the 3rd report received based on the assessment carried out and its approach is always the best.

Based on interviews with management revealed that PT DIL's Drainability Assessment had been sent to the RSPO and up to the time of the audit, no further results had been informed.

7.7.6

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

document verification, it is known that the area of peat land is 7,815 Ha, with a total of 34 peat subsidence stakes, where this number is in accordance with the requirements.

Based on field observations in peat areas, it shows that the construction of drainage canals is based on topography. In addition to the Piezometer, the unit of certification measures the water level in the waterways as found during field observations at Sei Mandang Estate and Sei Liam Estate, it is known that the water level above ground level is ± 54 cm. Downstream of the ditch, in the same block, a floodgate has been installed, to protect the water supply in the block from drought and flooding.

Status: Comply

7.8

Practices maintain the quality and availability of surface and ground water

7.8.1

The unit of certification has the results of identification of water flows in operational areas and a water management plan that is included in the 2013 HCV and 2019 HCS management plans, environmental management plan documents (RKL / RPL documents), riparian area SOPs (SOP-DMIL-MILLS-III-2013), and Policies for the protection of high slopes and riparian areas (SOP No. 21 / PMPB-DMIL / 2013). which focuses on the protection of river borders to be managed on both sides in accordance with statutory regulations. Large rivers (border width 100 m) and small rivers (border width 50 m). In areas that have been cultivated without buffer zone reserves, subsequent replanting will be managed according to the requirements stated in the procedure. Based on document verification, the water management that has been carried out by the company includes:

- Managing POME in the IPAL pond before it is used on the estate according to the license held.
- Test the quality of groundwater in the application area for POME and groundwater around residential areas.
- Prevent leakage at every water installation.
- Making clean water reservoirs around the building area.
- Non-chemical and chemical water separation

The unit of certification also monitors well water quality, river water, sedimentation, river water velocity based on river water quality monitoring SOPs (SOP-DMIL-PKAS-III-2013). A Water Management map with a scale of 1: 40,000 explaining the inlet in Block A1; B1; B03; B04 and B05 BR1 (source Sungai (river) Mandang) and Outlet in block L28; L29; K29; J30 (Sungai (river) Abang). Map of Water Management Monitoring equipment scale 1: 150,000 explaining the location:

- Installation of Water Level (160 pieces)
- Piezo Meter Installation (63 units)
- Installation of Over Flow Locations (20 units)
- Construction of Water Gates (2 units that have been realized).
- Installation of subsidence poles (11 units).

Forms of water management and maintenance of water sources, for example:

- Plant treatment does not use chemicals (chemist) but is done manually
- Fertilization is not done mechanically but is done manually.
- On river banks that are prone to landslides, so that plants that prevent erosion should be planted
- particularly for peatlands, the company has implemented management by monitoring groundwater levels, monitoring land subsidence, building weirs and embankments as well as routine maintenance, and cleaning of water reservoirs.

Base on document verification, all the parameters of surface water testing Rupit river, Liam river, Mandang river upstream & downstream, Abang river upstream & downstream conducted by laboratorium accredited date 10 September 2021. The parameters tested were 32 parameters according to government regulation No. 22 of 2021 regarding the implementation of water class I environmental protection and management.

Base on document verification, all the parameters of reverse osmosis water testing accordance of environmental quality standards as stipulated in Minister of Health No.492/MENKES/PER/IV/2010 for tresehhold for water drinking. Testing dated on 10 Februari 2022.

7.8.2

The unit of certification also monitors well water quality, river water, sedimentation, river water velocity based on river water quality monitoring SOPs (SOP-DMIL-PKAS-III-2013). A Water Management map with a scale of 1: 40,000 explaining the inlet in Block A1; B1; B03; B04 and B05 BR1 (source Sungai (river) Mandang) and Outlet in block L28; L29; K29; J30 (Sungai (river) Abang).

Forms of water management and maintenance of water sources, for example:

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- particularly for peatlands, the company has implemented management by monitoring groundwater levels, monitoring land subsidence, building weirs and embankments as well as routine maintenance, and cleaning of water reservoirs.

Based on the results of field visits to the area around the reservoir which is a source of clean water for mills, housing and offices, it can be seen that the condition of the reservoir is well maintained and is located on mineral land which is quite far from the IPAL area or areas that have the potential to cause other pollution. The company obtains clean water sources from an artificial reservoir that is used as rainfed by 1 main reservoir and 16 longitudinal small rain-fed reservoirs. The water from the reservoir is then carried out further management for cleaning and purification of the WTP so that it is suitable for production and daily needs. As for consumption needs, the company uses mineral water.

Base on field visit during audit, for examples on Mandang River block C03, Hitam River block H07 (Mandang Estate and Abang River, Block M30 (Sei Liam estate), acquired information that company shown proper ways for maintain and protect the catchment area for example manual weeding and marking the chemical boundary border. In addition, the company also carried out vetiver planting along the canals to prevent landslides and erosion as well as maintenance of canals with a washing / dredging program to protect them from silting.

7.8.3

The company have POME disposal to watersurface permit by Investment and Integrated Services Office Musi Rawas Agency issued 20 October 2020 valid 5 years. Before being thrown away to watersurface, the POME quality testing document review shown for January 2021 until 2022 all of POME testing parameters are compliant to the standards quality, Testing is carried out by an accredited laboratory (LP-001-IDN), for example month January 2022 consist of :

Parameter	Threreshold	Result
BOD	100	16.94
COD	350	63.22
TSS	250	34
Grease & fat	25	7.24
Nitrogen total	50	38.21
pH	-	7.51

Threeshold by Sumatera Selatan governor's regulation Number 8 year 2012.

The test results for February and March 2022 have not been shown due to delays in submitting test results from the laboratory, the company shows proof of handover of POME samples to the laboratory in February and March 2022.

The all of POME management and monitoring has been reported to related institutions for regular basis per 3 months. The last report for the fourth quarter of 2021 to the Murata agency of Land and Environment Service on January 18, 2022.

7.8.4

The procedure of water use monitoring in the mill is available under the document Procedure of Water Treatment Plant. Water consumption is monitored by using flowmeters installed in the piping system of WTP. Base document verification metric template RSPO is known for recording water consumption records for the period January until December 2021 mill fresh water per produced tonne 1.18 (M3 / MT) with budget standard 1.3 M3 / MT.

Status: Comply	
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7.9

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

The unit certification already maximizing the use of renewable energy (fiber & shell) as boiler fuel. For example, use of shells and fiber period January to December 2021 POM has produces 1,228,763 kWh of electricity from turbine. Renewable energy use per ton of palm product in the mill is 11.73 kwh / ton CPO. Result Direct fossil fuel used is 0.12 kWh/ ton CPO.

Based on the results of the field visit, it shows that there are no remaining fibers and shells in the storage area, the results of interviews by Mill employees stated that all waste in the form of shells and fiber is used for boiler fuel.

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 has identified source of pollution and air emission sources, including gaseous, particles and shoot emissions and effluent covering emissions and pollution sources from estate and mill operations. The emission source identified from estate and mill operation among others are land use change, vehicle operation, machine operation, fertilizer and pesticide application, use of AC/refrigerator, waste piling and electricity consumption.

Identification of significant GHG gas emission source is identified and the mitigation plan has been developed by the company covering mill and estate. The significant GHG emission among others are land use change, POME, use of fertilizer and pesticide, use of fossil fuel for operation and transport. The mitigation plan among others are correct dosage use for fertilizer and application as recommended, reduce reuse and recycle action, electric use limitation, transport and engine maintenance, periodic air quality test.

Fossil fuel reducing on DIL POM have been implemented by fiber/shell usage for boiler. POME has been monitored every month and monitoring periods January 2021 until 2022 as shown that all of waste water testing parameters is compliant to the standards quality.

Based on document review for examples: pesticides usages monitoring, diesel fuel monitoring, HCV identification and etc found that accurate data has been put into the RSPO palm GHG Calculator. Summary of net GHG emissions from PalmGHG calculator of the audit report which calculation option is applied "Apply full Version".

The calculation of GHG and its monitoring has conducted by EHS department. GHG emission calculated using RSPO palm GHG calculator 4.0 Summary of GHG emission for DIL POM and its supply base are listed as follows.

Emissions per product	tCO₂e/tProduct
CPO	12.85
PK	12.85

Production	t/yr
FFB processed	108,698.04
CPO produced	24,538.38
PK produced	3,863.61

Extraction	%
OER	22.57
KER	3.55

Land use	Ha
Planted area on mineral	16804.23
Planted on peat	6,577.90
Total area planted	2,338.13
Conservation Area (Forested)	5,071.26
Conservation Area (Non-Forested)	0
FFB Production per hectare	4.65

Summary of field emission and Sinks

Description	Own crop	Group	3rd	Total
Emissions Sources	tCO₂e	tCO₂e/ tFFB	tCO₂e /	tCO₂e

tFFB						
Land conversion	51367.12	7.12	87547.84	7.12	2751 2.82	166427.77
CO2 emissions from fertilizer	4229.53	0.59	11212.77	0.91	0	15442.30
NO2 emissions from peat	37114.10	5.14	0	0	1212 6.48	49240.58
NOO2 from Fertilizer	3119.98	0.43	9435.29	0.77	0	12555.27
Fuel consumption	185.75	0.03	1512.18	0.12	0	1697.93
Peat oxidation	270704.62	37.51	0	0	8844 8.72	-214667.05
Sinks						
Crop sequestration	-67561.57	-9.36	-	-1.45	-	-
			115134.75		3197 0.73	-214667.05
Sequestration in Conservation area	-22872.09	-3.17	-2363.37	-0.30	0	-46503.45
Total	276287.44	38.28	-29058.05	-037	96117 .29	343346.68

Summary Oil Mill Emissions and Credits

Remarks	tCO2e	tCO2e/t FFB
Emissions sources		
POME	21306.66	0.20
Fuel consumption	227.94	0
Grid electricity	89.79	0
Credits		
Export of grid electricity	0	0
Sales of PKS	0	0
Sales of EFB	0	0
Total	21624.39	0.20

Palm Oil Mill Effluent (POME) Treatment

Divert to compost (%)	0
Divert to anaerobic digestion (%)	100

POME Divert to Anaerobic Digestion

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

There is a difference between what is explained in the basic info and the RSPO ghg palm calculator, this is because DIL POM also gets supply base FFB from other estates not certified RSPO consist of Agro Kati Lama North & South estate, Agro Muara Rupit west & east estate and Agro Rawas Ulu west & east estate which also has HCV area.

7.10.2

Until the recertification audit conducted, there were no new planting activities above November 15 2018, the company is currently doing replanting at the certified area. Therefore, the company conducted no HCS assessment. The company also has been conducting NPP which submitted in RSPO website on January 2014.

7.10.3

The company has identified pollutions and emissions sources of DIL POM for the period 2021, such as CO2 (boiler, generator, transportation), CH4 (POME), hazardous waste (WTP, chemical storage), noise (machinery). The sources of pollution and emissions for

the estate are listed on the identification documents and management plans for pollution sources for the period 2021, such as emissions (CO₂, CO), noise, chemical waste, organic and inorganic waste, and infectious waste.

Plans to reduce or minimize have been implemented and monitored as explained in RKL-RPL semester I & II the year 2021. Fossil fuel reduction on DIL POM have been implemented by fiber/shell usage for the boiler.

Status: Comply

7.11

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

7.11.1

There is no new land clearing and the planting activity is and for planting 2021 and 2021 activity of replanting oil palm plants. Based on the results of visits to the replanting area on block M23 Sei Liam Estate planting year 2021, it was found that the company used mechanical and non-burning methods.

7.11.2

The company has procedures related to fire prevention and control as well as emergency response. In the fire emergency response points, buildings and land have included and explained the prohibition of burning; mapping of fire prone areas and water sources for suppression; fire fighting team; fire fighting equipment; fire siren; socialization; and monitoring.

The company already has a PT DIL Fire Disaster Emergency Preparedness Team consisting of Metun Sei Mandang Estate, DIL POM and Sei Liam Estate.

In addition, the company received guidance on preparedness to control forest and land fires by the South Kalimantan Provincial Forestry Service which was carried out on January 25, 2022. The company has made efforts to provide fire control/prevention facilities and infrastructure for each work unit. Based on the verification document, it is known that the available fire control/prevention facilities and infrastructure have referred to the Regulation of the Minister of Agriculture of the Republic of Indonesia number 05/Permentan/kb.410/1/2018.

7.11.3

The certification unit shows the report on the socialization of forest and forest fires in each unit as follows:

1. Socialization and training on *Dalkarbunla* PT DIL - Sei Liam Estate on 18 September 2021. The training was attended by 17 firefighters and 5 residents around the estate. The certification unit can show documentation, materials and attendance list for the event.
2. Socialization and training of PT DIL Sei Mandang Estate on 08 October 2021. The training was attended by 19 firefighters and 8 residents around the plantation. The certification unit can show documentation, materials and attendance list for the event.
3. Fire Awareness Community Socialization on November 15, 2021. The socialization was attended by 22 local people. The certification unit can show documentation and attendance list for the event.

The company regarding the formation of a fire-care community group (*Masyarakat Peduli Api*) in nearest community.

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 company has an obligation to carry out an HCV-HCS assessment because there have a propose area for new plantings after November 2018 on mineral land and there is no peat and conservation area at that location (HCV / HCS). In relation to these obligations, the company has carried out an HCV / HCS assessment and the area has been declared to be "Go-Area". Identification of HCV and HCS areas carried out by PKH Consultants in March 2019 with peer review approved on 20 July 2020.

Following are the stages of the historical analysis of land use change (LUCA) processes:

- On June 9, 2017, the Company stated that it has Zero Liability status.
- On 21 May 2018, Email from RSPO stated that the company received a "Grace Period" for 1 year
- On July 8, 2019, The RSPO Secretariat has been trying to get the clarification to the LUCA review report since last year and we have managed to get the relevant clarification after setting up a call with them. I would need to retrace all the old emails to find out pre-

2017, what was the status of the concept note if there was one submitted.

- March 26, 2020, based on the results of LUCA identification, an area with final compensation obligation was obtained covering an area of 20.33 hectares in Sei Liam Estate
- On 14 October 2020, the RSPO (Aimy Nadiyah) stated that only areas exempted from RaCP can continue certification, so a compensation area of 20.33 hectares has been excluded from the scope of certification. This is because the PT DIL concept note has not been approved by the RSPO. Based on the timeline above, it can be concluded that currently PT DIL has Zero Liability.
- The company shows the remediation and compensation plan template document that was approved by the RSPO on 2021 July 2021, the FCL calculated by the RSPO reviewer is 18.8 Ha.
- The RaCP process has been complete accordance email on August 25, 2021 from RSPO RACP compensation panel to PT DIL explaining that "satisfactory evaluation result of the compensation plan, the RACP process for SIFEF (PT DMIL) in now completed and you may proceed with certification".
- The company shows the PT DIL implementation of Remediation report dated February 21, 2022 with the following details:

No	Description	Location		Area (Ha)	Progress
1	Remediation on the Riparian				
	Sungai Mandang	Block C	SMG E	7.88	- Mapping of the area – DONE - Installing Sign Board in the field – DONE
	Additional S. Hitam	Block H	SMG E	6.69	- Selection of species adapted for reforestation – DONE
	Sugai Hitam	Block H	SMG E	36.8	- Training of sprayer's team (no pesticide in the area) – DONE - Procurement of 3,940 seedlings to plant on the 7.88 hectares (Block C) – DONE - Planting of seedlings in the 7.88 ha - DONE. - Procurement of 21,500 seedlings to plant on the 43.49 hectares (Block H)– DONE - Socialization to the village community around PT.DIL for fire awareness program - DONE
	Block J04 (replacement from S. Abang)	Block J04	SLM E	6.74	taliasih process
	Total			58.11	
2	Compensation Area				
	Block J05 (replacement from block K03)	Block J05	SLM E	16.78	taliasih process
	Block K04	Block K04	SLM E	6.86	taliasih process
	Total			23.64	
	Grand Total			81.75	

7.12.2

The company has an obligation to carry out an HCV-HCS assessment because there have propose area for new plantings after November 2018 on mineral land and there is no peat and conservation area at that location (HCV / HCS). In relation to these obligations, the company has carried out an HCV / HCS assessment and the area has been declared to be "Go-Area" (described in point 3 below). Company has carried out several activities to identify Protected Areas and Conservation Areas, including:

- Identification of HCV areas in 2013 led by the ALS HCV assessor (Kresno Dwi Santoso), with the following results:
 - The HCV area is 2,893.50 ha, consisting of inundated areas of 1,300.54 ha and rare ecosystems of 1,592.96 ha.
 - There are 22 species of RTE fauna and 5 species of RTE flora based on the species conservation status that refers to the IUCN redlist, CITES and PP No. 7 of 1999.
 - Maps of High Conservation Value Areas.
 - Management recommendations for the protection of riparian areas with non-chemical treatment for those that have been planted as well as protection and enrichment of natural vegetation for those that have been planted while for HCV areas in the form of natural forests, management is carried out. come out by defending the forest area without any maintenance.

- Identification and re-measurement by the PT DIL GIS team in June 2019 which obtained digitization results with an HCV area of 2,980.73 Ha
- Identification of HCV and HCS areas carried out by PKH Consultants in March 2019 with peer review approved on 20 July 2020 with the following results:
 - The HCV / HCS area was 2494,23 Ha.
 - The "give and take" process which is intended for the effectiveness of the implementation of Integrated Conservation Land Use Planning (ICLUP) with the Give area (No Go Area) to become an HCV area of 296.61 hectares and a Take area (Go Area) to be developed covering an area of 178.35 hectares.
 - The scope of the study still refers to the 2017 Environmental Permit, namely 17,793 Ha.
- Identification of areas carried out by the Ministry of Environment and Forestry in areas where fires occurred in 2019, the area was then determined to be a Non-HCV Conservation Area covering an area of 26.03 Ha.
- Changes in environmental permits on July 28, 2020 with a total area originally from 17,000 Ha to 11,893.04 Ha so that there was also a change in the area of HCV / HCS from the original 2,893.50 Ha to 2,494.23 Ha.

In its management, the company still refers to the 2013 HCV document because the 2019 HCV / HCS document was just legalized in 20 July 2020 and does not yet have a derivative product in the form of a management and monitoring plan. The company has been monitoring the HCV area every month. The last surveillance and monitoring were carried out on January, 2021 in the riparian. From the results of the monitoring that had been carried out, there were no additional protected animals from the previous data, and there was no damage or disturbance in the observed area.

7.12.3

Base on document submitted by Proforest namely RSPO No deforestation consultancy: high forest cover countries, Consultancy report on definitions and recommendations to the RSPO June 2018 as known not set HFCL for Indonesia.

7.12.4

The company has developed a 2021 HCV management plan matrix consisting of rare, threatened or endangered species, river buffer zones, reservoir buffer zones and local identities. The company has also issued controls for illegal or inappropriate hunting, fishing, or gathering activities, and is developing responsible actions for resolving human-wildlife conflicts under these procedures. The company has an SOP for the protection of plants and fauna (SOP-DMIL-PFF-IV-2013) and the company has socialized HCV and RTE species through morning briefings to workers. There is a policy of sanctions given to company workers caught hunting, collecting, injuring or killing RTE species in accordance with national regulations described in form letter no 001140A / PTDI-GM / XIII / 2016 from the General Manager.

The socialization to employees and the community has been carried out by the company, as an example of outreach on February 2, 2021. Evidence of education regarding RTE species is available and verified by a team of auditors, outreach to the closest community Maur Village and Batu Gajah village was conducted on January 2, 2021.

The company establishes an HCV management plan to maintain the HCV area in the operational area of PT Dendymaker Indah Lestari, which is stated in the 2021 HCV Management Plan document. Implementation of HCV management and monitoring carried out by the management unit includes maintaining HCV attributes (HCV boundaries, nameplate), socialization HCV (community and workers), maintaining HCV areas, routine patrols to maintain HCV safety, species monitoring, enrichment on river banks.

The company has also updated the HCV management plan which was carried out in June, 2021 meanwhile on Social Impact Assessment activities with documents as of March 1, 2018. These activities were carried out in a participatory manner to discuss HCV 5 and 6 in villages around the company, such as the village Batu Gajah Baru and Karang Dapo which was attended by 58 people.

Base on field visit during audit, for examples on Mandang River block C03, Hitam River block H07 (Mandang Estate and Abang River, Block M30 (Sei Liam estate) acquired information that company shown proper ways for maintain and protect the catchment area for example manual weeding and marking the chemical boundary border. During field visit also found riparian condition were managed well and there is no chemical activity indications on those riparian that become sampling audit.

The company has managed HCV, among others, through socialization of HCV to employees and the community, marking of HCV areas, monitoring of flora and fauna, enrichment of HCV areas and so on. The results of document reviews and field visits and interviews with

company management are encouraged to re-evaluate the effectiveness of HCV area management that has been carried out, **(OFI)** related to:

- The model for marking the HCV area of the Mandang River Border Block C3 is starting to fade
- Report on the results of monitoring the condition of the HCV area according to actual field conditions.

Based on the results of the field visit in the Sei Mandang Estate block H30, H31 and I33 area which is a No Go area, the area is not planted with oil palm.

7.12.5

Results of the verification documents, field visits and interviews via telephone with villagers obtained information that there are no areas of HCV-related and affect the local community.

7.12.6

The company has developed an HCV management plan and is implementing it properly. Regular patrol records show the company has been monitored for illegal hunting, and other illegal activity. All records for daily patrols at each plantation are available and verified by auditors. The socialization that has been carried out to the community regarding the existence of endangered plants and animals, which is carried out in conjunction with the socialization of protected areas, for example, the socialization related to the existence of protected animals and plants to Maur Village and Batu Gajah village was conducted on January 2, 2021, which was attended by 26 participants.

The company has conducted outreach to employees and the community regarding the steps that must be taken if there is a meeting with wild/rare animals. The results of the interviews with the company, HCV implementation & monitoring report 2021 and the RKL-RPL semester 2 year 2021 documents also state that there has never been any hunting in the company area.

7.12.7

The HCV management activities that taken by the management unit for period 2021 are maintain HCV attributes (HCV boundry, sign board), HCV socialization (community and worker), maintain HCV area, regular patrols for maintain HCV security, species monitoring, enrichment in riparian. The company has also submitted a report related to the biodiversity database and monitoring & management HCV of PT DIL to the Natural Resources Conservation Center of Jambi Province.

The management plan period 2020 is effectively and implemented based on the monitoring result implementation period 2020. The enhancement and result of the HCV / RTE monitoring review for the next HCV program. The review of the 2020 program, will become an HCV program in 2021, for example, the Repairing HCV signboard in December 2020 has not been fully completed and has been realization on January 2021.

	Status: Comply	
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3.2 Conformity Checklist of Certificate and Trademark Use

1.	Evidence of permission or approval certificate and trademark from Certification Body which submitted by Client	X or√
ASA-1.1 & ASA-1.2	Since the RSPO certificate achieved on July 27 th 2015, PT. Dendymarker Indah Lestari have neither used the certificate trademark whether on-product or off-product yet.	√
	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-1.1 & ASA-1.2	Since the RSPO certificate achieved on July 27 th 2015, PT. Dendymarker Indah Lestari have neither used the certificate trademark whether on-product or off-product yet.	√
	Status: Comply	
3.	Implementation of Certificate and trademark is not used on product	X or√
ASA-1.1 & ASA-1.2	Since the RSPO certificate achieved on July 27 th 2015, PT. Dendymarker Indah Lestari have neither used the certificate trademark whether on-product or off-product yet.	√
	Status: Comply	
4.	Controlling of Certificate and trademark, including withdrawing inappropriate trademark.	X or√
ASA-1.1 & ASA-1.2	Since the RSPO certificate achieved on July 27 th 2015, PT. Dendymarker Indah Lestari have neither used the certificate trademark whether on-product or off-product yet.	√
	Status: Comply	

3.3 Summary of RSPO Partial Certification.

Compliance of the uncertified management units of SIPEF GROUP 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

SIPEF GROUP Time Bound Plan explained in table section 1.10. SIPEF GROUP has achieved 5 management units in Indonesia and 3 Management Units in Papua New Guinea that RSPO certified. Total management unit in SIPEF GROUP are 8 in Indonesia, and 1 in Papua New Guinea. Therefore, since 1st August 2017 SIPEV NV has acquisition 1 company in Sumatera Selatan Province, Indonesia. SIPEF GROUP has informed the Time Bound Plan progress through representative's office in Indonesia. MUTU has considered that SIPEF GROUP is comply with the RSPO requirement for Time Bound Plan. The Time Bound Plan was revised and declared by the SIPEF GROUP representative on 2022 by the Sustainability Director.

MUTU has verified partial certification for un-certified unit's subsidiary of SIPEV NV 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:

- 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
2.2.1	Did the company conduct an internal audit? If so, has a positive assurance statement been produced?	<p>Company Group/Holding Statement: Companies are already doing internal audits. There are internal audit reports for each company.</p> <p>Auditor Verification: The internal audit has been conducted for all uncertified units:</p> <ul style="list-style-type: none"> • PT Citra Sawit mandiri → 24 – 26 April 2020 • PT Asri Rimba → 18 – 19 June 2020 • PT Agro Kati Lama → 03 & 05 April 2021 • PT Agro Rawas Ulu → 30 April 2021 • PT Agro Muara Rupit → May 2021 <p>Each company provide correction and corrective action on the base to ensure all RSPO P&C requirements are implemented.</p> <p>Positive assurance has been provided by General Manager South Sumatera Operation, as lined out in "Pernyataan Kesanggupan Memenuhi Prinsip dan Kriteria RSPO dan Kebijakan-Kebijakan Perusahaan", dated 19th December 2016. The statement indicated that PT Agro Kati Lama, PT Rawas Ulu, and PT Agro Muara Rupit – as a member of RSPO, committed to respect and implement company policies, as well as following and implementing all RSPO requirements related to development of new plantation. Companies are committed to perform continuous improvement to comply with all principle and criteria. Companies also committed to follow up all finding, both internal and external.</p>
2.2.2	No replacement of primary forest or any area identified as containing High Conservation Values (HCVs) or required to maintain or enhance HCVs in accordance	<p>Company Group/Holding Statement: PT Umbul Mas Wisesa was following RSPO Remediation and compensation procedure.</p>

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
	with RSPO criterion 7.3 (it has changed be Criterion 7.12 in P&C 2018).	<p>Auditor Verification:</p> <p>Assessment team checked to confirm any land conflict/liabilities on RaCP tracker and found note "The compensation plans for PT. Umbul Mas Wisesa and PT. Toton Usaha Mandiri (SIPEF) have been approved by the Compensation Task Force during the staged implementation of the RaCP between May 2014 and November 2015".</p> <p>All new planting after January 1st, 2010 have undergone and complies with RSPO New Planting Procedure/RSPO NPP. RSPO NPP for PT. Agro Muara Rupit, PT. Agro Kati Lama, PT Agro Rawas Ulu have been published in RSPO website.</p>
2.2.3	Any new plantings since January 1 st 2010 must comply with the RSPO New Plantings Procedure.	<p>Company Group/Holding Statement:</p> <p>All new planting after January 1st, 2010 have undergone and complies with RSPO New Planting Procedure.</p> <p>Auditor Verification:</p> <ul style="list-style-type: none"> • RSPO NPP for PT Mukomuko Agro Sejahtera has been uploaded in RSPO website for public notification on 6th March 2012. • RSPO NPP for PT. Agro Muara Rupit, PT. Agro Kati Lama, PT Agro Rawas Ulu have been published in RSPO website. • RSPO NPP for PT. Asri Rimba is waiting for HCV ALS review and LUC review.
2.2.4	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>Company Group/Holding Statement:</p> <p>All land conflict is following FPIC principle.</p> <p>Auditor Verification:</p> <p>The assessment team has conducted a search in internet to confirm that there is a lodged land conflict that was recorded as complaint under RSPO Case.</p> <p>Tracker; raised by individual on those units that have not been certified. RSPO Case Tracker recorded complaint to PT. Agro Muara Rupit, dated 17 May 2017. The complainant brought forward the issue of fraudulent land title to RSPO. The complainant claimed that his land was fraudulently sold by his cousin to PT. Agro Muara Rupit, a subsidiary of SIPEF Group. The summary presented in the RSPO Case Tracker:</p> <ul style="list-style-type: none"> • On 25 July 2017 - Secretariat to write to the company and inform them on the complaint. • On 24 August 2017 (CP Meeting) - Secretariat to wait for reply from the company. • On 28 August 2017 - Secretariat received response from the company. • On 5 September 2017 - Complainant failed to provide the document. • On 11 September 2017 - Secretariat has sent an email to SIPEF. • On 26 September 2017 (CP Meeting) - Secretariat to draft the decision letter. • On 18 June 2018 – Complaint Panel to deliver a decision. • On 25 July 2018 – Complaint Panel to deliver a decision. • On 23 August 2018 – Draft decision letter to be reformatted. • On 19 September 2018 – Decision Letter – Complaints Panel.

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<ul style="list-style-type: none"> On 26 September 2018 – The decision letter finalised and to be delivered to Parties. On 24 October 2018 – Complaint Panel Decision letter has been sent to parties. Deadline for submission of appeals is on 20 December 2018. On 20 December 2018 – The complaint is officially closed. The case tracker available on link https://askrspo.force.com/Complaint/s/case/50090000028Es1JAAS/detail. <p>Assessment team checked to confirm any land conflict/liabilities on RaCP tracker and found note “The compensation plans for PT. Umbul Mas Wisesa and PT. Toton Usaha Mandiri (SIPEF) have been approved by the Compensation Task Force during the staged implementation of the RaCP between May 2014 and November 2015”.</p>
2.2.5	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>Company Group/Holding Statement: No outstanding labor dispute noted.</p> <p>Auditor Verification: No labor dispute noted. The assessment team has conducted a search in internet to confirm that there is no new comments or dispute raised by the communities related to labor dispute on those units that have not been certified.</p>
2.2.6	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>Company Group/Holding Statement: No outstanding legal non-compliance identified.</p> <p>Auditor Verification: No non-legal compliance noted. The assessment team has conducted a search in internet to confirm that there is no new comments or dispute raised by the communities, related to legal non-compliance on those units that have not been certified.</p>

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

3.4.1. Identification of Findings, Corrective Actions and Observations Re-Certification Assessment

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

3.4.2. Identification of Findings, Corrective Actions and Observations ASA-1.1 Assessment (remote audit)

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

3.4.2. Identification of Findings, Corrective Actions and Observations ASA-1.1 + 1.2 Assessment (Onsite Audit)

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

3.4.3. Opportunity for Improvement (OFI) at Surveillance-1.1 & 1.2

No	Ref. Std.	Description
1	3.4.2	<p>As a form of social management, the company has developed/compiled by involving independent parties in conducting social impact assessments related to the company's operational activities. The first social impact assessment was carried out in 2013 by PT Sonokeling Akreditasi Nusantara. As a follow-up to the results of the assessment, there are several recommendations for managing social impacts for the company, including:</p> <p><u>External impact</u></p> <ul style="list-style-type: none"> - Infrastructure development. - Plasma plantation/partnership development. - Employment Opportunity - Community business opportunities - Increasing people's income - Environmental and community health <p><u>Internal impact</u></p> <ul style="list-style-type: none"> - Industrial relations - Career path - Salary and welfare benefits - Employee facilities <p>As a form of social management, the company has developed/compiled by involving independent parties in conducting social impact assessments related to the company's operational activities. The first social impact assessment was carried out in 2013 by PT Sonokeling Akreditasi Nusantara. As a follow-up to the results of the assessment, there are several recommendations for managing social impacts for the company, including:</p> <p><u>External impact</u></p> <ul style="list-style-type: none"> - Infrastructure development - Plasma plantation/partnership development - Employment Opportunity - Community business opportunities - Increasing people's income - Environmental and community health <p><u>Internal impact</u></p> <ul style="list-style-type: none"> - Industrial relations - Career path - Salary and welfare benefits - Employee facilities <p>As one of the efforts to improve and pay attention to the latest situation in December 2021 by the company's internal team, the Social Impact Review and Update was carried out due to the dynamic social situation and the seriousness of the company to build and maintain company sustainability, especially in the social aspect, so this study re-done. In the recommendation section, it is explained that a social impact study is carried out so that the management of social impacts can be mitigated both for internal and external social impacts, minimizing or eliminating negative impacts (mitigating adverse effects) and increasing positive impacts (advancing benefits) in order to achieve the company's social goals. The proposed recommendations refer to the principle of balance between the management of the social, environmental and economic aspects of the company.</p> <p>As a follow-up effort to the Social Impact Review and Update of SIA in 2021, the company has developed a social management and monitoring plan that has been developed as outlined in the Action Plan document on the findings of PT Dendymarker's social impact assessment. Based on the results of the review document review, companies are encouraged to carry out a more in-depth mapping of key stakeholders, for example for external stakeholders by paying attention to women, migrants, local residents, youth leaders, contractors and for internal stakeholders</p>

No	Ref. Std.	Description
		<p>by paying attention to wider representation of workers such as local workers, migrants, women, new workers including contract workers</p> <p>Furthermore, the results of the document review and interviews with management and stakeholders (internal and external) revealed that the company had managed issues that could have a social impact which were carried out partially by the relevant departments but were not explained in detail in the SIA review report, for example:</p> <ul style="list-style-type: none"> - Issues related to land issues / land conflicts at PT DIL - Issues related to Plasma dynamics at PT DIL - Issues related to dissatisfaction with CSR and job opportunities for the surrounding community <p>Based on the explanation above, companies are encouraged to develop a comprehensive social management and monitoring plan by integrating between sections/departments covering all impacts and representative samples of affected parties.</p>
2	2.2.2	<p>The results of document verification revealed that during the audit it was found that there were 8 contractors working with the company. In relation to the relevant legal compliance obligations, an evaluation conducted by the company can be shown in the form of an Evaluation Checklist for Compliance with the Contractor's Sustainable System Standards and a Self-Declaration Letter for the application's ability to be signed by the contractor periodically once a year. In the Checklist, there are 11 compliance parameters that must be complied with, including work agreements (between the company and the contractor), no workers under 18 years of age, BPJS Employment, provision of minimum wages and others.</p> <p>During the audit process the auditor team verified the contractors CV Razqa Jaya Mandiri and CV Tamras Indah accompanied by supporting evidence, namely proof of payment of wages in accordance with regulations, payment of BPJS (Health and Employment), no workers under 18 years old forced labor and have a copy of the work agreement (between the company and the contractor or the contractor and his workers).</p> <p>However, the auditor considers that the company needs to re-evaluate the compliance parameters of the relevant legal regulations by adding BPJS Health compliance points, work agreements between workers and contractors, & no forced/slave labor, whereas for the certification unit can added other legal compliance that are relevant in the work agreement they have.</p>
3	3.6.1	<p>The company has identified sources of hazards and potential risks for the company's operational activities in plantations and factories. In general, each activity unit has been identified, analyzed and assessed for its risk prevention efforts. However, based on field observations, several isolated cases have the potential to increase the risk of OHS, for example:</p> <ul style="list-style-type: none"> • The WWTP pool is not equipped with a perimeter fence and cables hanging around the WWTP pool due to the addition of processing capacity from 20 Tons of FFB/Hour to 60 Tons of FFB/Hour. • Supporting PPE in the form of life jackets and gloves that are not stand by at the work site <p>Based on the above, the company has the opportunity to re-assure that all areas that have been identified as hazards can be managed properly.</p>
4	6.7.3	<p>As a result of field visits, the company has provided sanitation facilities for workers who use chemicals, and furthermore, as part of continuous improvement, the company has plans to build sanitation and pesticide mixing facilities. In this case, the company shows a tender invitation document for the work of 1 lot chemical mixing shed capex 2022 Sei Mandang Estate. The tender document contains details of the bid price along with a plan for the construction of sanitation facilities and the mixing of pesticides. However, as a result of field visits to sanitation facilities, there are several things that need to be considered by the company, including:</p> <ul style="list-style-type: none"> • The condition of the bathroom door that doesn't work optimally • Arrange jerry cans for mixing pesticides

No	Ref. Std.	Description
		<p>Furthermore, the results of interviews with workers in one of the estates stated that PPE and work tools related to chemicals were brought home, to ensure this the auditor team made a field visit in the afternoon and it was found that PPE and work tools had been stored in the storage area.</p> <p>Related to this, the company has the opportunity to ensure the implementation of the storage of PPE and work tools in a predetermined place and ensure the realization of the construction of sanitation facilities and mixing pesticides.</p>
5	7.12.4	<p>The company has managed HCV, among others, through socialization of HCV to employees and the community, marking of HCV areas, monitoring of flora and fauna, enrichment of HCV areas and so on. The results of document reviews and field visits and interviews with company management are encouraged to re-evaluate the effectiveness of HCV area management that has been carried out, related to:</p> <ul style="list-style-type: none"> - The model for marking the HCV area of the Mandang River Border Block C3 is starting to fade - Report on the results of monitoring the condition of the HCV area according to actual field conditions.

3.4.4. Noteworthy Positive Components at Surveillance-1.1 & 1.2

No.	Description
1	The company's commitment to implementing the Sustainability Principles is proven by having obtained RSPO and ISPO certificates.
2	Enthusiasm and good teamwork in audit activities are accompanied by good presentation of documents.
3	Positive developments in the provision of supporting facilities for employee welfare
4	Has a water filtration installation in the treatment of domestic liquid waste.
5	Has a reverse osmosis installation for the supply of clean water.




3.5 Summary of Arising Issues from Public and Auditor Verification

Public Issues (Institution/ NGO/Community)	Auditor Verification
<p>Plantation Agency of Musi Rawas Utara. District. Date of Interview: April 05, 2022</p> <ul style="list-style-type: none"> • Mandatory reports to agencies have been routinely reported by companies including the Plantation Business Development Report, CSR Realization Report, and Firefighting Management Report. • In the last one period there were no reports related to disputes and land claims received by the agency. • The certification unit already has facility and infrastructure for firefighting. • In the past year, there has never been any information or fire incidents in the company's operational areas. • Communication relations between agencies and companies are fairly well established. 	<p>There are no issues that need further clarification and this information has been explained in the relevant indicators.</p>
<p>Manpower and Transmigration Agency of Musi Rawas Utara.</p> <p>In general, the communication relationship between the company and the agency has been going quite well since 2021 until the audit activity is carried out (March 2022). In 2022, the agency carried out labor inspection activities for the company and the results in general were that all normative labor rights for workers had been complied with and fulfilled by the company. The company already has a CLA and a labor union (SPM – Officially Registered) who are actively organizing within the company's operational scope.</p> <p>In 2022, there was a tripartite settlement related to the occurrence of layoffs (Termination of Employment Relations) for workers with the initials TFK.</p>	<p>In general, the company has fulfilled all the normative rights of labor and OHS of the workers in the company's operational scope.</p> <p>Related to the tripartite mediation meeting between the company, agencies and trade unions representing workers with the initials TFK which took place from January 2022 to completion in February 2022 with a Collective Agreement (PB), where the company agreed with the workers to settle it amicably by paying the farewell money that has been agreed upon by both parties.</p>
<p>Environmental and Land Agency of Musi Rawas Utara Regency.</p> <ul style="list-style-type: none"> - The company has EIA documents and has received environmental feasibility on 2020. - The company has a Temporary Hazardous Waste Storage located on Mill and each Estate, approved by Musi Rawas Utara Regency. - Hazardous Waste management activities carried out by storing hazardous Waste in licensed hazardous waste storage and transported have permission by KLH. Quarterly management reporting to relevant agencies. - The company has disposal POME to surface water permit. - The company has tested the quality of factory wastewater per month and reported the results of testing to Environmental Agency Musi Rawas Utara Regency. - The company has conducted POME quality testing per semester and reports the results of testing to Environmental Agency Musi Rawas Utara Regency. - The company has conducted noise, vibration and noise testing and reported the results of testing to Environmental Agency Musi Rawas Utara 	<p>According to field observation, there are no environment pollution from estate and mill operational.</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<p>Regency per semester.</p> <ul style="list-style-type: none"> - The company has reported Hazardous waste (balance and manifest) management to Environmental Agency Musi Rawas Utara Regency per semester, for example hazardous waste management report First quarterly 2022. - The company has sent the RKL / RPL implementation report to Environmental Agency Musi Rawas Utara Regency periodically, for example the 2 semester of 2021. - The company has managed the conservation area / HCV for example in the form of riparian. - Requests for information responded quickly by the management unit. - There have not been any issues and reports from other parties regarding the negative impacts on the environment due to the management of Estate and POM. 	
<p>Surrounding Communities Date of interview: April 05, 2022 Source of information:</p> <ul style="list-style-type: none"> - Head of Village of Beringin Jaya. - Head of Village of Bingin Rupit. - Head of Village of Kertasari. - Head of Village of Karang Dapo-1 <p>Notes:</p> <ul style="list-style-type: none"> • In general, there are good relationship between PT DIL and surrounding communities, as well as giving positive impact for community welfare. • There are no negative issues towards environment aspect, due to estate and mill operational activities. • The existence of the certification unit has a positive impact on the community, for example by providing employment opportunities and implementing social responsibility. <p>Issues:</p> <ul style="list-style-type: none"> • The community is not directly involved in the preparation of CSR programs. • The Karang Dapo community demands <i>tanah ulayat</i> with an area of 430 Ha which has not been returned. 	<p>In general, there were no negative issues raised by the informants and no further verification was needed, regarding land issue has been verify in indicator 4.8</p>
<p>Scheme Smallholders Cooperative MoU is made in 2019, and currently the area during replanting programs. Operational activity is managed by PT DIL. Wuth the new MOU the presence of cooperative will increase economy level of communities by</p>	<p>There are no negative issues that need further</p>
<p>Previous Land Owner (3 Persons) The communication and relation between villages around with company are well maintained, the company's public relation already known by the communities. The mechanism for complaint and grievance submission has been understood well by the community.</p> <p>There are no indigenous rights or customary rights. It also known that compensation process is done directed to the landowner and landowners are</p>	<p>The CH has shown land compensation documentary evidence carried out referring to the concept of FPIC. Described in detail in criteria 4.4;4.5;4.7.</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<p>given the freedom to release their land without coercion. There is no land disputes in company operational area,</p> <p>The company has considered satisfactory cooperative and transparent in providing information,</p>	
<p>Local contractor (contruction, CV Tambras) From Maur Baru village</p> <p>The cooperation between the company and the contractor has been carried out since 2021. There has been a clause regarding the prohibition on prohibition of using underage workers, compliance with OHS and this has also been socialized to contractors. There are no issues related to the cooperative relationship between the company and the contractor.</p> <p>When payment of work is done on time in accordance with the agreement that has been made. In addition, contractor workers have been given PPE by the contractor in accordance with the risk analysis that has been identified. The contractor workers have also provided health insurance for workers.</p>	<p>There are no negative issues that need further verification. The company has contributed in empowering local communities by collaborating with local contractors.</p>
<p>Labor Union (Serikat Pekerja Mandiri – SPM) PT Dendymarker Indah Lestari.</p> <p>The relationship between the certification unit and the union is well established, the certification unit supports the existence of the union and gives freedom to unionized employees and facilitates the union by giving room as an office. In the past one year period there were no work relationship disputes found, all employee rights were fulfilled by the certification unit in accordance with applicable regulations.</p>	<p>There are no negative issues that need further verification. The certification unit has ensure that the employee's rights have been fulfilled in accordance with the regulations.</p>
<p>Labour Union (Serikat Pekerja Seluruh Indonesia – SPSI) PT Dendymarker Indah Lestari.</p> <p>The relationship between the certification unit and the union is well established, the certification unit supports the existence of the union and gives freedom to unionized employees and facilitates the union by giving room as an office. In the past one year period there were no work relationship disputes found, all employee rights were fulfilled by the certification unit in accordance with applicable regulations.</p> <p>There are questions regarding the membership of the employee cooperative who must be workers who are members of the Labor Union (SPM) and if not then they are not allowed to join the employee cooperative.</p>	<p>There are no negative issues that need further verification. The certification unit has ensure that the employee's rights have been fulfilled in accordance with the regulations.</p> <p>Associated with employee cooperative membership which is intended only for Labor Union (SPM) while other than that it is not allowed to join. The results of interviews with workers in the field who have joined with those who have not, and the cooperative management who stated that this is not true and if you want to join the cooperative you do not have to join a labor union, because there are still workers who are not affiliated with a labor union but are joined. become a member of the cooperative.</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
Logistic / Employee cooperation The cooperatives are engaged in providing food ingredients for employees, the company fully supports employees' freedom in cooperatives, one form of support is the provision of cooperative buildings.	The company has provided freedom of cooperative rights and the employee cooperative also provides food for employees.
Gender Committee of SMGE Date of Interview: April 05, 2022 Notes: <ul style="list-style-type: none"> • The certification unit has set policies against underage workers, forced labor and immoral acts. • Each member holds regular meetings and socialization related to gender activities, for example socialization of the complaints and grievance mechanism. • There are no reports of immoral acts in the certification unit. • The certification unit has accommodated female workers, especially when they are pregnant. 	There are no issues that need further clarification and this information has been explained in the relevant indicators.

4.0	CERTIFIED ORGANISATION'S ACKNOWLEDGEMENT OF INTERNAL RESPONSIBILITY		
4.1	Formal Sign-off of Assessment Findings		
	<p>Hereunder sign by management representative from inspected company to acknowledge a field assessment and agree for all content explained in this assessment report, included of non-compliance findings.</p> <p>Signed on behalf of:</p> <table><tr><td><p>PT Dendymarker Indah Lestari Management Representative</p><p></p><p><u>Sander Van Den Ende</u> Friday, 15 April 2022</p></td><td><p>Mutuagung Lestari Lead Auditor</p><p></p><p><u>Moh. Arif Yusni</u> Friday, 15 April 2022</p></td></tr></table>	<p>PT Dendymarker Indah Lestari Management Representative</p> <p></p> <p><u>Sander Van Den Ende</u> Friday, 15 April 2022</p>	<p>Mutuagung Lestari Lead Auditor</p> <p></p> <p><u>Moh. Arif Yusni</u> Friday, 15 April 2022</p>
<p>PT Dendymarker Indah Lestari Management Representative</p> <p></p> <p><u>Sander Van Den Ende</u> Friday, 15 April 2022</p>	<p>Mutuagung Lestari Lead Auditor</p> <p></p> <p><u>Moh. Arif Yusni</u> Friday, 15 April 2022</p>		

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

No	Institution/ NGO/ Community	Address	Phone/ Email	Form of Communication	Date of Contact	Response	
						Yes	No
1	Plantation Agency.	Musi Rawas Utara Regency.		Communication by Phone	05 April 2022	✓	
2	Manpower and Transmigration Agency	Musi Rawas Utara Regency.		Communication by Phone	05 April 2022	✓	
3	Environmental and Land Agency	Musi Rawas Utara Regency.		Communication by Phone	05 April 2022	✓	
4	Head of Village of Beringin Jaya.	Musi Rawas Utara Regency.		Communication by Phone	05 April 2022	✓	
5	Head of Village of Bingin Rupit.	Musi Rawas Utara Regency.		Communication by Phone	05 April 2022	✓	
6	Head of Village of Kertasari.	Musi Rawas Utara Regency.		Communication by Phone	05 April 2022	✓	
7	Head of Village of Karang Dapo-1	Musi Rawas Utara Regency.		Communication by Phone	05 April 2022	✓	
8	Scheme Smallholders Cooperative	Musi Rawas Utara Regency.		Communication by Phone	05 April 2022	✓	
9	Previous Land Owner (3 Persons)	Musi Rawas Utara Regency.		Communication by Phone	05 April 2022	✓	
10	Local contractor (contruction, CV Tambras)	Musi Rawas Utara Regency.		Communication by Phone	05 April 2022	✓	
11	Labor Union (Serikat Pekerja Mandiri – SPM) PT Dendymarker Indah Lestari.	Musi Rawas Utara Regency.		Communication by Phone	05 April 2022	✓	
12	Labour Union (Serikat Pekerja Seluruh Indonesia – SPSI) PT Dendymarker Indah Lestari.	Musi Rawas Utara Regency.		Communication by Phone	05 April 2022	✓	
13	Logistic / Employee cooperation	Musi Rawas Utara Regency.		Communication by Phone	05 April 2022	✓	
14	Gender Committee of SMGE	Musi Rawas Utara Regency.		Communication by Phone	05 April 2022	✓	
15	DIL POM Workers (12 Workers)	Musi Rawas Utara Regency.		Interview	05 April 2022	✓	
16	Sei Mandang Workers (21 Workers)	Musi Rawas Utara Regency.		Interview	06 April 2022	✓	
17	Sei Liam Workers (24 Workers)	Musi Rawas Utara Regency.		Interview	07 April 2022	✓	

No	Institution/ NGO/ Community	Address	Phone/ Email	Form of Communication	Date of Contact	Response	
						Yes	No
18	Rumah AMAN	Jakarta	rumahaman@aman.or.id	Questionnaire by Email	29 March 2022		✓
19	Sawit Watch	Jakarta	info@sawitwatch.or.id	Questionnaire by Email	29 March 2022		✓
20	WWF	Jakarta	supporter-service@wwf.or.id	Questionnaire by Email	29 March 2022		✓
21	Transnational Palm Oil Labour Solidarity (TPOLS)	Jakarta	palmoillabour@gmail.com	Questionnaire by Email	29 March 2022		✓
22	Hutan Kita Institute (HAKI)	Jakarta	haki@hutaninstitute.or.id	Questionnaire by Email	29 March 2022		✓
23	Green Peace	Jakarta	info.id@greenpeace.or.id	Questionnaire by Email	29 March 2022		✓
24	Yayasan Setara Jambi	Jambi	info@setarajambi.org	Questionnaire by Email	29 March 2022		✓
25	Yayasan Pusaka Bentala Rakyat		info@pusaka.or.id	Questionnaire by Email	29 March 2022		✓
26	Walhi	Jakarta	informasi@walhi.or.id	Questionnaire by Email	29 March 2022		✓

Appendix 2. Assessment Program
1. Remote Audit

DATE	06 – 07 July 2021	
PROGRAM	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
Tuesday, 06 July 2021		
08.00 – 08.30	Opening Meeting Preparation	
08.30 – 09.00	Opening meeting (recorded video conference) <ul style="list-style-type: none">Auditee Speech (Introduction of PIC, Profile of Certified Management Unit)Auditor Team Speech (Introduction, Audit Objective, Audit Scope, Audit Plan Discussion, Determine of Audit Sample, Transparency and Confidentiality Clarification)	All Auditor
09.00 – 12.00	<ul style="list-style-type: none">Document review and completing audit checklist.Verification of Basic Information Mill and EstateConfirmation of Time Bound PlanReview of Partial Certification	All Auditor
12.00 – 14.00	<ul style="list-style-type: none">Break	All Auditor
14.00 – 16.15	<ul style="list-style-type: none">Document review and completing audit checklist.	All Auditor
16.15 – 17.00	<ul style="list-style-type: none">Presentation of Daily Progress.	
Wednesday, 07 July 2021		
08.00 – 11.00	<ul style="list-style-type: none">Document review and completing audit checklist.	All Auditor
12.00 – 15.30	Internal discussion by auditor team preparing for Closing Meeting	All Auditor
15.30 – 16.30	Closing Meeting (recorded video conference) <ul style="list-style-type: none">Presentation of audit findings (Noteworthy Positive Component, Non-Conformities, OFI, Timelie of CAR's, Conclusion)/Comments, Responses and Questions	All Auditor

2. Onsite Audit

DATE		04 – 09 April 2022	
PLANNED TIME		PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
Monday, 04 April 2022			
09.00 – 10.00	JAKARTA → BENGKULU		All Auditor & ASI AESSOR
11.00 – 16.00	BENGKULU → LUBUK LINGGAU		
17.00 – 18.00	Opening Meeting Auditor with ASI (Teleconference)		All Auditor & ASI AESSOR
Tuesday, 05 April 2022			
05.30 – 07.30	LUBUK LINGGAU → PT DENDYMARKER INDAHLESTARI		All Auditor
08.00 - 09.30	OPENING MEETING (recorded video conference) <ul style="list-style-type: none">Auditee Speech (Introduction of PIC, Profile of Certified Management Unit)Auditor Team Speech (Introduction, Audit Objective, Audit Scope, Audit Plan Discussion, Determine of Audit Sample, Transparency and Confidentiality Clarification)		
09.30 – 12.00	Stakeholder Consultation <ul style="list-style-type: none">Interview with Gender Committee, Worker's Union, Worker's Cooperative (if any), Local Contractor (for Mill and Estate), Third Party Supplier and scheme smallholders.public consultation with stakeholder to relevant agency in Musi Rawas Regency (by Phone)Stakeholder consultation to affected communities surrounding the plantations and previous land owner		All Auditor
09.30 – 12.00	<ul style="list-style-type: none">Document review and completing audit checklist.Verification of Basic Information Mill and EstateConfirmation of Time Bound PlanReview of Partial Certification		All Auditor
12.00 – 14.00	<ul style="list-style-type: none">Break		
14.00 – 16.00	Field observation to Dendymarker POM : <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
16.30 – 18.00	PT DENDYMARKER INDAHLESTARI → LUBUK LINGGAU		
Wednesday, 06 April 2022			

DATE	04 – 09 April 2022	
PLANNED TIME	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
05.30 – 07.30 08.00 – 08.15 08.15 – 12.00 08.15 – 12.00	LUBUK LINGGAU → PT DENDYMARKER INDAHLESTARI <ul style="list-style-type: none"> Technical audit coordination Stakeholder Consultation <ul style="list-style-type: none"> Stakeholder consultation to affected communities surrounding the plantations and previous land owner Field Observation to SEI MANDANG ESTATE Aspect to be verified : <ul style="list-style-type: none"> Implementation of Legal Aspect (Land Ownership, Legal Boundaries); Implementation of Agronomy Aspect (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application) Implementation of Environmental, Conservation/HCV and Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management) Implementation of Occupational Health & Safety Aspect Implementation of Employment Procedure and Mechanism Aspect Observation of Workers Facilities (Housing, School, Worship Place). 	All Auditor
12.00 – 14.00	Break	
14.00 – 16.00 16.00 – 16.30 16.30 – 18.00	<ul style="list-style-type: none"> Verification of stakeholder consultation result and field visit. Document review and completing audit checklist. Presentation of Daily Progress PT DENDYMARKER INDAHLESTARI → LUBUK LINGGAU 	All Auditor
Thursday, 07 April 2022		
05.30 – 07.30 08.00 – 08.15 08.15 – 12.00	LUBUK LINGGAU → PT DENDYMARKER INDAHLESTARI <ul style="list-style-type: none"> Technical audit coordination Field Observation to SEI LIAM ESTATE Aspect to be verified : <ul style="list-style-type: none"> Implementation of Legal Aspect (Land Ownership, Legal Boundaries); Implementation of Agronomy Aspect (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application) Implementation of Environmental, Conservation/HCV and Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management) Implementation of Occupational Health & Safety Aspect Implementation of Employment Procedure and Mechanism Aspect Observation of Workers Facilities (Housing, School, Worship Place). 	All Auditor
12.00 – 14.00	<ul style="list-style-type: none"> Break 	All Auditor

DATE	04 – 09 April 2022	
PLANNED TIME	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
14.00 – 16.00	<ul style="list-style-type: none">• Verification of stakeholder consultation result and field visit.• Document review and completing audit checklist.	All Auditor
16.00 – 16.30	<ul style="list-style-type: none">• Presentation of Daily Progress	
16.30 – 18.00	PT DENDYMARKER INDAHLESTARI → LUBUK LINGGAU	
Friday, 08 April 2022		
08.00 – 09.00	Internal discussion by auditor team preparing for Closing Meeting	All Auditor
09.00 – 10.30	Closing Meeting : <ul style="list-style-type: none">• Presentation of audit findings (Noteworthy Positive Component, Non Conformities, OFI, Timeline of CAR's, Conclusion)/• Comments, Responses and Questions	
11.30 – 16.00	LUBUK LINGGAU → BENGKULU	
20.00 -	CLOSING MEETING AUDITOR & ASI	All Auditor & ASI
Saturday, 09 April 2022		
10.00 -	BENGKULU → JAKARTA	All Auditor